

Surrey Heath Borough Council Deadline 5 Submission

Written Response to the The Examining Authority's written questions and requests for information (ExQ2)



Esso Petroleum Company Limited Southampton to London Pipeline Project Application for a Development Consent Order

Project reference no. EN070005

DCO.2.31 Potential Additional or Reworded Requirements

The Council continues to have ongoing discussions with the applicant as part of this process.

The following comments are provided to inform both the Examining Authority and Esso of the Council's position in relation to what has been provided to date and to signpost what information would be expected in future documents.

As an overarching principle the Council would expect that all persons carrying out inspections or investigations as part of any of the requirements are "appropriately qualified" in addition to being "experienced"

If reference to the Register of Actions and Commitments (REAC) is to be included in the documents, it should be noted that this document has been superseded by other documents (Esso document Deadline 3 Draft DCO Explanation of Changes at Deadline 3 Application Document: 8.28 revision no 1.0 December 2019) or reference to this document removed in the interests of clarity.

Outline Landscape and Ecological Management Plan (LEMP)

Whilst the Council acknowledges that the report is extremely comprehensive it remains non-committal in how tree issues are dealt with other than their preferred option to remove them. Trees subject to tree preservation orders (TPOs) and Veteran trees are the most public sensitive factor which will need careful assessment

Whilst the Council welcomes the applicants approach to surveying trees within and in the vicinity of the proposed Order Limits, the Council remains concerned about the lack of a detailed tree survey to BS5837:2012 to inform either the outline or detailed LEMP particularly in relation to vegetation retention and removal plans. To this end the Council continues to seek the proposed requirement as set out in the Local Impact Report submitted in October 2019. The absence of detailed information makes it difficult to fully assess the impact on the landscape, or to understand which trees are to be removed and/or retained including details of the requisite sizes of Root Protection Areas (RPAs) and any resultant mitigation.

Chapter 2 Project Commitments

The Council recognises that the commitments in the LEMP are statements previously published in other documents submitted as part of the Examination process. However the Council has made the following comments to give an indication of how these commitments should be reflected/addressed in the LEMP

With regard to Table 2.1 Good Practice Measures Relevant to the Outline LEMP we would make the following comments:

Commitment G88. It would not always be appropriate to reinstate vegetation with the same or similar species to that removed for example in the interests of biodiversity. As such there should be a degree of flexibility within the LEMP to allow the use of alternative species. There is also a concern that this commitment is loosely worded without firm commitments. Such commitments for appropriate replanting should be secured within the LEMP

Commitment G95. At Deadline 4 in response to Examining Authority's question relating to LV.2.7, the Council advised that tree protection measures should be in accordance with British Standard 5837:2012 to ensure robust tree protection measures, particularly in sensitive areas, are maintained to safeguard the trees to be retained. The NJUG are not considered to give the requisite level of protection during the development period which could extend up to two years.

Commitment G97. It is noted that this commitment only relates to planting approved by Esso. However the Council strongly disagrees that native shrub planting is an acceptable replacement for the loss of trees, particularly where veteran, mature or trees subject to tree preservation order are concerned. It would be appropriate for landowner agreement to be secured for the replacement planting as the landowner (normally the Council in Surrey Heath) would be responsible for ongoing maintenance. As the Council set out in its Deadline 4 response in respect of LV.2.4 the Council recognised that it may not be possible to accommodate replacement planting within the Order limits. To this end the Council reiterates that it would be prepared to enter into an agreement with the applicant to secure replacement tree planting within the Borough to compensate for trees and vegetation lost as result of works associated with the proposed pipeline.

Commitment HRA1. The Council as owner of many of the affected statutory and non- statutory designated wildlife sites seeks information on what "natural regeneration" would mean in practice and over what period this would be expected to take place. This lack of clarity means that the heathland could be impacted for an indeterminate period which would be of concern.

Chapter 4 Vegetation Retention and Removal

In general terms the principles are acceptable. However the Council is concerned that, to date, it has insufficient detailed information to enable it to make informed judgements and assessments. It is envisaged that the requisite detailed information will be provided in the LEMP.

