

Southampton to London Pipeline Project

Deadline 3

Responses to Written Representations -
Other Parties

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1 Response to Written Representations – Ashford Road (TW18) Residents Group

Table 1.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
<p>Section 3.1.1</p>	<p>Limits of Deviation</p> <p>The dDCO states that works can deviate within the LoD.</p> <p>Q1: At what point will the Project know if it needs to deviate from the possible pipeline location?</p> <p>Q2: How much notice will be given to residents affected by the deviation?</p> <p>The dDCO states that works can deviate vertically – up to a maximum of 5m below ground level.</p> <p>Q3: How does this vertical deviation align with the proposed level of the Brett Aggregate conveyor belt and their associated works within the eastern verge of Ashford Road?</p> <p>Q4: What assurance will be given to residents regarding subsidence should this level of vertical</p>	<p>A1: As a point of clarification, the Applicant can only vary/deviate within the existing limits of deviation, which are wholly within the Order Limits.</p> <p>The current status of the project requires a limit of deviation to be maintained for the pipeline alignment, as it may not always be possible to install the pipeline where initially planned. The pipeline location will be finalised at the detailed design stage. The Applicant’s need for flexibility in selecting the final route of the pipeline is to be able to deal with unforeseen circumstances, for example the unknown ground conditions in any given location.</p> <p>A2: Residents can review the corridor of land within which the pipeline may be constructed, maintained or diverted under the Order on the Works Plans (AS-046, AS-047 and AS-048).</p> <p>Information relating to the pipeline is and would continue to be readily available on the project website at https://www.slpproject.co.uk/. The Applicant would engage with landowners regarding the final pipeline location during construction and in some locations, such as when working within public open spaces, would look to employ methods such as direct mail/letter drops/posters/website updates to communicate the final pipeline location more widely.</p> <p>A3: The Brett Aggregates conveyor belt would run below the pipeline and the Applicant would ensure that the two could both be installed.</p> <p>A4: The Applicant would take measures to ensure that subsidence does not occur as a result of construction of the pipeline.</p> <p>Ground investigations will be undertaken to establish any subsidence risk and appropriate measures will be included in the Construction Environmental Management Plan (CEMP) which are secured by Requirement 6 of the dDCO (Document Reference 3.1 (4)).</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	deviation take place on the western edge of Ashford Road?	
<p>Section 3.2.1</p>	<p>Power to alter layout etc of streets</p> <p>The dDCO states that for the purposes of constructing or maintaining the authorised development that any street can be temporarily or permanently altered –whether they are within the Order Limits or not.</p> <p>Q5: There are a number of side roads off Ashford Road that only have one point of access/egress – what assurance will be given that there will no alterations –as those stated in Paragraph (2a-2i, section 3, para 9) to these roads?</p> <p>Q6: Ashford Road is a popular cycling route and the pavement is used for the school walking route to the school in Laleham Village. What level of protection would be provided should the above actions be implemented?</p> <p>Re resurfacing of the highway</p>	<p>A5: The Applicant does not anticipate any works in those side streets along Ashford Road. If works were required, the Applicant would need to get consent from the Council as set out in article 9(2) which provides a general power to alter streets which are not listed in Schedule 3.</p> <p>Whilst the Applicant is confident that only Station Approach in Ashford requires temporary layout alterations, this power is included to ensure that the Applicant has the necessary flexibility to alter other streets, for example due to issues arising during construction.</p> <p>A6: The Applicant would maintain pedestrian access along Ashford Road. Cyclists using the road would be subject to the same traffic management (traffic lights) as other road users.</p> <p>The Applicant is proposing commitment G79 in ES Chapter 16 Table 16.2 (Application Document APP-056): <i>'Pedestrian access to and from residential, commercial, community and agricultural land uses would be maintained throughout the construction period. Vehicle access would be maintained where practicable. This may require signed diversions. The means of access would be communicated to affected parties at least two weeks in advance.'</i></p> <p>A7: Under article 9(3), the Applicant is required to restore, to the reasonable satisfaction of the street authority, any street altered temporarily under this article. The Applicant is committing to reinstating road surfaces. Any change of surface material would need to be a matter for Surrey County Council as the highway authority.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Q7: This would be a welcomed mitigation measure and the Residents Group would be looking to see a full repair to the highway surface – not just a patch repair - using latest technology for noise reduction. Can the Project Team confirm this would be given consideration?</p>	
<p>Section 3.2.2</p>	<p>Street works</p> <p>Section 3, Paragraph 10 of the dDCO states the Project can enter any of the roads listed in Schedule 4 – Ashford Road is listed and without the consent of the street authority to break up or open the street or any sewer, drain or tunnel within or under it.</p> <p>Q8a: How would through-flow of traffic be maintained and access to properties be gained?</p> <p>Q8b: What mitigation would be in place if a sewer or drain was decommissioned?</p> <p>Q8c: The only tunnel that would be under Ashford Road would be</p>	<p>Article 10(1) sets out a non-exhaustive list of the street works that <i>may</i> be carried out by the Applicant on streets identified in Schedule 4. These are activities which the Applicant may need to undertake in order to construct and maintain the proposed development. However, it is not intended that the Applicant would seek to carry out every listed activity in respect of every street listed in Schedule 4.</p> <p>A8a: The Applicant intends to maintain one lane of traffic at all times unless in exceptional circumstances such as ground conditions or unknown utilities in the street require short closures.</p> <p>As noted in the Applicant's Responses to Relevant Representations (REP1-003), there would be traffic management in place where works take place along Ashford Road to manage the impact of the works on the road network.</p> <p>The Applicant is also proposing commitment G79 in ES Chapter 16 Table 16.2 (Application Document APP-056): <i>'Pedestrian access to and from residential, commercial, community and agricultural land uses would be maintained throughout the construction period. Vehicle access would be maintained where practicable. This may require signed diversions. The means of access would be communicated to affected parties at least two weeks in advance.'</i></p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>the conveyor tunnel from Brett Aggregates development on the western side of Ashford Road to the eastern side and into the Thames Water land. How would this be possible?</p> <p>More specific DCO questions in section 3.2.2</p> <p>Q9: Can the Project Team expand on the meaning of “tunnel or bore under the street or carry out works to strengthen or repair the carriageway”? This statement suggests that the Project Team anticipate some degree of strengthening would be required.</p> <p>Q10: Need clarification of “remove or use all earth and materials in or under the street”. Ashford Road is in a mineral-rich area and this suggests that the Order Limits will be used to mine the aggregate under the entire length and breadth of Ashford Road.</p> <p>Q11: “Apparatus” is defined as “pipelines” in the “New Roads and Street Works Act, 1991” to which</p>	<p>A8b: The Applicant is not intending to decommission any sewers or drains along Ashford Road.</p> <p>A8c: As noted above, not every activity listed in article 10(1) may be relevant to every street listed in Schedule 4. This provision is included in case the pipeline route intersects with a tunnel found underground. The Applicant does not intend to break up the Brett Aggregate conveyor tunnel.</p> <p>A9: The Applicant does not anticipate the need to carry out any carriageway strengthening along Ashford Road. Strengthening would be carried out if advised as necessary by the council.</p> <p>A10: The Applicant would not mine Ashford Road. The Applicant can only carry out the activities listed in article 10, including ‘<i>remove or use all earth and materials in or under the street</i>’ for the purposes of the development, so the Applicant could not mine the road as suggested.</p> <p>A11: The pipeline is the apparatus; any above ground apparatus is specified in Schedule 1 (works beginning with 2 and 3).</p> <p>A12: If any above ground apparatus requires alteration or movement this would be done during the construction phase either by the Applicant or owner of the apparatus.</p> <p>A13: Yes, these would be reinstated. Commitment G93 states that fences would be reinstated to a similar style and quality.</p> <p>A14: This applies only while the works are being undertaken.</p> <p>A15: The Applicant would conclude a Landscape and Ecological Management Plan with approval from the local authority. The residents’ group can input its comments on landscaping works during the development of that plan.</p> <p>A16: This is noted. However, the Applicant would only be able to restore what was there before; it cannot necessarily enhance it under the powers of the DCO.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>the Works of this Order will be executed.</p> <p>Q12: What is the timescale for the power to “maintain, alter or renew apparatus in or on the street or change its position”?</p> <p>Q13: Will the wooden knee railings along Ashford Road on the eastern verge be replaced upon completion of the Works?</p> <p>Q14: “(g) execute any works to provide or improve sight lines” Can the Project Team confirm is this referring to sight lines for the execution of the Works or for when the Works are complete?</p> <p>Q15: The Residents Group would welcome soft landscaping along Ashford Road and adjoining roads. The eastern verge of Ashford Road would lend itself well to sowing of wild flowers therefore there would be no further requirement for ground maintenance of that section of the road. The Group would welcome</p>	



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>discussion on options relating to hard landscaping.</p> <p>Q16: (i) carry out re-lining and placement of road markings; (j) remove and install temporary and permanent signage;</p> <p>The Residents Group would welcome the above Works being undertaken.</p>	
<p>Section 3.2.3</p>	<p>Temporary stopping up on streets and PRow</p> <p>Section 3, Paragraph 12(1) states that traffic can be diverted and persons can also be prevented from passing along the street or public right of way.</p> <p>Q17: Ashford Road has adjoining roads with only one point of access/egress and that is via Ashford Road. Can the Project confirm that access to the adjoining roads will not be affected?</p> <p>Q18: Ashford Road is a long linear road with two main points of</p>	<p>A17: Only the rights of way shown on the Access and Public Right of Way Plan (AS-055) can be affected by the Applicant.</p> <p>A18: The Applicant does not intend to cut Ashford Road in two. Works would be undertaken in short sections under traffic management allowing traffic to use Ashford Road.</p> <p>The Applicant would not be able to stop up or divert a street or public right of way, other than as listed in Schedule 5, without the consent of the street authority. Only one temporary stopping up is listed at Schedule 5 in relation to Ashford Road, from the junction of The Broadway to the junction of the access to Brett Aggregates and Capital Concrete as shown on Sheet Nos. 51, 119 and 124 of the Access and Public Right of Way Plan (AS-055).</p> <p>A19: Yes, the Applicant can confirm this construction compound was removed.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>access – one to the south via Laleham Village and one to the north via Kingston Road. There is access mid-way via the Royal Estate. Can the Project confirm if there is any intention to effectively cut Ashford Road in two to allow works to progress using access only via the Royal Estate for residents to access their properties on Ashford Road and have no through traffic? It should be noted that Ashford Road is a major route for emergency services between Ashford Hospital and St Peter's Hospital, Chertsey.</p> <p>Q19: When the final proposed route was announced in March 2019 this temporary logistics hub between 133 and 151 Ashford Road was no longer part of the scheme. Can the Project confirm if this was removed as it was evident from the statements within the DCO that the Project could choose anywhere, and ad hoc, to use as a temporary working site?</p>	



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Section 3.3.1</p>	<p>Authority to survey and investigate land</p> <p>Section 4, Paragraph 19 (1) states that the Project can enter any land shown within the Order Limits – or which may be affected by the Development.</p> <p>Q20: How much notice would be given to resident and how would this notice be given? If works were being under taken on the western verge of Ashford Road how would residents access their properties?</p>	<p>A20: Fourteen days' notice must be given, as set out in article 19(3). The Applicant's surveying powers under article 19 would not interrupt access.</p>
<p>Section 3.4.1</p>	<p>Compulsory acquisition of land</p> <p>Q21: Can the Project Team confirm if Ashford Road and the Order Limits will be subject to Compulsory Acquisition of Land due to the presence of minerals (aggregate).</p>	<p>A21: The Applicant is not acquiring any land 'due to the presence of minerals'; it must only be for the purposes of the project.</p> <p>As explained at paragraph 6.97 of the Explanatory Memorandum (REP2-005), article 21 incorporates Parts 2 and 3 of Schedule 2 (Mineral) to the Acquisition of Land Act 1981 to any land acquired by the Applicant that may contain mines or minerals. The provision prevents the Applicant from acquiring the rights to any mines and minerals underneath the acquired land (unless they are expressly purchased).</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Section 3.4.2</p>	<p>Rights under or over streets</p> <p>Section 5, Paragraph 28 (1) states the Project Team can enter upon and use so much of the subsoil, or air space over any street within the Order Limits for the purposes of the development or any other purpose ancillary to the proposed development.</p> <p>Q22: Can the Project Team confirm if Ashford Road and the Order Limits will be subject to the above statement and access to the subsoil for mineral extraction?</p>	<p>A22: Any exercise of the power under article 28 by the Applicant to enter on and use subsoil would be subject to article 21 which, as explained above, prevents the Applicant from acquiring the rights to any mines and minerals.</p>
<p>Section 3.4.3</p>	<p>Temporary use of land</p> <p>Section 5, Paragraph 29 (1) states the Project Team may take temporary possession of land.</p> <p>Q23: Whilst Schedule 7 states where these land plots are, what assurances can the Project give the Residents Group that as the project moves through the development stage there will not be changes to this?</p>	<p>A23: Once the DCO is granted, the limits of land that can be occupied are fixed; the Applicant would have to apply to amend the DCO to vary it and go through a similar process.</p> <p>A24: The Applicant would minimise disruption to road users and residents and is seeking agreement with Surrey County Council about applying its street works permitting scheme, which would provide information to the local community about when/where the Applicant would be working within Ashford Road. The final pipeline alignment would be communicated to the landowner, in this case Surrey County Council, and the Applicant would look to employ methods such as direct mail/letter drops/posters/website updates to communicate the final pipeline location more widely.</p>



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	<p>Q24: Whilst the current proposal is for the pipeline to be down the eastern verge of Ashford Road and the valve to the north of Ashford Road this may change as the project moves through the development stage or during construction phase there may be changes that need to be made. How will the Project Team notify residents of this work, how much notice will be given and how would the Project Team mitigate disruption to the users and residents of Ashford Road?</p>	
<p>Section 3.5.1</p>	<p>Felling or lopping Section 6, Paragraph 30 (1) states there may be a need to fell, lop, prune, coppice, pollard or reduce in height or width any tree or shrub –or cut back its roots –and that the Project Team will not cause unnecessary damage. Any compensation will be paid to any person who sustain any loss or damage from such activity.</p>	<p>A25: The Applicant has assumed that this question is referring to article 41 of the draft DCO in relation to the felling and lopping of trees.</p> <p>The wording of Article 41 of the dDCO has been altered to clarify that the Applicant can only impact trees encroaching on the Order Limits. The Applicant can also only carry out these works if it reasonably believes it to be necessary to do so to prevent the tree or shrub from—</p> <p>(a) obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development; or</p> <p>(b) constituting a danger to persons using the authorised development.</p>



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	<p>Q25: How can it be possible to cut back roots of ancient woodland trees with veteran tree status and not cause damage? Ashford Road is lined with ancient Oak trees and this forms part of the appeal for why residents chose to live on the road. How does the Project propose to compensate residents for loss of these trees?</p>	<p>In addition, the dDCO states the Applicant must not cause unnecessary damage to any tree or shrub.</p> <p>Veteran trees and Ancient Woodland are included within the Technical Note for Ancient Woodland and Veteran Trees (REP2-061) that was provided at Deadline 2. The veteran trees along Ashford Road would be subjected to site-specific measures during construction to mitigate the effects on the root protection area, for example, hand digging/ vacuum excavation under arboricultural supervision. These would be recorded in a method statement.</p> <p>In addition, a number of trees along Ashford Road are identified as being notable in ES Appendix 10.2 (REP2-009). Notable trees would be subjected to the following commitments set out in the Code of Construction Practice (REP2-010):</p> <p>Commitment G65: <i>'Working widths would be reduced in specific locations where trees or hedges are present. Where notable, TPO, Ancient Woodland and veteran trees would be retained within or immediately adjacent to the Order Limits, the trees and their root protection areas would be protected where they extend within the Order Limits and are at risk. This would be by means of fencing or other measures'</i>; and</p> <p>Commitment G86: <i>'works to notable, TPO and veteran trees, where at risk of damage, would be supervised by the ECoW and supported by an experienced arboriculturalist'</i>.</p>
<p>Section 3.6</p>	<p>Q25a. How long will it take to install the temporary access?</p> <p>Q25b. How many vehicles will this accommodate?</p> <p>Q25c. Will the vehicles be construction vehicles ie large items of plant</p>	<p>A25a: The Applicant anticipates that the installation of the temporary access should only take a couple of weeks to complete.</p> <p>A25b: The Applicant isn't able at this stage to state the number of vehicles that would use this access, however the purpose of the access is primarily to access the drive pit compound for the auger bore beneath the Queen Mary Reservoir Intake Channel.</p> <p>A25c: The Applicant isn't able at this stage to state the size of the vehicles that would be used to carry out the works, however the works to form the auger drive pit would be undertaken from this access.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Q25d. What will be the operating hours?</p> <p>Q25e. How will vehicles be controlled accessing and egressing the site? This is a very fast stretch of Ashford Road.</p> <p>Q25f. Will vehicles be required to cross over to the works location on the opposite side of the road – how will this be controlled?</p> <p>Q25g. What are the environmental mitigation measures for EM70 and EM71?</p> <p>Q26a. The above plan does not detail associated off road parking with Work No 11E or VA 20. Is this referring to the temporary access at locations 9AN and 9AO?</p> <p>Q27a. How long will it take to install the temporary access?</p> <p>Q27b. How many vehicles will this accommodate?</p> <p>Q27c. Will the vehicles be construction vehicles ie large items of plant?</p>	<p>A25d: The Applicant can advise that the hours have been amended in the dDCO and reduced to 08:00 to 18:00.</p> <p>A25e: Approval for the temporary access will be governed under the New Road and Street Works Act 1991 and approved by the local highway authority.</p> <p>A25f: The Applicant can confirm that works vehicles are not required to cross over at this location. The Applicant would use the Thames Water access track to install the auger reception pit and the open cut section of the pipeline along the access road.</p> <p>A25g: EM70 & EM71 have been included as release sites should any great crested newts require relocation from the working area. If required, additional hibernation habitat would also be provided in these areas.</p> <p>A26a: The Applicant can confirm that the area that would be obtained would have sufficient space to allow for one vehicle to be parked adjacent to the valve compound using permanent access point 11E, and would not use the temporary access points 9AN or 9AO.</p> <p>A27c: The Applicant anticipates that the installation of the temporary access would only take two weeks to complete.</p> <p>A27b: The Applicant isn't able at this stage to state the number of vehicles that would use this access, however the purpose of the access is primarily to access the drive pit compound for the auger bore beneath the Queen Mary Reservoir Intake Channel.</p> <p>A27c: The Applicant isn't able at this stage to state the size of the vehicles that would be used to carry out the works, however the works to form the auger drive pit would be undertaken from this access.</p> <p>A27d: The Applicant can advise that the hours have been amended in the dDCO and reduced to 08:00 to 18:00.</p> <p>A27e: Approval for the temporary access will be governed under the New Road and Street Works Act 1991 and approved by the local highway authority.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Q27d. What will be the operating hours?</p> <p>Q27e. How will vehicles be controlled accessing and egressing the site?</p> <p>Q27f. What consideration has been given for the residents on the corner of Ashford Road and Kingston Road and the impact on the children's nursery?</p> <p>Q27g. This section of the road is busy with workers from the council deport parking cars in the area – how will this be addressed?</p> <p>Q28. When will location specific Construction Phase Plans be made available? Contractors when appointed for each of the areas along the stretch of the pipeline will develop the further when they are appointed however at this stage of the development the Client should have a reasonably detailed Construction Phase Plan in place and this is not evident from the documents that have been made available.</p>	<p>A27f & 27g: The Applicant intends to maintain one lane of traffic at all times unless exceptional circumstances, such as ground conditions or unknown utilities in the street, require short closures.</p> <p>As noted in the Applicant's Responses to Relevant Representations (REP1-003), there would be traffic management in place where the open cut works take place along Ashford Road to manage the impact of the works on the road network.</p> <p>The Applicant is also proposing commitment G79 in ES Chapter 16 Table 16.2 (Application Document APP-056): <i>'Pedestrian access to and from residential, commercial, community and agricultural land uses would be maintained throughout the construction period. Vehicle access would be maintained where practicable. This may require signed diversions. The means of access would be communicated to affected parties at least two weeks in advance.'</i></p> <p>A28: A construction phase plan is not a deliverable under the DCO process. The Applicant has produced the CoCP which is the securing mechanism.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Section 3.6.1</p>	<p>dDCO schedule 2, part 1</p> <p>Q29: When will a specific detailed pre-construction and construction programme be available for each work location?</p> <p>Q30: Why are the relevant work no's (9AM, 9AN, 9AO, 11E) not included?</p> <p>Q31: When will the CEMP be available for each work location?</p> <p>Q32: Where are the relevant plans for reinstatement of hedgerows?</p> <p>Q33: Re oversized deliveries: on what basis has the Project assessed these hours to be acceptable to local residents?</p>	<p>A29: The construction schedule would be developed during the detailed design stage. The Applicant is committed to ensuring that the local community is provided with information regarding relevant construction activities. Information relating to the pipeline is and would continue to be readily available on the project website at https://www.slpproject.co.uk/. This would include the project programme with estimated durations and email addresses with helpline numbers for the members of the public or businesses who wish to request information or make an enquiry relating to the construction activities.</p> <p>Many of the DCO requirements must be satisfied and approved before construction can commence.</p> <p>A30: Requirement 4 relates to above ground installations such as the pigging station, valves and pressure transducer and temporary construction facilities such as compounds and logistic hubs and provides that these must be carried out in general accordance with the indicative layout drawings. Works 9AM, 9AN, 9AO, 11E all relate to the construction of temporary (and permanent in relation to Work No. 11E) accesses. Indicative layout drawings have not been provided for construction compounds and accesses.</p> <p>A31: The Outline CEMP is already available (Application Document APP-129) and the Applicant will be submitting an updated, more detailed version at Deadline 4. The final CEMP would be agreed with the local authority before work starts in the area.</p> <p>A32: The written plan of reinstatement would be developed during the detailed design phase. Under Requirement 8(2), the reinstatement plans must form part of the Landscape and Ecological Management Plan. Requirement 12 prevents the commencement of any stage of the authorised development before a LEMP for that stage has been approved by the planning authority. The Applicant will submit an Outline LEMP at Deadline 4.</p> <p>A33: In response to representations, in the revised draft DCO submitted at Deadline 3 (Document Reference 3.1 (4)) the Applicant has amended the core construction working hours in Requirement 14(1) by an hour at the start of the day and an hour at the end of the day. A key effect of this change is that the start-up and shut down activities, which could have taken place one hour either side of the core working hours under Requirement</p>



WR Para Ref	Point raised	Applicant's response to point raised:
		<p>14(4)(b), may now only be undertaken between the hours of 07:00 to 08:00 in the morning (as opposed to 06:00 to 07:00) and 18:00 to 19:00 in the evening (as opposed to 19:00 to 20:00).</p> <p>The Applicant is not expecting to undertake activities outside of core hours. The activities listed in Paragraph 14 (3) are to cover exceptional and unforeseen circumstances if a problem arises during construction. In such cases, it would be necessary to have to powers to continue the works in order to complete the task. The Applicant would not plan for works to occur outside of normal hours and it may be that no such activities occur at Ashford Road.</p> <p>Requirement 14(a)(1) permitting the delivery of oversized loads outside of core construction working hours is necessary in order to reduce congestion on the public highways, or if requested by the local highways authority or the police. Further details would be set out in the Construction Transport Management Plan.</p>
<p>Section 3.6.3</p>	<p>Schedule 5, part 2</p> <p>There will be 1,300m from junction of the Broadway to the junction of the access to Brett Aggregates.</p> <p>Q34: Over this length of carriageway a contra-flow will need to be in place. Has the Project given consideration to where this will be to ensure the traffic lights controlling the contra-flow are strategically placed to ensure light pollution from the traffic lights is considered as well</p>	<p>A34: A Construction Traffic Management Plan (CTMP) will be produced setting out how the diversions and closures within the highway network would be managed and will reflect the mitigation measures set out in the REAC (Application Document APP-056).</p> <p>Requirement 7 of the draft DCO provides that the proposed development must not commence until a CTMP has been submitted to and approved in writing by the relevant highway authority. The Applicant has modified Requirement 7 in the revised draft DCO submitted at Deadline 3 (Document Reference 3.1(4)) to require consultation with the local planning authority in respect of any CTMP submitted to the relevant highway authority for approval.</p> <p>The Applicant will be submitting an Outline CTMP to the Examination at Deadline 4.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	as air pollution from idling vehicles?	
<p>Section 3.6.6</p>	<p>Schedule 7</p> <p>When referring to the Land Plans it identifies the Order Limit as blue shading. When cross-referencing this back to the Book of Reference it states that blue shading depicts the following: "<i>...may compulsorily acquire permanent rights over in respect of the pipeline and associated works...</i></p> <p><i>...may compulsorily acquire permanent rights of access and parking over this land</i>"</p> <p>The description of the blue shading contradicts the heading of the schedule – the heading states only temporary possession yet the detailed description states otherwise.</p> <p>Q35: Why is this Schedule misleading? Does the Project have any intention of acquiring permanent rights over the extent</p>	<p>A35: The land in Schedule 7 of the draft DCO (Document Reference 3.1(4)) is land of which only temporary possession may be taken and this is shown coloured yellow on the Land Plans (AS-042, AS-043, AS-044 and AS-045). No permanent rights may be acquired over this land. The land shown coloured blue on the Land Plans is land in respect of which permanent rights may be acquired by the Applicant and does not relate to the parcels of land listed in Schedule 7 of the DCO. The Applicant does not therefore consider that Schedule 7 is misleading. The Applicant seeks a power to acquire permanent rights to maintain the replacement pipeline within the extent of land shown coloured blue along Ashford Road (Sheet 124). This is to ensure that those rights are enforceable against any subsoil interests in the land.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	of the Order Limit along Ashford Road?	
<p>Section 3.6.5</p>	<p>Schedule 8 Specific question regarding trees – see p16.</p> <p>Q36: Why do these trees need to have tree work carried out on them?</p> <p>Q37: Is the project team aware of the historical aspect of this area? Has the project team discussed this area of the development with Natural England, Woodland Trust and other interested parties?</p>	<p>A36: The project was designed to avoid TPOs where practicable. Further detail on how TPOs were considered by the project is set out at paragraphs 3.3.7 – 3.3.12 of the Applicant's Responses to Relevant Representations (REP1-003).</p> <p>For the pipeline installation along Ashford Road, no work is anticipated to these trees. However, some branch removal may be needed if at the time of construction there is a risk of safety of personnel or the public from branches being damaged by machinery. Safety is extremely important, and the Applicant would not leave any trees in an unsafe state.</p> <p>Furthermore, the draft DCO would oblige the Applicant to avoid causing unnecessary damage and to pay compensation to anyone who sustains loss or damage (see article 41 (2) and article 42 (2) of the draft Development Consent Order (Document Reference 3.1 (4)).</p> <p>A37: The Applicant has discussed the project extensively with the relevant statutory bodies such as Historic England, Surrey County Council (Archaeologist), Natural England and the Forestry Commission. The Historic Environment chapter in the Environmental Statement has considered the archaeological, historic buildings and historic landscape features of the area.</p> <p>In relation to Ancient Woodland, the project had regard to the standing advice from the Forestry Commission and Natural England (Ancient Woodland, ancient trees and veteran trees: protecting them from development, 2018) when developing the hierarchy of mitigation principles, with avoidance of works within 15m of the edge of Ancient Woodland recommended where practicable.</p> <p>References: Forestry Commission and Natural England (2018). Ancient woodland, ancient trees and veteran trees: protecting them from development. Accessed December 2019.</p>

**Southampton to London Pipeline Project
Responses to Written Representations – Other Parties**



WR Para Ref	Point raised	Applicant's response to point raised:
		https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences .



