



Southampton to London Pipeline Project

13 February 2020

Final Version

Deadline 5 Submission 13 February 2020

Dear Sir /Madam,

This document sets out Surrey County Council's (SCC) comments on various documents submitted for Deadline 4. In particular the County Council wishes to make comment on the following documents:

6.4	Appendix 9.5	Archaeological Mitigation Strategy
6.4	Appendix 16.1	Code of Construction Practice
8.50		Outline Landscape and Ecological Management Plan
8.51		Outline Construction Environmental Management Plan
8.51	Appendix B	Outline Water Management Plan
8.53		Outline Surface Water and Foul Water Drainage Plan
8.51	Appendix C	Outline Site Waste Management Plan
3.1		Draft Development Consent Order - Revision No. 5.0

Archaeological Mitigation Strategy

The updated Archaeological Mitigation Strategy (AMS) provides an updated archaeological trial trench programme (Annex A) which reflects the most recent trial trenching proposals submitted by ESSO to Surrey CC following the meeting of 09/01/2020. There are a (fairly significant) number of areas which were initially identified as areas to trial trench, but throughout the discussion process have been removed due to logistical or land ownership reasons. Some of these trial trench areas were identified to further our understanding of the likelihood of encountering archaeological remains where this is presently 'unknown', and others were to further our understanding of the nature/date/extent/significance where archaeological remains are already believed to exist. Therefore it should be noted that the targeted trial trench areas are not wholly archaeologically led (as per para 2.2.3 of the AMS), but a pragmatic approach to advance information finding given the constraints at the present time.

Given this, there are some large areas where it appears it is not possible to undertake advance archaeological trial trenching, which will result in an increased risk that unexpected archaeological remains, (or remains of an unexpected significance) may be revealed at a later stage in the

construction programme. As such where trial trenching is not undertaken, ESSO’s archaeological consultants have indicated that they acknowledge the necessary requirement to undertaking the adequate mitigation at a later date (at increased risk), and to ensuring the necessary resources and timescales are provided to ensure that any archaeological remains revealed during the construction programme will be adequately dealt with. In order to secure these commitments, these assurances will need to be fully incorporated into the submitted AMS.

From the perspective of archaeological mitigation it remains our opinion that while all attempts should be made to conduct early phase trial trenching as far as possible, given the varied constraints we are minded to agree these trial trenching proposals subject to the necessary assurances described above.

The details of the updated AMS has been reviewed with the need for these assurances in mind. The following specific comments/questions/suggestions were sent to the ESSOs archaeological consultants 06/01/2020.

Archaeological Mitigation Strategy Jan2020 – SCC comments	
Para	Comment
2.3.6	Please note the precise sampling amounts will need to be agreed in the detailed WSI and meet Surrey’s minimum sampling standards.
Targeted Watching Brief additions:	
	The updated AMS has further information regarding the Watching Brief methodology, which does go some way to addressing some of the issues above.
2.3.14	14 Detailed trial trenching and archaeological recording prior to construction will seek to reduce the likelihood of the second and third scenario. This implies that comprehensive trial trench coverage has been agreed, whereas there is a large portion of the route in Surrey where the second and third scenario remain the standard.
2.3.15	Provision will be made, as appropriate, for archaeological monitoring in the form of a watching brief so that: <ul style="list-style-type: none"> • archaeological remains are recognised and recorded during construction; or • the initial results of the watching brief trigger the release, in an agreed context, of sufficient resources of formal archaeological recording where such provision has been reasonably identified through the results of the watching brief. I think this is aiming to provide the assurance I am looking for above to allow for more robust methodologies in the event that archaeological remains are revealed through the watching brief. I am not sure I fully understand the wording of this though – and I question the definition of “an agreed context” “sufficient resources” and how the provision will be “reasonably identified”.
Annex A	
	We are prepared to accept this programme if the appropriate phase B provisions are in place, and subject to an agreed WSI
Annex A: F.24.5	I notice that F.24.5 in the table has not been updated to “No Trial Trenching” rather than “No archaeological programme”, which seems to be an oversight as

	it was updated in the spreadsheet sent over following our meeting of 09/01/2020.
	I would encourage the category B sites to be renamed, as “No Trial Trenching” could be misleading, something like “phase B mitigation” perhaps? I suggest the addition of a further column to the Category Bs to contain notes on what this is likely to look like. E.g. SMS/WB/phase II trial trenching/To be agreed? I appreciate this will come as a later part of the process, but it would vastly help to consider the programme as a whole entity.
General comment	
General	Given the level of detail now set out within the AMS, to support this information I would recommend the document also contain an overall process and timescale for review of trial trench results, discussions and decisions on the appropriate mitigation strategies, and production of overarching and detailed WSIs?

Code of Construction Practice

No comments from an ecological perspective. Please expect further comments week beginning 17 February.

Outline Landscape and Ecological Management Plan and Outline Construction Environmental Management Plan

No comments

Outline Water Management Plan and Outline Surface Water and Foul Water Drainage Plan

Unfortunately Surrey County Council has not had enough resource since Deadline 4 to review or comment on the large number of ESSO drainage documents provided. This is due to other ongoing statutory commitments.

In order to adequately review these documents SCC needs sufficient time to do so. Even for a standard planning application or watercourse consent the timeframe is 21/28 days and this development is considerably more complex, as well as covering a much wider area and with a greater number of risks. SCC will endeavour to respond with comments as soon as possible, we are targeting the week beginning 17 February.

Outline Site Waste Management Plan

The County Council has no comments to make on the Site Waste Management Plan. It is considered comprehensive and appropriate.

Amended Draft DCO

Whilst the Surrey County Council Permit Scheme has been acknowledged, it is not in agreement with the references to it as drafted and will be providing detailed comments and suggested wording at the next draft DCO hearing.

Other Documents

In addition to the comments above it is possible that the County Council May wish to make comments on the following documents, once it has had the chance to review them:

8.49		Outline Construction Traffic Management Plan
8.51	Appendix A	Outline Emergency Action Plan
8.51	Appendix D	Outline Dust Management Plan
8.51	Appendix F	Outline Soil Management Plan
8.51	Appendix G	Outline Lighting Management Plan
8.58		Site Specific Plan - Turf Hill
8.59		Site Specific Plan - Fordbridge Park
8.63		Site Specific Plan - Ashford Road
8.66		Sample Vegetation Retention and Removal Plans

The County Council hopes to respond with comments as soon as possible.

Yours Faithfully,

Caroline Smith,
Surrey County Council