With regard to Table 4.1 we have the following comments to make:

Commitment G59. The Council has a specific concern about the translocation of Greater Crested Newts to the nearest undisturbed pond as these amphibians use different ponds for different functions and this does not appear to have been taken into account as part of the translocation process.

With regard to Table 4.2 it would be helpful to have a link to the protected species provisions to ensure clarity and consistency of approach.

Commitment 174. The Council notes that commitment G56 provides mitigation measures in respect of any bat roosts removed with moderate or high bat roost potential

At paragraph 4.3.6 it states that where avoidance of the RPA is also not practicable specialist construction measures for use within the RPA would be adopted and set in a method statement. In the event that a method statement is required it is unclear where this would be publically available to view and whether it would be for the Council to approve or note.

With regard to paragraph 4.3.8 please refer to the comments made at commitment 95 above.

With regard to paragraph 4.3.9 it is unclear that where encroachment into Tree Protection Zones is unavoidable, where information on the temporary ground protection measures would be made publically available to view.

With regard to paragraph 4.3.13 it is unclear whether risk reduction measures would include an assessment of made ground

With regard to paragraph 4.3.18 (which links into Table 4.2), the absence of potential replacement habitats is noted.

With regard to paragraph 4.3.19 it is unclear where the details will be recorded about the reinstatement/replacement of the feature(s) to aid reinstatement following construction and how they will be publically viewable. It is also unclear what consultation would take place with regard to these features.

With regard to paragraph 4.4.3 it is unclear whether regard would be had to made ground.

With regard to paragraph 4.5.2 and 4.5.3 where translocation would be undertaken and the identification of the suitable receptor site would be made, it would be expected that the relevant areas would be the subject of up to date site surveys which would inform the site specific method statement. Information on where these details would be publically viewable should be provided.

With regard to paragraph 4.6.1 and whilst acknowledging that St Catherine's SANG has a site specific plan, the Council confirms that there are a large number of rhododendrons within the Order Limits at St Catherine's.

With regard to paragraphs 4.6.2 and 4.6.3 it is unclear whether regard would be had to made ground.

Chapter 5 Landscape and Ecological Reinstatement

At paragraph 5.1.4, the Council would seek a survey plan so that an informed comparison of “before” and “after” impacts could be made.

At paragraph 5.2.1 clarification of what constitutes “completion of installation” would be helpful

With regard to paragraph 5.2.2 the comments made in respect of G97 above are relevant.

With regard to Table 5.1 and commitment HRA2 we would refer to the comments made in respect of commitment HRA1 above.

With regard to paragraph 5.2.3 it is unclear what would happen if the landowner does not agree with the proposed Landscape and Ecological Reinstatement Plans specifically in relating to future maintenance. Further clarity on this point is required.

With regard to the paragraphs 5.3.1 reinstatement of woodland and trees, the Council would refer to its Deadline 4 response to question LV.2.4 in which it stated that a minimum of two replacement trees would be required to replace each mature tree removed. Replacement trees should be standard, root balled of between 15-20 years of age and broad leaf native species. The Council would advise that in the event that further evidence of the Oak Processionary Moth is found within the Borough, the use of Oak trees may not be appropriate in a replacement planting scheme. The Council would wish to ensure that appropriate replacement trees are planted specifically for the purposes of tables 5.2, 5.3, 5.4, 5.5 and 5.6.

With regard to paragraph 5.6.1 and in the interests of clarity the Council as landowner would seek the replacement of all fencing, walls and footpaths on a like for like basis. For information on certain sites the Council has obligations on types of fencing (e.g. within the SANGS = 5ft stock fencing to ensure dogs are unable to escape) that it must comply with and would need the re-instatement to adhere to these requirements.

Chapter 6 Aftercare

It is noted that the programme of aftercare operations would be developed for inclusion in the detailed LEMP. In the interests of clarity the Council as landowner would seek further information on the five year aftercare plan, how it will be delivered, by whom and how frequently. If herbicides, fertilisers or product intended for use on the land Control of Substances Hazardous to Health (COSHH) details should be provided.

