

# Southampton to London Pipeline Project

## Deadline 5

Draft SoCG with South Downs National Park  
Authority

Application Document: 8.4.28

Planning Inspectorate Reference Number: EN070005

Revision No. 2.0

February 2020



**Draft Statement of Common Ground between:**  
**South Downs National Park Authority**  
**And**  
**Esso's Southampton to London Pipeline Project**  
**Dated 6 February 2020**

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**I. Agreed**

**General**

The project and the Authority have met at appropriate times since the project launch in December 2017. The Authority is satisfied that the consultation and engagement has been robust and meaningful.

## 1.1 Planning Policy

Both Parties agree that the relevant NPSs are:

- Overarching NPS for Energy (NPS EN-1)
- NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (NPS EN-4)

## 1.2 The need for the proposed development

The Overarching NPS for Energy (NPS EN-1) sets out, in paragraph 5.9.10, first bullet point, that DCO applications should include an assessment of the need for the development. No issue is raised by the SDNPA in this regard.

## 1.3 Construction Effects on People and Communities

The Authority agrees that there is no demonstrable harm to residential amenity. The Authority supports the need for the proposed DCO requirements 5 and 7 which require adherence to the Code of Construction Practice and the requirement for a Construction Traffic Management Plan.

The Authority agrees there would be no permanent effect on access to open land and that there will be minimal disruption to Public Rights of Way during construction. The Authority and Project agree that there will be some temporary impacts on the Wayfarer's Walk Long Distance Path, which runs parallel to the pipeline route for approximately 2.5km and the Four Marks location of the pipeline which intersects with five public rights of way.

The Authority agrees with the Applicant's proposed new commitment within the Code of Construction Practice regarding the timing of construction through the South Downs Way and measures to avoid impacting on major events along this route.

## 1.4 Biodiversity

The Authority agree with the approach taken to biodiversity matters, and that the pipeline route avoids all international, national and locally designated sites within the National Park and that the only priority habitats present are lowland deciduous woodland and hedgerows.

## 1.5 Flooding and Water

The Authority notes that there are no major surface water courses in the National Park section of the route and agrees that there are no significant impacts on the four watercourses which have been identified. The Authority agrees that with the adoption of good practice and mitigation measures the project would not exacerbate flood risk within the National Park.

## 1.6 Historic Environment

The Authority agrees within the Local Impact Report that there are no high value heritage assets within the Order Limits. The Authority states that “there will be short term impacts during construction but given that once operational the development will be an underground pipeline with a very small number of above ground installations the SDNPA considers that the impact of the proposal on heritage assets is of minor concern.”

## 1.7 Security and Safety

The Authority does not have comments to make on this theme.

## 1.8 Highways and Transport

The Authority notes that Hampshire County Council, as Highways Authority, will be making representations regarding the highways impacts of the proposed pipeline through the examination process. At this stage the SDNPA considers this matter to be of minor concern. The Authority supports the inclusion of proposed DCO Requirement number 7 that requires the submission and approval of a Construction Traffic Management Plan (although the SDNPA would prefer this DCO requirement be discharged by Local Planning Authorities) and recognises this should ensure that the impact on the local road network is acceptable.

## 1.9 Noise, air quality and disturbance during construction

The Authority agrees that there are no appreciable air quality implications during pipeline operation. During construction, there may be impacts however these will be temporary and there is no evidence that there will be significant air quality impacts.

The Authority agrees that there will be minimal waste arising from excavation for the pipeline, as spoil will be reused.

## 1.10 Socio-economic impacts

The Authority believes it will be difficult to assess the impacts that the loss of visual amenity and tranquillity during construction will have. Overall the impact is considered to be negative, but it is acknowledged that this will be limited by the temporary nature of the construction works.

## **2. In Discussion**

### 2.1 The Draft Development Consent Order

The project wrote to the Authority to provide and invite comments on a draft DCO.

The Authority's Local Impact Report (LIR), Written Representation and response to Examining Authority questions ExQ1 and ExQ2 identify several comments and proposed amendments to the draft DCO. These are under discussion at the time of submitting this draft SoCG.

## 2.2 Trees and Woodland

The Authority considers the proposal fails to conserve and enhance trees and woodland within the National Park, and believes there is no package of compensation put forward for any impacts on Ancient Woodland, trees and hedgerows.

The Applicant issued the Technical Note: Ancient Woodland and Veteran Trees to the Authority in early November 2019 which has been agreed to be appropriate by Natural England and the Forestry Commission, which addresses these concerns. This theme remains in discussion.

## 2.3 Landscape and Visual Impacts

The Authority states that the proposal, in the absence of satisfactory mitigation, fails to comply with the statutory requirement to conserve and enhance whereas the Applicant considers the relevant policies for a NSIP are those contained in the National Policy Statements.

Further discussions are being held in respect of the construction methodology where the proposed pipeline crosses HCX130, noted in Jane Austen's novel *Persuasion*. The parties consider that this can be dealt with through the DCO and the parties should have reached an agreed way forward on this by the end of the examination.

The Authority is seeking assurances from the applicant that the Landscape and Ecological Management Plan will apply to the whole of the pipeline route within the National Park.

The Authority is intending to issue a draft list of planning obligations to address its concerns on landscape and visual impact, for the Applicant to consider. The Authority considers that a planning obligation is required to mitigate the impacts of the proposed development and to make the development acceptable in planning terms. The Applicant does not consider that a s106 agreement is required for the reasons detailed in its submissions to the Examination.

## 2.4 Dark Night Skies

The Authority agrees that there will be no permanent lighting as part of the scheme. However, the temporary construction compounds will have some lighting, as might sections of the pipeline as it is being installed. This has the potential, unless appropriately mitigated, to harm Dark Night Skies and the Authority is currently in discussions with the Applicant. The Applicant submitted its Outline Lighting Management Plan at Deadline 4 and believes this issue will be resolved.