2 Response to Written Representations – Church Crookham Parish Council

Table 2.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
<p>11.3.15 4.3.8 4.3.13 4.3.14 4.3.17</p>	<p>Peter Driver Sports Ground - Availability</p> <p>CCPC seek ongoing liaison with applicant to ensure that any impact on the sports ground during the football season is minimal and the general impact upon users of the facility is minimal. CCPC welcome works commencing as soon as the season ends.</p> <p>CCPC want to work closely with the project team to ensure the length of time the pitches are unavailable for is kept to a minimum – in order to avoid loss of income, particularly to competing facilities. Hiring of the pitches is not on an ad-hoc basis, as CCPC regular enter into annual/season contracts with a range of different local football teams.</p>	<p>The Applicant met with the Church Crookham Parish Council (CCPC) on 14 May 2019 to discuss the route and installation through Peter Driver Sports Ground. At this meeting, CCPC and the Applicant mutually agreed to a future meeting by the end of May 2020 to discuss the detailed timing and construction plans, once a contractor had been appointed and the fixture list would be available. This would provide sufficient time to inform sporting plans for 2021 or 2022. The Parish Council signed an Easement Option Agreement on 19 June 2019. The Applicant is fully committed to continuing the positive relationship with the Parish Council and would like to acknowledge the time the Parish Council officers have taken to meet with the project on several occasions.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>4.3.6 4.3.16 4.3.18 4.3.19</p>	<p>Peter Driver Sports Ground - Condition</p> <p>Recognition that a football kick wall and 6 boundary benches are also located at this sports ground. CCPC want to work with project team to ensure Street Snooker facility is replaced/relocated.</p> <p>CCPC want to work with appointed contractor to understand ongoing maintenance and agree how long the contractor will be involved for to ensure pitches are reinstated to the current standard in as quick as time as possible.</p>	<p>The Applicant will continue to work with Church Crookham Parish Council (CCPC) over the reinstatement of the site, including the replacement or relocation of the Football, Kick Wall, six boundary benches and Street Snooker facility if it is affected by the construction works (this facility lies within the Order Limits, but with the commitment to narrow working it is not yet certain whether the facility would be affected or not). This is secured through the agreed land agreement.</p> <p>The Applicant has also committed to narrow working techniques through the pitches in order to reduce the extent of football pitch affected by the construction work (commitment NW10 in the Code of Construction Practice (CoCP) (REP2-010) secured by draft DCO Requirement 5. As part of this narrow working technique, measures can be employed to protect the ground within the working area so that it is available for use as soon as possible after installation of the pipeline.</p>
<p>11.8.103</p>	<p>Surface Water Drainage</p> <p>CCPC want to see post-works monitoring to ensure the same standard as currently with no loss in drainage effectiveness and no waterlogging of pitches.</p>	<p>The Applicant has committed to this. Commitment G82 within the CoCP (REP2-010), states that '<i>Drainage surveys would be undertaken prior to construction.</i>' This would be done to inform and enable the design of the reinstatement of the drainage of the site. Commitment G94 in the CoCP then secures the reinstatement, including any necessary monitoring: '<i>On completion of the installation works, the contractor(s) would hydrotest the pipeline and land used temporarily would be reinstated to an appropriate condition relevant to its previous use (G94).</i>'</p>
<p>11.8.106</p>	<p>Reservoir</p> <p>CCPC want clarification on any locations in Section D at risk of</p>	<p>The locations of flood risk from reservoir flooding can be found at https://flood-warning-information.service.gov.uk/long-term-flood-risk/map. There are locations at risk of reservoir flooding in the locations of Tweseldown Road and to the north of Aldershot Road within Church Crookham Parish. As stated in paragraph 10.4.1 of the Flood Risk</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	reservoir flooding and the potential impact on that from the project.	Assessment (Application Document APP-134) <i>'The project is unlikely to affect the severity of a reservoir failure to other parties given the volumes of water involved in an uncontrolled release, therefore the severity of impact arising from the proposed project is assessed as low, and very low in areas not predicted to flood from a reservoir breach'</i> .
11.8.125	TPOs Request reassurance that for any loss of trees subject to a TPO that replanting of native species of mitigation would be provided.	The project has made a range of commitments which are set out in the CoCP (REP2-010), including commitment G88 which states that <i>'where possible, reinstatement of vegetation would generally be using the same or similar species to that removed (subject to restrictions for planting over and around pipeline easements)'</i> . This would be secured by DCO Requirements 6 (CEMP), 8 (Hedgerows and Trees) and 12 (LEMP).
11.10 (Table)	Community and Recreation/Amenity receptors CCPC would like the following receptors included in the list of community and recreation/amenity receptors in Section D: <ul style="list-style-type: none"> • Gracewell Care Home • Tweseldown Pub • Quetta Park housing estate • Wakefords Park housing estate 	The list of community and recreation/amenity receptors referred to in Table 11.10 of the Planning Statement (Application Document APP-132) included a list of receptors taken from Environmental Statement (ES) Chapter 13 (Application Document APP-053). The assessment considered the potential effects of the construction of the project on sensitive receptors within the study area. As part of the assessment, potential effects on residential properties and commercial properties within the study area were considered. As such, although not listed individually, potential effects on Tweseldown Pub, Quetta Park housing estate and Wakefords Park housing estate were considered as part of the assessment. The Applicant is grateful to CCPC for identifying the omission of Gracewell Care Home within the application documents. The Applicant has undertaken a review of this receptor and can confirm that it would not experience significant noise effects, and so this does not affect the conclusions of the people and communities assessment in ES Chapter 13 (Application Document APP-053).



WR Para Ref	Point raised	Applicant's response to point raised:
11.5.3	<p>Crookham Park SANG Request minimal impact on public access and no adverse impacts to the SANG's natural environment.</p>	<p>The CoCP (REP2-010) includes commitment OP04 to ensure crossing points are provided so that the Suitable Alternative Natural Greenspaces (SANGs) are useable during construction and would not prevent its use by the community, secured through the CoCP and Requirement 5 of the draft DCO. Through this commitment and the details that will be secured in the Construction Environmental Management Plan (CEMP), the Applicant would ensure that access to, through and around the SANG is maintained.</p>
Additional	<p>Planning conditions CCPC want to understand the process for reporting any breaches of conditions arising during installation.</p>	<p>To clarify, planning conditions would not be imposed on the project by the Planning Inspectorate or the Secretary of State. However, the draft requirements contained in the draft DCO are akin to planning conditions in that they impose restrictions on the development which must be complied with.</p> <p>It is an offence to carry out development in breach of the DCO. The relevant planning authorities would be responsible for monitoring compliance with the DCO requirements and can report a breach of a DCO requirement.</p>



3 Response to Written Representations – Environment Agency

Table 3.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
4.0	<p>Cove Brook Flood Storage Area (FSA)</p> <p>The Applicant has proposed a Trenchless Crossing of the Cove Brook embankment structure.</p> <p>The depth of any trenchless crossing must be sufficient to allow us to strengthen or replace the FSA embankment in future.</p> <p>It would be unacceptable to store material for any length of time within the FSA (unless mitigation and/or compensation was provided).</p>	<p>The Applicant can confirm that a trenchless crossing has been confirmed at Cove Brook Flood Storage Area (FSA) embankment structure (TC014a). This has been added to the list of trenchless crossings in the revised Code of Construction Practice (CoCP) submitted by the Applicant at Deadline 2 (REP2-010).</p> <p>The trenchless crossing would be installed at a depth of approximately 3m below the existing ground level. The Applicant’s view is that this would be deep enough to enable the future strengthening or replacement of the FSA embankment.</p> <p>The pipe would be installed in an open cut trench for the remainder of its crossing of the FSA. The total excavated material stockpile (which includes haul road and pipeline trench) within the FSA would be 2,600m³ out of a total storage volume of 95,000m³ which represents 3%.</p> <p>The Applicant will address this issue in the revised CoCP submitted at Deadline 4, with the new commitment as follows: <i>‘While installing the open cut pipe through the Cove Brook FSA the Applicant would not store excavated topsoil within the FSA boundary. On completion of the pipeline installation the topsoil would be returned to its original location as part of reinstatement’.</i></p> <p>In addition, the Applicant would be required to obtain acceptance of the proposed details under the protective provisions as part of the future consenting process.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
5.0	<p>River Thames Scheme (RTS)</p> <p>The Environment Agency and the Applicant have been continuing discussions about the design and location of both projects in the Littleton Lane, Shepperton area. The RTS team is waiting for the Applicant to submit further costings information to them, in consideration of different route options through the area and discussions are ongoing.</p>	<p>Following recent meetings with the Environment Agency, the Applicant has undertaken to evaluate the feasibility of possible alternative engineering solutions at the location of the RTS. This will be communicated to the Environment Agency when complete to further progress discussions.</p>
6.0	<p>Draft Development Consent Order</p> <p>There are ongoing discussions to agree the protective provisions.</p>	<p>There is no further update on this. An update will be provided in the next iteration of the Statement of Common Ground.</p>
7.1-	<p>Flood risk (general)</p> <p>The Environment Agency states that there is insufficient information in the Flood Risk Assessment (APP-134) to demonstrate that there has been a robust assessment of the potential on- and off-site impacts from the</p>	<p>The Applicant considers the Flood Risk Assessment to be proportionate to the scale of the proposed works. There would be limited effects during the operational phase, as almost all of the installation would be underground. As stated in paragraph 1.3.5 of the Flood Risk Assessment (FRA) (Application Document APP-134), <i>'When operational, the only above ground features would be the pigging station, valves, pressure transducer, Cathodic Protection transformer rectifier cabinets and route markers and paperwork associated with the replacement pipe which would have minimal impact on, or consequences from, flood risk'</i>. Therefore, the focus of the FRA is on the temporary, short duration effects during the</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	works at an individual, site specific level.	<p>installation phase. Site specific locations are further discussed in the answers in the following sections.</p> <p>In addition, the Applicant would be required to obtain acceptance of the proposed details under the protective provisions as part of the future consenting process.</p>
7.4 – 7.5	<p>Temporary watercourse crossings</p> <p>The Environment Agency acknowledge that there is limited detail available at this stage in terms of the temporary watercourse crossings designs, temporary in channel works design, depth of pipe under watercourses and methods of working. However, they suggest that some principles could be set out.</p> <p>The Environment Agency also wants clarification on whether they would be consulted in the future to confirm such details.</p>	<p>The Applicant has adopted commitment G123, which states, '<i>All works within or adjacent to watercourses would be carried out in accordance with the requirements of permits and licences agreed with either the Environment Agency or relevant Local Lead Flood Authority or in accordance with the provisions of the DCO</i>'. In addition, the Applicant can confirm that the detail of individual designs for temporary main river watercourse crossings would be provided to the Environment Agency as part of the application for Environmental Permits for Flood Risk Activities.</p> <p>Principles for the design of these crossings are included in the commitments made by the project in the Code of Construction Practice (REP2-010) including commitment W4, which states, '<i>Afflux at temporary main rivers and ordinary watercourse crossings would be maintained at less than 100mm</i>'.</p> <p>The Applicant would comply with requirements of the Environment Agency or the Lead Local Flood Authority with regard to the depth of the pipeline beneath watercourses.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
7.6	<p>Land raising</p> <p>The Environment Agency states that the Applicant has confirmed that there will be no land raising as part of the development and want this to be formally registered to remove the previous concerns on this matter.</p>	<p>The Environment Agency has requested details for land raising to be assessed and, where required, mitigated in the FRA due to concerns about the impact on flooding in Flood Zone 3. The Applicant can confirm it will include a commitment within the CoCP submitted at Deadline 4 to this effect:</p> <p><i>'There would be no land raising undertaken in locations identified as Flood Zone 3'.</i></p>
7.7	<p>Material stockpiles</p> <p>The Environment Agency has noted a deviation from the usual request for 10m long stockpiles with 1m breaks for material stockpiles.</p>	<p>The Applicant can confirm that it has amended commitment W6 to state, 'stockpiles in Flood Zone 3 or areas of high or medium surface water flood risk would not exceed 10m between breaks. Breaks in between stockpiles would be at least 1m. Breaks would be located opposite each other on either side of the excavation where practicable'. The change will align the commitment to the Environment Agency's standard wording. The revised commitment has been added to the CoCP to be submitted at Deadline 4.</p>
7.8	<p>Flood Zone 3 (FZ3) Compounds</p> <p>There have been further discussions between the Environment Agency and the Applicant to proposed works within FZ3. These comprise:</p> <ul style="list-style-type: none"> • Shepperton Road North • Mead Lane 	<p>The Applicant has prepared a Technical Note covering these locations and the new commitments have been included within the revised CoCP submitted by the Applicant at Deadline 2 (REP2-010) With these commitments in place, the Applicant considers the project risk to Flood Zone 3 (FZ3) to be negligible.</p> <p>Shepperton Road North: New commitment W17 states that <i>'the project would locate any temporary buildings outside of FZ3 at the Shepperton Road North Construction Compound'</i>.</p> <p>Mead Lane: New commitment W16 states that <i>'the project would raise temporary buildings to a maximum of 1m above ground level which is above the 1%AEP (1:100 year) event at the Mead Lane Construction Compound'</i>.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<ul style="list-style-type: none"> • Frimley • Frimley Green <p>The Environment Agency has also requested detailed designs for the compounds to be submitted through the protective provisions, which could negate the requirement for further details to be provided at this stage if the provisions are agreed.</p>	<p>Frimley: New commitment W15 states that 'Construction Compound 33 (DCO Works No CO5A) would be sized and located so that it does not sit within FZ3 or within 8m of the top of bank of the watercourse'.</p> <p>Frimley Green: The Applicant would like to further clarify the purpose of the Frimley Green site. This site would not be used as a construction works compound but is identified in the draft DCO (Document Reference 3.1 (4)) as an area of land that could be used as alternative temporary car parking for staff at the SC Johnson Factory while works take place within their normal car park. The overflow car parking would only be used during the construction phase and no modification to the existing ground surface is proposed. It would not be used for any purpose during the operational phase. The area allocated for overflow car parking is completely outside of Flood Zone 3b as defined by Surrey Heath Borough Council and 325m² is located within Flood Zone 3a which represents 2% of the total area (20,000m²).</p> <p>Therefore, commitments for two of the four compounds (Frimley and Frimley Green) mean that there would be no alteration to the existing floodplain storage within Flood Zone 3. At Shepperton Road North and Mead Lane, commitments mean that temporary buildings would not impact on flood risk through reduction of floodplain storage.</p> <p>All work within Flood Zone 3 would be subject to an Environmental Permit for Flood Risk Activities. Therefore, the final details of the layout and design of Shepperton Road North and Mead Lane would be subject to permitting.</p> <p>In addition, the Applicant has committed to the following:</p> <p><i>G127: 'The contractor(s) would subscribe to the Environment Agency's Floodline service which provides advance warning of potential local flooding events. The contractor(s) would implement a suitable flood risk action plan which would include appropriate evacuation procedures should a flood occur or be forecast'.</i></p>



WR Para Ref	Point raised	Applicant's response to point raised:
		G179: <i>'An Emergency Action Plan would be developed for the construction phase which would outline procedures to be implemented in case of unplanned events such as site flooding, pollution incident, disease outbreak etc'</i> .
7.9	<p>Watercourse crossings</p> <p>The Environment Agency require the applicant to confirm that all excluded crossing reports have assessed whether the launch / receptor pits and / or any plant or material stockpiling are also outside flood risk areas.</p>	<p>The specific location for trenchless crossing launch and receptor pits would be determined during the detailed design stage. All work within Flood Zone 3 would be subject to an Environmental Permit for Flood Risk Activities. Therefore, the Environment Agency would be consulted at this point, when details are available.</p>
7.10	<p>Stockpile durations</p> <p>The Environment Agency has requested details of approximate lengths of time that stockpiles would be in place for, for stockpiles located in flood risk areas.</p>	<p>The Applicant cannot yet confirm the duration that stockpiles would be in place for within flood risk areas. As set out in the FRA (paragraph 15.2.3) (Application Document APP-134), <i>'While the total construction period is assumed to be two years, this does not mean that the entire route would be active for this whole period of time'</i>.</p> <p>In addition, the Applicant has a commitment (G184) (REP2-010) which states that <i>'Stockpiles would not be located within 10m of any main rivers or ordinary watercourse crossings'</i>.</p> <p>The Applicant has included a new commitment in the revised Code of Construction Practice to be submitted at Deadline 4: <i>'While installing the open cut pipe through the Cove Brook FSA the Applicant would not store excavated topsoil within the FSA boundary. On completion of the pipeline installation the topsoil would be returned to its original location as part of reinstatement'</i>.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
7.11	<p>New or amended Commitments</p> <p>W3 (temporary buildings) – this needs to be updated to reflect the latest commitment from the applicant.</p> <p>W6 (stockpiles) – this is subject to further discussion with the applicant in relation to the appropriateness of 25m long stockpiles in high risk flood areas.</p> <p>W8 and W9 (Cove Brook FSA) – these need to be removed/amended following the applicant's commitment to using a trenchless technique to cross the Cove Brook FSA.</p> <p>G184 (stockpiling in proximity to watercourse crossings) – it is not clear why this commitment is exclusively for watercourse crossings and why a commitment cannot be made to not stockpile within 10m of a watercourse at any point of the scheme.</p> <p>G39 (buffer zones) – the wording of this commitment is quite vague;</p>	<p>The Applicant submitted an updated version of the CoCP at Deadline 2 (REP2-010), which included new commitments W15, 16 and W17. A further revised CoCP will be provided by the Applicant at Deadline 4.</p> <p>W3 (temporary buildings) will be updated to reflect the latest commitment from the Applicant. This commitment has been superseded in part by commitments W15, W16 and W17 that have revised the commitments for temporary buildings in Flood Zone 3. These three commitments cover the three temporary construction compounds where buildings could be located within Flood Zone 3. Therefore, commitment W3 will be revised to remove reference to Flood Zone 3 and solely relate to areas of high and medium risk of flooding from surface water (RoFSW).</p> <p>W6 (stockpiles) – the Applicant has amended this commitment to match the Environment Agency's proposed wording and this will be included in the CoCP to be submitted at Deadline 4.</p> <p>W8 and W9 (Cove Brook FSA) – The Applicant has included the new trenchless crossing beneath Cove Brook FSA dam, and this was included in the CoCP submitted at Deadline 2 (REP2-010). This supersedes Commitment W9, which stated that '<i>The Cove Brook flood storage area embankment dam would be reinstated to its former condition as soon as is practicable</i>'. This commitment has been deleted from the CoCP to be submitted at Deadline 4. Commitment W8 is retained, as this would still apply to installation works within the FSA.</p> <p>G184 (stockpiling in proximity to watercourse crossings) – The Applicant will be amending this commitment and this will be included in the CoCP which to be submitted at Deadline 4.</p> <p>G39 (buffer zones) – This is a wider environmental commitment to reduce impacts to watercourses and is not specific to flood risk. Commitment G123 states, '<i>All works within or adjacent to watercourses would be carried out in accordance with the requirements of</i></p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>we have agreed with the applicant that material stockpiles will be placed a minimum of 10m from watercourses and compounds a minimum of 8m from watercourses.</p>	<p><i>permits and licences agreed with either the Environment Agency or relevant Local Lead Flood Authority or in accordance with the provisions of the DCO'.</i></p>
<p>8.1</p>	<p>Fisheries and timing of works</p> <p>The Environment Agency does not agree with the timing of the works proposed at the specific watercourses and require further evidence to back up the proposed change. The Environment Agency has proposed undertaking a site visit with the Applicant to discuss any amendments to timings on an individual site basis.</p>	<p>The Applicant would like to clarify that there are no plans to dam any watercourse. The proposed construction method would be to lay an appropriately sized (based on flood risk modelling calculations) pipe within the channel for the main channel flow. This would allow continuous use of the watercourse by fish species. The pipeline would then be installed beneath this pipe. Once crossed, the temporary pipe would be removed.</p> <p>The Applicant has existing commitments in relation to reducing effects at open cut crossings, including commitment G122, which states, <i>'for open cut watercourse crossings and installation of vehicle crossing points, mitigation measures would include to:</i></p> <ul style="list-style-type: none"> • <i>only use a 10m working width for open cut crossings of a main or ordinary watercourse whilst still ensuring safe working;</i> • <i>re-instate the riparian vegetation and natural bed of the watercourse using the material removed when appropriate on completion of the works and compact as necessary. If additional material is required, appropriately sized material of similar composition would be used'.</i> <p>The Applicant is in the process of arranging a site visit with the Environment Agency to discuss the seasonal constraints in relation to the five watercourses. The agreement on the timing will be set out in the next iteration of the Statement of Common Ground.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
8.2	<p>Environmental Investment Programme (EIP)</p> <p>The Environment Agency welcomes the EIP for the project and welcome at least some high-level principles to be agreed during the examination process.</p>	<p>The Applicant is preparing an Environmental Investment Programme (EIP) which will be reported in an Environmental Investment Programme Report.</p> <p>The EIP comprises a range of activities along the replacement pipeline route to carry out localised projects and enhance local biodiversity within environmentally designated sites and/or areas of social/community importance over and above what is required by planning policy.</p> <p>The Applicant has published the report summarising the activities included as part of the EIP and these are currently being agreed with selected stakeholders. It should be noted that the content of this report is based on negotiated voluntary agreements and is an approach deemed suitable by stakeholders including Natural England and will continue to be developed as discussions continue.</p> <p>The EIP report is not an application document as there is no statutory requirement for Nationally Significant Infrastructure Projects (NSIPs) to deliver net gain, or biodiversity enhancement. The Department for Environment, Food and Rural Affairs published its response to a consultation on net gain in July 2019. This document states on page 5 that 'nationally significant infrastructure and net gain for marine development will remain out of scope of the mandatory requirement in the Environment Bill'.</p>
9.1	<p>Water Framework Directive</p> <p>The ES refers to dewatering activities during construction. Before discharging this water to the environment, the Applicant will need to check if they qualify for a permit to discharge. Impoundment licences may also be required.</p>	<p>The Applicant notes this comment and refers to commitment G123, which states, '<i>All works within or adjacent to watercourses would be carried out in accordance with the requirements of permits and licences agreed with either the Environment Agency or relevant Local Lead Flood Authority or in accordance with the provisions of the DCO</i>'.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>9.1.1-9.1.3</p>	<p>Dewatering</p> <p>In those locations that have been identified as potentially being impacted by the drawdown effects of dewatering, it is not clear how the Applicant intends to use this monitoring information, for example what triggers they be looking for, and whether they will they stop dewatering if levels drop below a certain level.</p> <p>It is important that the hydrological regime of a waterbody is not compromised through dewatering activities. In those locations where drawdown is expected to impact on watercourses in connectivity with groundwater, the discharge back to the watercourse should be as close to the expected section impacted by drawdown as possible to prevent a depleted reach effect.</p>	<p>Monitoring information would be used to inform the design of the temporary works, particularly for shafts/pits at trenchless crossings. Shafts at locations that are impacted by drawdown effects of dewatering may be designed to not require dewatering. Similarly, the trenchless construction methodology/equipment can be selected such that de-watering is avoided.</p> <p>In addition, the Applicant has committed to the following commitments:</p> <p>G128: <i>'The contractor(s) would comply with all relevant consent conditions or DCO provisions regarding de-watering and other discharge activities. This would particularly be with regard to volumes and discharge rates and would include discharges to land, water bodies or third-party drains/sewers'.</i></p> <p>G132: <i>'The contractor(s) would ensure that the time the trench is open in the vicinity of certain features would only be as long as necessary for the installation of the pipeline. The required dewatering of the trench would be undertaken only as and when necessary to enable safe working and preparation for pipe installation'.</i></p> <p>G138: <i>'Water levels would be monitored immediately prior to and as dewatering takes place. This would be in the potentially affected abstraction or watercourse as appropriate'.</i></p> <p>G143: <i>'The quality of water generated by dewatering would be tested prior to discharge'.</i></p>



WR Para Ref	Point raised	Applicant's response to point raised:
9.2	<p>Water Framework Directive (WFD)</p> <p>It is not clear that consideration has been given to the risk to these chemical WFD components as a result of construction (new pathways) or dewatering to watercourses.</p>	<p>Explicit reference to chemical Water Framework Directive (WFD) quality elements has not been made in ES Appendix 8.6 (Application Document APP-107). However, they have been considered alongside physico-chemical quality elements given the strong relationship between the two elements. This approach was discussed and agreed with the Environment Agency during a workshop held 6 September 2018 to keep the assessment concise and reduce repetition.</p> <p>Compliance with the WFD objective to reduce priority pollutants is assessed in Table 36 in ES Appendix 8.6 (Application Document APP-107).</p>
9.3	<p>WFD Cumulative Effects</p> <p>It is also not clear whether the WFD assessment (APP-107) has considered the potential cumulative impact, particularly in those waterbodies where many of the tributaries will be crossed by the pipeline.</p>	<p>Whilst not explicitly stated, the Applicant considered cumulative effects when drawing the conclusions presented in Table 36 of ES Appendix 8.6 (Application Document APP-107). This was based on the information presented in Table 4, Tables 6 – 20 and Appendix C of ES Appendix 8.6 (Application Document APP-107). Table 4 in particular identifies the number of watercourses crossed per WFD surface water body, whilst Appendix C sets out the baseline of each watercourse to be crossed in a given WFD surface water body to allow for likely impacts to be considered in the context of the wider catchment. This approach was discussed with the Environment Agency during a workshop held 6 September 2018.</p>
9.5	<p>WFD Future Targets</p> <p>A WFD assessment should give consideration to both objectives of the WFD: No deterioration in status, and no compromising of the ability to achieve the future target status. It is not clear that the latter objective has been</p>	<p>The ability of a water body to meet future targets in quality are discussed in Tables 36 and 37 of ES Appendix 8.6 (Application Document APP-107) under the table heading 'Ability to Achieve Good Ecological Potential/Status'. The Applicant has explicitly stated in these tables that the project would not compromise the ability of each WFD water body to achieve future targets. This is based on the lack of significant impacts identified, particularly in relation to operation of the project.</p> <p>Assessment of potential impact on proposed mitigation measures was assessed in Tables 31 – 34. Mitigation measures were only made available by the Environment Agency for</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	considered in the submitted WFD assessment (APP-107).	Heavily Modified Water Bodies, which amounts to four of the 13 WFD surface water bodies assessed.
9.5	<p>Groundwater, hydrology and land contamination</p> <p>There are ongoing discussions regarding the works through the active, permitted landfill sites. At this stage, agreement has not been reached between the site operator/s, the EA and the Applicant to enable the Permit variation for works to proceed, but discussions are ongoing.</p>	No further update is available. An update will be provided in the next iteration of the Statement of Common Ground.
10.2	<p>Technical Notes</p> <p>Following the Applicant's submissions of TN3 (Source Protection Zone - SPZ assessment), TN4 (Groundwater Dependent Terrestrial Ecosystems - GWDTE Assessment and Private Supplies), TN6 (Working at depth) and other confirmations from the Applicant, all of the queries and issues that the Environment Agency raised in their relevant</p>	This agreement has been included within the Statement of Common Ground.