In the interests of collaborative working the Council would wish to be advised prior to any inspections and works taking place on the sites so that it may advise of any issues that may need to be noted before the site visit/work.

It is unclear where the landscape inspection reports and details of any arising actions would be made publically viewable and clarification of this would be welcome.

Ecological Monitoring

With regard to paragraph 7.2.1 in the interests of clarity the Council would expect to see a five year inspection programme and aftercare period.

Outline Construction Environmental Management Plan (CEMP)

Chapter 2 Design and Construction

With regard to paragraph 2.2.1 the timing considerations are acceptable in principle. However it would be expected that further detail on timing would be submitted at the detailed stage.

With regard to paragraph 2.3.1, with the exception of Windlemere, the Council is not aware of what and where baseline surveys have been completed and on what basis. It would be helpful to know where this information would be viewable. It is noted that the surveys were undertaken over a year ago. The Council supports that pre-construction surveys will be undertaken.

With regard to paragraph 2.3.2 it is unclear how the results of the pre-construction surveys will inform the development or update any approved details eg will they be used to re-define the pipeline route, the trench type or proposed mitigation for species at risk. It is also noted that there is not a definitive list of the locations where these surveys would take place. Notwithstanding the Council has concerns that the surveying undertaken at Windlemere is not complete and further surveying is required particularly in relation to the Great Crested Newt meta population. This is critical to understanding the potential impacts on these amphibians and the mitigation measures required to minimise the impact on them and their habitats.

Further to this the Council has been advised by the applicant that survey work has been undertaken in respect of the potential presence of dormice at Windlemere. However this information has not been provided to the Council and as such the Council is unable to confirm if the survey work undertaken or methodology used is appropriate to assess the impact on this protected species.

With regard to paragraph 2.5.1 the emphasis on "Sunday or Bank Holiday working is not anticipated as being typical" does not reflect the provisions of requirement 14 which states that construction works must only take place between 0800 and 1800 Monday to Saturday except in an emergency. There is a potential conflict in the definition of emergency for the purpose of the requirement and the provisions of extended hours working as set out in paragraph 2.5.1. Clarity on this issue would be welcome.

Chapter 3 Project Team Roles and Responsibilities

With regard to paragraph 3.3.1 the Council, as landowner, would seek a recorded pre-site check and then a post-site check to ensure that it is handed back to the Council in an acceptable condition.

With regard to paragraphs 3.3.3 and 3.3.4 it is unclear why the central Environmental Log would not be publically available and only, as currently proposed, on request. Furthermore there does not seem to be a provision to update the Log with the additional procedures which may have been undertaken, by whom and when.

With regard to paragraph 3.4.3, it would appear logical to replace “propose” with “provide” and add “compulsory” to “training” to ensure all site operatives are fully briefed on local ecology.

With regard to paragraph 3.6.1 there does not seem to be a provision to update the action plan to detail what actions with the additional procedures which may have been undertaken, by whom and when.

With regard to paragraph 3.7.1, an e-mail address and a “contact us” facility should be made available on the main Southampton to London pipeline website.

With regard to paragraph 3.7.2 there does not seem to be a provision to update the record of the incident to detail what actions were taken, by whom and when.

Chapter 4 Consents and Permits

With regard to paragraph 4.2.1 it would be helpful to have clarity on where updated information would be publically held and viewable if changes are required during the construction phase. The Council as landowner would seek copies of consents, permits and licences on its land.

Appendix A Outline Emergency Action Plan

In general terms this is acceptable. However information should be publically available on any incident and actions arising. This should include any monitoring requirement.

With regard to paragraph 4.5.1, there is a lack of clarity on when stakeholders would be notified. It is important that the Council/any landowner are notified as a matter of urgency should an emergency arise to ensure that they are able to respond to enquiries in relation to the incident.

Appendix B Outline Water Management Plan

In general terms this is acceptable. However the Council would be concerned about any changes to ground water at Windlemere and the impact on the ponds on site as

this may have a greater long term effect on the suitability as habitats for the Great Crested Newts. The proposed pipeline runs alongside existing watercourses (ditch and ponds) which may be vulnerable to change in ground water from reading this point. This would cause a damaging effect if correct.