## 3. **Not Agreed**

### 3.1 The proposed pipeline route where it re-enters the National Park to the west of Lower Farringdon.

For the Authority, as stated in SDNPA's Local Impact Report, "the SDNPA do not consider that it has been demonstrated that the proposed pipeline needs to re-enter the National Park and why the pipeline cannot be routed away from this northern part of the National Park." The SDNPA do not consider that proper regard has been had to the requirements of paragraph 5.9.10 of the Overarching National Policy Statement for Energy (EN-1). The SDNPA considers that the applicant's development scheme submission does not allow, on account of the limited information provided, an assessment of the cost of, and scope for, developing outside the National Park as required by paragraph 5.9.10.

The Applicant considers that it has provided an assessment of the proposed routing of the pipeline through the SDNP against the policy tests in NPS EN-1 and NPS EN-4, including impacts upon the designated landscape, in paragraphs 7.4.170 to 7.4.190 in the Planning Statement (Application Document APP-132). The Applicant provided further information in its submission at Deadline 4 in response to Further Written Question ALT2.3 (**REP4-018**). The Applicant considers that the Authority's request for an assessment to demonstrate "that the pipeline could not be located outside of ... the SDNP ..." goes beyond the policy requirements of the relevant NPS.

#### **4. Informative**

4.1 This SoCG relates to the impacts either within or upon the South Downs National Park.

4.2 A record of engagement between the Project and the Authority to date is provided within Appendix A.

#### **5. Signatures**

South Downs National Park Authority

Esso's Southampton to London Pipeline Project

Appendix A –

Table A.1 Schedule of engagement prior to DCO submission

<b>Date</b>	<b>Format</b>	<b>Topic</b>	<b>Discussion Points</b>
04/12/2017	Correspondence	Project introduction	The project sent a letter to planning team at the Authority regarding: <ul style="list-style-type: none"> <li>• Map of current route</li> <li>• Project timeline</li> <li>• Project introduction</li> </ul>
11/12/2017	Meeting	Kick off meeting	First meeting between the project and SDNPA, held at the SDNPA offices.
19/01/2018	Hampshire Officers Forum	Update	The Authority attended the Hampshire Officers Forum. A presentation was provided with Q&A session at the end. This included: <ul style="list-style-type: none"> <li>• Summary of project, including existing pipeline and the need for replacement.</li> <li>• Explanation of project plan, including the intention to consult on corridor options before the statutory consultation.</li> </ul>
29/01/2018	Meeting	Technical meeting	First technical meeting with the authority.
01/02/2018	Meeting	Conference Call	Project update call
01/03/2018	Briefing note	Non-statutory (Corridor) consultation	Briefing note sent to all local authorities and councillors of wards within each corridor option.
14/03/2018	Correspondence	Commitment to Community Consultation (CtCC) – early view	Email containing draft CtCC.
19/03/2018	Correspondence	Launch of non-statutory (Corridor) consultation	The project sent the Authority three letters: <ol style="list-style-type: none"> <li>1) Notification of launch letter (as a potential future statutory consultee)</li> <li>2) A notification letter as a landowner, with a Person with an Interest in Land questionnaire and land plans</li> <li>3) Draft CtCC with a separate cover letter</li> </ol> No feedback was provided on the CtCC.
26/04/2018	Correspondence	Non-statutory (Corridor)	The project received a non-statutory consultation response from SDNPA. A copy is enclosed as Appendix B.

<b>Date</b>	<b>Format</b>	<b>Topic</b>	<b>Discussion Points</b>
		consultation response	
30/04/2018	Meeting	Leadership meeting	Leadership meeting with leads from SDNPA and the project
03/05/2018	Correspondence	Correspondence regarding a contact for the online portal.	Correspondence between SDNPA and the project regarding a contact for the online portal.
15/05/2018	Meeting	Meeting to discuss Landscape and Trees	Meeting to discuss various topics relating to Landscape and Trees, including Zone of Theoretical Visibility (ZTV), landscape character area, tree surveys and decommissioning of the existing pipeline.
16/05/2018	Meeting	Meeting to discuss Ecology and Soils	A meeting was convened with specialists from SDNPA to discuss the latest project position with respect to biodiversity and soils. The meeting also allowed an opportunity to discuss SDNPA's recent consultation response. The project team discussed most issues at a high level.
23/05/2018	Correspondence	Pre-brief on corridor selection	Pre-brief on corridor selection and preferred corridor announcement.
27/06/2018	Briefing	Initial Working Route Briefing	Briefing held to demonstrate how the project had taken into account feedback from the non-statutory consultation, how this had informed the preferred corridor selection and to provide an overview of the Initial Working Route
09/07/2018	Consultation	Draft Statement of Community Consultation	The draft SoCC was issued for statutory consultation to the Authority.
12/07/2018	Event	Landowner Event	SDNPA attended the landowner event on 13 July in Bramdean.
17/07/2018	Correspondence	Invitation to scoping workshops	Invitation to the Authority to attend the scoping workshops being held in August.
25/07/2018	Meeting	Technical meeting	Technical meeting covering the broad approach to the Scoping Report, a walkthrough of the Initial Working Route, and some discussion on construction environmental management, landscape and visual impact assessments and tree surveys.
26/07/2018	Correspondence	Scoping Report	Scoping report was sent to SDNPA from the project team.