WR Para Ref	Point raised	Applicant's response to point raised:
	representations response (RR-239) in paragraphs 5.1 – 5.11 (inclusive) have been addressed.	
10.2.1	<p>SPZ Methodology</p> <p>The Environment Agency is willing to accept the justification provided for the SPZ 'ranking' by assigning very high to SPZ1s and other SPZs to high and medium respectively as set out in Table 1 in TN3 (SPZ assessment).</p>	This agreement has been included within the Statement of Common Ground.
10.2.2	<p>GWDTE Methodology</p> <p>The Environment Agency is happy to accept the justification provided for the use of UKTAG methodology for GWDTEs as set out in the Applicant's TN4 (GWDTE Assessment and Private Supplies).</p>	This agreement has been included within the Statement of Common Ground.
10.2.3	<p>Source Protection Zones</p> <p>Of relevance to both TN3 (SPZ assessment) and TN4 (GWDTE Assessment and Private Supplies) is a note to the applicant that private water supplies have a</p>	As outlined in ES Chapter 4 (Application Document APP-044), source protection zones were considered as part of the overall pipeline routing. Embedded design measure O6 in Table 4.6 states, ' <i>The pipeline as laid will not lie within existing Source Protection Zone 1 (SPZ 1) areas</i> '. This is in relation to designated SPZ and did not take into account default SPZ1 connected with Private Water Supplies, as the locations of these were generally unknown. To take into account Private Water Supplies, the Applicant has committed to:



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>default SPZ1 of 50m and SPZ2 of 250m. This is important to take into account for the applicant's commitment that the pipeline will not be laid in SPZ1 (although we note that this verbal commitment has not been included as a REAC commitment, which we would appreciate being included).</p>	<p>G144: <i>'As part of negotiations with landowners within the Order Limits which are affected by the project, active private water supplies would be identified with the landowner. Appropriate mitigation would be considered during construction'</i>.</p> <p>W12: <i>'For private water supplies (PWS) the following would be put in place:</i> <i>In the event of a landowner or tenant complaining that installation activities have affected their PWS, an initial response would be provided within 24 hours.</i> <i>Where the installation works have affected a PWS, an alternative water supply would be provided, as appropriate.</i> <i>In the event of a significant spill during construction:</i> <i>All landowners/tenants would be contacted within 24 hours, within 250m of the spill, to determine if there are any PWS that might be affected;</i> <i>An assessment of the likelihood of groundwater contamination supplying identified PWS would be undertaken;</i> <i>Where requested by the relevant landowner, monitoring of well water would be undertaken for a determined period of time, taking into account pollution travel time in groundwater, to determine whether pollution has occurred; and</i> <i>where a PWS is affected, an alternative water supply would be provided, as appropriate'.</i></p>
<p>10.2.4</p>	<p>Working at Depth The Environment Agency is satisfied with the information provided in the applicant's TN6 (Working at depth) The Applicant has made a commitment to update the CEMP (APP-129) to provide</p>	<p>A new commitment has been included in the updated CoCP submitted at Deadline 2 (REP2-010) to cover the additional working at depth locations. Commitment W14 states: <i>'Temporary sheet piling or similar for control of groundwater would be put in place at the following locations unless a detailed assessment is undertaken which demonstrates that no building or infrastructure is at risk of differential settlement:</i> <i>Near the junction of Roakes Avenue and Canford Drive, Chertsey (TQ048657).</i></p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>mitigation for four additional 'deep burial' locations – on top of existing REAC (within the CoCP (APP-128)) W13 commitment to provide mitigation for trenchless crossings.</p>	<p><i>Southeast of Jubilee Church, Chertsey (TQ049658).</i> <i>Junction of Chesterfield Road and Woodthorpe Road, Ashford (TQ059716).</i> <i>To the southwest of the Esso West London Terminal storage facility, West Bedfont (TQ068733).'</i></p> <p>This agreement has been included within the Statement of Common Ground.</p>



4 Response to Written Representations – E P and M Elmer

Table 4.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
<p>Paragraph 3</p>	<p>Our boundary with the route of the proposed pipeline comprises a 100+ year old holly hedge or two mature oaks. Any damage or loss of these important landscape features would clearly have a serious adverse impact upon our property but generally to the locality.</p>	<p>The trees and boundary hedges within the residential properties are outside of the Order Limits and therefore the Applicant is not seeking powers to remove these.</p> <p>The Applicant notes the location of the Affinity Water watermain and its easement along the rear of the properties. This would provide a 3m buffer in which the Applicant cannot place the pipeline. Therefore, given the location of the residential property boundaries, the watermain offers additional distance away from these trees for the excavation of the pipeline trench, further reducing the likely impact on the trees.</p> <p>In addition, the Applicant has undertaken a detailed tree survey at this location to gather information about the root protection areas of mature trees to further inform the detailed route alignment.</p>
<p>Paragraph 4</p>	<p>The bridleway running adjacent to the residential properties of Heronscourt and Colville Gardens comprises an exceptional and much used leisure facility.</p>	<p>As the Public Right of Way (PRoW) runs parallel to the Order Limits and would need to be closed for the duration of the works. Commitment G114 would apply which states <i>‘All designated PRoW would be identified, and any potential temporary closures applied for/detailed in the DCO. All designated PRoW crossing the working area would be managed, including National Trails, with access only closed for short periods while construction activities occur’</i>.</p>
<p>Paragraphs 5 and 6</p>	<p>Lack of justification for the proposed route and the decision to not route close to the existing pipeline.</p> <p>Due to the nature of the open area of the existing pipeline route with</p>	<p>The existing pipeline route lies within an area of habitats that are important to birds, which are a feature of the Thames Basin Heaths Special Protection Area (SPA), and to sand lizards – a European Protected Species. Gorse is used by Dartford warbler (one of the SPA bird species) for nesting and foraging, and the sandy heath habitats also found along the existing route support small numbers of nightjar (another of the SPA bird species) and</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>gorse being the only prominent feature, the area cannot be attractive to ground nesting birds and in any event suitable steps can be taken to avoid construction works during the March/September period.</p> <p>The sand lizards would presumably move naturally or can be relocated or temporary physical steps taken to isolate their location from the construction works.</p>	<p>the protected sand lizard. These habitats are also features of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation.</p> <p>The Applicant understands that the priority is to avoid impacts on priority habitat and that a licence for the trapping and relocation of a protected species such as sand lizards would only be granted where avoidance cannot be achieved. At Turf Hill, impacts on sand lizards can be avoided by selecting the proposed pipeline route. This route would also not impact on the European Dry Heath and Northern Atlantic Wet Heath, the latter being particularly difficult to reinstate post construction.</p> <p>Further details regarding the planning balance exercise which was undertaken by the Applicant, and how this informed route selection, are set out in Chapter 9 (Turf Hill) of the Applicant's Responses to Relevant Representations (REP1-003).</p>



5 Response to Written Representations – Heronscourt and Colville Gardens Residents’ Associations

Table 5.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
<p>Section 1</p>	<p>Introduction</p> <p>The residents of Heronscourt and Colville Gardens are unhappy with the selection of the final route (F1a+) in Turf Hill.</p>	<p>The Applicant understands that the logic of a straight-line route across Turf Hill that is near the existing pipeline appears strong on paper. However, there is sufficient evidence to demonstrate protected species are living in the heathland along the existing pipeline route, which has been validated by national and local environmental bodies. These have some of the highest levels of environmental protections both nationally and internationally.</p> <p>Following significant consideration, engagement and consultation, the Applicant selected the route that best balances the competing environmental considerations in this highly constrained area.</p> <p>The Applicant recognises that properties back onto the park and residents are concerned by the removal of trees in the wooded area that is closest to their boundary. The Applicant has engaged with the residents’ associations and their elected representatives on several occasions and sought to reassure them regarding the reduced working area, the secured commitment to reinstatement and set out the assessments carried out. The Applicant intends to continue meetings with the residents’ associations before and during construction.</p> <p>The Applicant will be submitting an updated CoCP and CEMP at Deadline 4, which should give greater clarify regarding installation.</p>
<p>Section 3</p>	<p>Consultation process</p> <p>Lack of consultation with Heronscourt Residents Association and Colville Gardens</p>	<p>The Planning Act 2008 does not recognise residents’ associations as a prescribed body. The Applicant sought to identify these bodies as part of the community consultation during the statutory consultation.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Residents Association as 'relevant organisations' during the Design Refinement consultation.</p> <p>Minor modification to sub-option F1a should be a 'material change'.</p> <p>Route selection in Chobham following engagement with the Chobham Society.</p>	<p>At the beginning of 2018, the Applicant undertook a desktop search to identify community groups of the 200-metre-wide corridor options before the project's Corridor Options (non-statutory) consultation. Shortly before the Corridor Options consultation, the Applicant requested feedback on groups from Surrey Heath Borough Council to formally write to as part of the development of the Commitment to Community Consultation (CtCC) This is noted in Consultation Report (Application Document APP-033). The document would later form the basis of the project's Statement of Community Consultation (SoCC). Heronscourt and Colville Gardens Residents Associations were not identified during this process.</p> <p>In July 2018, the Applicant formally consulted Surrey Heath Borough Council on the draft Statement of Community Consultation, Appendix 4.5 of the Consultation Report (Application Document APP-035). Heronscourt and Colville Gardens Residents' Association was not identified during this process. However, as local residents, each member will have been engaged through the letter drops local newspaper notices and consultation events at both non-statutory and statutory consultation stages.</p> <p>The Applicant has responded to the issues regarding route selection at this location and the materiality of the change in Section 9 of the Applicant's Responses to Relevant Representations (REP1-003).</p> <p>The selection of the route across Chobham Common is not directly comparable to Turf Hill Park as, although it has similar designations and protected species, it is much greater in size.</p>
Section 4	Sand lizards not in the route F1c due to unsuitability to reptiles.	<p>The Applicant has responded to the issues regarding sand lizards and priority habitat in Section 9 of the Applicant's Responses to Relevant Representations (REP1-003).</p>



WR Para Ref	Point raised	Applicant's response to point raised:
Section 4	Lack of field surveys	<p>The justification for survey methodology regarding common and rare reptile species is provided in para 2.3.1 of Environmental Statement (ES) Appendix 7.11 (Application Document APP-092).</p> <p>Following a review of extensive desktop surveys, detailed habitat mapping of Turf Hill was undertaken and is provided in the Phase 1 Habitats and Botany Report (Application Documents APP-080 and APP-081), specifically Priority habitats in Figure A7.1.146 (Sheet 4 of 4) and Phase 1 Habitats in A7.1.147 (Sheet 4 of 4). Subsequent reptile habitat suitability mapping on heathland sites (including of Turf Hill) was also undertaken and is recorded in ES Appendix 7.11 (Application Document APP-092). This information shows that suitable habitat for rare reptiles is not present within the Order Limits for the selected route option at Turf Hill. It is for this reason that no field surveys were undertaken in respect of rare reptiles.</p> <p>The Statement of Common Ground between the Applicant and Natural England (REP1-005) states '<i>That the scope and methods of the ecological surveys are appropriate</i>'.</p> <p>Therefore, as Turf Hill is already well surveyed for reptiles and its habitats were surveyed in detail, it is very unlikely that field surveys would have provided additional information that would have affected the conclusions of the assessment at this location.</p>
Section 4	<p>Environmental damage and biodiversity net gains and losses</p> <p>Comparison of F1c and the final route.</p> <p>Potential for raising the water table in Turf Hill.</p>	<p>The Applicant has responded to these issues in Section 9 of the Applicant's Responses to Relevant Representations (REP1-003) and in the Applicant's Response to the Examining Authority's First Written Questions - Turf Hill (REP2-049).</p> <p>The Applicant has responded to the potential reduction in noise abatement in the Applicant's Response to the Examining Authority's First Written Questions – People and Communities (REP2-047).</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Potential reduction in noise abatement.</p> <p>Damage to the roots of mature trees in residents' gardens.</p>	
<p>Section 5</p>	<p>Community concerns</p> <p>Permanent damage to the environment by the removal of trees and habitats of bats and adders.</p> <p>Damage to trees in residents' gardens and ability to sell homes.</p> <p>Loss of community amenity and visual impact.</p> <p>Increase in traffic noise, air pollution, dust and vibration.</p> <p>Traffic disruption.</p>	<p>The Applicant has responded to the issues in relation to habitats, flood risk, landscape and trees, traffic, construction traffic and blight in Section 9 of the Applicant's Responses to Relevant Representations (REP1-003) and in the Applicant's Response to the Examining Authority's First Written Questions - Turf Hill (REP2-049).</p> <p>The Applicant has responded to the potential reduction in noise abatement in the Applicant's Response to the Examining Authority's First Written Questions – People and Communities (REP2-047).</p> <p>In response to point about the impact on the tree-lined paths, the Applicant has included commitment G94 within the CoCP, which states '<i>land used temporarily would be reinstated to an appropriate condition relevant to its previous use</i>'.</p> <p>In response to the point about the car park and access through the main entrance of Turf Hill Park, construction of the pipeline would require the temporary suspension of parking and access from this point during construction. The Applicant has adopted commitment G114 which states that '<i>all designated PRow would be identified and any potential temporary closures applied for / detailed in the DCO. All designated PRow crossing the working area would be managed, including National Trails, with access only closed for short periods while construction activities occurred</i>'. Therefore, public access to unaffected parts of the park would remain.</p> <p>The information sheet shared with residents and available on the project website (www.slpproject.co.uk) (April 2019) is attached for reference in Appendix 4.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Section 6</p>	<p>Engineering and construction Alternative route suggested (see Appendix 8.14).</p>	<p>The Applicant has responded to the issues in relation to habitats, flood risk, landscape and trees, traffic, construction traffic and blight in Section 9 of the Applicant's Responses to Relevant Representations (REP1-003) and in the Applicant's Response to the Examining Authority's First Written Questions - Turf Hill (REP2-049).</p> <p>The Written Representation makes reference to the existing 8" water main along the boundary of the back gardens at Turf Hill. The Applicant has consulted with Affinity Water on a number of occasions including November 2018, February 2019 and October 2019. Affinity Water has not raised any specific concerns with regards to the 8" water main and the Applicant has a signed Statement of Common Ground with Affinity Water (REP2-014). In addition, a Written Statement between Affinity Water and the Applicant clarifying the position regarding the existing 8" water main at Turf Hill (Document Reference 8.20 Appendix 4).</p> <p>In response, to the alternative proposed route, the Applicant would like to note that the logic of a straight-line route across Turf Hill that is near the existing pipeline appears strong on paper. However, following significant consideration and engagement with multiple environmental bodies, the Applicant has selected the route that best balances the competing environmental considerations in this highly constrained area. The Applicant does not consider that this route would avoid significant effects on the primary habitat for sand lizards and ground nesting birds.</p>



6 Response to Written Representations – Independent Educational Association Limited (IEAL)

Table 6.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
Paragraph 4	<p>The principle of the development</p> <p>The Independent Educational Association Limited (IEAL) does not object in principle to the Project as a whole but it does object strongly to the proposed route of the pipeline through the School and to the compulsory acquisition of its land, rights it has over the land and the compulsory creation of rights over land owned by IEAL or in which IEAL has an interest.</p>	<p>The Written Representation raises a strong objection to the proposed route of the pipeline through the school and the acquisition of land and acquiring of rights.</p> <p>This has been addressed in the Responses to Relevant Representations (REP1-003), Section 13, Table 13.1.</p> <p>The Applicant has agreed to produce a method statement detailing construction activity and mitigation in schools impacted by the pipeline project which would be secured through the CoCP, an updated version of the CoCP to be submitted at Deadline 4. This statement will include additional details specific to St James School, including details relating to how the route would accommodate the proposed Assembly Hall and teaching accommodation approved under planning application reference 10/00460/FUL. This commitment is shown as NW31 (REP2-010) on the General Arrangement Plans, Sheets 52 and 53 and Sheet 122 (AS-058).</p>
Paragraph 5	<p>Acquisition powers</p> <p>The IEAL also objects to the seeking of powers to carry out works over and/or in the vicinity of its land without first securing appropriate protections for the School's benefit.</p>	<p>The Applicant will continue to maintain an ongoing dialogue with the IEAL to endeavour to reach acceptable terms for a voluntary agreement based on the Applicant’s Preferred Routing option. Measures applicable to exercise compulsory powers are contained within the draft Development Consent Order (Document Reference 3.1 (4)). However, the Applicant considers that it would be beneficial to both parties to seek voluntary agreement.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Paragraph 6</p>	<p>Measures required to overcome IEAL's objection</p> <p>In order for the IEAL to be in a position to withdraw its objection to the DCO the IEAL requires:</p> <p>(a) An application to be submitted by the Applicant for a material change to the application so that the pipeline follows a route along the north western boundary of the School which will significantly reduce the impacts of the pipeline scheme on the School;</p> <p>(b) An agreement in respect of the revised route from the Applicant that any acquisition of rights over the School's land is on terms agreed with the IEAL, and that compulsory powers will not be exercised in relation to the School's land; and</p> <p>(c) That sufficient protection for the School's benefit is put in place for the carrying out of works over and in the vicinity of the School's land.</p>	<p>a) The Applicant has undertaken a thorough review of the IEAL's proposed alternative route. The Applicant considers the route proposed by the IEAL to have several significant disadvantages when compared against the Applicant's own route and performs less favourably when considered against the project's guiding principles. The IEAL route has increased engineering risks and increased potential impacts. As a result, the Applicant does not propose to submit any request for a material change to the Examining Authority.</p> <p>b) The Applicant has confirmed at Section 8.1.3 of the Statement of Reasons (AS-010(a)) that, where terms of a voluntary agreement have been reached and can be relied upon at the time the Applicant requires entry onto the Order Land, then the Applicant would not exercise any powers of Compulsory Acquisition.</p> <p>c) The Applicant has agreed to produce a method statement detailing construction activity and mitigation in schools impacted by the pipeline project which would be secured through the CoCP. An updated version of the CoCP is to be submitted at Deadline 4.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Paragraph 7</p>	<p>Impact on the school</p> <ul style="list-style-type: none"> • Operation of the school and its reputation • Protection of staff and pupils • Impact on sports facilities • Existing planning permissions 	<p>The Written Representation makes comments in respect of the operation of the school, child protection, the impact on sports facilities and the impact on existing planning permissions.</p> <p>These matters have been addressed in the Responses to Relevant Representations (REP1-003), Section 13, Table 13.1.</p> <p>The Applicant has agreed to produce a method statement detailing construction activity and mitigation in schools impacted by the pipeline project which would be secured through the CoCP. An updated version of the CoCP to be submitted at Deadline 4</p>
<p>Paragraph 20 -22</p>	<p>Contaminated Land</p> <p>The Proposed Development will disturb this contaminated material and disturb and damage the new drains that have been laid by the School underneath the north fields.</p>	<p>This matter raised in the Written Representation has been addressed in the Responses to Relevant Representations (REP1-003), Section 13, Table 13.1. The Applicant has reviewed the information provided by IEAL at Deadline 2 (REP2-101) and this will be considered as the Applicant progresses the detailed design of the works. The Applicant does not anticipate the need for any changes to commitment G71.</p>
<p>Paragraph 23</p>	<p>Loss of Revenue</p> <p>The School's Land and premises are being used for weddings and other events. The Proposed Development will make it impossible for the IEAL to continue using the School's Land and its premises for such purposes while the works are carried out which will</p>	<p>This matter raised in the Written Representation has been addressed in the Responses to Relevant Representations (REP1-003), Section 13, Table 13.1.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	result in a loss of income for the IEAL.	
Paragraph 24	<p>Future restrictions</p> <p>The proposed acquisition will impose unacceptable restrictions on the School's ability to manage its estate and carry out any new development on the School's Land in the future.</p>	<p>This matter raised in the Written Representation has been addressed in the Responses to Relevant Representations (REP1-003), Section 13, Table 13.1.</p>
Paragraphs 25 - 30	<p>Alternative proposal</p> <p>The IEAL proposed an alternative route to the Applicant, which passes along the southern and western boundaries of the School Land.</p> <p>The IEAL notes that the high level statement as to why the Applicant is not willing to pursue the Alternative Route received on 8th October 2019.</p> <p>The IEAL has obtained preliminary advice from a firm of consulting engineers which has suggested that an open trench method of construction would be a viable and</p>	<p>The Applicant attended a meeting with several representatives from the St James School on 30 July 2019 to discuss how the project could mitigate the application route to address the school's concerns and present an assessment of alternative routes which the school had proposed at a meeting on 26 June 2019.</p> <p>The Applicant has made its own assessment of the IEAL alternative route and provided that detailed assessment to the IEAL on 8 October 2019 and are still awaiting a response. The Summary of the Applicant's Assessment of the Alternative Route Proposal (Document Reference 8.22 Appendix 3) concluded that the route proposed by the IEAL has several significant disadvantages when compared against the Applicant's own route and performs less favourably when considered against the project's guiding principles. The IEAL route has increased engineering risks and increased potential impacts to users of the school, its infrastructure and potential future development opportunities. As a result, the Applicant does not propose to submit any request for a material change to the Examining Authority.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	feasible method to deliver the Alternative Route. The IEAL submits that the Examining Authority should ask the Applicant to apply for a material change in respect of the Alternative Route.	
<p>Paragraph 31</p>	<p>Consultation</p> <p>The IEAL had made clear in its response to the Applicant's section 42 consultation that its proposed route through the School grounds was not acceptable. However, the Applicant has had no regard to the School's submissions; the Applicant appears to have approached the consultation with a closed mind and without having undertaken the studies necessary to reach an informed decision on the feasibility of the Alternative Route.</p>	<p>This matter raised in the Written Representation has been addressed in the Responses to Relevant Representations (REP1-003), Section 13, Table 13.1. The Applicant has produced an Assessment of the Alternative Route Proposal (Document Reference 8.22 Appendix 3) following consultation with the school. However, this engagement has not resulted in a change to the project.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Paragraph 32</p>	<p>Compulsory acquisition of rights</p> <p>The IEAL considers that there is no compelling case in the public interest for the compulsory acquisition of, or the use by the Applicant of, the Land Parcels as the serious adverse impact on the School. The IEAL's rights to property, outweigh the case for the Proposed Development so that there is no compelling case in the public interest for the confirmation of the compulsory purchase powers sought by the Applicant.</p>	<p>The Applicant has set out in Section 7 of the Statement of Reasons (AS-010(a)) its justification for the inclusion of powers of Compulsory Acquisition in the Development Consent Order. The Applicant does not consider that the development would have a serious adverse impact on the IEAL property, and the powers sought are reasonable and proportionate. The Applicant seeks to acquire the minimum rights necessary to ensure long term fuel supply security.</p>
<p>Paragraph 33</p>	<p>Protective Provisions</p> <p>The IEAL notes that there are no protective provisions in the draft DCO for the School's benefit and also objects to the DCO on this basis.</p>	<p>This matter raised in the Written Representation has been addressed in the Responses to Relevant Representations (REP1-003), Section 13, Table 13.1.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Paragraph 34</p>	<p>Asset protection agreements</p> <p>The IEAL submits that if the Applicant does not make an application for a material change to seek powers in respect of the Alternative Route, the IEAL will require asset protection agreements in respect of those works to secure:</p> <p>(a) that no works are carried out without the IEAL's prior approval of the plans, specification, method statement and programme of works;</p> <p>(b) that full access rights, during both the construction and operation phases, are retained for the benefit of the IEAL to enable the operation of the School's Land and any necessary maintenance, repair, renewal, inspection and enhancement works to such land;</p> <p>(c) the recovery of the IEAL's legal and professional fees, costs and disbursements incurred in connection with the proposals to carry out the works and any other</p>	<p>(a) The Applicant would not propose to agree to the IEAL having prior approval of the plans or specifications.</p> <p>The Applicant has already offered to discuss and agree the terms of a separate agreement regarding the construction methodology, including a detailed timetable and programme of works.</p> <p>(b) During construction activities, the Applicant would discuss and agree with the IEAL appropriate means of access to their retained land to carry out any routine maintenance activity.</p> <p>During the operational phase of the pipeline, the land would have been reinstated and handed back to the IEAL. Therefore, there would be no restriction on the IEAL continuing to maintain, repair, renew, inspect or enhance their land, subject to the standard safe working requirements of the Applicant.</p> <p>(c) The Applicant has provided the IEAL with fee undertakings in respect of its professional costs associated with the negotiation of a voluntary legal agreement. In respect of the maintenance and operational phase of the pipeline, provision is provided in the voluntary legal document for the recovery of professional fees.</p> <p>(d) The Applicant has these obligations under the DCO as drafted.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>costs incurred by the IEAL arising out of the construction, operation and maintenance of the Proposed Development insofar as it affects the School; and</p> <p>(d) that no works are carried out unless and until all consents, licences, registrations and authorisations (including any statutory or regulatory consents) are in place.</p>	



