



**Southampton to London Pipeline Project**

**17 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 relation to water and flood risk which were not available at the submission of the rest of our comments for Deadline 5. In particular the County Council wishes to make comment on the following documents:

- 6.4 Appendix 16.1 Code of Construction Practice
- 8.51 Appendix B Outline Water Management Plan
- 8.53 Outline Surface Water and Foul Water Drainage Plan
- 3.1 Draft Development Consent Order - Revision No. 5.0

And also the Technical Note: Surrey County Council – Flood Risks: not submitted

**Code of Construction Practice**

<b>Section/Paragraph</b>	<b>Subject</b>	<b>Comments</b>
2.3.1	Construction Phase Activities	Mentions pre-construction drainage – what kind of measures does this include? – what detail is there on this?
2.5.10	Watercourses encountered while preparing working width	2.9 contains further information. Principle sound - though as they are using either span bridges or pipes- pipes sized based on channel width and estimated peak flows
2.5.12, 2.5.13	Surface water drainage	Mentions that consultations with landowners will happen and goes on to say that changes may be made. 2.5.12 says that "scheme of pre-construction land drainage will be designed with the intent of maintaining the efficiency of the existing land drainage system and to assist in

		maintaining the integrity of the right of way during construction.” Require clarification if this means that surface water will not leave the sites faster than current levels or without increasing flood risk?
2.9 WATERCOURSES		For Open Cut watercourse crossings and installation of vehicle crossing points, mitigation measures would include those laid out in (G122). Further details are given below and in the CEMP, Appendix WMP (Document Reference 8.51).
2.9.10	A suitably-sized flume pipe will be placed in the watercourse (in the direction of the flow). This flume pipe will be sized in line with commitment W4, ‘Afflux at temporary main rivers and ordinary watercourse crossings would be maintained at less than 100mm’. In accordance with commitment G183, ‘natural substrate would be provided through temporary watercourse crossings box culverts’.	The 100mm afflux may be an issue for sites of high flood risk or areas where property flooding has already been recorded. This should be mitigated wherever possible to prevent the 100mm afflux causing issues at these sites.  This may also be an issue where watercourses are already very shallow as the 100mm afflux may take up most of the channel.  These issues were raised with Esso and the technical note was set out to provide a response to this.
The overall works sound reasonably sensible - issues are how the sites will be monitored and maintained during works and how long the works will be there for at each site.		
Water good practice measures and mitigation – G127	Flood risk action plan	This will need to be reviewed – cannot do anything which will adversely affect other landowners or allow flood risk to be increased without mitigation

Specifically relating to the Flood Risk Action Plans (FRAPs) set out in G127:

A number of sites have been identified as having potentially high risk to/from flood risk and these site should have site specific FRAPs where the general CEMP is augmented to address and flood related risks.

The technical note sent to Surrey County Council provides a response to queries over certain watercourse crossings which were regarded as High Risk and whilst we are generally accepting that any increases in river afflux are unlikely to cause significant effects, the site specific FRAPS should be developed to seek to mitigate any increases in flood risk through working practices. This may include detailed provisions for particular sites. As stated these should be developed in conjunction with the EA and LLFAs.

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

We believe the Outline Surface and Foul Water Drainage Plan (SFWDP) should be included as an appendix of the Outline Water Management Plan as much of the information is relevant.

In general the SFWDP does not appear to meet its objective to “*define the contents and scope of the final SFWDP(s).*” Rather the SFWDP seems to seek to provide the final SFDWP for the project, except in regard to the pigging station at Boorley Green.

The SFWDP should set out the areas where surface water may be impacted as a result of the permanent works (temporary works are dealt with in the CEMP), how these impacts are assessed and mitigated, even if the impacts are predicated to be negligible. This is unlikely to be known until detailed design is complete.

2.1.1 The reinstatement of the ground above the pipeline and any vegetation removal/replanting *may* have an effect on SW if the ground is compacted - this should be included in the CEMP however.

2.1.3 It is stated that all surface water from above ground hardstanding areas will be free to drain to surrounding ground due to the small footprint of the sites.

Whilst we agree that these areas are unlikely to *significantly* increase the SW runoff across the whole pipeline, no assessment has been made for local impacts which may affect infrastructure, local residents or other receptors. We believe that a proportionate assessment and suitable mitigation should be made based on the standard design of the compounds, taking into account any local topography. As a minimum a check should be made regarding what runoff is likely to be and where exceedance flows may end up (the runoff may be to other impermeable surfaces or drainage systems for example) and a statement set out within the final SWFDP regarding the mitigated impact.

### **Amended Draft DCO**

Discussions around the Draft DCO and protective provisions are still ongoing,

Yours Faithfully,

Glen Westmore,  
Surrey County Council