<b>Date</b>	<b>Format</b>	<b>Topic</b>	<b>Discussion Points</b>
06/09/2018	Correspondence	Launch of first statutory (Preferred Route) consultation	The project sent the Authority two letters: 1) Notification of launch letter (as a statutory consultee) 2) A notification letter as a landowner, with a Person with an Interest in Land questionnaire and land plans (Both letters were in line the Planning Act 2008)
10/10/2018	Correspondence	Request for extension to consultation period.	SDNPA requested an extension to the consultation period on 10 October 2018. The project responded on the 12 October refusing this request.
12/10/2018	Correspondence	Correspondence to arrange a meeting	The project emailed the Authority requesting a meeting in late October 2018.
18/10/2018	Correspondence	First statutory (Preferred Route) consultation response	Response from the Authority regarding the first consultation. A copy is enclosed as Appendix C.
20/12/2018	Meeting	Meeting to discuss planned Design Refinements consultation	Meeting to discuss the outcome of the Preferred Route consultation and design refinements.
03/01/2019	Briefing Note	Next steps – Design Refinements Consultation	Provided an overview of the Design Refinements Consultation and its contents ahead of the launch on 21 January 2019.
18/01/2019	Correspondence	Launch of second statutory (Design Refinements) consultation	The project sent the Authority two letters: 1) Notification of launch letter (as a statutory consultee) 2) A notification letter as a landowner (Both letters complied with the approach set out the in SoCC).
19/02/2019	Correspondence	Second statutory (Design Refinements) consultation response	Response from the Authority on the second statutory consultation. A copy is enclosed as Appendix D.

<b>Date</b>	<b>Format</b>	<b>Topic</b>	<b>Discussion Points</b>
19/03/2019	Meeting	Monthly Meeting	Regular meeting with the Authority – main discussion points were the DCO, trees, hedges and Public Rights of Way.
25/03/2019	Briefing note	Next steps	The project issued a briefing note to the Authority following the close of the Design Refinements Consultation re: next steps.
27/03/2019	Correspondence	Final route release	The project issued a letter to planning officers announcing the final route and offering a meeting if required.
03/04/2019	Correspondence	Draft DCO	The project wrote to the Authority to provide and invite comments on a draft DCO and offered to meet with authorities to discuss the draft Order.
16/04/2019	Meeting	Site visit	Site visits took place in Chawton, Brockwood Park, Hinton Ampner and Stephen's Castle Down to discuss key areas of concern with the park.
01/05/2019	Meeting	Leadership Meeting	Meeting to discuss the project and work orders.

Table A.2 Schedule of engagement post DCO submission

<b>Date</b>	<b>Format</b>	<b>Topic</b>	<b>Discussion Points</b>
16/05/2019	Correspondence	Application submitted	The project confirmed that the application for Development Consent was submitted to the Planning Inspectorate and a USB containing the application was being sent in the post to the Authority's planning team.
06/06/2019	Correspondence	Consulting the project on planning applications	The project requested that the Authority consult it on planning applications where relevant.
06/06/2019	Correspondence	Safeguarding	The Project emailed the Authority's planning officer to confirm safeguarding procedures and request the Project be consulted on planning applications made on the application site for the Project.
11/06/2019	Correspondence	Letter regarding adequacy of consultation	South Downs National Park response to PINS adequacy of consultation representations.

<b>Date</b>	<b>Format</b>	<b>Topic</b>	<b>Discussion Points</b>
01/07/2019	Correspondence	Correspondence regarding updated PPA	The project sent the Authority an updated PPA for review and requested a meeting date. The PPA was accepted on 26 July 2019.
15/07/2019	Correspondence	Relevant Representation	The project received a Relevant Representation from the Authority. This is enclosed within Appendix E.
09/08/2019	Meeting	Project update and Statement of Common Ground	A meeting to give an update on the project, site visit and discuss SoCG, as well as discussions regarding the Authority's main issues.
23/08/2019	Correspondence	Correspondence regarding sub-options	The project informed the Authority that they are withdrawing Hinton Ampner sub-option A2b and retaining sub-option A2a.
18/09/2019	Meeting	Regular Meeting	Covering project updates and Statement of Common Ground
21/10/2019	Meeting	Regular Meeting	Covering project updates, Statement of Common Ground and the Authority's request for a Section 106 agreement.
17/01/2020	Meeting	Regular Meeting	Covering project updates, Statement of Common Ground, HCX130 Crossing, and the Authority's request for a Section 106 agreement.

## Appendix B - Non-statutory (Corridor) consultation response

SDNPA Consultation Response  
 ESSO Pipeline  
 ESSO Non Statutory Consultation April 2018



**Response to Northern and Southern Proposals**

1. The South Downs National Park Authority (SDNPA) notes that ESSO are consulting on a replacement pipeline along the approximate line of the existing route, the consultation being split into two parts – i) the northern option (from Alton to the London Terminal, Hounslow and ii) the southern options from Alton down towards Fawley. The South Downs National Park Authority (SDNPA) makes one response to cover the two consultations.
2. The potential route crosses the Park in three main blocks, Lower Upham - Ropley (part of Option G 17km pipeline approx.), Four Marks to Chawton (Option G, 5km) and Binsted – towards Spreakly (Option Q, 5km). Approximately 66 hectares of the South Downs National Park (SDNP) fall within the redline area of the proposals. (refer to Appendix 2a). It is notable that the proposals pass through several landscape types which are identified in the South Downs Integrated Character Assessment, from the Hampshire Clay Plateau, to the Greensand Terrace to the north.
3. The 200m – 300m wide corridor which has been identified by ESSO allows for deviations around significant environmental issues, whether ancient woodland or scheduled monuments, though this may not be wide enough to avoid registered historic parkland at Chawton House (GII), access land at Stephen Castle Down or unscheduled monuments through which the existing route passes.
4. The SDNPA has broad concerns about the proposals in relation to impacts on the SDNP in terms of landscape, access, biodiversity, trees and woodland and cultural heritage.
5. ESSO have identified a route outside the SDNP (option A) which ESSO has considered and discounted prior to the consultation. The SDNPA agree with the reasons given by ESSO in their consultation document not to bring this option forward for consultation.
6. The SDNPA consider that there is potential for permanent damage to the national park from a route (option G) through the SDNP. Woodland, hedgerows, sunken lane banks and undiscovered archaeological features could be at risk and full mitigation and where this is not possible compensatory measures should be brought forward.
7. It is also noted that shorter options through the SDNP, to the west of the existing alignment were considered, but not brought for consultation. This is due to the potential for this alignment to have significant impacts on the River Itchen SAC. The SDNPA agree that having considered these alternative routes the impacts on the Special Qualities of the NP over an albeit shorter distance would be likely to be unacceptable due to the potential for harm to the SAC.
8. ESSO have included alternative route options (D and F) north of West Tisted in the consultation which avoid the SDNP altogether. The SDNPA considers these options to be preferable due to the potential for impacts on the Registered parkscape at Chawton House (GII\*) (Ropley to Chawton section) and also the Ancient woodland at Alice Holt (Binsted to Spreakly section). In addition both are significant tourism destinations within the SDNP where the pipeline construction impacts would be highly disruptive to the enjoyment of the SDNP in these locations for high numbers of visitors.

