

From: [REDACTED]
To: [Southampton to London Pipeline Project](#)
Cc: [REDACTED]
Subject: Heronscourt & Colville Gardens Residents' Associations and Lightwater Residents: Deadline 5 Submission?
Date: 13 February 2020 11:34:11
Attachments: [ENOUGH IS ENOUGH Final 13.2.20.docx](#)
Importance: High

Dear Mr Allen,

As representative bodies of residents affected by the Southampton to London Pipeline, we continue to remain jaundiced about the Applicant's commitment to provide complete explanations on their decision to adopt the Route F1a+ and the potential long term destruction of Turfhill Park.

And this is before addressing further requests for information about the additional damage likely to be caused to trees bordering Guildford Road and the potential on-site compound although there are now indications that a compound serving an extended, not just Turfhill, part of the pipeline in the Lightwater area will be in or adjacent to the 'boggy area' of the Park! Disruption has already commenced for all residents as the Applicant undertakes a Utility Tracing Survey of Red Road, Guildford Road and Turfhill Park.

The on-going frustration with the process and the intractability of the Applicant has finally spilled over and has resulted in the attached note!

We are uncertain how this fits into the Examination Timetable, whether for Deadline 5 today the 13th February, the upcoming ISHs or whenever before the end of your Examination, but in the circumstances we felt it appropriate to submit our feelings at this stage to you and your Case Team in the expectation that it will elicit some of the clarifications that you and we are all seeking.

Many thanks for your continued assistance in this matter.

HCRA

CGRA

Per pro Interested Lightwater Residents

ENOUGH IS ENOUGH!

Throughout the Examination of Project ENO70005, Heronscourt and Colville Gardens Residents' Associations [the RA's] have adopted a reasoned, factually based approach in opposing the Applicant's choice of route across Turfhill Park. This is not just to protect self-interest, but for the genuinely held views of the RA's and users of Turfhill Park, as expressed in document REP3-053, that the route chosen by the Applicant **is the wrong route**.

The ExA have been admirably patient in Open Hearings and in their questions, in seeking to draw out clarity and evidence of genuine response from the Applicant, but it is increasingly clear that the Examination process itself inhibits their freedom to direct. Their frustration has been evident to observers.

Now, Enough is Enough!

It is evident that the Applicant is using procrastinating tactics, avoiding giving direct replies to questions, flooding the channels with paperwork, reverting back to the original Application, and even refusing to follow ExA legitimate requests. Each set of partly answered questions, extends the process further towards the end of the time legally allotted to the Examination. If they keep hedging for 50 more days, time will have expired!

As the Examination enters its penultimate month, **it is time to bring into the open** what is occurring, and **demand** that the Applicant **faces up** to the key questions on the route across Turfhill Park. **They cannot be allowed to "run down the clock" until April 9th 2020!**

Consultation and Materiality The Applicant continues to claim that they carried out a faultless consultation

Did they consult and communicate with the residents and RA's of Heronscourt [HC] and Colville Gardens [CG]? CATEGORICALLY NO

Was it clearly visibly obvious that HC and CG were the closest dwellings to the revised pipeline route and would be affected by the change? YES

Were any documents announcing the route **honest enough** to admit that there would be substantial tree loss? NO

Did the Applicant's decision to describe the route selection as "not material" have an effect upon the Application? YES

The Water Line It is extraordinary that the existence of the 8 inch water line was not highlighted until well into the Examination. There is no record of any communication between the Applicant and Affinity Water until months after the Application was submitted. It is unthinkable that there should be any risk, physical or chemical, to the water supply as a result of the pipeline

Can the integrity of the water line be guaranteed during and after the construction of the pipeline? NO

Should Affinity Water accept any risk to this line? NO

Can the Applicant guarantee that they can construct the pipeline, obeying their own order limits, and any easements imposed by the Water line? NO

Even at this late stage the Applicant's contractors are surveying Red Road, Turfhill and Guildford Road, apparently to establish and mark the exact location of existing utility lines; this is after publishing their chosen route and maintaining this preference for eleven months.

Should this survey have taken place as part of the initial decision? OF COURSE IT SHOULD

Trees. Both trees and heathland are vital parts of the environment and natural habitat that is Turfhill, and both are vital parts of the Surrey Heath Borough Council development Plan for Turfhill, where a tree boundary is specified. The Applicant commissioned an arboricultural survey of the trees along their chosen route. This survey was incomplete, selective, inaccurate and used inappropriate criteria. The Applicant is unable to quantify the number of trees that would be lost by using their chosen route, and will leave it to their contractor to select which are felled "on the day!"