Appendix C Outline Site Waste Management Plan

This is acceptable in principle. The Council as landowner would like to confirm and agree what could be re-used and retained on each site in respect of any materials that are to be left on site that are over and above 'making good' for example chipped vegetation as mulch, trees as habitat piles, spreading of previously excavated top soil that is surplus to that required to infill the pipeline trench.

Appendix D Outline Dust Management Plan

Chapter 3 Outline Dust Management Plan

At paragraph 3.2.1. the Council notes the absence of detail and that further details will be submitted following the detailed design stage

With regard to paragraph 3.3.2 it is assumed that site planning and preparation would include an assessment of "made ground"

Chapter 4 Site Checks and Reporting

With regard to paragraph 4.2.1, the complaints procedure is scant in its content. Any complaints received should be publically viewable with details of what actions were taken in response to the complaint, by whom and when and whether any monitoring was required.

Appendix E Outline Noise and Vibration Management Plan Chapter 3 Outline Noise and Vibration Management Plan

With regard to 3.5.2 it would be helpful to have clarity about what is meant by "control of working hours" as construction hours are covered by requirement 14

In response to question PC.2.1 at Deadline 4 the Council identified a number of roads in Camberley, Chobham, Frimley, Lightwater, West End and Windlesham which should be included in the Noise and Vibration Management Plan.

Given this and In regard to paragraphs 3.6.1, 3.6.2, 3.6.3 and 3.6.4 the Council would seek the submission of noise surveys, in respect of those locations previously identified within submitted documents and as submitted by the Council at Deadline 4, to assess the need, or not, for acoustic fencing to safeguard the amenities of occupiers of the provided addresses. The Council would also seek site specific plans for the area of the pipeline between Buckingham Way and the administrative boundary with Rushmoor Borough Council to ensure that potential impacts are appropriately assessed and mitigated as required.. It is noted that these issues are

also considered at paragraphs 1.55, 1.56, 1.57 and 1.59 in Appendix 13.3 in the Noise and Technical Vibration Technical Note. It is important that the provisions in both documents are cross referenced in the interests of clarity.

Appendix 13.3 Noise and Vibration Technical Note

This is acceptable to inform the Outline Noise and Vibration Management Plan.

Appendix F Outline Soil Management Plan

Chapter 3 Outline Soil Management Plan

With regard to paragraph 3.2.1 the Council notes the absence of detail and that further details will be submitted following the detailed design stage.

With regard to paragraph 3.3.17, it is noted that topsoil stockpiles should not exceed 4 metres in height and subsoil stockpiles should not exceed 5 metres in height. It is important that the location of the stockpiles are clearly identified in the interests of visual and residential amenity including relationship to trees and nature conservation interests.

With regard to paragraph 3.3.20 reference is made to the maximum gradient of the stockpiles. As part of this submission the Council would expect that the width and depth of the stockpiles would be provided.

With regard to paragraph 3.4.1 the Council would expect reference to the Sites of Special Scientific Interest specifically Turf Hill.

Chapter 4 Site Checks and Reporting

With regard to paragraph 4.2.1 the complaints procedure is scant in its content. Any complaints received should be publically viewable with details of what actions were taken in response to the complaint, by whom and when and whether any monitoring was required.

Appendix G Outline Lighting Management Plan

Chapter 3 Control Measures

With regard to paragraph 3.7.1 "Exceptional working" does not reflect the provisions of requirement 14 which states that construction works must only take place between 0800 and 1800 Monday to Saturday except in an emergency. Clarity on this issue would be welcome.

With regard to paragraph 3.8.1 the applicant has previously indicated that, for logistical reasons, there may be circumstances where compounds are dormant for a period of time. In such circumstances clarification of whether the hubs and/or compounds would be illuminated during such periods should be provided. Given the location of the proposed compounds within Surrey Heath in proximity to trees and

woodland, the Council would expect to have bat friendly lighting within all the compounds within Surrey Heath.