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9. The sections at Chawton and Alice Holt through the SDNP were not part of the former East Hampshire Downs AONB (see Landscape Report map para 7.2) therefore decision making about the route alignment for the existing pipeline would not have considered impacts on designated landscapes at that time. The subsequent inclusion of these areas within the SDNP changes the planning context for these proposals, and given the impacts identified above are considered to be unacceptable by SDNPA.
10. Therefore, the SDNPA concludes that were any scheme to be given approval then the SDNPA recommends that option G, entering the SDNP to the west of Bishops Waltham from the south running northwards to West Tisted followed by either route D or F to take the pipeline out of the SDNP would be the least damaging option to the SDNPA. North from Alton options J or M would be preferable to returning into the SDNP through option Q as this would unnecessarily impact on the ancient woodland and special qualities of the SDNP in that area.
11. Although not part of the consultation exercise, further consideration should be given as to alternatives to the decommissioning of the existing pipeline so that large amounts of concrete are not needed to fill the old pipeline, with all of the associated environmental damage that producing and using concrete brings
12. Details of mitigation, and/ or compensated proposals have not been included as part of the consultation to date and SDNPA recommends that a scheme of mitigation and, where this is not possible, compensation should be consulted on to enable proper and full assessment of the impacts on the SDNP to be undertaken
13. The Government's publication of 'A Green Future: Our 25 Year Plan to Improve the Environment' includes the commitment to 'support development by embedding the principle that new development should result in net environmental gain....' The challenge and expectation is for ESSO to work up the details of mitigation or compensation to a sufficient standard to be enhancing for a National Park, in line with current guidelines.

#### Assessment Stage

14. The assessment of impacts to date by ESSO has been carried out in accordance with the National Infrastructure Commission process which does not require a full Environmental Impact Assessment (EIA) until the Development Consent Order Application (ie preferred route announcement). The following assessment is therefore based on the information made available to the SDNPA prior to the consultation document being released by ESSO as part of their information gathering and non-statutory consultation and stage. Further detailed assessment of the preferred route option will be undertaken by SDNPA in order to refine this early impact assessment of likely impacts to identify indicative mitigation and compensation.

#### Planning process

15. It is understood that permission for the pipeline will go through the National Infrastructure Planning process which is undertaken by the Planning Inspectorate (PINS) on behalf of the

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Secretary of State for Business, Energy and Industrial Strategy. ESSO will apply for a Development Consent Order (DCO). The National Park Authority would be considered to be a 'relevant' Local Authority and will be invited to produce a Local Impact Report on the proposals within the DCO to submit to PINS for their consideration during the application process.

#### Planning policy

Overarching National Policy Statement for Energy (EN-1)(ONPSE)

16. The proposals would be considered by the Secretary of State for Business, Energy and Industrial Strategy against the policy criteria set out in the Overarching National Policy Statement for Energy (EN-1) <sup>1</sup> and The National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) <sup>2</sup>, (NPSGSI) some consideration will also be given to the Local Development Plan and the relevant policies in the NPPF.
17. The ONPSE sets out several policy criteria in relation to Energy infrastructure development within or close to National Parks;
- Paragraph 5.9.8 - 9 : Reference to the need for the Infrastructure Planning Commission to have regard to the statutory purposes for which national parks and AONBs were designated and refers to the NE publication which sets out the 'Duty of Regard'<sup>2</sup>
  - Paragraph 5.9.10 sets out the approach to Energy infrastructure development proposed within nationally designated areas and broadly follows the tests for major development in Nationally designated landscapes which is set out in the NPPF;
  - Paragraph 5.9.10 sets out the need for the IPC to ensure that infrastructure projects in these areas are carried out to high environmental standards.
  - Paragraphs 5.9.12 & 13 sets out the considerations for infrastructure projects which might affect the statutory purposes of designated areas from beyond their boundaries – ie in the setting of the designated area.
  - Paragraphs 5.9.18 – 5.9.20 covers visual impact
  - Paragraphs 5.9.21 – 5.9.23 covers mitigation of landscape and visual impact.
- National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) (NPSGSI)<sup>4</sup>
18. This NPS provides the primary basis for decisions by the IPC on applications it receives for gas supply infrastructure and gas and oil pipelines. This proposed pipeline meets the criteria for IPC decision making in paragraph 1.8 point (iv) being over 10 miles in length.
- Section 2.21 provides guidance for decision makers on Biodiversity, landscape and visual matters.
  - Section 2.22 provides guidance on impacts on water quality and resources

<sup>1</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47854/1938-overarching-npa-for-energy-en1.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-npa-for-energy-en1.pdf)

<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/37049/1941-npa-gas-supply-oil-en4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37049/1941-npa-gas-supply-oil-en4.pdf)

<sup>3</sup><http://webarchive.nationalarchives.gov.uk/20130402204840/http://archive.defra.gov.uk/rural/documents/protected/npaonb-duties-guide.pdf>

<sup>4</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/37049/1941-npa-gas-supply-oil-en4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37049/1941-npa-gas-supply-oil-en4.pdf)

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- Section 2.23 provides guidance on soil and geology.