7 Response to Written Representations – Neighbours and Users of Queen Elizabeth Park

Table 7.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant response to point raised:
2.1.1.	Support in Farnborough’s Local Community	<p>The Applicant is prepared to work with the local community group and has spoken to Rushmoor Borough Council to request its assistance in arranging a meeting with this group.</p> <p>The Applicant is aware that since the close of the relevant representations period, members of the community have been raising awareness and have now formed the community group referenced at the Issue Specific Hearings. The Applicant is willing to meet with the community group as it has done with many community groups across the 97km of replacement pipeline route.</p>
<p>Section 2.2.1 Temporary play area Q1- 4, 7-8</p>	<p>Concerns about the temporary play area. No suitable site for the temporary play area has yet been identified. There is no scope to site it within Queen Elizabeth Park because doing so would require the removal of even more trees.</p> <ol style="list-style-type: none"> 1. Esso will not take full responsibility for finding a site for the temporary play area. 	<p>The Applicant recognised the importance of this play area in the Open Space Assessment and has taken responsibility for providing a temporary play area during installation. This is represented in commitment OP05 secured in the Code of Construction Practice (CoCP) (REP2-010).“<i>In recognition that the existing neighbourhood equipped area for play (NEAP) at Queen Elizabeth Park would be impacted by the pipeline construction, the project would reinstate the existing NEAP as soon as practicable after construction (G94). The project would seek to provide an alternative NEAP for use while the existing NEAP is out of commission. The alternative NEAP would either be provided by the project within the Order Limits in the vicinity of the existing NEAP on land belonging to Rushmoor Borough Council or would be provided in collaboration with Rushmoor Borough Council in accordance with the details agreed.</i>”</p> <p>The Applicant will work with the Council with the intent for the temporary play area to be in place before the existing play area is removed, and for it to be in place while the existing play area is out of use.</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>2. A suitable alternative site will not be found before the project starts.</p> <p>3. The temporary play area will not be complete before the current play area is removed.</p> <p>4. Esso will go ahead and remove the current play area even if an alternative has not been found.</p> <p>7. The residents will lose the play area for the duration of the project.</p> <p>8. The temporary play area will be decommissioned before the new play area is fully built and opened.</p>	<p>The Applicant has had early discussions with a potential specialist supplier who has indicated that play provision to create space where children interact with the woodland through play can be installed without tree removal.</p> <p>The Applicant has sought the input of Rushmoor Borough Council regarding the removal of the playground, as evidenced in the email dated 11 April 2019 (Document Reference 8.24 Appendix 1). This matter remains under discussion with the Council, as the landowner and relevant local planning authority.</p>
<p>Section 2.2.1 Temporary play area Q5-6</p>	<p>Concerns about the quality and location of the temporary play area.</p> <p>The temporary play area will be substandard compared to the current facility.</p>	<p>The Applicant wishes to reassure the community that while the temporary play area may be different in terms of the equipment and location within the park, the provision will be agreed with the Council and the Applicant will commission an experienced and professional company to install it.</p> <p>As per the commitment outlined above, the Applicant has committed to installing a temporary play area within the Order Limits within the park, if a suitable alternative location is not agreed with Rushmoor Borough Council.</p>



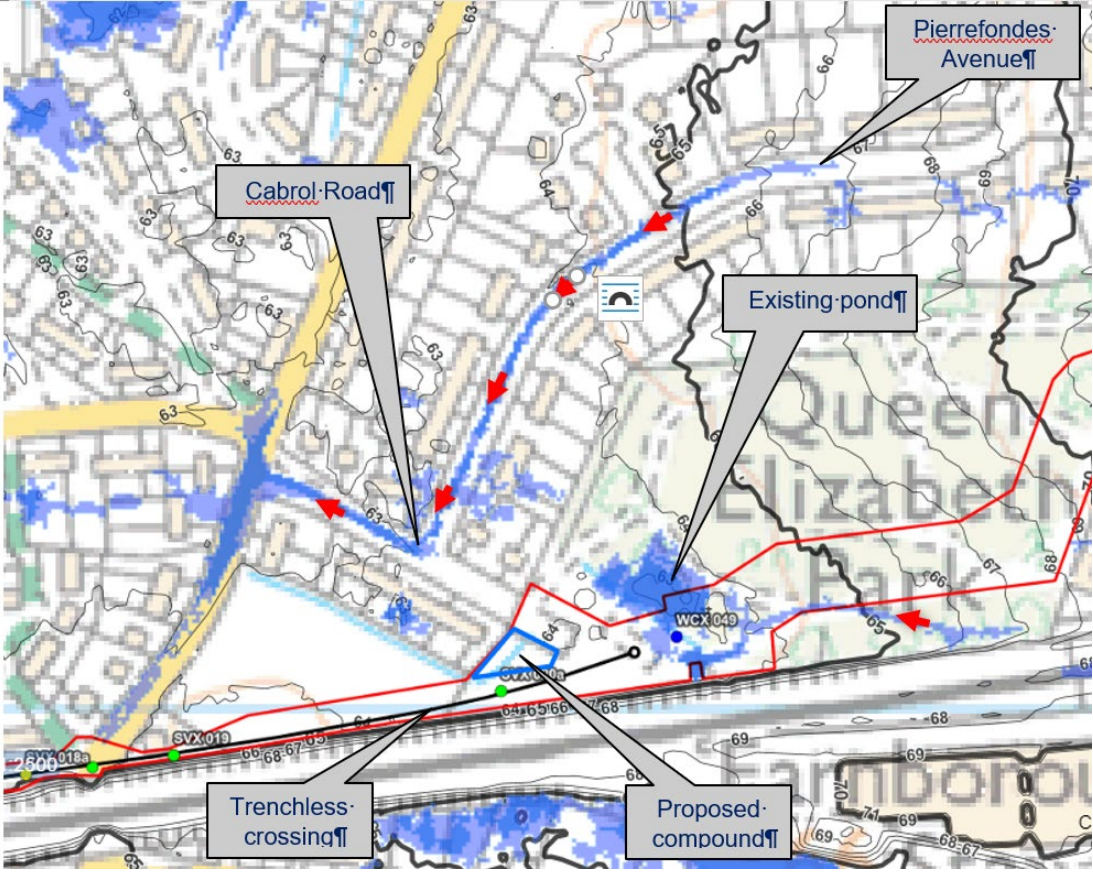
WR Para Ref	Point raised	Applicant response to point raised:
	<p>The temporary play area will be too far away from the current one to be accessible by the current users.</p>	
<p>Section 2.2.2 New play area Q1-2</p>	<p>Concerns about the size and location of the new play area.</p> <p>1.The route of the pipeline will impose restrictions on where the new playground can be sited and what it can contain.</p> <p>2.The new play area will not be in the same location as the existing one.</p>	<p>In response to point 1, Rushmoor Borough Council actively engaged Esso before the installation of the existing play area, as it is partly within the easement of the existing pipelines within the park. There is no evidence to suggest this would not be possible with the replacement pipeline.</p> <p>In response to point 2, the Applicant can confirm that the reinstated play area will be in the same location as the existing one.</p>
<p>Section 2.2.2 New play area Q3-10</p>	<p>Concerns about the quality and suitability of the new play area.</p> <p>3.The current equipment will be reused in the new play area.</p> <p>4.The new play area will be smaller than the current one.</p> <p>5.The equipment in the new play area will be inferior to that of the current one.</p>	<p>The Applicant confirmed in its response to WQ1.QE.1.1 (REP2-048) that “<i>The reinstatement would take the form of new play equipment, to replace the existing older equipment.</i>”</p> <p>In response to point 4, the Applicant has no intention to reduce the size of the playground, as this would conflict with the reinstatement commitment. The format of the new playground would be agreed with Rushmoor Borough Council.</p> <p>In response to points 3, 5, 6 and 7, the Applicant will reinstate like for like, new for old, in consultation with Rushmoor Borough Council.</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>6.The design and layout of the new play area will be inferior to the current one.</p> <p>7.The new play area will not be built to the highest level of safety standards.</p> <p>8.The age range of children catered for in the new play area will not meet the needs of the community.</p> <p>9.The new play area will not be available before the temporary play area is removed.</p> <p>10.Inflation reduces the real value of the budget agreed for the replacement.</p>	<p>In response to points 8 and 9, the existing playground caters for various age ranges as will the new one, in agreement with Rushmoor Borough Council.</p> <p>In response to point 10, the Applicant has not provided a monetary commitment, but a commitment to fully reinstate as set out here.</p>
<p>Section 2.3.1 Flooding in Cabrol Road Q1,2,3,4,5</p>	<p>Concerns about flooding as a result of installation and tree removal.</p> <p>1.Esso have not performed full flood risk assessments on the park and surrounding houses.</p> <p>2. Esso do not have a mitigation strategy for the flood risk during and after the project.3.Removal of</p>	<p>The Applicant has provided detail regarding flooding in the response to actions from the Issue Specific Hearing (ISH) Environmental Matters Tuesday 3 December Action 22 (ISH2-22 Document Reference 8.20). The Applicant has completed the relevant flood assessments to support the application, please see the Flood Risk Assessment (Application Document APP-134).</p> <p>The Risk of Flooding from Surface Water (RoFSW) mapping (Environment Agency, 2019) identifies areas at risk of surface water flooding. The RoFSW mapping identifies an overland flow path from the north along Pierrefondes Avenue southwards that could contribute to flooding in Cabrol Road (see Figure 1.1 below). The RoFSW mapping also identifies a smaller overland flow path from east to west in parallel to the railway through</p>

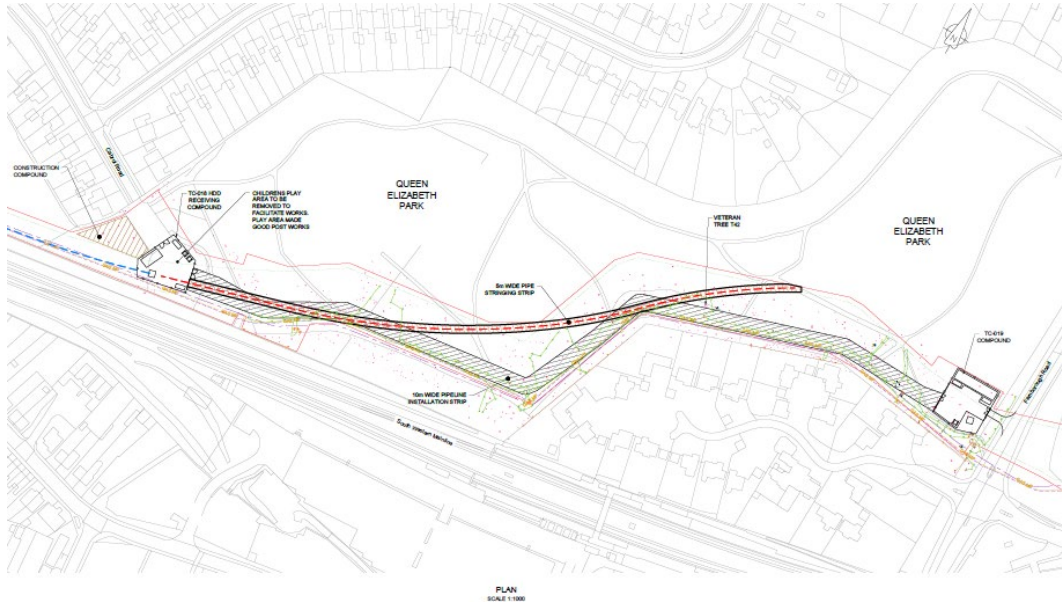


WR Para Ref	Point raised	Applicant response to point raised:
	<p>trees in the park will result in increased flooding in Cabrol Road.</p> <p>4.The construction compound and the activities within it will contribute to an increased risk of flooding in Cabrol Road</p> <p>5.The lower end of the park and gardens in Cabrol Road will be generally wetter all year round due to decreased drainage capacity during and after the project.</p>	<p>Queen Elizabeth Park. This second flow path appears to enter the pond at the western end of the park. When considering the 1% (1 in 100 (Medium)) Annual Exceedance Probability (AEP) extent this flow path does not appear to extend into Cabrol Road.</p> <p>The Rushmoor Borough Council Strategic Flood Risk Assessment (SFRA) (2015), makes no reference to flood history in relation to Cabrol Road based on historic reports provided by the Environment Agency, Hampshire County Council or Rushmoor Borough Council.</p> <p>There would also be no impermeable surfaces introduced during the construction phase.</p> <p>During construction the Applicant does not anticipate having an effect on the flood flow path along Pierrefondes Avenue. The southern flow path through Queen Elizabeth Park is less defined where it enters the Order Limits and the Applicant does not anticipate its work in this area contributing to flows. While the Applicant expects to remove some trees in the southern part of the park, removal of trees would not change the nature of the ground surface, and the ground would remain permeable. Therefore, the project would not change surface water runoff rates as a result of the removal of the trees.</p>

WR Para Ref	Point raised	Applicant response to point raised:
		<p>Figure 1.1: Current understanding of Cabrol Road Surface Water Flood Risk based on RoFSW Mapping for 1 in 30 (dark blue) and 1 in 100 (light blue) events</p> 



WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.3.1 Flooding in Cabrol Road Q6</p>	<p>Concerns about mitigation for flooding and impacts of the construction compound.</p> <p>6. Waste and pollutants within the construction compound could contaminate gardens in Cabrol Road if they are carried off by heavy rain, flooding, or general run off.</p>	<p>In response to point 6, the Applicant does not anticipate that waste and pollutants from within the construction compound could contaminate the gardens of Cabrol Road. There are measures within the CoCP to protect against such events occurring, primarily by implementation of the following mitigation measures:</p> <p>A Construction Environmental Management Plan (CEMP) would be produced in line with the outline CEMP , to be submitted at Deadline 4. It would explain how the activities of sub-contractor(s) comply with its requirements and include subsidiary plans such as the management of waste and soils (commitment G1).</p> <p>The CEMP would include pro-active actions and measures to control pollution risks. This could be either directly from the construction works or due to external factors such as extreme weather. Measures would include appropriate storage and handling of fuels and other substances hazardous to the environment (commitment G8).</p> <p>All refuelling, oiling and greasing of construction plant and equipment, would take place above drip trays and also away from drains as far as is reasonably practicable. Vehicles and plant would not be left unattended during refuelling. Appropriate spill kits would be made easily accessible for these activities (commitment G121).</p> <p>The Applicant would comply with all relevant consent conditions or DCO provisions regarding de-watering and other discharge activities. This would particularly be with regard to volumes and discharge rates and would include discharges to land, waterbodies or third-party drains/sewers (commitment G128).</p>

WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.4.1 Tree loss due to working width Q1-2</p>	<p>1. Esso are not willing to use a 5 metre working width when other areas of the route show this is possible.</p> <p>2. A 15 metre working width is still too damaging.</p>	<p>In response to point 1, the 5 metre working areas are significantly confined. As outlined in our response to Issue Specific Hearing Action 10 (Document Reference 8.22), there are a number of challenges that 5m causes such as increased vehicle movements, lack of storage and slower progress.</p> <p>In response to point 2, the Order Limits contain two areas, an area to string the pipe above ground, which is maximum 5 metres wide and an area for the open-cut installation, which is maximum 10 metres wide - see below. This is the maximum area that the Applicant can use within its Order Limits to install the pipeline. The Applicant will try to reduce the area needed even further where it is possible to install in a timely and safe manner.</p> <p>Figure 1.2: Working Widths in Queen Elizabeth Park</p> 



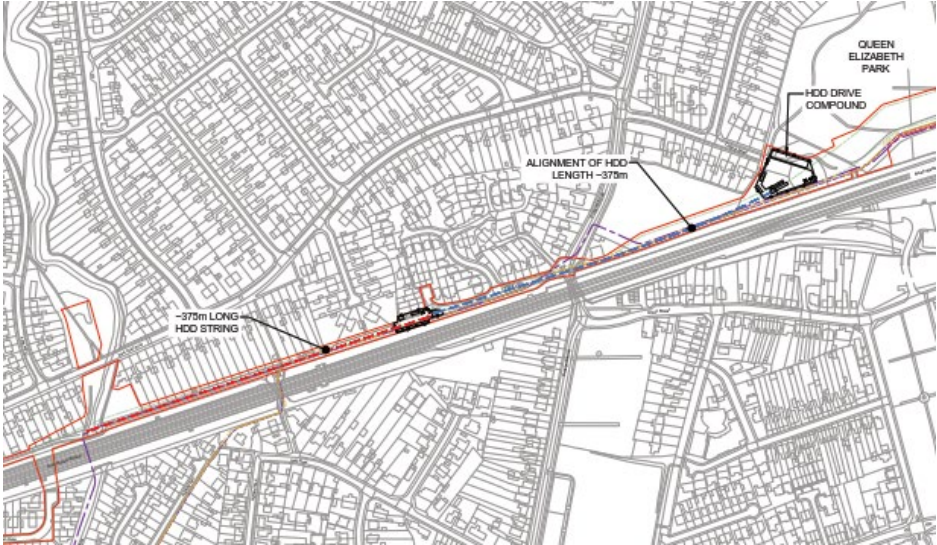
WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.4.1 Tree loss due to working width Q3-11</p>	<p>3.The 15 metre working width includes trees up to 200 years old which will be removed.</p> <p>4.A 15 metre working width could result in an area far wider than 15 metres being cleared if any trees which encroach (roots or canopy) into the working width are also removed.</p> <p>5.All trees within the Order Limits but outside the working width are still at risk.</p> <p>6.Esso know the route of the current pipeline and yet they will not commit to a precise route for the new pipeline in an area where it is critical to do so.</p> <p>7.Lack of a precise route for the pipeline at this stage and the very wide Order Limits gives too much scope for excessive tree removal.</p> <p>8.Trees which survived the installation of the previous pipelines are now at risk.</p> <p>9.Trees within the Order Limits which are not felled could be</p>	<p>In response to point 3, the Applicant has undertaken an arboricultural survey compliant with British Standard BS5837 and is aware that there are old trees within the park. We do not expect these will be removed.</p> <p>In response to points 4 and 5, the wording of Article 41 of the dDCO has been altered to clarify that the Applicant can only impact trees encroaching on the Order Limits. The Applicant can also only carry out these works if it reasonably believes it to be necessary to do so to prevent the tree or shrub from:</p> <p>(a) obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development; or</p> <p>(b) constituting a danger to persons using the authorised development.</p> <p>In addition, the dDCO states the Applicant must not cause unnecessary damage to any tree or shrub.</p> <p>In response to point 6, the current status of the project requires a limit of deviation to be maintained for the pipeline alignment, as it may not always be possible to install the pipeline where the Possible Pipeline Location is. The pipeline location will be finalised at the detailed design stage. The Applicant’s need for flexibility in selecting the final route of the pipeline is to be able to deal with unforeseen circumstances, for example the unknown ground conditions in any given location.</p> <p>In response to point 7, the Applicant has responded in ISH2-11 (Document Reference 8.20). The Applicant has committed to a 10-metre-wide working area for open-cut installation and a 5-metre-wide area for stringing through the park to reduce the impact on trees and users of the park. The Applicant did not reduce the width of the Order Limits because of the trenchless installation and the need to maintain flexibility to move the</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>pollarded, crown reduced or otherwise affected.</p> <p>10.The commitment to a 15 metre working width only covers trenched installation and not other activities which could also require tree removal.</p> <p>11.The narrow working width commitments do not apply to the area around the auger boring pit.</p>	<p>working area to avoid mature and veteran trees, as well as unknown below ground conditions.</p> <p>In response to point 8, the Applicant does not hold records regarding which trees were within the working area and retained during the installation of the existing pipelines.</p> <p>In response to point 9, trees within the working area, or that overhang the working area may be loped or pruned to maintain the safety of the working area, and to make sure there is no damage to the tree during installation.</p> <p>In response to point 10, this is correct and further detail regarding the intended working area is presented in ISH2-10,11 and 12 (Document Reference 8.20).</p> <p>In response to point 11, this is correct. Due to the requirements of trenchless installation a wider area is required. The area for the trenchless crossing of the A325 will require greater tree removal in comparison.</p>
<p>Section 2.4.2 Tree loss due to stringing out area</p>	<p>1.The stringing out activities and their effects on the park are not documented.</p> <p>2.Stringing out will require the clearance of trees.</p> <p>3.The area cleared for the stringing out activities will be separate from and in addition to any area cleared for trenchless installation (if trenchless installation is used).</p>	<p>In response to point 1, the effects on the park have been fully assessed as a worst-case scenario in the Environmental Statement. Further design detail on the installation methodology is being provided at Deadline 4.</p> <p>In response to point 2 (please refer to ISH2-11 (Document reference 8.20)), some of the younger trees and scrub around the pond would need to be removed, but the mature trees to the east of the pond are well spaced and the Applicant is confident these will not need to be removed.</p> <p>Point 3 is correct. To reduce impacts to trees the Applicant intends to install near the existing pipeline and the path. These both follow the southern boundary of the park, which is not straight. The Applicant then needs a single length of pipe the same length as the trenchless section (from Stake Lane into the park) which needs to be laid out on rollers above the ground so it can be pulled back through. This would be a mostly straight working area.</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>4.Narrow working width commitments do not apply to stringing out.</p> <p>5.The exact area to be used for stringing out is not documented.</p> <p>6.Stringing out could require the closure of additional areas of the park.</p> <p>7.The environmental and visual impact statements do not take into account the damage caused by stringing out.</p> <p>8.Mitigation commitments do not cover damage caused by stringing out.</p> <p>9.Esso have not considered reversing the direction of drilling to avoid stringing out within the park.</p>	<p>In response to point 4 the narrow working applies to all works undertaken in the designated sections.</p> <p>In response to point 5, the Applicant is submitting a draft plan to illustrate the 10-metre maximum working area for the open-cut installation and the 5-metre maximum stringing area.</p> <p>In response to point 6 the Applicant is only seeking permission within the Order Limits. The Applicant has committed to a 10-metre-wide working area for open-cut installation and a 5-metre-wide area for stringing through the park to reduce the impact on trees and users of the park.</p> <p>In response to point 7 the Applicant has assessed a worst-case scenario in the Environmental Statement. This covers all activity related to the project.</p> <p>In response to point 8 mitigation commitments cover all works. In addition, stringing is a low impact activity as it is above ground and the pipeline is laid out on rollers.</p> <p>In response to point 9, reversing the direction of drilling was considered and discounted on the basis that it would require stringing along and behind the back gardens of the properties along West Heath road, this would then require vegetation and tree clearance at the base of the railway embankment. The replacement pipeline along this section of the route is being installed by trenchless construction (TC017) to avoid the need for such an event and also to limit the impact on the residents, hence it would not make sense to then impact the residents with pipeline stringing works for TC018. The lengths of pipe material (12m long) to create the string for TC018 in this proposal will have to be delivered to the work site in Stake Lane and a ‘workshop’ area created to weld the lengths together in this location to limit the impact on the residents back gardens of West Heath Lane, and therefore the duration of the works to the area of the former garages of Stake Lane will be considerably longer, with more deliveries for the residents of Stake Lane and Brewers Close. The Applicant has considered that for efficiencies utilising the drive pit from the same location at Stake Lane does mean that the drive unit only needs to be turned around</p>

WR Para Ref	Point raised	Applicant response to point raised:
		<p>in the same location and there is not the requirement to build another drive pit in QEP. To move the drive pit to the play area of the park would introduce a larger mobilisation of plant to the park location. This would result in a larger drive compound and the loss of trees in the south west corner. See sketch below (Figure 1.3).</p> <p>Figure 1.3 – HDD from play area in QEP to Stake Lane</p> 
<p>Section 2.4.3 Tree identification</p>	<p>1. Esso has not produced detailed tree identification records for Queen Elizabeth Park. 2. Lack of detailed tree records prevents the extent of the damage</p>	<p>In response to point 1, the Applicant has provided Appendix 10.2 Schedule of Notable Trees – Revision No. 2.0 (REP2-009) that shows that the trees within Queen Elizabeth Park have been identified as a notable group. Notable trees are defined by the Applicant as prominent trees within the landscape and by nature will generally be the large, mature specimens.</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>to the park being accurately and objectively assessed.</p> <p>3.The accurate age and significance of individual trees will not be known when the route for the pipeline is chosen.</p> <p>5.Older and more significant trees could be overlooked and therefore unnecessarily removed if the trees in the park are considered as a group.</p>	<p>In response to point 2, the Applicant has assessed a worst-case scenario as part of the Environmental Statement. This included an appropriate tree survey to support the application and stage of design development.</p> <p>In response to point 3, the Applicant is in the process of completing a BS 5837 tree survey at Queen Elizabeth Park. This will be submitted to the Examining Authority, along with a methodology statement at Deadline 4.</p> <p>In response to point 5, trees are individually assessed to inform detailed design and before installation commences.</p>
<p>Section 2.4.3 Tree identification on Q4</p>	<p>4. Decisions on individual tree felling will be based on arbitrary opinions rather than documented facts.</p>	<p>The British Standard BS 5837 requires the survey of individual trees above 75mm in diameter and it is this documented information that will be used to inform any decisions on tree felling.</p>
<p>Section 2.4.4 Risk of tree removal outside OL Q1</p>	<p>1.There is no precise definition of 'near'.</p>	<p>Article 41 of the dDCO (Document reference 3.1(4)) has been clarified and removed the word 'near'.</p>



WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.4.4 Risk of tree removal outside OL Q2&3</p>	<p>Summary of concerns:</p> <p>2. There is no documented process for agreeing to the removal, or reduction, of trees outside the Order Limits.</p> <p>3. Trees outside the Order Limits could be removed or reduced without any consultation.</p>	<p>It is not the Applicant's intention to remove trees outside of the Order Limits. dDCO Article 41, set out above, makes it clear when works to trees or shrubs near the Order Limits might take place.</p> <p>The Applicant does not consider that it has requested unusual or extensive permissions regarding trees or shrubs outside the Order Limits. This permission is required to maintain safety of the working area, and to make sure potential damage to trees is reduced.</p>
<p>Section 2.4.4 Risk of tree removal outside OL Q4-6</p>	<p>4. There will be no opportunity to challenge the planned work on trees outside of the Order Limits.</p> <p>5. There is no documentation explaining who can challenge decisions to fell or reduce trees outside the Order Limits.</p> <p>6. Given that trees may be disrupted outside of the Order Limits, other work may take place outside of the Order Limits which is not identified at this time.</p>	<p>As outlined in the Applicant's response to Relevant Representations (paragraph 10.3.12 (REP1-003) Article 41 of the draft DCO ensures that the Applicant's power to undertake works to trees in connection with the construction, maintenance and operation of the project is not unfettered. First, any works to trees must either be necessary to prevent the tree from obstructing or interfering with the construction, maintenance or operation of the project or from constituting a danger to persons using the authorised development (per article 41(1) of the draft DCO). In addition, the Applicant must not cause unnecessary damage to any trees in exercising its powers under Article 41 (per Article 41(2) of the draft DCO). These are important limitations on the exercise of the Applicant's powers in relation to trees.</p> <p>The Applicant's ability to conduct authorised development is limited to the Order Limits.</p>
<p>Section 2.4.5 Tree loss in the</p>	<p>1. Recent reductions in tree cover in the local area mean that further reductions will have increasingly negative impacts.</p>	<p>The Applicant has not been made aware of local tree loss within or near to the Park and does not anticipate substantial tree loss as part of the project.</p> <p>Tree loss as a result of the project has been considered against the current condition of land crossed by the Order Limits.</p>



WR Para Ref	Point raised	Applicant response to point raised:
local context Q1		
Section 2.4.5 Tree loss in the local context Q2	<p>2.An air quality assessment has not been performed to assess the impact of the proposed tree removal.</p>	<p>This is incorrect. The ‘People and Communities’ ES Chapter 13 (Application Document APP-053) assessed air quality impacts and reviewed the conclusions of the air quality assessment outlined in Appendix 13.2 (Application Document APP-120). However, once good practice measures were applied, the air quality effects were sufficiently reduced to avoid significant impacts on human receptors, and therefore air quality effects continued to be scoped out of the assessment on community disruption within ES Chapter 13 (Application Document APP-053).</p> <p>The Applicant followed the standard assessment methodology set out within the Institute of Air Quality Management (IAQM) construction dust guidance (IAQM, 2016). The assessment for dust effects has assumed a worst case, that all trees within the Order Limits are removed.</p> <p>IAQM (2016) acknowledges that trees can provide natural shelters to reduce the risk of windblown dust (see Section 7.3). However, air quality assessments do not normally take the potential benefit of trees into account in the assessments. As, such the assessment contained with ES Appendix 13.2 (Application Document APP-120) assumes a worst case that all of the trees are removed and does not take into account any potential benefit of any existing barriers such as trees and the residual effect would remain not significant. The standard good practice measures proposed to control dust emissions do not rely on any potential mitigatory effect provided by vegetation or trees, so the assessment is sufficiently conservative in this regard. The conclusion of the air quality assessment was carried through to inform the human health assessment.</p>



WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.4.5 Tree loss in the local context Q3-4</p>	<p>3.A noise level assessment has not been performed to assess the impact of the proposed tree removal.</p> <p>4.Noise from the adjacent railway line and roads will be more audible within the park.</p>	<p>In response to point 3, noise effects were presented in the ES Appendix 13.3 (Application Document APP-121). This assessment adopted a conservative calculation approach that did not rely on any potential noise attenuation due to trees and vegetation.</p> <p>In response to point 4, the international Standard ISO9613-2 states that ‘foliage of trees and shrubs provides a small amount of attenuation, but only if it is sufficiently dense to completely block the view along the propagation path, i.e. when it is impossible to see a short distance through the foliage’. The Applicant has calculated noise attenuation using a worst-case scenario that all trees within the narrow working area would be removed, and the density of trees is as in the ISO9613-2 guidance. The calculation for tree removal indicates that there would be a reduction in screening of approximately 1dB or less for road and rail sources across 20 metres. The minimum threshold of perceptibility in outdoor environments is generally taken to be 3dB. Therefore, the removal of trees will not give rise to a perceptible increase in noise levels from road or rail.</p>
<p>Section 2.4.5 Tree loss in the local context Q5</p>	<p>5.Reduction in the park’s cooling capacity will give a smaller area for offsetting the heat of the nearby built-up town centre.</p>	<p>Given the minimal nature and the temporary nature of tree loss no impact on the park’s capacity to cool the air is expected.</p>
<p>Section 2.5 Wildlife Q1-2,6-7</p>	<p>1.The report detailing the scope and numbers of wildlife in the park is inadequate and failed to find the species which are known to live there.</p>	<p>In relation to points 1, 2 and 6, the scope of the ecological surveys was set out within Appendix 3 of the Scoping Report (Additional Submission AS-019). There was no comment on the scope of the ecological surveys raised by Rushmoor Borough Council within their Scoping response (Additional Submission AS-018). The scope of all of the ecological surveys was discussed with Natural England, which in the Statement of Common Ground confirms ‘that the scope and methods of the ecological surveys are appropriate.’</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>2. Decisions which affect wildlife in the park will be based on inadequate evidence.</p> <p>6. The impact to the wildlife and biodiversity following completion of the work has not been fully assessed.</p> <p>7. There is no detail on the planned range of replacement plants, so the impact on wildlife of any changes in planting cannot be known.</p>	<p>The reptile and bird factual reports (Application Documents APP-092 and APP-090 respectively) set out the methodology for the assessment to these species. These state that site surveys were not required as the impacts associated with pipeline installation are well understood and the good practice measures proposed were sufficient to reduce the risk of impacts to birds and reptiles.</p> <p>The Applicant's approach was confirmed in the Scoping Opinion (reference 4.1.27 in Additional Submission AS-018) which stated 'The Inspectorate agrees on the basis of the characteristics of the Proposed Development and the largely temporary nature of the vegetation removal which could affect other notable species identified, together with proposed mitigation measures to prevent killing/injuring, that effects on other notable species can be scoped out of the ES'.</p> <p>In response to point 7, the Applicant's commitment to reinstatement (G94 in Chapter 16 of the ES Application Document APP-056) covers this. This information will also be presented in the Landscape and Ecological Management Plan (LEMP), an outline of which will be submitted at Deadline 4. The LEMP must be submitted to the relevant planning authority (Rushmoor Borough Council) prior to the commencement of construction and will be secured through Requirement 8 of the DCO.</p>
<p>Section 2.5 Wildlife Q3-5</p>	<p>3. There is no commitment to avoid working during nesting and breeding seasons within the park.</p> <p>4. There is no commitment to prevent disturbance of bird nests and eggs during the project.</p> <p>5. There is no commitment to avoid the use of netting in trees and shrubs to restrict nesting.</p>	<p>Points 3 and 4 are not correct. It is a legal requirement to prevent the disturbance of birds during the nesting season and commitment G35 (Application Document APP-056) states that <i>'the assumption would be that vegetation with the potential to support bird nests would not be removed during the breeding bird season (March to August inclusive). If any works become necessary during the breeding bird season, works would be supervised by an Environmental Clerk of Works (ECoW). Appropriate protection measures would be put in place should active nests be found. These would include exclusion zones around active nests until chicks fledge or nests become inactive as determined by monitoring by the ECoW'</i>.</p>



WR Para Ref	Point raised	Applicant response to point raised:
		<p>In response to point 5, the Applicant has no intention to net trees or shrubs to restrict nesting.</p>
<p>Section 2.6.1 Drilling between Stake Lane and the play area</p>	<p>1.Documentation of directional drilling in and around the park is inadequate.</p> <p>2.It is not clear whether TC018 is the trenchless route which runs beneath the allotments and into the park.</p> <p>3.Documentation about drilling under the allotments is incomplete or not up to date.</p> <p>4.It is not possible to know which direction the trenchless route will be drilled in.</p> <p>5.Whilst temporary loss of allotments is very undesirable, prioritising the allotments, which can be reinstated in a short time over trees, which take many years to replace, is the wrong decision.</p>	<p>The Applicant is providing more detail regarding the working method in the park to the Examination Authority in ISH2-15 (Document Reference 8.20).</p> <p>In response to point 1, the Applicant can confirm that from a directional drilling perspective in the park, there are three elements associated with that activity that would impact the park. The first is the reception pit for TC018, which would be located within the area to the southeast of the park. The second is the pipe stringing out area associated with TC018, which would be strung out through the park along the alignment indicated in the sketch below Figure 1.4. The third is an auger bore for the crossing beneath the A325 (TC019 and the reception pit for this is in the north east corner of the park).</p>

WR Para Ref	Point raised	Applicant response to point raised:
		<p>Figure 1.4 Working Widths in Queen Elizabeth Park</p> <p>In response to point 2 the Applicant can confirm that TC018 is the trenchless route beneath the allotments from the drive pit located in Stake Lane.</p> <p>In response to point 3 the Applicant believes the information is clear that TC018 will pass beneath the allotments.</p> <p>In response to point 4 the Applicant can confirm that the drive pit for TC018 will be at Stake Lane.</p>



WR Para Ref	Point raised	Applicant response to point raised:
		<p>In response to point 5 the Applicant notes the objection raised, but the selection was not made solely to avoid the allotments. There are other elements including a residential property and the highway, which the directional drill is designed to avoid.</p>
<p>Section 2.6.2 Auger boring under Farnborough Road</p>	<p>1.Esso have not properly evaluated the use of a trenched crossing on the A325.</p> <p>2.Auger boring will result in major tree loss in and around the drive pit area.</p> <p>3.The Order Limits around the drive pit are large - approximately 40 x 40 metres.</p> <p>4.The entire 40x40 metre area around the drive pit will be cleared of trees.</p> <p>5.The number, age and type of trees which will be removed for the drive pit area has not been documented.</p> <p>6.Commitments to narrow working width do not apply to the working area around the drive pit.</p> <p>7.The auger boring pit is positioned very close to residential properties.</p>	<p>In response to point 1, the Applicant started with an embedded design measure to use trenchless techniques for the crossing of all trunk roads, motorways and railways. Following discussions with the Highways Authorities this measure was extended to all A roads. This is reflected in the SoCG with Hampshire County Council (REP2-027).</p> <p>In response to point 2, the Applicant has positioned the drive pit and reception pit compounds so as to reduce tree loss. The reception pit is located on the park side to reduce tree loss in Queen Elizabeth Park. The Applicant can position equipment in and around the larger trees and anticipates that vegetation clearance in both areas can be kept to a minimum. The Applicant does not need to remove all of the boundary vegetation on the A325 - only a limited access width as shown on sketch below.</p>

WR Para Ref	Point raised	Applicant response to point raised:
	<p>8. Digging and lining the pit and subsequently operating the auger boring machinery will be very noisy, dusty and disruptive for the neighbouring houses.</p> <p>9. Bringing machinery and materials to the auger boring site via the park will be noisy, messy and disruptive for residents of all houses neighbouring the route through the park.</p> <p>10. Digging a very deep pit in a public park, so close to the road and footpath is extremely dangerous to the public and wildlife.</p> <p>11. It will not be possible to prevent all public access to the drive pit area and therefore it cannot be guaranteed to be completely safe.</p> <p>12. Positioning the drive pit in the park is more damaging overall than positioning it on the other side of the road in Farnborough Hill.</p>	<p>Figure 1.5 – TC019 Layout Farnborough Road</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>13.Short-term traffic management is being prioritised over long-term tree loss.</p> <p>14.The decision to use auger boring is based on closing the whole road when the pipe could be installed by closing one lane at a time.</p> <p>15.Direction drilling has not been considered.</p>	<p>In response to points 3 and 4, the Order Limits are the maximum area the Applicant is seeking rights to work within. It is likely that the working area of the trenchless will use the majority of the area as shown in the sketch above.</p> <p>In response to point 5, the Applicant has undertaken a BS 5837 tree survey of Queen Elizabeth Park, which has identified the individual trees within the Order Limits. The results of this survey will be used to inform detailed design and will be submitted at Deadline 4.</p> <p>In response to point 6, the narrow working commitment cannot be applied to the trenchless area due to the need to ensure a safe working area, however this is a reception pit that is smaller than a drive pit and therefore requires the removal of less trees.</p> <p>In response to point 7, the working area for the trenchless installation is likely to be off set from the southern boundary and therefore away from properties due to the project's commitment to maintain access via the southern A325 footpath entrance.</p> <p>In response to point 8, the drive pit for the crossing TC019 will be located in Farnborough Hill School therefore the machinery associated with the auger bore will be located away from residential properties. A noise assessment has been undertaken, as noted above.</p> <p>In response to point 9, the Applicant can confirm that the reception pit compound for TC019 will be serviced direct from the A325 and will not utilise the park to access or deliver materials. These works could take place independently of the other works within the park and therefore the route from the southern end of the park may not have commenced when the works to TC019 are underway. The works are not interdependent. The Applicant can confirm access point work no. 8CZ will be included in the dDCO.</p> <p>In response to point 10, the Applicant has considered safety in its design and is certain safety can be maintained during construction.</p> <p>In response to point 11, the Applicant will secure all sites with secure fencing. This is secured in the COCP commitment G85 (Application Document APP-056) which states that <i>'Working areas would be appropriately fenced. The choice of fencing would be</i></p>



WR Para Ref	Point raised	Applicant response to point raised:
		<p><i>decided following a risk assessment, relevant to the work location. Specific areas such as compounds may require additional security measures such as lighting, security guards or CCTV.'</i></p> <p>In response to point 12, trenchless installation requires space on both sides of the crossing (for drilling or receiving). For an auger bore technique the larger compound is the drilling compound as it holds all the machinery to drive the auger, plus the pipe which is installed into the crossing. The Applicant has positioned the smaller reception pit within the park to reduce the impact on the park.</p> <p>In response to points 13 and 14, the Applicant acknowledges the residents' position, but the Applicant has a duty to take all factors into account, including traffic disruption and the safety of installing across major roads. On balance, the Applicant believes it is appropriate to trenchless under the A325 as this is the least disruptive solution, as opposed to open cut across the highway.</p> <p>In response to 15, the Applicant has considered using horizontal directional drilling in this location, however it would require that the drive pit would need to be located within the park and as mentioned above, drive compounds are larger than reception compounds. The reason the drive pit would need to be in the park is due to the stringing out length required for the HDD installations, which would be pulled back through the bore, and this would be located within Farnborough Hill School in order to take advantage of the open space as opposed to switching the drive compound to the opposite side and into the school which would then require a smaller reception pit in the park but an additional stringing out area in the park.</p>
<p>Section 2.7.1 Health and safety of park</p>	<p>1.The levels of noise, vibration and dust pollution which the surrounding residents will be</p>	<p>Construction noise and vibration were assessed within ES Appendix 13.3 (REP2-060). This used similar schemes to identify potential noise levels associated with typical machinery. The noise levels were mapped to identify receptors that would experience elevated noise levels. The assessment did not identify any receptors (residential and</p>



WR Para Ref	Point raised	Applicant response to point raised:
neighbours and users	subjected to has not been assessed or documented.	community properties) likely to experience significant noise or vibration effects during construction at this location. Dust has been assessed in Appendix 13.2 Air Quality Technical Note (APP-120). The assessment of dust during the construction phase has been carried out using a risk-based appraisal. The assessment of human receptors focused on areas extending up to 350m from the Order Limits. With the Good Practice Measures set out within the CoCP in place there would be no significant effects from dust on receptors.
Section 2.7.1 Health and safety of park neighbours and users Q2	2.Mitigation measures against noise, vibration and pollution have not been documented.	The Applicant does not agree with this statement. The CoCP includes a number of Good Practice Measures to reduce impacts from noise, vibration and pollution (REP2-010). Mitigation measures for noise, vibration and pollution are presented in the Register of Environmental Actions and Commitments (REAC) in Chapter 16 of the Environmental Statement (Application Document APP-056).
Section 2.7.1 Health and safety of park neighbours and users Q3-4	3.The working hours of 7am to 7pm are too long for a residential area. 4.Weekend working is not appropriate in a residential area.	In response to point 3, the Applicant has modified the core construction working hours in Requirement 14(1) of the dDCO to reduce the working hours to 8am-6pm Monday to Saturday in order to reduce potential impact. In response to point 4, the Applicant has no planned work for Sundays.
Section 2.7.1 Health and safety	5.There is no commitment to implement safety measures which will prevent the users of the	In response to point 5, the Applicant will secure all sites with secure fencing. This is secured in the COCP commitment G85 (Application Document APP-056) which state that <i>'Working areas would be appropriately fenced. The choice of fencing would be</i>



WR Para Ref	Point raised	Applicant response to point raised:
<p>of park neighbours and users Q5-8</p>	<p>remaining part of the park (both human and animal) from straying into the work area.</p> <p>6. There is no documentation on whether there will be suitable screening to prevent accident or injury to members of the public and local residents caused by flying debris.</p> <p>7. Removal of the vegetation in the Order Limits will leave neighbouring properties completely open and exposed to the work.</p> <p>8. The disturbance caused by the work in the park could displace rats from the park into neighbouring gardens and houses.</p>	<p><i>decided following a risk assessment, relevant to the work location. Specific areas such as compounds may require additional security measures such as lighting, security guards or CCTV.'</i></p> <p>In response to point 6 the Applicant has to comply with the Health & Safety at Work Act 1974, which requires the Applicant to keep everybody safe. The CoCP commitment G85 contains the measures to install suitable screening from the construction works.</p> <p>In response to point 7, the Applicant has recognised the importance of screening and stated its intention in the Queen Elizabeth Park information sheet (Appendix 2) that this will be retained. The majority of the private property and park boundary is outside of the Order Limits and the Applicant has off set the Order Limits from the boundary.</p> <p>In response to point 8, within the CoCP commitment G7 requires that the Applicant takes appropriate site layout and housekeeping measures would be implemented by the contractor(s) at all construction sites. These may include:</p> <ul style="list-style-type: none"> • preventing pest and vermin and treating any infestation promptly. This would include arrangements for the proper storage and disposal of waste produced on site; • inspecting and collecting any waste or litter found on site.
<p>Section 2.7.2 Use of heavy machinery in the park Q1,4,5</p>	<p>1. The machinery which Esso plans to use is inappropriately sized for the park environment.</p> <p>4. Esso are not willing to use smaller machinery, which would</p>	<p>In response to points 1 and 4, the Applicant has assessed the vehicles that would be required to carry out the works within the park, this is reflected in the reduction of the working areas to 5 metres and 10 metres. Machinery has therefore been considered appropriately according to this reduced width.</p> <p>In response to point 5, information on typical machinery will be included in the method statements that the Applicant will provide at Deadline 4.</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>be much less damaging to the park.</p> <p>5.The type of machinery which will be used in the park has not been specified, e.g. typical examples of make and model.</p>	
<p>Section 2.7.2 Use of heavy machinery in the park Q2-3</p>	<p>2.Speed of installation is being prioritised over limiting damage to the park.</p> <p>3.Esso have not considered techniques which could be used to remove the need for heavy machinery in the park.</p>	<p>In response to point 2, the Applicant has made the conscious decision to reduce the working width within the park, which will be a slower installation technique to reduce the impacts on the park and therefore speed of installation was not a definitive criterion.</p> <p>In response to point 3, the size of machinery is not dictating the space needed to safely install through the park.</p>
<p>Section 2.7.3 Use of the park as a haul route Q1-2</p>	<p>1.The park will be used as a haul route for vehicles accessing the drive pit area.</p> <p>2.The construction compound in the park will be used as a base for all the machinery and materials used to bore under the A325.</p>	<p>In response to point 1, the Applicant does not plan to use the route through the park to access the reception pit for the trenchless crossing – TC019 – which crosses the A325.</p> <p>In response to point 2, the Applicant can confirm that the reception pit compound for TC019 will be serviced direct from the A325 and will not utilise the park to access or deliver materials. These works could take place independent of the other works within Queen Elizabeth Park and therefore the route from the southern end of the park may not have commenced when the works to TC019 are underway. The works are not interdependent. The Applicant can confirm access point work no. 8CZ will be included in the dDCO.</p> <p>The construction compound Work no. CO 4AE would only be used for those works within Queen Elizabeth Park, including the reception pit for TC018.</p>




WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.7.4 Constructi on compound Q1-3</p>	<p>1.The gates and fencing at the entrance to the Cabrol Road car park will be removed.</p> <p>2.If the gates and fencing are removed, they will not be replaced and returned to the same or better condition than when they were removed.</p> <p>3.Pedestrian access from Cabrol Road will be prevented by the need to allow safe entry and access to the site for construction vehicles.</p>	<p>In response to points 1 and 2, the Applicant is likely to remove the gates and fencing as it is considered that this is the best way of ensuring they are not damaged. The gates and fences will be refurbished and reinstated at the conclusion of the works within the park as stated in commitment G93 and G94.</p> <p>In response to point 3, the Applicant will be installing a new pedestrian gate to allow safe public access to the park. This will be located to the northern side of Cabrol Road.</p>
<p>Section 2.7.4 Constructi on compound Q4-6</p>	<p>4.Trees surrounding the car park entrance will be removed or reduced.</p> <p>5.Trees within the area of the compound will be removed.</p> <p>6.The number, type and age of trees to be removed from the compound area has not been documented.</p>	<p>In response to point 4, the trees at the entrance to the car park would not need to be removed to allow vehicle access. The Applicant may have to undertake some small scale pruning to prevent branches being damaged.</p> <p>In response to point 5, we don't anticipate removing the trees in the compound area.</p> <p>In response to point 6, a tree survey of the intended working area (including the compound) was completed on 13 December 2019. The final tree survey report and an assessment of the trees likely to be removed will be submitted at Deadline 4.</p>



WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.7.4 Construction on compound Q7-8</p>	<p>7.The material to be used for surfacing the construction compound has not been specified.</p> <p>8.There is no commitment to reinstate the site of the construction compound after it is removed.</p>	<p>In response to point 7, this is detailed in commitment G126: Where new or additional surfacing is required on any access tracks and compound areas, these would be permeable surfaces where ground conditions allow.</p> <p>In response to point 8 the Applicant has made commitment G94: “Land used temporarily would be reinstated to an appropriate condition relevant to its previous use.”</p>
<p>Section 2.7.4 Construction on compound Q9-13</p>	<p>9.Activities in the construction compound could cause noise, dust and vibration disturbances to residents in Cabrol Road.</p> <p>10.Access to Cabrol Road and the houses along it could be restricted while the compound is in use.</p> <p>11.Cabrol road will be used as an overflow car park for the compound.</p> <p>12.HGV traffic will cause excessive disturbance to residents, particularly early and late in the day.</p> <p>13.Activities in the construction compound will attract more rats to the area.</p>	<p>Please see response to 2.7.1 for a response to point 9. The assessment covers all activity required to install the pipeline.</p> <p>In response to points 10 and 11, the Applicant has not requested any permissions to use Cabrol Road, except as a public highway. The Applicant understands that there are already parking restrictions in place along Cabrol Road.The Applicant would not park vehicles on this road</p> <p>In response to point 12, the Applicant appreciates that there will be temporary disturbance to residents of Cabrol Road. Works will not require intense HGV movements for the duration of the installation works. There is likely to be short peaks of activity and there would be staff arriving/ departing each day. Responding to feedback the Applicant has reduced the working hours to 8am-6pm, Monday to Saturday.</p> <p>Please see answer 2.7.1 for a response to point 13.</p>



WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.7.5 Alternative compound at Farnborough Hill School</p>	<p>1.The siting of the Cabrol Road compound compromises public safety.</p> <p>2.Alternative locations for the compound have not been properly evaluated.</p> <p>3.The promise to maintain access to the park will be withdrawn on safety grounds.</p> <p>4.Even if the park stays open, access via Cabrol Road will be prohibited on safety grounds.</p>	<p>In response to point 1, the Applicant has to comply with the Health & Safety at Work Act 1974, which requires the Applicant to keep everybody safe. Working areas would be appropriately fenced. The choice of fencing would be decided following a risk assessment, relevant to the work location. Specific areas such as compounds may require additional security measures such as lighting, security guards or CCTV.</p> <p>In response to point 2, the Applicant has located the compound as close as possible to the worksite to reduce the impact. Construction compounds need to be sited near to the working area, otherwise materials and equipment would need to be stored in the working width, which would conflict with the project’s narrow working commitment. The Applicant also notes there is little alternative land nearby to site the compound. The compound has been sited in the optimum location to have to minimal impact on trees and vegetation.</p> <p>In response to points 3 and 4, pedestrian and cyclist access is secured via commitment G79 (Application Document APP-056) ‘<i>Pedestrian access to and from ... community land ...would be maintained throughout the construction period.</i>’ which is secured in Requirements 6 and 7 of the dDCO (REP2-004).</p>
<p>Section 2.8.1 Duration of work Q1-4</p>	<p>1.The duration of work required from the initial reduction of park availability through to the complete restoration of the park is unknown.</p> <p>2.The timescales quoted by Esso may be working time and not total elapsed time. For example, 12 months of working could be spread over 2 years.</p>	<p>In response to points 1 and 2, the Applicant has assessed works to take place for up to two years. Its current estimate is that it may be working within the park for up to 12 months. However, this would not necessarily be continuous due to the different techniques it would be using, which require separate machinery and would have variable periods for installation. The two year period is to account for seasonal constraints, such as nesting birds and other such ecological and environmental constraints. The Applicant proposes to amend the CoCP at Deadline 4 to make clear that the two-year period that has been assessed is the maximum period the Applicant may construct in Queen Elizabeth Park.</p>