Chapter 4 Site Checks

With regard to paragraph 4.3.1 the complaints procedure is scant in its content. Any complaints received should be publically viewable with details of what actions were taken in response to the complaint, by whom and when and whether any monitoring was required.

Deadline 5 submission – 8.61 – Site Specific Plan (SSP) – St Catherine’s SANG – Revision No 1.0

Chapter 3 Description of Works

The Council welcomes the submission of the Site Specific Plan for St Catherine’s Road SANG and the greater level of detail it provides in respect of construction works. However further clarification on habitat, tree and vegetation removal is required.

Understandably, in the absence of a contractor, the precise details for extent of the compound and how that would work in terms of traffic movement, location of facilities, parking, deliveries, on site storage are unknown. These details should be included in the detailed SSP.

With regard to paragraphs 3.2.3 and 3.2.4 clarification of what is meant by “some young trees” would be welcome. How many are some? and what qualifies as a young tree?

With regard to paragraph 3.2.6 cross referencing to the proposed tree protection measures would be helpful.

With regard to paragraphs 3.3.4 and notwithstanding the provisions of the proposed Outline Soil Management Plan, the Council would expect to be provided with details of location, height, gradient, width and depth of any topsoil to be stored on site. The document is silent on the need for any storage of subsoil and clarification of this would be welcome.

With regard to paragraphs 3.3.5 and notwithstanding the provisions of the Outline Management Plan, the Council would expect to see a detailed lighting plan for this compound to include standard, security and bat friendly lighting. Details of the facilities required for the 24 hour security team (how many? Shift patterns?) including the location and height of CCTV should be included in this SSP.

With regard to paragraph 3.4.5, and as set out above and in response to the Examining Authority’s question LV.2.7 at Deadline 4, the Council would expect all works to be undertaken to BS5837:2012.

With regard to paragraph 3.5.1 the Council would expect the reinstatement to be seeded.

With regard to paragraphs 3.5.2 and 3.5.3 a SSP reinstatement plan should be included within the SSP in the interests of clarity and for ease of reference. This should include, inter alia, what areas will be re-instated, to what standard, the methods to be used, appropriate replacement planting and an aftercare schedule of works for a minimum period of five years.

With regard to paragraph 3.5.4 further information is required on “reinstated to previous condition” or a provision added to the existing wording “in a manner to be agreed with Surrey Heath Borough Council”

The site specific plan should include specific, detailed measures to minimise disruption to remainder of the SANG and prevent recreational displacement. This could include:

- a. Acoustic fencing to limit the impacts of noise pollution on the tranquillity of the SANG.
- b. Using materials for fencing that reduce the visual impacts on the SANG, maintaining low visibility of the work area.
- c. Minimising the use of the SANG as far as is practical to limit any potential impacts, including temporary land take for storage vehicles, materials etc.
- d. Introducing up to date, clear and user friendly information within the SANG for its users, including details of timings and potential routes through the Frith Hill woodland, as well as making clear the remainder of the site will remain open.
- e. Laying the pipeline into the SANG outside bird nesting season to limit any potential impact.
- f. Avoid obstruction of main access routes.
- g. Ensuring that the site remains secure for dogs to be safely let of the lead.
- h. Reinstating the site in accordance with the SANG management plan.
- i. In advance of any construction works taking place, providing an information pack to every Keaver Drive residence detailing the timescale of the works, notification that the SANG will remain open and potential routes that can be utilised within Frith Hill and the Frimley Fuel Allotments.

The site specific plan refers to the likely occupation of the SANG being 13 months, although this may not be for a continuous period of time. However, it is noted that the Site Specific Plans state that activities will be demobilised within the two year period. It would be helpful if the reason for the difference in time periods could be outlined in the site specific plan.

As set out above the Council recognises that it may not be possible to accommodate replacement planting within the Order limits. To this end the Council would be happy to engage with the applicant to identify other areas where planting could take place to mitigate for any tree loss. The Council is very keen to ensure that there is no net tree loss in the borough due to this project.

Deadline 5 Submission - 8.58 - Site Specific Plan (SSP) - Turf Hill - Revision No. 1.0

Chapter 3 Description of Works

The Council welcomes the submission of the Site Specific Plan for Turf Hill. The Council notes that the applicant should have regard to comments raised by residents in respect of the site specific plan for the Turf Hill area.