National Planning Policy Framework

19. Paragraph 115 of this document states that great weight should be given to conserving landscape and scenic beauty, wildlife and cultural heritage in National Parks, the Broads and Areas of Outstanding National Beauty;
20. Paragraph 116 then goes on to say that planning permission should be refused for major development in these areas except in exceptional circumstances and where it can be demonstrated to be in the public interest and meets the following tests;
  - The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
  - The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
  - Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Local Plan documents may also be considered relevant by PINS;

The East Hants/SDNPA Joint Core Strategy 2014

21. The Joint Core strategy 2014 contains the following overriding policy which is relevant to the proposal

Policy CP2 Spatial Strategy

- *New development must fully acknowledge the constraints and opportunities of the South Downs National Park and the form, scale and location of development must ensure that the duty and purposes of the National Park are delivered. In particular, major new development will only be considered if it supports National Park purposes*

Winchester/ SDNPA Joint Core strategy 2013

22. Contains the following overriding policy which is relevant to the proposal.

Policy CP19 - South Downs National Park.

- *New development should be in keeping with the context and the setting of the landscape and settlements of the South Downs National Park. The emphasis should be on small-scale proposals that are in a sustainable location and well designed. Proposals which support the economic and social wellbeing of the National Park and its communities will be encouraged, provided that they do not conflict with the National Park's purposes.*
- *Development within and adjoining the South Downs National Park which would have a significant detrimental impact to the rural character and setting of settlements and the landscape should not be permitted unless it can be demonstrated that the proposal is of overriding national importance, or its impact can be mitigated.*

- a. The emerging South Downs Local Plan (Submission Version, September 2017).

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- b. Partnership Management Plan – Shaping the future of your South Downs National Park 2014-2019 This proposal impacts and could contribute to the following policies of the PMP:

Policy 1, 3, 4, 5, 9, 10, 19, 24, 26, 28, 30, 31, 34, 37, 38, 47

**Summary of Impacts on Special Qualities of the SDNP**

23. The proposals at this stage are very high level and do not include detailed information about the route alignment and construction methodology. Further very detailed assessment of the preferred option will be necessary at the next consultation stage of the project in order to fully identify likely impacts, mitigation and potential compensation

**Biodiversity (see Appendix 4)**

24. The SDNPA Landscape and Biodiversity Lead (water) commissioned a data search from the Hampshire Biodiversity Information Centre (HBIC) and carried out an ecological desk-based assessment for the proposed Junction changes and area of influence
25. The route cuts through many hedgerows and the species diversity and connectivity of these should be considered, in some cases they may be protected by the Hedgerow Regulations (1997). Where possible damage to hedgerows should be avoided, by utilising gateways or for important species rich hedgerows consider direct drilling. Hedgerows that need to be removed should be replaced with a similar species mix.
26. The route has been planned to avoid many designated and local wildlife sites. There are a number of local wildlife sites close to the pipeline which may be affected and measures to mitigate for these impacts will be required. Any chalk downland turf which is along the route should be carefully removed and preserved and then reinstated as soon as possible.
27. There is a range of protected species found in the vicinity of the route for which appropriate mitigation measures will be required.
28. The protection of the varied geology and soil profiles along the route during the construction process will need to be set out in a soil management document in accordance with Defra Construction code of practice for the sustainable use of soils on construction sites<sup>5</sup>

**Archaeology/Cultural Heritage (see Appendix 5)**

29. SDNPA commissioned a report by Hampshire County Council Heritage Services which has identified the significant number of heritage features along the proposed route.
30. There are significant issues identified with both designated and undesignated features which will require re-routing and consents from Historic England

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<sup>5</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69308/ph13298-code-of-practice-090910.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69308/ph13298-code-of-practice-090910.pdf)



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31. Route corridor G passes through Chawton Park Grade II Registered Park and Garden. Historic England would need to be consulted and the need for the route to cross the park be justified. Any impacts on the park would be likely to be temporary, unless of course works required the removal of landscape features such as tree lines.
32. Impacts on nearby scheduled monuments and listed buildings would be a material consideration at the planning stage.
33. The general archaeological potential along all of the routes within the Park is good to high. Having established this potential, with a large number of prehistoric field systems, funerary sites and possible settlements located along the routes, it is clear that the stripping of topsoil along the pipeline easement would expose many archaeological features and that where the pipe trench crosses these features, the impact upon them would be severe.
34. A draft programme for a series of archaeological assessments along the chosen route would be expected. This would include a geophysical survey of the route, the results of which could then be used to target a series of trial trenches to be excavated along the easement, (along with a general spread of trenches within areas deemed as 'blank' by the geophysics results). The results of this trial trenching could then be used to fully assess the archaeological potential of the route and the impact of the development. This potential could then be mitigated via a series of excavations at sites of particular value. This fieldwork would then be followed up by a programme of post-excavation assessment and ultimately the publication of the results for public consumption.
35. Any archaeological work carried out within the Park would also require an element of public engagement.