WR Para Ref	Point raised	Applicant response to point raised:
	<p>3.Quoted timescales get longer with each iteration of documentation.</p> <p>4.There do appear to be any penalties imposed for overrunning timescales, either for the whole project or at specific locations.</p>	<p>Point 3 is incorrect. Below is an extract from page 10 of the Preferred Route Consultation brochure (September 2018).</p> <div data-bbox="842 459 1682 683" style="background-color: #0070c0; color: white; padding: 10px; border: 1px solid #0070c0;">  <p>Typically, installation of the pipeline itself could take around two to three months in a local area. However, in complex areas, especially where trenchless techniques are used, this might be significantly longer.</p> </div> <p>The two-year period referred to above provides for a worst-case scenario. When the Applicant received a number of questions in April 2019, an information sheet was produced on Queen Elizabeth Park. This sought to provide information on what may be likely to happen based on professional judgement of the construction experts engaged on the project.</p> <p>How long will it take?</p> <p>Open-cut installation is less complicated than trenchless and so installation through the park would take less time than the trenchless installation techniques taking place in both the south west and south east corner of the park, as these areas are more challenging.</p> <p>Our current estimate is that we may be working within the park for up to 12 months. However, this would not necessarily be continuous due to the different techniques we would be using, which require separate machinery and would have variable periods for installation.</p> <p>In response to point 4, the Applicant is motivated to complete the construction as quickly as possible within the time constraints imposed by environmental and engineering challenges due to the cost of the staff and equipment that will be engaged in the construction phase of the project. Where the Applicant has committed to specific a time period within the CoCP (as will be the case with Queen Elizabeth Park) it will be a secured</p>



WR Para Ref	Point raised	Applicant response to point raised:
		<p>commitment and it will be a breach of the related DCO requirement (enforceable by the local authority) if the Applicant fails to comply with this commitment.</p>
<p>Section 2.8.1 Duration of work Q5-7</p>	<p>5.It is not known which section of the pipeline the construction compound will serve.</p> <p>6.It is not known how long the construction compound will be active for.</p> <p>7.Esso have not said how long it will take to construct and remove the construction compound.</p>	<p>In response to point 5, the Applicant can confirm that the construction compound in Queen Elizabeth Park – Work No. CO 4AE - will only service the installation within the park.</p> <p>In response to point 6, the compound will only be active to support the duration of the installation through the park.</p> <p>In response to point 7, the Applicant would anticipate that set up and demobilisation of the construction compound would each take in the region of three to four weeks, however there is the need to reinstate the area after the compound has been removed. And this would be seasonally dependant.</p>
<p>Section 2.8.1 Duration of work Q8</p>	<p>8.It is not clear how long the consent for tree removal lasts. For example, there is a risk that trees could be removed during maintenance activities after the installation is complete.</p>	<p>In response to point 8, the consent covers installation of the replacement pipeline. The Land Agreements (with the Council) govern future maintenance of the easement. Maintenance would not impact any trees retained during installation and the reinstatement over the easement with suitable native species.</p> <p>While the Applicant cannot account at this time for self-seeding, it points towards the management of the existing pipelines to demonstrate how it maintains sensitively within the park.</p>



WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.8.1 Duration of work Q9-10</p>	<p>9.It is unclear what scale and duration of maintenance activities are permitted after installation is complete.</p> <p>10.It is unclear whether working width and all other restrictions which are in place for the installation activities also apply to all subsequent maintenance activities.</p>	<p>In response to point 9, the Applicant will regularly monitor and maintain the pipeline and easement to ensure the safety and security of the pipeline. The permission for this is secured by the easement rights within the Deed of Grant with the landowner (the Council). This is comparable to the existing pipeline easement rights and maintenance.</p> <p>In response to point 10, access to the pipeline for maintained will be agreed with the landowner (the Council), except in emergency circumstances.</p>
<p>Section 2.8.2 Access restrictions during construction Q1,3-5</p>	<p>1.The Cabrol Road entrance to the park will be closed to the public.</p> <p>3.Access to the park for residents who usually use the Cabrol Road entrance will require a significantly longer walk.</p> <p>4.Closing the Cabrol Road car park will displace all cars to the Farnborough Road car park, which does not have a hard surface.</p> <p>5.The surface of the Farnborough Road car park will deteriorate excessively due to increased use.</p>	<p>Point 1 is covered in the response to 2.7.4 above.</p> <p>In response to point 3 access will remain open to pedestrian and cyclists.</p> <p>In response to points 4 and 5, the surface of the car park has not been raised with the Applicant before. The Applicant has secured a commitment to fully reinstate those within the Order Limits including the full resurfacing of the Cabrol Road car park</p>



WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.8.2 Access restrictions during construction Q2, 6-9</p>	<p>2.The local residents will lose the use of the park as a commuter route to the station.</p> <p>6.The reduced area of the park will become more crowded and damaged by heavier use.</p> <p>7.The park will be completely shut during the work if adequate access cannot be maintained.</p> <p>8.There will be no lit path in the park during the work.</p> <p>9.Pedestrians who use the park as a route to Farnborough North station may switch to using cars.</p>	<p>In response to points 2 and 8, there is a second well-used path that connects the Cabrol Road entrance to the A325. The Applicant has offered to upgrade the path, including lighting, if Rushmoor Borough Council deems it appropriate and would secure this through the land agreement.</p> <p>In response to point 6, the Applicant does not consider there is evidence to support this statement.</p> <p>In response to point 7 the park will remain accessible during the Applicant's works.</p> <p>In response to point 9, pedestrians have multiple routes open in this area. The existing alternative path provides a green corridor route and there are alternative road diversions pedestrians could take. A review by the Applicant has estimated that between one and four minutes would be added onto an approximate 22 to 24-minute journey time (using Prospect Road and Stake Lane as examples based on a diversion via Union Street).</p>
<p>Section 2.8.3 Negative effects on house values</p>	<p>1.Sellers are likely to have more difficulty finding a buyer.</p> <p>2.Sellers are likely to receive a lower price for their property.</p>	<p>In response to points 1 and 2, based on the Applicant's experience of owning and operating pipelines, it does not believe that the construction and operation of the replacement pipeline through land adjacent to a property would impact the sale of a property. The Applicant does not therefore consider that the circumstances for statutory blight are applicable. Landowners would still be able to enjoy and use their gardens or land and the park. The Applicant's experience with existing landowners demonstrates that there is very little to no impact on people's use of their properties as a result of having a pipeline in or near their land.</p>



WR Para Ref	Point raised	Applicant response to point raised:
<p>Section 2.9.1 Mitigation – trees Q1-2</p>	<p>1.Esso have not committed to replace any trees which they remove.</p> <p>2.Esso have not committed to how many trees will be planted.</p>	<p>In response to point 1 the reinstatement commitment (G94) secured in the Code of Construction Practice ensures the replanting of native trees, with the exception of the easement where native shrubs would be planted, which could include species such as hazel.</p> <p>In response to point 2, the Applicant does not know the exact number of trees to be planted as part of reinstatement. However, full reinstatement will be detailed in the LEMP and is secured in Requirement 12.</p>
<p>Section 2.9.1 Mitigation – trees Q3-4</p>	<p>3.There is no detail on the type or age of the replacement trees.</p> <p>4.Restrictions on where replacement trees can be planted could change the character of the park.</p>	<p>In response to point 3, while not site specific, the Applicant has stated that where possible, reinstatement of vegetation would generally be using the same or similar species to that removed (subject to restrictions for planting over and around pipeline easements) (G88). Where woodland vegetation is lost and trees cannot be replaced due to the restrictions of pipeline easements, native shrub planting approved by Esso would be used as a replacement (commitment G87, Document Application APP-056).</p> <p>Saplings would be planted as these have the lowest risk of failure. The Applicant has committed to a five-year monitoring period.</p> <p>Discussion with Rushmoor Borough Council officers has indicated that it would welcome the creation of a woodland ride, which is part of the Applicant’s Environmental Investment Programme. The Council has requested that rhododendron is removed to open the area around the existing path.</p> <p>In response to point 4, reinstatement and easement planting will complement the woodland character of the park.</p>
<p>Section 2.9.1</p>	<p>5.The commitment to tree care following the project is inadequate.</p>	<p>In response to point 5, a five-year maintenance period would be established for all mitigation planting and reinstatement, which has been reflected in the updated dDCO submitted at Deadline 3 (Document Reference 3.1(4)).</p>



WR Para Ref	Point raised	Applicant response to point raised:
Mitigation – trees Q5-6	6.The soil in the park is known to be of low quality and replacement trees may not establish well enough to grow vigorously.	In response to point 6, the species used for replanting would be selected according to their suitability to the prevailing soil conditions. These are likely to be a similar mix to those currently growing as the soil is supporting healthy growth of these tree species. The specification for planting within the LEMP would be prepared to ensure that the planting will establish successfully. During the five-year maintenance period, dead or dying trees would be replaced.
Section 2.9.2 Mitigation – path	<p>1.The existing footpath will not be reinstated.</p> <p>2.The replacement path will have no lighting or the lighting provided will be unsuitable.</p> <p>3.The path will either be un-surfaced or inappropriately surfaced.</p> <p>4.The route of the path will be moved closer to neighbouring gardens.</p>	<p>Points 1 to 3 are covered in the Applicant’s response to section 2.8.2.</p> <p>In response to point 4, the Applicant has no plans to change the location of the path as part of reinstatement.</p>
Section 2.9.3 Mitigation – screening Q1-2	<p>1.Removal of screening will leave gardens exposed, reducing privacy during and after the project.</p> <p>2.Loss of screening will decrease the security of neighbouring gardens and houses.</p>	These questions are addressed in the Applicant’s response to section 2.7.1.



WR Para Ref	Point raised	Applicant response to point raised:
	<p>3.Replacement planting will be inadequate in terms of size and density.</p> <p>4.Screening will not be immediately replaced.</p> <p>5.Residents will not be consulted about the type, size and effectiveness of any replacement screening.</p>	
<p>Section 2.9.4 Mitigation – car parks</p>	<p>1.The Farnborough Road car park does not have any additional capacity and will rapidly become unusable.</p> <p>2.Car parks will be damaged during the project and not reinstated.</p> <p>3.Any reinstatement will not be to a sufficient standard.</p>	<p>In response to points 1, 2 and 3, this issue has not been raised with the Applicant before, so it will discuss the matter with Rushmoor Borough Council at its next meeting.</p> <p>The Applicant will not damage areas outside of the Order Limits during installation and has secured a commitment to fully reinstate those within the Order Limits including the full resurfacing of the Cabrol Road car park.</p>
<p>Section 3 Alternative route suggestions Q1-3,5</p>	<p>1.Esso has not properly evaluated alternatives to routing the pipeline through Queen Elizabeth Park.</p> <p>2.A route which avoids the park was dismissed because of issues</p>	<p>In response to point 1, the Applicant developed the route in a phased process that included multiple public consultations. The park is well known to the Applicant due to the presence of its existing pipelines and it was also identified in the Open Space (planning term) Assessment (APP-132). However, Farnborough is a particularly challenging area to design a route through because of the many roads, railways and residential properties. (This is why at the first consultation the corridor split in two in this area.)</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>which have no relevance to the area surrounding the park.</p> <p>3.Esso have not fully evaluated a viable alternative route along Prospect Road and Prospect Avenue.</p> <p>5.Esso have not provided any justification for why they are unable to use directional drilling beneath Queen Elizabeth Park.</p>	<p>When considering the route that broadly followed the preferred corridor, the Applicant considered all factors and the proposal route was, on balance, selected as the preferred route, consulted upon, and confirmed as the final route before submission of the application.</p> <p>In response to points 2 and 3, there are many factors that influenced the selection of the final route. This included the crossing point of the South Western main railway line and then progressing to a suitable crossing point of the A325. The Applicant is confident that it has, on balance, selected the most appropriate route in this tightly constrained area.</p> <p>The alternative route via Prospect Road has not been previously submitted to the Applicant as part of the public consultation or pre-application. The Applicant has considered this and concludes it to be unviable for the following reasons:</p> <ul style="list-style-type: none"> • Introduction of open trench street works the full length of Prospect Road from the junction with Stake lane to the roundabout with Prospect Avenue and then along the full length until the Avenue meets the A325 is a distance of more than 1.5km. The works would have to be undertaken with carriageway closures and the traffic being controlled with traffic management. This would lead to considerable congestion to the southern section of Prospect Road where it runs beneath the railway, primarily as this short section is already controlled by traffic lights. This in turn would back up traffic on the wider road network, such as Cove Road. • At the northern end there is no viable route from the A325 junction with Prospect Avenue to ultimately end up at Ringwood Road, other than to continue with open trench street works along the A325, then crossing over at the junction where Ship Lane joins the A325. This brings the route back into the Applicant’s route down Ringwood Road.



WR Para Ref	Point raised	Applicant response to point raised:
		<ul style="list-style-type: none"> • The route would introduce a significant length of street works in a congested area. • The route would require the Applicant to work in this area for a long duration as street works are considerably slower than working in open areas. <p>In response to point 5, a detailed assessment of this is in the ISH2-15 (Document Reference 8.20).</p>
<p>Section 3 Alternative route suggestions Q4</p>	<p>4. Esso have not engaged with the community or Rushmoor Borough Council to find out whether a road-based route for the pipeline would be preferable to going through Queen Elizabeth Park.</p>	<p>The Applicant has undertaken two consultations in this area, including the statutory Preferred Route Consultation. The Applicant has also been regularly meeting with Rushmoor Borough Council since the project commenced in December 2017, including forums and one-to-one meetings with Council officers.</p> <p>The Applicant has included all consultation responses received that mentioned Queen Elizabeth Park at the end of this document (appendix 2).</p>
<p>Section 4 The project</p>	<p>1. The remaining service life of both existing pipelines has not been disclosed.</p> <p>2. Differences in materials and construction of the two existing pipelines has not been disclosed.</p> <p>3. The reason why the older pipeline can outlast the newer one has not been disclosed.</p> <p>4. The other existing pipeline which runs through the park will have to be replaced soon.</p>	<p>In response to points 1, 4 and 5, Esso is actively monitoring the multi-fuel pipeline and it is operating adequately. There is no data that supports the need to replace it in the near future and Esso has no plans to replace the multi-fuel pipeline.</p> <p>In response to points 2 and 3, the design of the existing aviation fuel pipeline included an insulated foam coating. This ensured that the hot heavy fuel oil being transported was insulated and kept warm during transportation of the fuel along the pipeline. Whilst a foam insulation is an excellent coating for a pipeline in hot product service, it is less resistant to the effects of external corrosion on the pipeline. This is why the aviation fuel pipeline needs to be replaced, while the multi-fuel pipeline (without this insulation) does not need to be replaced.</p> <p>In response to points 4 and 5, the Applicant has no plans or need to replace the other existing pipeline through the park.</p>



WR Para Ref	Point raised	Applicant response to point raised:
	<p>5.Replacement of the other existing pipeline will be undertaken as a separate project.</p> <p>6.The new pipeline will be made of materials of an inferior quality to the one which it replaces.</p> <p>7.The new pipeline will have a shorter service life than the one it replaces.</p> <p>8.The new pipeline will need more maintenance and repairs than the current pipeline.</p>	<p>Point 6 is incorrect. The pipeline will be made in line with industry standards constructed of steel, constructed with present day technology. The wall thickness is greater than British Standard PD 8010 (British Standards Institution, 2019) to provide additional long-term protection from deterioration or damage.</p> <p>Point 7 is incorrect. The ES has assessed the design life of the pipeline to be at least 60 years, but the Applicant anticipates it lasting much longer.</p> <p>Point 8 is incorrect. Maintenance of the current pipeline is increasing, which is why Esso is applying for permission to replace it. Please see the Applicant’s response to ISH3-1 from 4 December 2019 (Document Reference 8.22).</p>
<p>Section 4.2 Mapping of notable trees and tree groups</p>	<p>1.There are serious errors in the Schedule of Notable Trees.</p> <p>2.The preparation and review of the Schedule of Notable Trees was inadequate.</p> <p>3.Errors of this sort cast doubt on the accuracy of all other documents so far submitted by Esso.</p> <p>4.The Schedule of Notable Trees lists trees which are well outside the Order Limits (e.g. T46 and T47).</p>	<p>The Applicant has acknowledged that the grid references in the schedule of notable trees was incorrect, however it can confirm that the survey data held by the Applicant is correct. An amended Schedule of Notable Trees has been reissued as application document (REP2-009).</p> <p>The error in grid referencing in the application documents has no impact on accuracy of the assessment.</p>

**Southampton to London Pipeline Project
Responses to Written Representations – Other Parties**



WR Para Ref	Point raised	Applicant response to point raised:
	5.The proper co-ordinates of all tree groups and woodlands in Table 1.3 is not known.	



8 Response to Written Representations – North Surrey Green Party

Table 8.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
<p>Paragraphs 6 - 8</p>	<p>Climate Change Concerned that the project is counter to the commitment made by the government regarding carbon emission reduction and air quality, because the replacement pipeline is 12” compared to the existing which is 10” it will carry 44% more fuel than the existing pipeline, that the existing pipeline is safe and adequate and does not need to be replaced.</p>	<p>Given the need for a replacement pipeline, paragraphs 2.4.36 to 2.4.38 of the Planning Statement (Application Document APP-132) set out the decision for the replacement pipeline to be future-proofed. The diameter of the pipeline at the Fawley end of the pipeline replaced in 2001 has a diameter of 20cm. This, therefore, limits the throughput of the whole pipeline. The diameter of the replacement pipeline is a business decision taken by the Applicant. Although the increase in diameter from 10” to 12” results in approximately a 44% increase in pipeline volume, it does not mean that the pipeline would transport 44% more fuel. The increased diameter would allow the Applicant to respond flexibly to both seasonal fluctuations in aviation fuel demand and shorter-term changes in demand.</p> <p>Paragraphs 2.4.42 to 2.4.46 of the Planning Statement (Application Document APP-132) also set out the need for the pipeline to protect against potential supply interruptions elsewhere which could affect aviation fuel supplies. As noted above, the increased diameter provides additional flexibility to respond to such fluctuations. Here, the Planning Statement also references more recent work by the Department for Business, Energy and Industrial Strategy which sets out the rationale for increased resilience of fuel supplies within the UK.</p>
<p>Paragraphs 1-11</p>	<p>Existing pipeline On the basis that the existing pipeline can be operated ‘adequately’ as reported in the PEIR and the ES, there is no requirement to replace the</p>	<p>The existing pipeline is working adequately, but the need for inspections and maintenance (repair and recoating) is increasing. Therefore, the economic life of the pipeline is reaching the point where replacement is the more responsible and cost-effective course of action.</p> <p>The existing pipeline was built between 1969 and 1972. It runs from the Applicant’s Fawley Refinery, near Southampton, to the West London Terminal storage facility in the London Borough of Hounslow. This pipeline was designed differently to the other pipelines in the Applicant’s UK network, as it was originally used to transport a type of fuel oil used by large industrial sites and oil-fired power stations. The pipeline has a two-inch foam coating to</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>pipeline. Therefore, there is no justification for the project.</p> <p>The limits oil reserves are likely to reduce the use of the pipeline before its design life has expired, together with a need to reduce the reliance of carbon fuels in the Government commitment of carbon emission, the pipeline is not justified.</p>	<p>keep the product warm. This coating is the ideal coating for a pipeline in hot product service but less ideal for protection against external corrosion when in cold service</p> <p>This type of oil had to be heated to 50°C to enable it to flow through the pipeline. During the 1980s, when natural gas became more widely available in the UK, the need for this type of heavy fuel dwindled. With the growth of air travel, the pipeline was then used to transport aviation fuel.</p> <p>In addition, the Applicant has discounted an option to replace the pipeline in sections as the environmental impacts of this option were considered to be greater than the replacement of the pipeline under a DCO. The existing alignment, for example, passes through areas of ancient woodland that have been designated since consent was given for that line.</p>
<p>Paragraphs 1-3</p>	<p>Use of Road tankers instead of the replacement pipeline</p> <p>This option is based on a false assumption that the existing pipeline would cease to function, as stated above the existing pipeline continues to function adequately.</p>	<p>As detailed above, the existing pipeline is nearing the end of its economic life, inspection and maintenance is increasing, the maintenance regime is becoming increasingly intrusive both for local residents and environmentally. As with many aging assets there comes a point at which it is more efficient and sensible to replace than to maintain.</p> <p>Without a replacement pipeline, the aviation fuel could be transported by road in tankers, as assessed in the Assessment of Alternatives section in Chapter 4 of the Environmental Statement (Application Document APP-044).</p> <p>Transportation of fuel by pipeline has been established as the safest and most efficient method.</p>
<p>Paragraphs 1 - 7</p>	<p>New 12" pipeline</p> <p>Concerned that the increased capacity of the new 12" pipeline</p>	<p>The replacement of the pipeline is required for operational reasons and is not connected to any other development, including the proposed expansion of Heathrow Airport.</p> <p>The diameter of the replacement pipeline is a business decision taken by the Applicant, the increased diameter allowing the Applicant to respond flexibly to both seasonal fluctuations in aviation fuel demand, and shorter-term changes in demand. From an</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>and that this could operate alongside the new pipeline.</p>	<p>environmental, engineering and practical perspective there is no difference between the installation of a 25cm diameter pipeline and a 30cm diameter pipeline.</p> <p>The Applicant can confirm that the replacement pipeline cannot operate alongside the existing pipeline as it is a physical impossibility for the Applicant to operate both lines concurrently. The section of the existing pipeline that would be abandoned would be physically disconnected prior to welding in the new replacement pipeline section. There would be no pathway for fuel to enter the abandoned section of the existing pipeline. Therefore, both pipelines cannot be operated concurrently.</p>
	<p>Removal of Vegetation</p> <p>Environmental impact of the construction of the new pipeline, removal of mature trees and vegetation and then burnt resulting in an environmental impact from the loss of the trees and additional carbon emissions.</p>	<p>The Applicant has carried out an Environmental Impact Assessment as reported in the Environmental Statement (ES). The impact of the pipeline on trees and hedgerows is reported in the ES. Tree and vegetation clearance and good practice measures include:</p> <p>G87: <i>'Vegetation clearance, retention, protection and replanting/reinstatement drawings would be produced prior to the construction phase. The contractor(s) would implement these plans including agreed mitigation where practicable.'</i> This would be secured by DCO Requirements 8 (Hedgerows and Trees) and 12 (LEMP).</p> <p>G88: <i>'Where possible, reinstatement of vegetation would generally be using the same or similar species to that removed (subject to restrictions for planting over and around pipeline easements).'</i> This would be secured by DCO Requirements 6 (CEMP), 8 (Hedgerows and Trees) and 12 (LEMP).</p> <p>G97: <i>'Where woodland vegetation is lost and trees cannot be replaced due to the restrictions of pipeline easements, native shrub planting approved by Esso would be used as a replacement.'</i> This would be secured by DCO Requirements 5 (CoCP) and 12 (LEMP).</p>



WR Para Ref	Point raised	Applicant's response to point raised:
		<p>In the Code of Construction Practice (CoCP) (REP2-010), commitment G18 states, <i>'Bonfires and the burning of waste material would be prohibited.'</i> Therefore, the Applicant is committed to ensuring the responsible reuse or disposal of all waste materials including any timber from the removal of trees and vegetation in agreement with the landowner.</p>
	<p>Residential Amenity Impacts on residential amenity and local businesses from construction particularly on Woodthorpe Road and Ashford Station</p>	<p>The Applicant has adopted good practice measures to manage these impacts on local residents and businesses and, therefore, does not anticipate any significant impacts as set out in ES Chapter 13 People and Communities (Application Document APP-053).</p> <p>As regards compensation, to the extent that the losses described in the written representation are compensatable as a matter of law in accordance with the Compensation Code, those losses would be recoverable and the draft DCO does not seek to (nor would it be lawful to) exclude their recovery.</p>
	<p>Inspections and Testing Concern about the robustness of the new welds on the pipeline and the safety of the method for testing these welds using radiography.</p>	<p>Prior to commissioning the pipeline every weld would be tested using Non-destructive Techniques to ensure that the quality standard meets design and project specification minimum quality requirements.</p> <p>These techniques include Automated Ultrasonic Testing and radiography.</p> <p>If radiography is utilised, strict safety rules are imposed and constant monitoring is carried out to ensure that at no time are members of the public or the workforce subjected to radiation exposure, in accordance with the Ionising Radiation Regulations 2017. This is a legal requirement enforced by the HSE. Records are maintained and the process is regularly audited by an independent auditor and the Applicant to ensure that the safety processes are being strictly applied.</p> <p>The pipeline then undergoes a full pressure test with water to confirm weld robustness before being commissioned into aviation fuel service.</p>