With regard to paragraph 3.1.2, if diversionary paths are unable to be provided, full engagement with residents and stakeholders should take place to ensure that information is publically available (on site and online) which explains how long access will be unavailable.

With regard to paragraph 3.2.1, a tree survey plan and assessment to BS5837:2012 should be provided.

With regard to paragraph 3.2.3 a tree survey plan and assessment to BS5837:2012 should be provided to clarify and assess the trees to be removed from the compound area. "A number of trees" is too vague.

With regard to paragraph 3.2.4 it is unclear when and how the outstanding details will be submitted and on what basis eg for approval or for noting and where they will be publically available.

With regard to paragraphs 3.3.1 and 3.4.6 there is a lack of clarity about what will be included within the construction compound and the facilities that will be required. Further details are required in this regard (please see the response to paragraph 3.3.5 in respect of the St Catherine's SSP)

With regard to paragraph 3.4.5 and notwithstanding the provisions of the proposed Outline Soil Management Plan, the Council would expect to be provided with details of location, height, gradient, width and depth of any topsoil to be stored on site. The document is silent on the need for any storage of subsoil and clarification of this would be welcome.

With regard to paragraph 3.5.3 and as set out above and in response to the Examining Authority's question LV.2.7 at Deadline 4, the Council would expect all works to be undertaken to BS5837:2012.

With regard to Appendix B in the Turf Hill Re-instatement plan it shows that both the compound and mitigation area would be re-instated through natural regeneration. It is unclear why the mitigation area would need to be re-instated as it is being shown for mitigation purposes. The same area is shown as habitat creation area on the construction plan so it is unclear to what extent it is intended to be used.

Clarification of these points would be helpful

There is a lack of clarity as to whether the mitigation area will be fenced off. In the interests of clarity the Council would not want it to be fenced off.

On the drawing entitled Turf Hill: Construction Stage there is a hatched area along the road the notation for which states that "tree removal" is to be confirmed. This area is a main landscape buffer adjoining the Guildford Road. The SSP should survey the relevant trees to BS5837:2012, assess the impact of the trees proposed to be removed and propose mitigation for the trees identified for removal.

A general comment here is that the compound is directly next to the only area of humid/wet heath on this site which supports particular types of grass and moss not found on other areas. This is the only place where Sundews are found. It is key that as little damage is created in this area and that re-instatement is sensitive to this type of heath. Notwithstanding the proposed LEMP, the Council would want to agree all planting of vegetation and trees proposed for this site.

It is noted that the reference is made to retaining the trees on the northern edge of Turf Hill which adjoin the residential properties to the North and appendix B does identify trees to be removed.

The Council looks forward to receiving further information in relation to the Environmental Mitigation Area.

Outline Community Engagement Plan

Chapter 5 Community Stakeholders

With regard to paragraph 5.1.1 the Council would be happy to assist the community engagement team to identify all local stakeholders to ensure that appropriate local consultation is undertaken.

Chapter 6 Core Engagement Channels

With regard to the Core engagement channels the Council has made comments above about details and information being made publically available. It is considered that the SLP website would be an appropriate place for such details to be available.

Chapter 7 Frequency of Engagement

With regards to paragraph 7.1.1 a definition of what constitutes “installation” would be helpful.

Chapter 8 Core Engagement Topics

It would be helpful if the information to be provided was also made available on the SLP website.