**Landscape and visual Impacts (see Appendix 6)**

36. The pipeline would be buried after construction is complete and the land reinstated. As a result, in theory, the visual impact could be reduced to occasional infrastructure associated with maintenance/safety and operation of the line; principally on/off valves at regular lengths along the route and below ground inspection chambers. However this minimal visual impact does rely on important features in the landscape being avoided and unaffected during construction of the pipeline, and sensitive construction and reinstatement methods for the landscape being used.
37. The removal or alteration of existing features due to the proposed pipeline construction could affect the continuity of the existing landscape – eg woodland, hedgerows and field patterns, ancient tracks and lanes, hedge banks and sunken lanes, distinctive open topography, scheduled monuments and archaeological features, rivers, streams and historic parkland for example. Long distance views along a scar in the landscape for example would result in both visual and landscape impacts. In these cases it is recommended that the working width of the construction corridor is reduced to the minimum (likely 12m) or horizontal direct drilling is used as an alternative to preserve existing features such as hedgerows, banks to sunken lanes, walls and other linear features which the proposed route may cross.

SDNPA Consultation Response

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38. Where the route passes through existing arable land it is considered that residual landscape and visual impacts could be neutral, however again this would rely on hedgerows and other existing features being gapped up or retained following completion.
39. Pasture and woodland would be more affected by the construction process where the permanent land cover would be broken by the construction corridor which could result in permanent landscape and visual impacts for example on open and unenclosed slopes of chalk downland and through areas of woodland where a 6m wide easement would be needed for the pipeline. This approach will require further detailed assessment.
40. A scheme of reinstatement of the landscape and replacement planting where necessary following completion of the works will be required together with the agreements in place for establishment maintenance and long term management of the restored land.

#### **Tranquillity (included in Appendix 6 vol 2)**

41. Tranquillity is a perceptual quality of the landscape, and is influenced by things that people can both see and hear in the landscape around them. It is considered to be a state of calm, quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence that it helps to promote health and well-being. As a special quality of the National Park, it is a characteristic of the landscape that visitors and residents greatly value. These are not characteristics that apply uniformly across the whole National Park, some areas are considered more tranquil than others based on a wide number of influences.
42. It is considered that Tranquillity would be detrimentally affected along the proposed route for the duration of both the construction and decommissioning phases due to the presence of vehicles, machinery and human activity in rural and undeveloped areas of the SDNP. This could affect users of the PROW network, residents and other visitors and their enjoyment of this special quality for the duration of the works.. However following completion it is anticipated (at this stage) that existing levels of tranquillity would be restored.
43. Tranquillity mapping for the route alignment is included in volume 2 of the Landscape report at Appendix 6.

#### **Impacts on Access and Recreation (see Appendix 7)**

44. The proposed routes shown on the confidential map will impact on numerous rights of way including several long distance promoted routes and the South Downs Way where the route is not just crossed by the pipeline route but the route follows the line of these paths for some distance. Open Access land at Stephens Castle Down could be affected in combination with other biodiversity impacts.
45. During construction the timetable should take account of any major events planned for the National Trail or on other rights of way ensuring any diversions (where unavoidable) are able to accommodate event numbers and are well signed.

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46. Paths will need to be reinstated following any disruption or damage by the works in accordance with the Rights of Way Authority (HCC) recommendations and the National Trail management team (NE/SDNPA)
47. A scheme of appropriate mitigation for the prolonged disturbance to the amenity and use of the PROW network will be needed together with a robust communications strategy for giving information about closures and diversions of route for the duration of the works.

**Woodland and existing trees (see Appendix 8)**

48. Modifications to the southern section of route options D,F, & G would be required as several areas of Ancient Semi Natural Woodland are currently shown as being within the route corridor.
49. Further detail will be required on minimising the impact on trees through the construction phase – eg compliance with BS5837 (including an Arboricultural Impact Assessment and method statement).
50. Mitigation or compensation for the loss of woodland, existing trees and hedgerows would be required, together with a scheme of replacement planting (or other habitat restoration) with demonstrable long term management agreements in place. Horizontal direct drilling could be considered beneath hedgerows and woodland where feasible and where there is no suitable alternative route.

## Appendix C - First statutory (Preferred Route) consultation response



18 October 2018

Tim Sunderland,  
Southampton to London Pipeline Project Executive,  
Global Project Development,  
ExxonMobil Fuels and Lubricants

Via E-Mail: [info@slppproject.co.uk](mailto:info@slppproject.co.uk)

Dear Mr Sunderland,

### **Southampton to London Pipeline – s42 Consultation Response**

Thank you for your letter, dated 6 September 2018, requesting the comments of the SDNPA on the proposed development in accordance with s42 of the Planning Act 2008. The response of the SDNPA is set out within this letter and attached Landscape and Visual Impact Report and associated maps.

It is important to recognise that this consultation marks only a specific point in time, driven by your statutory requirements. It is however positive that the SDNPA have been in substantive consultation with you for some time. Accordingly, this letter should be read in conjunction with all written responses that the SDNPA have provided to date.

We note that this consultation commenced almost simultaneously with the Scoping Report being issued by the Planning Inspectorate on 9 September. Given the information you have provided for comment does not substantively respond to the scope required by the Inspectorate this undermines, to some extent, the value of this consultation and results in the need for significant continued consultation if the concerns of the SDNPA are to be addressed.

The construction corridor would be approximately 81 hectares within the National Park. This would result in significant potential for long term impacts on the statutory purposes of the National Park as follows:

- Woodland and hedgerow loss;
- Loss of continuity of hedgerows and field patterns, particularly where these are historic, or have associations with other landscape features e.g. Chawton House Registered Parkscape;
- Loss of permanent pasture e.g. chalk downland;
- Damage to ancient tracks and lanes, including hedge banks and sunken lanes;
- Changes to the distinctive open and undulating topography;
- Damage to historic parklands (Chawton House, Brockwood Park) and medieval hunting parks, including veteran trees and wood pasture;
- Long distance views along a visible scar in the landscape for example would result in both visual and landscape impacts by affecting the scale and continuity of the remote and undeveloped landscape; and
- Permanent loss of existing soil profiles due to construction could cause changes in land cover over large tracts of highly sensitive landscape.