Is it acceptable that Applicant's plan should proceed with no tree loss specified or quantified? NO

Does the Applicant's tree survey convey an accurate picture of the trees along their route? NO

Is it acceptable to leave the tree-felling decision to contractors? NO

Will felling trees and disturbing of extensive tree roots have an impact upon flood prevention, the integrity of the water line, noise pollution and many other factors? YES

Does the alternative route proposed by the RA's involve any loss of trees? NO

Natural Life [primarily fauna] It is claimed that the major reason for choosing the proposed route is to "maximise" the protection of protected species. **All** of Turfhill is an SSSI and an SPA, so **any** major construction activity **must** be subject to some form of environmental scrutiny and indirect supervision. The degree and nature will depend upon the choice of route, and in their Document 001065 Natural England indicate that appropriate safeguards are essential and that specific mitigation and management techniques will need to be put in place. While they state categorically that the Applicant's chosen route is preferable for wildlife, they also make many other interesting statements

"There will be no permanent or long term loss of habitat" "Dry heathland will recover in 5-10 years" [Whereas tree loss will take over 60 years to regain the current status!]

On the subject of the three specified protected birds [Dartford Warbler, Nightjar and Woodlark] “ Natural England does not recognise the statement “breeding territories for Dartford Warblers Nightjars and Woodlarks will be lost” Their breeding sites change from year to year. Natural England strongly recommend that construction takes place outside the breeding season – from October 1st to January 31st.

Other species that need careful management are the recently introduced sand lizards, where their needs and preferred habitat are well defined. While introduction to Turfhill is welcome it should be noted that they are present in at least 4 other locations within a 7 mile radius. It is possible that they have spread out from the release area, but it is inconceivable that they will remain or burrow on the hard packed, gorse-bounded, well-frequented footpath that is the route recommended by the RA’s.

It should be recognised that Turfhill is a **well-used public park** and **not** an enclosed nature reserve. This leads to the **key questions**

Has there been detailed surveys of the fauna on **all** possible routes across Turfhill? NO

Will there need to be environmental supervision in all possible Turfhill routes? YES

Can the wildlife issues be managed on all routes, including the one recommended by the RA’s? YES

Can construction be carried out in the months specified by Natural England? YES

Can the sand lizards be managed? YES

Fencing and corralling of lizards should take place in the months **preceding hibernation** so that there is no danger of them or their habitat being damaged or disturbed during the construction period, generally accepted to be from October to January, so as to avoid breeding birds. The Applicant claims, without evidential backing, that this is an expensive and labour-intensive process, but **surely** this is a very minor expense in the overall cost of this project!

Should all measures be taken to protect wild life on Turfhill and can this be done for **all routes** across the Park? **Emphatically YES**

Amenity Value The Applicant has totally underestimated the amenity and aesthetic value of Turfhill Park. It is used by large numbers of walkers, dog walkers, cyclists and equestrians on a daily basis. They value the space, the three avenues of attractive trees and the wildlife that they can observe. The trees are a vital part of the landscape to the south of Lightwater, and the line of trees along the ridge of Turfhill is an important backdrop to the village. Lightwater is not the most attractive village in Surrey, and destroying a significantly redeeming feature diminishes the village.

Are the trees, and the avenue of trees integral parts of the landscape and amenities of Lightwater? YES

Will the reduction of Turfhill trees damage the village of Lightwater? DECIDEDLY YES

Will the construction of this route cause **permanent damage** to Turfhill Park. YES

Has the Applicant's insensitive approach to this local amenity excited a response? YES

Alternative Route. Is there an alternative route? Of course there is. It has been presented to the ExA but the Applicant has **refused** to survey it when instructed by the ExA . It causes no more traffic disruption, follows existing pipelines, is 300 metres shorter, has less troublesome bends, and fells no trees?

Did the Applicant compare their chosen route with the alternative proposed by the RA's, as requested by the ExA? NO

Should the alternative line be adopted? YES!

These questions demand answers, and the Applicant can no longer hide behind Natural England in persisting with an untenable choice of route. The RA's have repeatedly quoted ten reasons that the Applicant has chosen the wrong route The Applicant's refusal to consider a far better route, must now be exposed, by demonstrating that all routes are manageable. This should be judged against the fact that the Applicant's chosen route causes irreversible damage to the environment and Landscape.

Now the rape of the Lightwater landscape by the Applicant's chosen route is arousing very fierce local opposition.

ENOUGH IS ENOUGH !

13.2.20