Chapter 10 Tracking Activities

It would be helpful if the information to be provided was also made available on the SLP website

11 Enquiries and Complaints

It would be helpful if a “Contact us” and a “Report an Incident” facility was provided on the SLP website

Appendix A – Community Stakeholders List

With regard to the works proposed at St Catherine’s SANG, the Council would recommend that Tomlinscote School and St Augustines Primary School, both Tomlinscote Way Frimley and Lakeside Primary School Alphington Avenue Frimley are added to the Community Stakeholders List

With regard to the works proposed at Turf Hill the Council would recommend that the Heronscourt and Colville Gardens Residents Associations are added to the Community Stakeholders List

Appendix B – Template for Location Specific Tactical Engagement Plans

The Council would question whether notification of residents one week pre-construction is sufficient. In this regard St Catherine’s Road is a well used vehicular route from Frimley Green/Mytchett to Frimley and vice versa and is also a major route to schools in Alphington Avenue and Tomlinscote Way. Alternative routes would need to be identified and then implemented for all road users including cyclists and pedestrians. As set out above the Council would recommend that the schools are also informed to ensure that the local school communities are aware of the closure of St Catherine’s Road.

The Council would recommend a feedback facility being provided as part of the community engagement.

Code of Construction Practice

Chapter 2 Construction Method

As a general point it would be helpful if it were to be made clear that where specific documents have been approved, they would take precedence over the Code of Construction Practice.

With regard to paragraphs 2.4.4 and 2.4.9, it would be helpful to cross reference to the LEMP, CEMP and site specific documents as appropriate.

With regard to paragraphs 2.4.12 and 2.5.20, it is unclear whether the lift plan would be submitted as part of the CTMP. Clarification of this would be helpful.

With regard to paragraph 2.5.3 clarification of how pedestrian access to open space would be dealt with during the construction period.

With regard to paragraph 2.5.10 clarification of which statutory body would oversee these works would be helpful.

With regard to paragraph 2.5.13 it is unclear, that if required, how details of the mitigation measures would be made publically available and which statutory body would be responsible for overseeing these works.

With regard to paragraph 2.5.14, this should be cross referenced to the permitted size limits and locations as set out in the Outline Soil Management Plan

With regard to paragraph 2.8.2 St Catherine's Road is in Frimley/Frimley Green rather than Farnborough

With regard to paragraph 2.14.2 the Council would expect to see a plan maintaining a circular walk with the SSP for St Catherine's or an amendment to this paragraph to reflect what will be maintained at St Catherine's.

With regard to paragraph 2.18.1 the statement that "Sunday or Bank Holiday working is not anticipated as being typical" does not reflect the provisions of requirement 14 which states that construction works must only take place between 0800 and 1800 Monday to Saturday except in an emergency. There is a potential conflict in the definition of emergency as set out in the requirement and the provisions of extended hours working as set out in paragraph 2.5.1. Clarity on this issue would be welcome.

With regard to paragraph 2.18.2 the exceptions should be amended to reflect the terms of requirement 14.

With regard to paragraph 2.18.3 this should be amended to reflect the terms of requirement 14

With regard to paragraph 2.21.1 it would be helpful to have a clear definition of “timely”. Full details should be included in the CEMP, LEMP and site specific documents as appropriate.

With regard to paragraph 2.23.2 any complaints received should be publically viewable with details of what actions were taken in response to the complaint, by whom and when and whether any monitoring was required.

Chapter 4 Good Practice Measures

With regard to paragraph 4.3.1 it is unclear whether the Protected and Controlled Species Compliance Report forms part of the DCO submission. Clarification of this would be welcome

With regard to paragraph 4.6.1 the Council has not been provided with tree surveys and this information is critical to understanding the impact on the landscape and nature conservation.

Outline Construction Traffic Management Plan (CTMP)

Chapter 2 Authorised Development

With regard to paragraph 2.2.3 it would be helpful if the applicant could confirm who would be responsible for the stated activities.

With regard to paragraph 3.1.3 it would be helpful if the applicant could confirm if a banksman would be available on site.

Chapter 6 Street Works and Traffic Management

With regard to paragraph 6.2.3 timing for deliveries of construction materials should also be timed to avoid peak traffic times for schools in the area particularly St Catherine’s Road

With regard to paragraph 6.4.1 the statement that “Sunday or Bank Holiday working is not anticipated as being typical” does not reflect the provisions of requirement 14 which states that construction works must only take place between 0800 and 1800 Monday to Saturday except in an emergency. There is a potential conflict in the definition of emergency as set out in the requirement and the provisions of extended hours working as set out in paragraph 6.4.1. Clarity on this issue would be welcome.