The following temporary (Construction and reinstatement) Landscape and visual Impacts would also occur:

- Changes to character, remoteness, tranquility and amenity from noise and intrusion from construction activity across a large area (27km);
- Visual intrusion from machinery, vehicles, moving in the landscape over a large area (27km);
- Specific locations where site compounds are located where contractors traffic would affect amenity, tranquility and the character of rural roads;
- Loss of habitat connectivity during the construction and 10-15years reinstatement period;
- Visual intrusion from site compounds where security fencing, site cabins, storage of plant and machinery would cause impacts on views and local character; and
- Visual disruption to the landscape over a large area which would affect a wide range of users, residents and visitors to the SDNP during the construction period and 10-15yr re-establishment period.

We do not therefore consider, at this point in time, that the proposed development would be fully in accordance with the NSIP policy framework and the statutory purposes of the National Park. However, if you are minded to pursue the proposals to the formal application stage we would welcome further dialogue regarding the mitigation measures proposed and, as a last resort, compensation measures to prepare for the event that the Inspectorate is minded to grant a Development Consent Order.

Yours Sincerely,

David Cranmer BSc (Hons) MSc MRTPI  
Development Management Lead

South Downs Centre, North Street,  
Midhurst, West Sussex, GU29 9DH

T: 01730 814810  
E: [info@southdowns.gov.uk](mailto:info@southdowns.gov.uk)  
[www.southdowns.gov.uk](http://www.southdowns.gov.uk)

Chief Executive: Trevor Seattle



Appendix D - Second statutory (Design Refinements) consultation response

**Replacement pipeline design refinements consultation response form**

*We are committed to listening to organisations, communities, landowners and members of the public as the project progresses.*

**Have your say**

It's easy to contribute to this consultation, and we do hope you will.

We welcome all views, ideas and opinions.

**The fastest way to respond is online.  
Simply go to [www.slpproject.co.uk](http://www.slpproject.co.uk)  
Consultation closes at 23:59 Tuesday 19 February 2019.**

You can save and edit your response before submitting it online, but please note that additional documents cannot be uploaded to the online response form.

If you are unable to respond online, you can also:

**Email** [info@slpproject.co.uk](mailto:info@slpproject.co.uk) - If possible, please use this Word document version of our response form. This can also be downloaded from our website.

**Post** FREEPOST SLP PROJECT - If possible, please use this Word document version of our response form. It can also be downloaded from our website. If you post your submission, please include your name and postcode to avoid double counting of responses.

Please respond using one of the approved channels listed. These have been set up specifically to receive responses to this consultation. We cannot accept responsibility for ensuring responses that are sent to addresses other than those listed are included within the consultation process.

When submitting your response, please note the privacy statement on the response form, which explains how the information provided will be processed and used.

If you would like a large text, a print copy or alternative format of this document, please contact us by email on [info@slpproject.co.uk](mailto:info@slpproject.co.uk) or telephone on 07925 068 905.

Requests for alternative formats will be considered on a case-by-case basis. We will, as far as possible and proportionate, respond to any requests that help you to take part in this consultation.

**Your details**

a) Please provide your name *(required)*

Title:

...Miss.....

First name:

...Veronica.....

Surname:

...Craddock.....

ii) Please tell us your address *(required)*

Address line 1:

South Downs Centre, North Street, Midhurst

.....

Address line 2:

.....

.....

.....

.....

iii) Postcode:

GU29 9NH .....

iv) Please provide your email address:

veronica.craddock@southdowns.gov.uk

v) Are you a landowner or occupier (Person with Interest in Land) who has received a Section 42 notification letter?

Yes

No

vi) Are you completing this questionnaire as:

An individual

An organisation

vii) If you are responding on behalf of an organisation, please tell us:

The name of the organisation:

South Downs National Park Authority.....

The category of your organisation:

- A county, district or parish council
- A statutory body  
(e.g. the Environmental Agency, the National Trust or a community group)
- A voluntary or community sector organisation
- A business
- Other (please specify below)

.....National Park Authority.....

#### **Privacy and use of the information provided**

Esso Petroleum Company, Limited and our 3rd party project partners will store and process your data in full compliance with our legal obligations for the purposes of the application, development and operation of the proposed Southampton London Pipeline. Further details about how your data will be used can be found on the website ([www.slpproject.co.uk](http://www.slpproject.co.uk)), or by contacting us by email ([info@slpproject.co.uk](mailto:info@slpproject.co.uk)) or telephone (07925 068 905).

Please do not provide personal information about other individuals. However, if you provide any details of other individuals or organisations within the text body of your consultation response, we will assume that you have obtained the consent of such individuals for such disclosure.

**If you would prefer that your response is not quoted within the consultation report, including anonymously, please tick the box below.**

- Please do not quote from my response within the consultation report.



## **Design refinements**

Please provide comments regarding any of the following proposals:

### **Section B – Bramdean to South of Alton**

#### **1) Uncle Bills Lane**

The additional area of order limits which is proposed within Uncle Bills Lane is within the South Downs National Park. It is on a rural lane which is bounded by soft verges and mature hedgerows with hedgerow trees to each side. The South Downs National Park Authority does not foresee at this stage given the information provided that this amendment to the proposals would cause significant impacts on the National Park and its special qualities on the basis that:

- i. The hedgerows and trees will be protected from harm to either their canopy or root area during the construction and operation of the works;
- ii. Any damage to the soft verges and vegetation therein will be remediated to an appropriate standard consistent with landscape character following completion of the works;
- iii. Any additional overhead wiring for either power or telecommunications will be removed following completion, and no permanent fixtures remain following completion of the works other than those already identified (eg road verge markers).