9 Response to Written Representations – Celia Crescent Resident Group (TW15)

Table 9.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
N/A	<p>Proposed route</p> <p>Lack of justification for the replacement pipeline. Proposed route is inappropriate and will cause disruption.</p> <p>Q: Provide a detailed explanation of</p> <ul style="list-style-type: none"> i) Why the new pipeline is required ii) The justification for the proposed route around Celia Crescent iii) Why Thames Water were told in the initial consultation period that the line would run under Queen Mary Reservoir and why the pipeline was not routed along the North East side of Queen Mary Reservoir where the existing pipeline is, and which 	<p>Requirement for replacement pipeline</p> <p>The existing pipeline is working adequately, but the need for inspections and maintenance (repair and recoating) is increasing. Therefore, the economic life of the pipeline is reaching the point where replacement is the more responsible and cost-effective course of action.</p> <p>The existing pipeline was built between 1969 and 1972. It runs from the Applicant’s Fawley Refinery, near Southampton, to the West London Terminal storage facility in the London Borough of Hounslow. This pipeline was designed differently to the other pipelines in the Applicant’s UK network, as it was originally used to transport a type of fuel oil used by large industrial sites and oil-fired power stations. The pipeline has a two-inch foam coating to keep the product warm. This coating is the ideal coating for a pipeline in hot product service but less ideal for protection against external corrosion when in cold service.</p> <p>Justification for route near Celia Crescent</p> <p>The Applicant balanced environmental, engineering, planning and social/community concerns. At Statutory Consultation the Applicant received representations regarding the proposed route for the pipeline along Celia Crescent, (Application Document APP-038). As a result, the Applicant reviewed the proposed route options from Laleham to the Staines Bypass. At Design Refinement Consultation the Applicant consulted upon a new option to route the pipeline along Ashford Rd and into Fordbridge Park. This did not route the replacement pipeline along Celia Crescent, but did include Celia Crescent as an access for construction vehicles to Fordbridge Park. As outlined in Section 12 of the Applicant’s Responses to Relevant Representations (REP1-003).</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Thames Water have not opposed.</p>	<p>The Applicant will explore with Surrey County Council the potential to access the works at the west end of Fordbridge Park from Woodthorpe Road in accordance with the Action Point ISH2-37.</p> <p>Alternative routes</p> <p>There has never been an option to route under Queen Mary Reservoir, the route option was to run alongside the western side of the reservoir embankment. The longlisted corridors can be seen in Figure 4.2 for Chapter 4 of the ES (Application Document APP-060).</p> <p>There was a suggestion made at the Design Refinements Consultation from the public for an alternative route travelling east around the Queen Mary Reservoir. The Applicant did not take this alternative forward. See Section 16 of the Design Refinements Consultation Summary Report, Appendix 6.18 of the Consultation Report (Application Document APP-037).</p> <p>The Applicant would also point out that the existing Esso pipeline is not to the east of Queen Mary Reservoir as suggested but rather is to the west of the reservoir.</p>
<p>N/A</p>	<p>Inadequate consultation</p> <p>The use of Fordbridge Park as a working area and Celia Crescent as an access route was not formally identified within the Design Refinements consultation or mentioned at a meeting held 24 January 2019 with residents and councillors.</p>	<p>The Applicant's aim during consultation was to provide a proportionate level of detail, including in the consultation materials and events. It did not include specific details of the working area within Fordbridge Park, the wider Order Limits at the west end of the Park are to accommodate the equipment required to undertake the trenchless crossing beneath Staines Bypass and across Woodthorpe Road. This area is allocated for the sole purpose of trenchless crossing.</p> <p>Further, the access route to the working area for the trenchless crossing of the Staines Bypass (A308) via Celia Crescent was part of sub-option H1a (which was consulted on at</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Q: Provide an explanation of why the information about the use of the park and access from Celia Crescent was not included in the public consultation or mentioned in the meeting.</p>	<p>the Preferred Route consultation (Statutory Consultation) in autumn 2018). This part of the route was then retained as part of the refined route. It was not added at a later stage.</p> <p>The meeting held on 24 January 2019 focused on the routing of the pipeline, including technical and safety considerations. Attendees did not discuss details as part of this meeting.</p>
<p>N/A</p>	<p>Withholding information from residents</p> <p>Following correspondence with residents, the Applicant created an information sheet to explain its proposals in the area and committed to sharing it with residents via post.</p> <p>Q: Provide an appropriate explanation of</p> <ul style="list-style-type: none"> i) Why it took nearly two months to produce the information sheet? ii) Why Esso did not keep its promise to ensure every resident of Celia Crescent was sent a copy of the information sheet? 	<p>The Applicant created an information sheet regarding route development in Celia Crescent (see appendix 5)), which was published on the project website (www.slpproject.co.uk) in April 2019. This was created in response to questions received from residents in the area.</p> <p>As with all publicly available project materials, the information sheet was drafted with input from technical experts across engineering, environment and planning disciplines. It also required the creation of new maps and graphics to help people understand the information.</p> <p>The Applicant shared the information sheet via post with residents along the sections of Celia Crescent who would be affected by the use of the gate (numbers 9-36, 7A and 7B, and 1-4 Celia Court) on 30 April 2019. This was to avoid causing any confusion to those residents on the sections of Celia Crescent who would not be affected by the use of the gate.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
N/A	<p>Working area description</p> <p>Lack of concise technical description of the working area for the trenchless crossing of the Staines Bypass.</p> <p>Q: Provide a concise technical explanation with the details of the infrastructure, logistics, personnel and timescales required to build, operate and decommission the proposed facility (working area for trenchless crossing in Fordbridge Park).</p>	<p>At this stage of the project development, the Applicant is only able to estimate the working areas and the durations. The working area for the trenchless crossing from Fordbridge Park (TC039) would potentially be required for approximately three months. On average, there would be 10 operatives working from the drilling site over the duration of the drilling works.</p>
N/A	<p>Access to depot/working area</p> <p>Lack of clarity from the Applicant on the reasons for using the access gate at the end of Celia Crescent when there are suitable alternative access points.</p> <p>Q: Provide a detailed explanation to justify the use of the gate on Celia Crescent.</p> <p>Q: Provide an explanation to address why the gates on</p>	<p>At the Issue Specific Hearing on the 4 December 2019 Action Point 37, the Applicant agreed to reconsider access to the Park from Woodthorpe Road. The Applicant will consult with both Spelthorne Borough Council and Surrey Highways Authority and will report progress to the Examining Authority through Statements of Common Ground (Document Reference 8.22).</p> <p>In relation to points 1, 2, 3, 5 and 7 in the email from Celia Crescent Written Representation, Appendix A sheet 16. Would be addressed through the Construction Traffic Management Plan (CTMP). An Outline of the CTMP will be submitted to the Examining Authority at Deadline 4.</p> <p>In relation to points 4, 6 and 10 in the email from Celia Crescent Written Representation, Appendix A sheet 16. Would be addressed in the detailed Construction Environmental</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Woodthorpe Road and Kingston Road are not being utilised.</p> <p>Q: Provide answers to the previously submitted questions in Appendix A p16.</p> <p>Q: Explain the volume and type of vehicles that will be accessing the park via the gate on a daily basis and for the duration of the building, commissioning, operation and decommissioning of the site.</p>	<p>Management Plan, under requirement 6 of the draft DCO and which will be approved by the local planning authority (Spelthorne).</p> <p>The remaining points along with other installation-related details will be taken into account at the next stage of the project.</p> <p>Typically, there would be an average of approximately six vehicle movements per day through Celia Crescent, comprising vans bringing operatives to the worksite, delivery of tools and road tankers to transport drilling fluid. The largest amount of construction traffic would be at the beginning and end of the drilling period and this would be approximately 10 vehicle movements over a four-day period at the beginning and end of the drilling operation. The drilling rig would be delivered to site on a vehicle similar in size to refuse collection trucks.</p>
<p>N/A</p>	<p>Parking within Celia Crescent</p> <p>Lack of detail about the number of vehicles requiring access and where they will park.</p>	<p>Vehicles would park within the temporary drilling worksite within the park itself. Construction vehicles above for both the open cut and trenchless operations would not park within Celia Crescent, they would use the existing public car park within Fordbridge Park.</p>



10 Response to Written Representations – Windlesham Parish Council

Table 10.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
<p>Paragraph 2</p>	<p>Inadequate consultation Lack of consultation on final route in the area – should have included the amendment as a material change.</p>	<p>Paragraph 9.3.15 of the Applicant’s Response to Relevant Representations (REP1-003) outlines the Applicant’s justification for the minor modification in Turf Hill. In brief, the route selection in this area did not introduce new landowners and did not introduce different potential impacts to the community or the environment than the proposals the Applicant had previously consulted upon.</p> <p>For this reason, the Applicant did not consult on the minor modification in Turf Hill during the Design Refinements Consultation (second statutory consultation).</p>
<p>Paragraph 3</p>	<p>Sub-option selection Lack of justification of why sub-option F1a (with an amendment) was selected. Alternative mitigation methods questioned and explored.</p>	<p>The Applicant does not contend that it would not be possible to relocate sand lizards in the vicinity of Turf Hill to another location and this did not form an integral part of the balancing exercise undertaken by the Applicant in alighting upon the chosen route. Rather, the Applicant took the view that, in weighing environmental matters as part of the route selection process, the highest form of environmental mitigation would be to avoid a route which impacted directly upon optimal habitat for sand lizard.</p> <p>It is also relevant to note that the Applicant does not believe that the use of vegetation clearance (habitat manipulation) to displace sand lizards in areas of hibernation and breeding habitat would be unacceptable to Natural England and this has been highlighted in the Draft Rare Reptiles EPS Licence Application (Application Document APP-100).</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Paragraph 4</p>	<p>Lack of communication and engagement</p> <p>Esso did not inform Lightwater councillors or residents about the variation to the route.</p>	<p>The Applicant sent a letter to the clerk for Windlesham Parish Council at the launch of the Design Refinements consultation on 21 January 2019. This included a link to the consultation brochure. Details of the minor modification in Turf Hill could be found on page 8 of Appendix 6.2 Design Refinements consultation brochure (Application Document APP-037).</p> <p>Further, the same letter and link to the consultation brochure were also sent to the following:</p> <ul style="list-style-type: none"> • MP for Surrey Heath Constituency • Councillor for Lightwater, West End and Bisley Ward • Councillors for Lightwater Ward • Councillors for West End Ward • Clerk for West End Parish Council
<p>Paragraphs 5 and 6</p>	<p>Loss of trees and habitat</p> <p>Concerns about loss of a significant number of trees and questions about mitigation.</p>	<p>The Applicant is not expecting to remove all trees within the Order Limits. The Applicant cannot yet confirm the number of trees that would need to be removed because the detailed construction planning necessary to determine the precise location of the replacement pipeline is not required to support the application for development consent. In commitment NW22 in Chapter 16 Environmental Management and Mitigation (Application Document APP-056) the Applicant also states that '<i>Working width reduced to 15m to reduce impacts to woodland at Turf Hill over an approximate distance of 888m</i>'.</p> <p>The trees within the residential properties are outside of the Order Limits and therefore the Applicant is not seeking powers to remove these trees.</p> <p>The Applicant notes the location of the Affinity Water watermain and its easement along the rear of the properties. This would provide a 3m buffer in which the Applicant cannot</p>



WR Para Ref	Point raised	Applicant's response to point raised:
		<p>place the pipeline. Therefore, given the location of the residential property boundaries, the watermain offers additional distance away from these trees for the excavation of the pipeline trench, further reducing the likely impact on the trees.</p> <p>In addition, commitment G88 in Chapter 16 Environmental Management and Mitigation (Application Document APP-056) states that <i>'Where possible, reinstatement of vegetation would generally be using the same or similar species to that removed (subject to restrictions for planting over and around pipeline easements'</i>. Further, commitment G97 in Chapter 16 Environmental Management and Mitigation (Application Document APP-056) sets out that <i>'Where woodland vegetation is lost and trees cannot be replaced due to the restrictions of pipeline easements, native shrub planting approved by Esso would be used as a replacement'</i>.</p> <p>Further details regarding the Applicant's response in relation to the wider benefits of trees can be found in the responses to relevant representations (REP1-003).</p>
<p>Paragraph 7</p>	<p>Flood risk Request for assurances that mitigation measures would be effective.</p>	<p>The Risk of Flooding for Surface Water mapping shows that Colville Gardens is at risk of flooding from surface water. This mapping shows flood risk associated with a watercourse that flows from the south via a culvert beneath Red Road towards the western end of Colville Gardens.</p> <p>As noted above, the Applicant is only intending to remove a small number of trees at this location. In the case of Turf Hill, removal of trees would not change the nature of the ground surface, and the ground would remain permeable.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
<p>Paragraph 8</p>	<p>Disruption during construction Concerns about noise, dust and air pollution, disruption and traffic congestion.</p>	<p>The Applicant recognises that there would be some disruption to the community during construction. The Applicant is committed to managing these impacts through the good practice measures set out within the Code of Construction Practice (REP2-010) and the outline CEMP (Application Document APP-129).</p> <p>The Applicant is working with Surrey County Council Highways Department to integrate the construction works into their established works planning through the South East Permitting Scheme, in order to reduce traffic congestion and disruption on the local network. The Applicant has agreed to produce an outline Construction Traffic Management Plan (CTMP) for Deadline 4. The contractor(s) would then implement measures within the CTMP as set out in commitment G110.</p>



11 Response to Written Representations – Woodland Trust

Table 11.1: Applicant’s response to Written Representation

WR Para Ref	Point raised	Applicant’s response to point raised:
N/A	<p>Ancient Woodland</p> <p>The Woodland Trust state that the proposed development is likely to impact on numerous areas of ancient woodland provided in a table. They recommend that the Applicant follows the Natural England Standing Advice on the project with regards to buffer zones around ancient woodland.</p>	<p>The Applicant has submitted a Technical Note on Ancient Woodland and Veteran Trees to the Examining Authority at Deadline 2 (REP2-061). This is based on the Natural England and Forestry Commission Standing Advice (2018) and sets out the mitigation principles for each area of ancient woodland adjacent to the Order Limits.</p> <p>All of the ancient woodlands listed within the Woodland Trust Written Response are included within the Technical Note on Ancient Woodland and Veteran Trees (REP2-061). Natural England and the Forestry Commission have agreed to the approach set out within the Technical Note for mitigating effects on Ancient Woodland and potential ancient woodland, as outlined within their Statements of Common Ground.</p> <p>The Applicant will include the technical note and the actions within it within the Outline LEMP submitted to the Examining Authority at Deadline 4. The LEMP would be secured through DCO requirement 12.</p>
	<p>Veteran Trees</p> <p>The Woodland Trust state that the route will impact four veteran trees recorded on the Ancient Tree Inventory (197352, 197341, 193108 and 193090) either through direct loss of specimen or through impacts to the root protection area (RPA). They recommend that the Applicant follows the Natural England</p>	<p>Since the publication of the Environmental Statement in May 2019, three veteran trees within 15m of the Order Limits were added to the Ancient Tree Inventory in May 2019. These are located along Ashford Road, Staines (ID 193108, 193090 and 194703).</p> <p>Two further veteran trees (197352 and 197341) were added to the Ancient Tree Inventory in November 2019 and are located at Queen Elizabeth Park, Farnborough. These trees fall within notable tree group W67, shown on Figure 10.3 (Sheet 9 of 14) in the Environmental Statement (Application Document APP-064)</p> <p>The Applicant has submitted a Technical Note on Ancient Woodland and Veteran Trees (REP2-061) based on the Natural England and Forestry Commission Standing Advice (2018). This sets out the proposed mitigation for each veteran tree within 15m of the Order Limits.</p>



WR Para Ref	Point raised	Applicant's response to point raised:
	<p>Standing Advice on the project with regards to RPAs for veteran trees.</p>	<p>Natural England and the Forestry Commission have agreed to the approach set out within the Technical Note for mitigating effects on veteran trees, as outlined within their Statements of Common Ground.</p> <p>As set out above, the Applicant will include the technical note and the actions within it within the Outline LEMP submitted to the Examining Authority at Deadline 4. The LEMP would be secured through DCO requirement 12.</p>
	<p>Nation Planning Policy Reference to National Planning Policy Framework paragraph 175 and National Policy Statement for National Networks paragraph 5.32.</p>	<p>The Applicant wishes to highlight that this project falls under National Policy Statements EN1 Overarching Energy and EN4 Oil and Gas Supply and Storage and the Planning Statement (Application Document APP-132) demonstrates accordance with these policies.</p>



12 References

Natural England and Forestry Commission (2018). Ancient woodland, ancient trees and veteran trees: protecting them from development. Accessed December 2019. <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>



Appendix 1: FAQ John Thorne Queen Elizabeth Park - SLP Project

Date: 11/04/2019 [12:08 BST]
From: info@slpproject.co.uk
To: [REDACTED]
Subject: FAO John Thorne: Queen Elizabeth Park - SLP Project

Hi John

As discussed with Chris from my team, this email is to provide more context regarding the open space matter we'd like to discuss with the council. As you'll be aware, we've now released our final route for the Southampton to London Pipeline.

As part of our application for development consent we have to consider the project's likely impact on key open spaces along the route. The Queen Elizabeth Park is clearly one of these spaces.

We are aware that our Order Limits within the Park cover the existing play area (NEAP), near Cabrol Road. Our understanding is that this facility is well used and that there isn't a nearby alternative in this part of the Borough. The installation of the pipeline will result in the removal of this play area for a temporary period. The project will provide a commitment within the Development Consent Order to reinstate the play area in full once installation is complete. The project would like to confirm that the Borough is aware of this and if there are any further comments from the Borough on this matter.

We are more than happy to meet with any member of the Council to discuss this matter.

Many thanks

Philippa Garden
Head of Engagement



Appendix 2: Queen Elizabeth Park Information Sheet

Queen Elizabeth Park, Farnborough

This information sheet sets out our proposals for the replacement underground pipeline route through Queen Elizabeth Park in Farnborough. This is part of our application for development consent for the full 97km of replacement pipeline, which is currently (October 2019) being examined by the Planning Inspectorate.

Why are we replacing the pipeline?

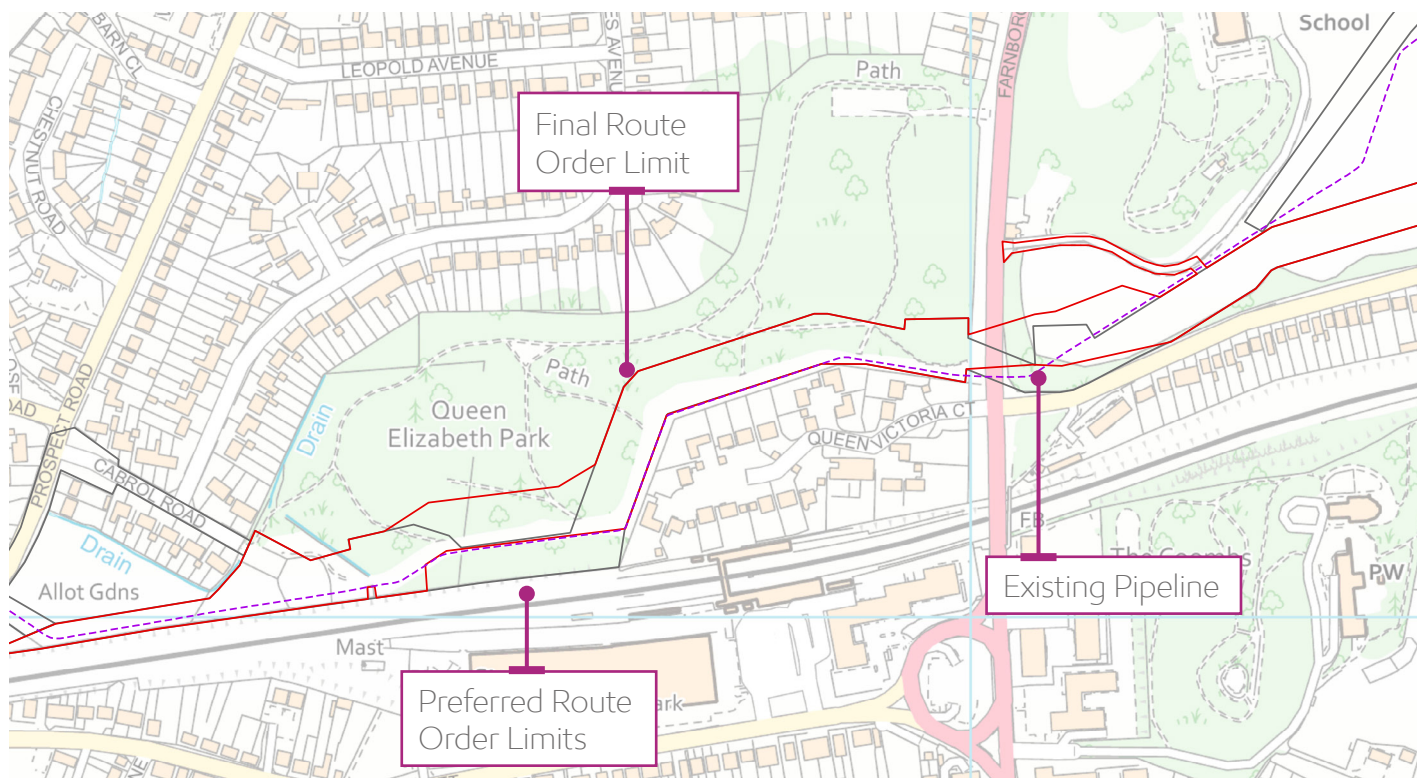
The existing pipeline was built between 1969 and 1972, and currently runs through the park. It is working adequately, but the need for inspections and maintenance is increasing. It is just like your car: you reach a point where it makes more sense to replace it.

Route development

Farnborough is one of the most complex areas on our route. In developing the route, we have considered many factors such as public open spaces, wildlife and habitats, protected sites, private property, railways, and roads. Following extensive public consultation, we have selected a route that balances the environmental and community aspects in this residential area.

At the Preferred Route Consultation in September/October 2018, we consulted on a route which broadly follows the existing pipeline and footpath – travelling along the southern edge of Queen Elizabeth Park.

Consultation feedback highlighted the importance of the trees within the park. In response, we made a project commitment to narrow working through the park. This means we would only use a maximum of 15 metres width within the 30 metre Order Limits (Order Limits are the outer limits for the project and define the area we are seeking permission to use). The final route in our application is mostly the same as at statutory consultation, except for a very minor tweak at the south west boundary, which enabled us to make a commitment to narrow working.



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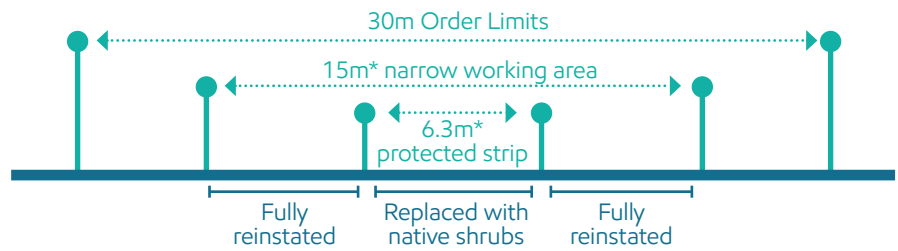


Southampton to London
Pipeline Project

For more information please visit
www.slpproject.co.uk

Installing through the park

We plan to use a trenchless technique, such as a directional drill, to install from Stake Lane to the western end of Queen Elizabeth Park, as this would enable us to maintain the flow of traffic along Prospect Road during installation and avoid the allotments.



* The 15m working area and 6.3m protected strip may be placed anywhere within the 30m Order Limits and is dependent on local features.

The drill pit would be tucked in the corner of the park, with a construction compound placed behind the car park to keep materials and equipment safe. The works in this area would require the temporary suspension of the car park and the temporary removal of the children's play area to create a safe working area and support installation through the park.

From this south west corner we would use open-cut trench techniques to install the pipeline along the southern boundary of the park, with the aim of installing near to the existing pipeline and near to the path.

As the route meets the south east corner of the park, there would be a drill pit to enable trenchless installation under the A325 to reach the grounds of Farnborough Hill School, reducing the impact of installation on the wider community. We would maintain safe pedestrian and cycle access from Cabrol Road to the A325 by providing a diverted path to the north of the route.

Our application – what we've asked for

We are seeking permission to install a 30cm steel pipeline within an area defined by our Order Limits. This area is typically 30 metres wide for the project. However, to reduce the impact on trees we have committed to only using a maximum 15-metre-wide working area for the open-cut installation within the park.

- To reduce impacts on trees we would try to install near the path, which broadly follows the existing pipelines.
- We are committed to full reinstatement following installation, with native shrubs being planted within the six-metre-wide protective strip over the pipeline. The reinstatement of the car park would include resurfacing.
- We are committed to replacing the children's play area and, with the agreement of the Council, providing a temporary play area during installation.
- We intend to maintain access for pedestrians and cyclists through the park by facilitating a path through the northern section of the park.
- We have committed to trenchless installation under the A325 and Prospect Road.
- We have included a temporary compound in the park to facilitate installation within the park.
- We would communicate works in advance to the community and park users, and this would be part of our community liaison plan commitment.

How long will it take?

Open-cut installation is less complicated than trenchless and so installation through the park would take less time than the trenchless installation techniques taking place in both the south west and south east corner of the park, as these areas are more challenging.

Our current estimate is that we may be working within the park for up to 12 months. However, this would not necessarily be continuous due to the different techniques we would be using, which require separate machinery and would have variable periods for installation.

After installation

We would only fence off areas within the park while they are needed for installation. After this, we would start to return the area to a suitable park environment. A new playground would be installed, the path reinstated and native trees planted to replace those we have removed, where possible.

In the six-metre-wide protected strip of land above the pipeline, we would plant smaller native shrubs. We do this to restrict what can take place within the strip of land that lies over the pipeline, in order to prevent damage to the pipeline once it has been laid.

Once the pipeline has been installed, people would be able to use the park as before with no impact from the pipeline's day-to-day operation.

Trees

We have committed to using a maximum working width of 15 metres in Queen Elizabeth Park to reduce impacts on the park and trees. This commitment can be found in Chapter 16 of our Environmental Statement submitted as part of our application for development consent.

Our aim is to avoid removing trees where possible. We cannot yet confirm the exact number of trees we may need to remove because the detailed construction design takes place after our application has been submitted and much nearer the start of installation – which we expect to start in 2021.

Environmental Investment Programme

We are working with Rushmoor Borough Council to agree on a number of voluntary environmental investment activities, over and above the reinstatement that we have already committed to do. We have discussed with the Council a proposal to improve the woodland trail within the park by planting wildflowers along the six-metre-wide protected strip.