### **Section C – South of Alton to Crondall**

#### **2) Water Lane**

This area is outside the South Downs National Park and the Authority does not wish to make any comments.

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#### **3) Great crested newt mitigation area**

This area is outside the South Downs National Park and the Authority does not wish to make any comments.

### **Section D – Crondall to Farnborough**

#### **4) Beacon Hill Road**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

### **Section E – Farnborough to Bisley and Pirbright Ranges**

**5) Cove Road**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**6) Farnborough Hill School**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**7) Blackwater River Valley**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**8) Balmoral Drive**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**Section F – Bisley and Pirbright Ranges to M25**

**9) Windle Brook crossing**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**10) Blind Lane**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**11) South of Windlesham**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**Section G – M25 to M3**

**12) Hardwick Lane to Pannells Farm (spans sections F and G)**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**13) Philip Southcote School**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**14) Chertsey Meads**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.* **Section H – M3 to the West London Terminal storage facility**

**15) Ashford Road**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

**16) Woodthorpe Road**

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

### 17) Ashford Station Approach

*This area is outside the South Downs National Park and the Authority does not wish to make any comments.*

### 18) Temporary logistics hubs

Please provide any comments you have about the proposed temporary logistics hubs and indicate which of the following hub(s) your comments relate to. See page 22 of the consultation document to see the proposed location of the hubs.

- A31, Ropley Dean**
- A31/A32 Junction, Northfield Lane, Alton**
- Hartland Park Village, Farnborough**
- MoD land: Deepcut Bridge Road, Frimley Green**
- M3 Junction 3: New Road, Windlesham**
- Brett Aggregates, Littleton Lane, Shepperton**

**If your comments relate to several hubs, please specify which within your response below.**

.....

A31 Ropley Dean – The proposed site is in the setting of the SDNP due to the extensive views over the borrowed landscape to the north of the SDNP, where the undeveloped largely rural and pastoral landscape of north-west Hampshire is viewed from high ground to the south. There are numerous PROW within this part of the SDNP to the south of the proposed compound and the potential impacts of the site location should be robustly assessed in the Landscape and visual impact assessment in relation to the purposes of the SDNP and the potential for visual impacts on the SDNP. The site is some distance from the pipeline route and whilst this reduces the potential for landscape impacts on the SDNP, there are potential impacts from traffic and the movement of materials to the construction site along rural roads.

A31/A32 Chawton - The proposed site is in the setting of the South Downs National Park on the north side of the A31 with the boundary of the National Park along the southside of the road.

It is noted that the current East Hampshire District Council Local Plan consultation includes proposed allocation SA24 for employment uses. This site is opposite the proposed ESSO logistics site (which is not allocated). Both sites are on the north side of the A31, however there is potential for cumulative impacts on the setting and character of the SDNP from the use of both sites simultaneously. The SDNPA urges ESSO to consider the use of site SA24 rather than use additional greenfield land for a temporary use in the setting of the SDNP.

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**19) Views on the consultation process**

Please rate the following areas of the consultation:

Area of consultation	Very good	Good	Average	Poor	Very poor	Not Applicable
19a. Materials – were the materials clear and easy to understand?						
19b. Information – was enough information made available for you to respond?						
19c. Promotion – was the consultation promoted well and to the right people?						
19d. Events – were the events of good quality and suitably located?						

19e. Please provide any further comments about the consultation here.

Reference page 7 where sub options are considered in the document, the SDNPA notes that sub options A2a and A2b are still being considered by ESSO. The SDNPA's response to the Section 42 consultation is below for reference,

### 8.9 Route Selection

*The route option which passes in close proximity to Brockwood Park is likely to result in significant impacts on the tranquillity of this location and these impacts should be carefully considered and an alternative route selected if possible. Information about tranquillity assessment has been given the SDNPA's response to the ESSO scoping opinion request to PINS. The cumulative impact of the construction compound location and the possible route selection option in this area would be likely to have significant impacts on the character and experiential qualities of the landscape in its own right and also for which the Krishnamurti centre was located.'*

*Additional comments;*

*1. Construction Management Plan and Construction Environment Management Plan - the intent to prepare these documents is noted and supported however it is disappointing to note that these documents will not be completed until after the DCO application has been made. It is recommended that the EIA includes adequate and robust information with which to assess the likely impacts of the proposal on the National Park through the construction period which includes phasing and assessment of impacts on all of the SDNP Special Qualities. The proposal to prepare a Register of Environmental Commitments is also noted and supported although not yet seen or commented on.*

*2. The limits of deviation set out in the consultation document from Autumn 2018 and the Design Refinement Consultation did not show how the alignment would respond to the assessment of hedgerows in terms of importance for landscape connectivity, landscape character and habitat value. It is suggested that a nuanced approach to construction methodology where the route crosses hedgerows is developed within the EIA to demonstrate the avoidance/mitigation of harm to hedgerows within the SDNP.*

*3. The response to impacts on the PROW network is noted, it is recommended that further work is undertaken to establish the dates and times of particular events and competitions which run on the South Downs Way National Trail where there may be a steep rise in the number of users of the National Trail during these times. Exchanging information with the organising body about the proposals and phasing of PROW diversions would also be advisable.*

Appendix F – Relevant Representation Response

**Southampton to London Pipeline Project**

Received **15 July 2019**

From **South Downs National Park Authority**

*Representation*

“The SDNPA will be submitting a Local Impact Report in due course. The key issues will be the impact upon the statutory purposes and duty of the National Park.”