Next steps

The application process is now being managed by the Planning Inspectorate and the latest updates about our application can be found at: <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/southampton-to-london-pipeline-project/>

You can view our interactive map of the route at: www.slpproject.co.uk

We are still on hand to answer your queries about the project and you can get in touch with us on the below details.

✉ info@slpproject.co.uk

☎ 07925 068 905





Appendix 3: Responses to Consultation Regarding Queen Elizabeth Park

Responses to consultation regarding Queen Elizabeth Park, Farnborough

Corridor Options Consultation

Member of the public

User ID 347 – 17/04/2018

Specific concern is that the existing route through Queen Elizabeth Park in Farnborough should be followed - NOT the alternative diverting along Prospect Road which will lead to severe traffic disruption. Feel free to clear as much Rhododendron and birch trees as you like - which have grown since the original pipe was installed here BUT no mature Beech, Oak or Chestnut trees should be felled or compromised.

Preferred Route Consultation

Prescribed consultee – Thames Water

User ID 100292 – 26/10/2018

SU8656 450mm gravity surface water sewer 450mm internal diameter gravity located at 1.3m deep surface water sewer located between the Allotment Gardens and Queen Elisabeth Park 486466 156010

Local authority – Rushmoor Borough Council

User ID 335032 – 22/10/2019

Queen Elizabeth Park

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

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

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

Member of the public

User ID 331408 – 15/10/2018

Area of concern:

Pipeline section through Queen Elizabeth Park in Farnborough, particularly the section along the rear boundary of [redacted].

Issues:

Working width required during installation
Loss of trees during pipeline installation
Loss of trees and bushes providing screening between our garden and the park
Permanent change in view from our house and garden into the park
Permanent changes allowing direct unobstructed views from the park into our house and bedrooms
Change in character of the park for the local community who use it (during and after installation)

Details:

Queen Elizabeth Park is unique within Farnborough: 24 acres of woodland in the centre of an urban area which provides a quiet and peaceful space for local residents to walk, exercise their dogs, play and get away from the surrounding noise. It is one of the few places in the area where it is possible to completely get away from the traffic noise of the surrounding roads. There are numerous large mature trees giving a mostly unbroken canopy over the entire area. According to Hampshire Gardens Trust, it is of local heritage merit.

Our back garden backs directly onto Queen Elizabeth Park. The fact that our garden backs onto woodland is a major reason why we chose this house.

A path in the park runs parallel to our rear boundary. Between this path and our rear fence there are trees and bushes which provide screening and privacy. On the far side of the path are numerous large trees.

We believe the existing pipeline is located somewhere between the path and our rear fence.

We understand the proposal is to install the new pipe a few metres further into the park than the existing pipe. The stated working width of 20 metres is not available anywhere along this path.

Installing the pipe through Queen Elizabeth Park will inevitably result in the loss of trees and bushes and we really wish that this were not necessary. Ideally, all trees on the far side of the path could be retained to protect the environment and to reduce the social impact of the project.

However, if the pipeline must run through the park along the currently indicated route, we would strongly request that the trees and bushes between the path and our garden are not disturbed, reduced or removed in any way.

Losing trees will affect views into and out of the park. Even if trees are replanted, the seclusion and privacy of our garden will never be the same again for all the time we are likely to be in our house.

Comments on Preliminary Environmental Information:

7.3.29 of the Preliminary Environmental Information Report claims that the preferred route has been developed to avoid vegetation where possible but from our perspective this does

not seem to be true. It seems as if the route has been chosen to follow the existing pipeline as closely as possible, regardless of how many trees may be affected.

The Preliminary Environmental Information Report does not mention any particular care being taken or any specific installation techniques being used in the Queen Elizabeth Park section in Farnborough.

The working width of 20 metres is not available anywhere in Queen Elizabeth Park without losing a large number of trees. Even a reduced working width looks difficult to accommodate at almost any point within the park, on the assumption that the extent of a tree's branches indicate the extent of the roots.

Section 7.3.26 of the Preliminary Environmental Information Report mentions that replacement planting of trees along the route would decrease the impact in the medium to long term. The size and age of the trees in Queen Elizabeth Park means that it will be many generations before the replacements grow to the same size. None of us will live to see this, so the impact is permanent as far as we are concerned.

Member of the public

User ID 328308 – 18/09/2019

The play area in Queen Elizabeth Park is fairly new and was installed in the 10 years we have lived in Stake Lane. It would be a shame to have to rip it out and have to replace it. There is also a pond in this park which is not even mentioned in this document as a wildlife area.

Design Refinements Consultation

Local authority – Rushmoor Borough Council

User ID 337761 – 22/02/2019

Rushmoor is heavily urbanized and contains few semi natural habitats or open spaces. This project will disrupt a number of these sites temporarily with some of the proposals leading to the loss of trees, which will have a more permanent impact. I would like to meet with the team to discuss the issues below and agree avoidance and/or mitigation measures and a scheme to ensure biodiversity gain within Queen Elizabeth Park, Southwood Country Park SANG and along the green routes within the borough.

Queen Elizabeth Park

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

I am concerned that within the site visit ESSO appeared unwilling to consider providing anything outside the red line on this site. The significant loss of trees will not be mitigated for many years and the lack of natural habitat within Rushmoor means that this project will cause the loss of a significant percentage of natural habitat at the residents disposal.

We wish to discuss urgently the funding of the Queen Elizabeth Park restoration scheme which would require the following expenditure.

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

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

Appendix 4: Red Road and Turf Hill

Red Road and Turf Hill

Development of the route – Sub-options F1a, F1b and F1c

We have been working on our proposals for the Southampton to London Pipeline, which will replace our existing underground aviation fuel pipeline. Since launching the project in 2017 we have met with Surrey County Council, Surrey Heath District Council, Surrey Highways and Natural England, and have listened to the feedback from three public consultations. These meetings and feedback from the consultations have helped us understand the local area and have informed the final route selection.

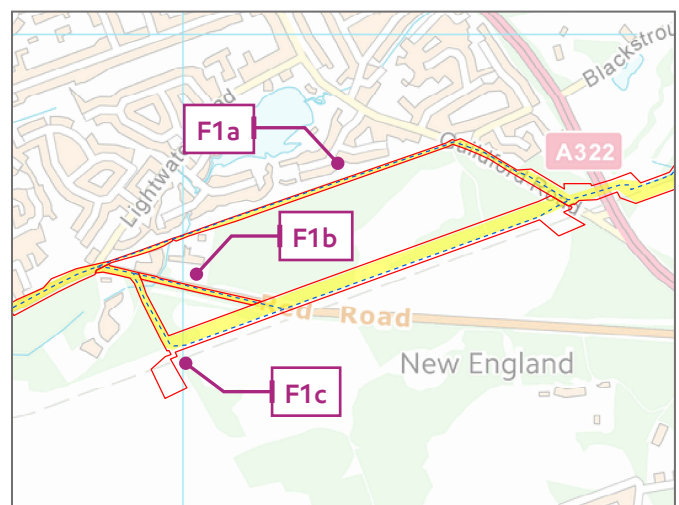
Preferred route consultation

In September/October 2018, we consulted on sub-options F1a, F1b, F1c in this area.

- F1a crossed Red Road (B311) at the junction with Lightwater Road, and followed an existing track to Guildford Road
- F1b followed Red Road and re-joined the existing pipeline route to follow it to Guildford Road
- F1c followed an existing track to re-join the existing pipeline route and follow it to Guildford Road

Consultation responses raised concerns that:

- F1a would lead to the removal of trees
- F1a followed a well-used footpath that, at the westerly end near Red Road, is very narrow
- F1b used Red Road, which is very busy and would likely have significant traffic impacts
- F1c would affect sensitive wet heathland habitats and protected species including reptiles and amphibians
- F1c would go through a Biodiversity Opportunity Area where habitats can be created
- F1c would have less visual impact on local residents and from Red Road
- All options would impact Public Rights of Way in Turf Hill Park



Selecting a route in this area

Selecting a single sub-option in this area was challenging as we had to take into account that Turf Hill Park is part of the Colony Bog and Bagshot Heath Site of Special Scientific Importance, and the internationally protected Thames Basin Heath Special Protection Area. It is protected due to its important wet heathland habitat, which is used by ground nesting birds in summer. We also considered the residential, community and road-related impacts.

We had also continued our environmental impact assessments during the consultation period and found sand lizards along the F1b and F1c sub-options. Sand lizards are a European protected species.

The combination of hibernating sand lizards and ground nesting birds (both protected species) along F1b and F1c were a critical consideration for route selection.



As a result of consultation feedback and this technical information we merged sub-options F1a and F1b. This was to reduce the impact on the most sensitive and protected environmental features and animals that live in Turf Hill Park. This also allowed us to avoid the narrowest part of the public footpath at the western end of sub-option F1a.



Having developed the final route in this area, we were keenly aware that we could not avoid all the established trees and traffic disruption along Red Road. To reduce these impacts, we have:

- Made sure the outer limits for the project are wholly within Turf Hill Park and do not use any land from residential properties bordering the park
- Committed to narrow working in this area and hope to install the pipeline along the existing footpath to reduce the impact on trees
- Where practicable we will reinstate the land to its former state

Announcing the final route in this area

As part of the Design Refinements Consultation in January 2019 we released the outcome of our sub-option selection and wrote to all affected landowners to confirm if they were on a selected or deselected sub-option. The selection was also published in the Design Refinements Consultation Booklet, on our website and in our e-newsletter that people have signed up to on our website.

Once we completed the Design Refinements Consultation and selected our final 97km route, we sent a booklet to all properties within 50m of the outer limits of the project. We also updated our website and sent an e-newsletter to subscribers.

Next steps – submitting our application for development consent

Our team is now working to prepare documents to support our planning application for a special type of planning approval, called a Development Consent Order. This is the type of approval required by projects that are classed as Nationally Significant Infrastructure Projects (such as this), and the final decision is taken by the Secretary of State for Business, Energy and Industrial Strategy. We aim to submit our application in late spring of this year.

Although the final pipeline route has been selected, we encourage anyone with questions on the next phases of the project to get in touch with us. We will continue to monitor the project email address and phone line throughout the Development Consent Order process, so we can respond to your enquiries. We will also continue to keep you updated on the project via the website and e-newsletter.

Managing impacts

- We will use narrow working, between 5-10m wide, to reduce the number of trees we need to remove
- We will use established working practices to reduce impacts to tree roots and impacts on neighbouring woodland
- We will agree traffic management plans with Surrey County Council
- We will only have sections of Red Road under traffic light control at any time to maintain traffic flow

Contact us

info@slpproject.co.uk

07925 068 905

www.slpproject.co.uk



Appendix 5: Route Development Celia Crescent

Route development: Celia Crescent

Preferred route consultation – September/October 2018

In autumn 2018, we consulted on two sub-options in this area.

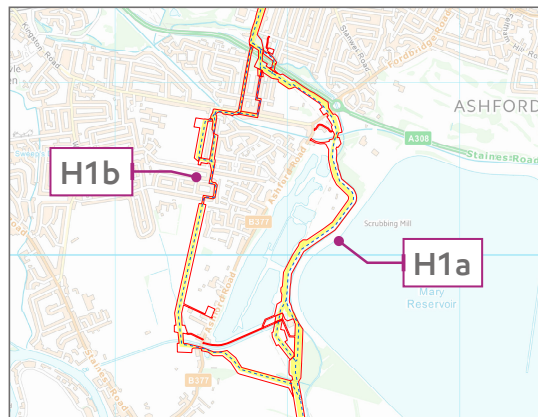
Sub-option H1a followed the existing pipeline near Queen Mary Reservoir and past Laleham Substation before crossing the B377 into Fordbridge Park. A trenchless crossing from the park would pass under the Staines Bypass (A308).

Sub-option H1b proposed the replacement pipeline to be installed either along Woodthorpe Road or along Celia Crescent, where it would enter into Fordbridge Park for the trenchless crossing of the Staines Bypass.

Following feedback from the preferred route consultation, ongoing engagement with landowners, and early involvement with contractors, we had to **deselect both sub-options H1a and H1b**.

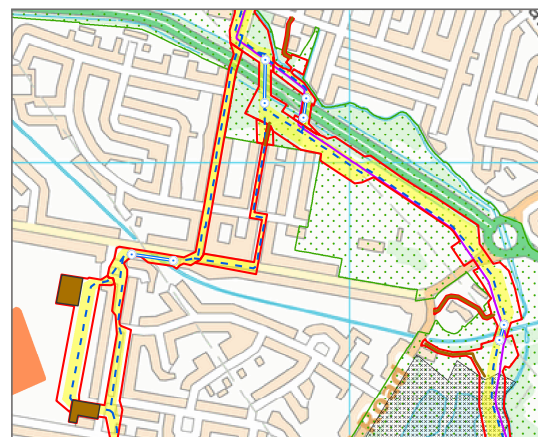
H1a was deselected to avoid the safety risk of installing close to the edge of the reservoir, alongside a major gas main and below overhead power lines (see diagram overleaf). As a responsible operator we could not select an option with significant risks to local water and gas supplies, and to our installation teams.

H1b was deselected due to the narrow residential roads, proximity to schools and the development plans for the Manor Farm Quarry. The publicly available planning application for the quarry shows that the route taken by H1b would travel through a small embankment (bund) that is a retaining wall for a new lake. This would be in place by the time we install the pipeline and would have posed a significant engineering challenge to install the pipeline but, more importantly, would have posed safety risks for the ongoing maintenance of the pipeline.



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Map from preferred route consultation brochure



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Map from preferred route consultation map book

Order limits

The outer limits for the project, including the route and any temporary working areas, shown as a red outline on the map.

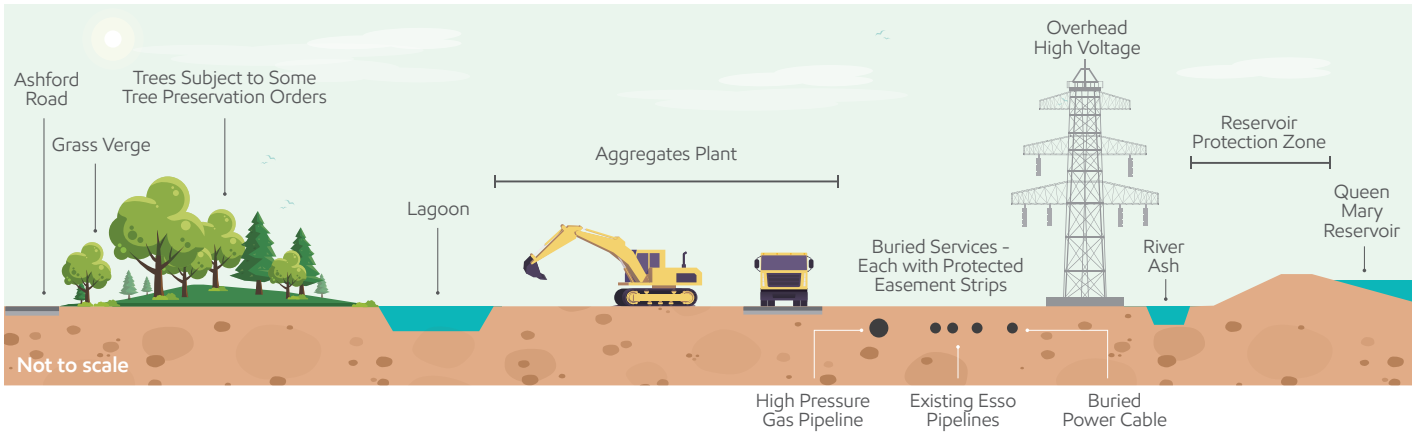
Limits of deviation

The maximum area within which the pipeline could be installed, shown as yellow shading on the map.

Possible pipeline location

The proposed location of the pipeline within the limits of deviation, shown as a dashed blue line on the map. This represents Esso's current assumptions on the location of the replacement pipeline, but if granted development consent, it could be anywhere within the limits of deviation. This flexibility is required in case of any unforeseen ground conditions and local features.





Design refinements consultation – January/February 2019

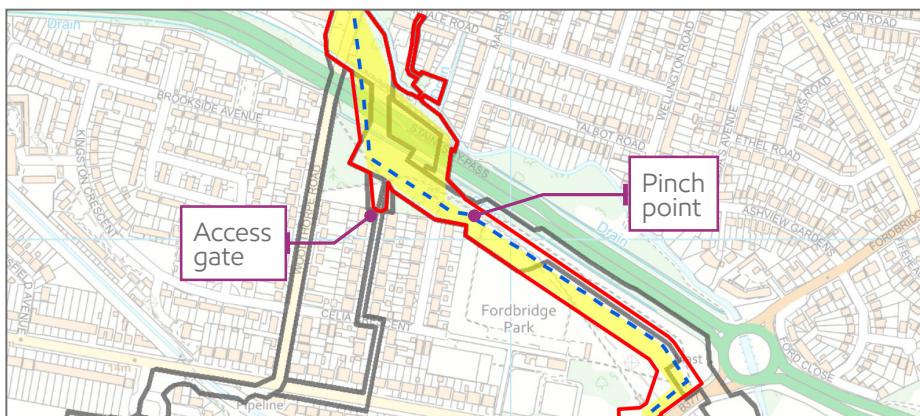
Several responses from the preferred route consultation suggested an alternative route along Ashford Road, in place of the two sub-options. This is the refined route that we consulted on between 21 January and 19 February 2019.

The trenchless crossing from Fordbridge Park under the Staines Bypass, River Ash and Woodthorpe Road was retained within our refined order limits. We also retained the existing access gate into Fordbridge Park on the north western end of Celia Crescent. The order limits do not include Celia Crescent itself as it is a public highway, and so we can only use it for vehicle access. We would not be able to install the replacement pipeline within the road.

The proposed use for the gate would only be for access to the north west corner of Fordbridge Park, which we would use as a working area for a trenchless crossing. This would enable us to install the pipeline underneath the Staines Bypass, River Ash and Woodthorpe Road and would avoid the need to disrupt traffic on either of those roads, or impact the flow of the river.

Our intention would be to transport the drill rig and equipment needed for the trenchless crossing in and out of Fordbridge Park through the gate on Celia Crescent, which would only be two sets of equipment movements (once in, and once out of the park). These vehicles would be a similar size to a refuse lorry or large removal van.

The park gate on Celia Crescent is currently used for maintenance access into the park.



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Map from design refinements consultation

- We would use the gate at the north western end of Celia Crescent to access Fordbridge Park
- It would not be a depot, but a working area for the trenchless crossing of the Staines Bypass, River Ash and Woodthorpe Road in the north west corner of the park
- We are not installing the replacement pipeline along Celia Crescent

Access to Fordbridge Park via Celia Crescent

Why we are not using other access points to the working area for the trenchless crossing, such as the gate on Kingston Road (B377)

The main reasons that we are retaining access rights through the gate into Fordbridge Park from Celia Crescent are:

- East of the gate there is a pinch point within the park that would require significant tree removal to enable us to access the western end of the park from the eastern end, adjacent to the A308 roundabout.
- We wish to reduce the amount of time areas of the park are fenced off by the project.

Reducing tree loss at the pinch point. This area can be seen on the map overleaf where the limits of deviation narrow to fit between the end property on the north eastern end of the Crescent, mature trees and the electricity pylon located within the park. While we are committed to using narrower working areas to reduce the impacts on trees in Fordbridge Park, if we were to access the working area for the trenchless crossing via the main park area, we would need to remove more trees.

Reducing impact on the park. There is a National Policy Statement (created by the government to provide a framework for large infrastructure projects such as this one), which directs us to minimise the temporary loss of open space, such as park land. As lots of people use Fordbridge Park, it is important that we reduce the amount of space we use and the time we use it for. Trenchless installation typically takes longer than open-cut installation. If we were to access the working area in the north west corner of Fordbridge Park via the main park area, we would need to maintain vehicle access and fence off an access road through the park for the entire duration of the trenchless installation.

Reducing disturbance to residents of Celia Crescent

We are aware that Celia Crescent is a narrow, residential road and would plan to keep heavy vehicle movements to a minimum. We believe this is the most appropriate way to install in this area and have carefully considered the balance between reducing the impact on Celia Crescent and keeping the installation time and impacts to a minimum within Fordbridge Park.

Our proposal is to drill from the north west corner of Fordbridge Park, under the Staines Bypass, River Ash and Woodthorpe Road, coming out the other side at a recreational area to the west of Woodthorpe Road.

We would transport the drill rig and equipment needed for the trenchless crossing in and out of Fordbridge Park through the gate on Celia Crescent. This would only be two sets of equipment movements (once in, and once out of the park). These vehicles would be a similar size to a refuse lorry used by the local council or a large removal van.

The sections of pipeline would be laid out in the area next to Woodthorpe Road and pulled back through the drill to Fordbridge Park. This means we do not anticipate needing to transport long lengths of pipeline through the access point at the end of Celia Crescent.

We need to use Celia Crescent for access to:

- Avoid the need to remove trees within Fordbridge Park
- Reduce the amount of time we are working in the park
- Reduce the space that we need to fence off within the park

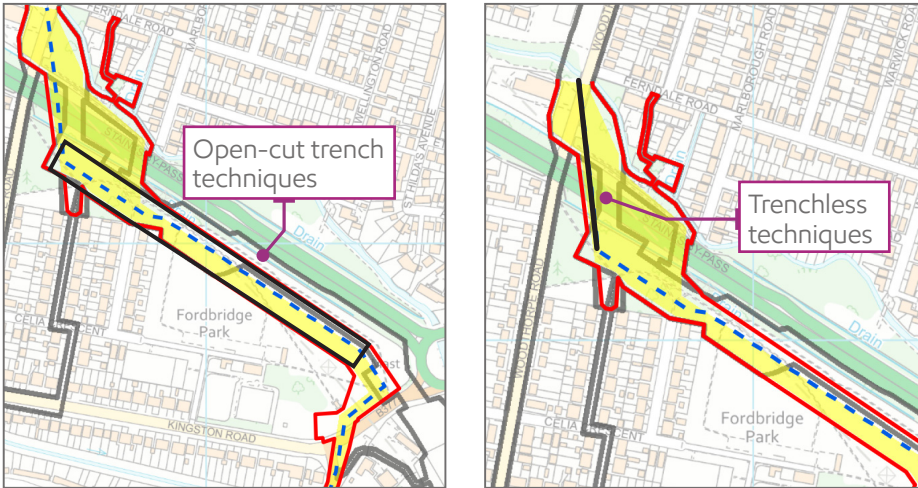
- There would only be two sets of equipment movements – once in and once out of the park
- Vehicles carrying equipment would be a similar size to refuse lorries used by the council or large removal vans
- Day to day, we would only use the gate for small vehicles such as vans

Aside from this, we would aim to use the gate only for small vehicles such as vans to avoid the need to travel through the park itself at the start and end of each working day.

In summary, we would only use Celia Crescent as a road for vehicles to drive on to reach the existing access into the park. We will not be installing the pipeline within Celia Crescent itself, nor would we be storing any equipment in the Crescent.

Installation within Fordbridge Park

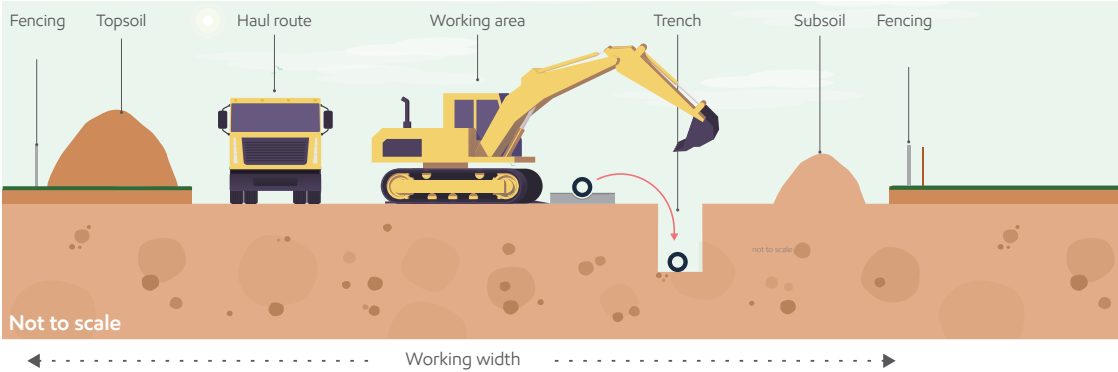
The installation of the replacement pipeline within Fordbridge Park would take place in two parts:



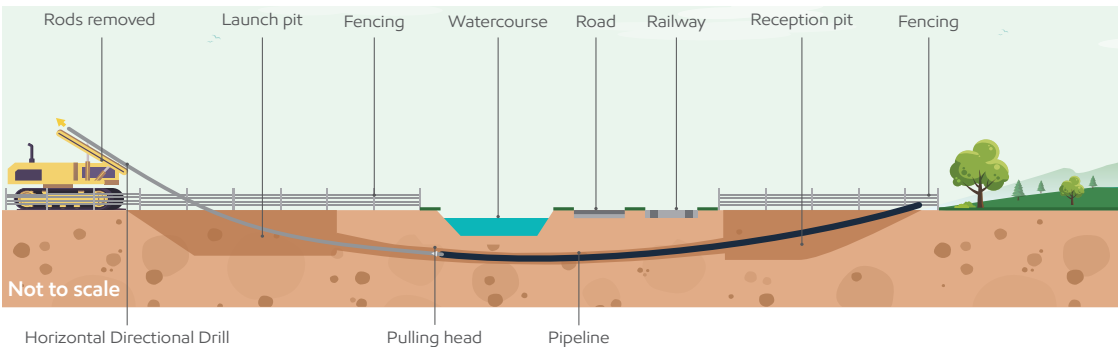
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i You can find out more about our installation techniques at: www.slpproject.co.uk/installation-techniques/

1. Open-cut trench techniques through the main area of the park.



2. Trenchless techniques to cross the Staines Bypass, River Ash and Woodthorpe Road.



Within the park, both the working area for open-cut and trenchless techniques would be securely fenced off within the order limits. Within these areas, there would be room for any parking needed for vans and for mobile welfare units, which include toilet facilities.

