

From: [REDACTED]
To: [Southampton to London Pipeline Project](#)
Cc: [REDACTED]
Subject: Additional Deadline 6 Submission
Date: 05 March 2020 12:38:32
Attachments: [The SLP Deadline 6 Paper final 5 3 20.docx](#)
Importance: High

Dear Mr Allen,

Following the further meeting yesterday in Westminster with Mr Gove, Natural England, Surrey Heath councillors and representatives of Heronscourt Residents Association, we submit our additional update for Deadline 6. In the event, the meeting also extended to involve some of the Esso team including Tim Sunderland and additional outstanding matters were discussed.

Underlying those meetings, there seems to be no softening of Esso's determination to ignore any of the arguments placed before the ExA and their resolve to pursue route F1a+ with all the environmental and ecological consequences this will create.

We are hopeful that some of the discussions, particularly in respect of tree loss, may very well lead to Surrey Heath Borough Council providing additional questions via the ExA to the Applicant. In addition, having also raised the question of the Paris Agreement in our earlier papers, we remain very interested in how the environmental issues for this major pipeline are to be addressed.

We hope that our various submissions will be registered as our Deadline 6 contribution to the Inspectorate's deliberations.

With regards,

HCRA

CGRA

Lightwater Residents

SLP- Deadline 6 Additional Information

Natural England's Letter to Mr Gove

This submission is of particular importance as it provides new clarification on Natural England's (NE) position regarding the choice of route through Turfhill Park since in recent correspondence to interested parties including, Mr Michael Gove, it sets out to clarify its position on F1c and F1a+. A copy of that letter was included as Appendix 3 in our recent Deadline 6 submission and is attached here as an Appendix.

They have stated in its response to ExA's Q2, that it had passed no opinion or advice to the Applicant on the acceptability or choice of route option for F1c as 'this was never presented as a preferred option' and that 'as they (Esso) had decided to follow F1a'.

It now further clarifies its position by saying 'It is now our advice that either route would be deliverable with the right package of avoidance and mitigation', which is an extract from the attached letter.

To date, the Applicant has maintained that one of its major considerations for changing to F1a+ was NE's support of this route.

This further clarification by NE effectively now renders that consideration invalid.

As we indicated, discussions took place at Westminster yesterday initially with Natural England, Michael Gove, local Surrey Heath Borough attendees and representatives of the Residents Associations. Unexpectedly, this was followed by a meeting with the Applicant's Tim Sunderland.

Following those meetings, it was absolutely clear to all those attending that the Applicant has no intention of amending the route, the decision to follow route F1a+ had been made and the concerns expressed by all the interested parties have been dismissed.

They are fully aware of the objections of the residents and seem prepared to accept any adverse publicity that may arise.

Additional Discussions and Matters arising

In an accompanying submission by the RA's on the Site Specific Plan for Turfhill Park, further major concerns were raised on the following:

- **The anticipated result of the new tree survey**

There has been an escalation of the number of trees affected from the 17 trees that were to be removed to 57 but we have still not seen the results and are not convinced this is the correct number. This point is relevant since the current tree survey seems to have been centred on the bridle path and may not include trees on the residents' property boundaries.

- **The ability to use an Open Trench method for laying the pipeline**

It has been confirmed that an Open Trench method will be used but we understand that experts in pipe laying have stated that this may not be possible.

- **New concerns about the water main**

Still to be surveyed – scheduled for 6th March - and mention was made about the sharing of easements for the water and hydrocarbon lines which cannot be in the interests of Affinity, the water supplier and their contract to supply.

- **The inability to replant replacement saplings along a thin strip of the Order Limits**

We understand that a revised Site Specific Plan for Turfhill Park is to be published within the next few days showing the 'exact line' of the new pipeline.

If this new clarification from NE is combined with all the above and all of the major negative impacts expressed in previous submissions, it must demand a return to F1c. By also adopting the Alternative Route to F1a+, SHBC needs, re traffic disruption on the Red Road, will continue to be satisfied.

Paris Agreement on Emissions

The RAs raised this topic when submitting comments for Deadline 6 and this was raised at Prime Minister's Question Time in the House of Commons yesterday.

In view of the Heathrow decision, he was asked whether all National Infrastructure proposals would have to carry out an analysis in accordance with the Paris Agreement. The answer given by the PM seemed to indicate that it should apply to all proposals.

Presumably, the Inspectorate will now need to seek assurances from the Applicant bearing in mind the significant CO2 emissions resulting from this larger and more efficient pipeline?

HCRA

CGRA

Lightwater Residents

Appendix

Email from Toby Bell, Parliamentary Assistant to Michael Gove, 2nd March 2020 to HCRA and SHBC

Thank you very much for coming to Michael's surgery last Friday.

He has asked me to pass on the below response from Tony Juniper at Natural England, which he hopes is informative and useful.

'Dear Mr Gove,

Thank you for your email regarding Esso's Southampton to London Pipeline project. I understand from our local planning team that Natural England has been engaged with the Jacobs, the ecological consultants working for the applicant from an early stage in the process to ensure that the risk of ecological impacts were properly identified and taken into consideration in the route design and planning of working methods. We have provided environmental advice for Jacobs and Esso to make a decision on their final route. As you are aware this application has now been submitted to the Planning Inspectorate and was accepted for examination on the 11th June 2019.

We have provided advice around the potential impacts of routing the pipeline across parts of Colony Bog and Bagshot Heath Site for Special Scientific Interest (SSSI), close to Heronscourt and Colville Gardens. Both routes F1c and F1a+ run through this SSSI, which is also designated as the Thames Basin Heaths Special Protection Area (SPA), and the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC).

From an ecological point of view, route F1c crosses heathland which is known to be of value to Dartford Warblers and sand lizards at this site. In comparison, route F1a+ passes through woodland which, although mature, has not been designated as ancient woodland, and does not support the features for which the sites have been designated. However, we do recognise that the woodland may contain some veteran or other important trees. Natural England is working with the Forestry Commission and the applicant to ensure that these trees are not significantly harmed by the application. We have made a formal written representation covering this issue, which is available to view on the Planning Inspectorate's website. I have provided a link to Natural England's submission below:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000383-Natural%20England%20Formal%20Response%20to%20NSIP.pdf>

Natural England has advised that although route F1c has the potential to have a greater impact on the features of the designated sites (the heathlands, the breeding birds and sand lizards), it is our advice that either route would be deliverable with the right package of avoidance and mitigation - Jacobs will have taken our advice and used it to inform their Habitats Regulations Assessment which will have helped them to decide which route to take, along with other factors.

Our local Area Manager, Andrew Smith, would be happy to meet to discuss this matter further should that be useful. His contact details are as follows: andrew.smith@naturalengland.org.uk [REDACTED]. In addition, Andrew would of course also be happy to discuss these issues with the representatives from Heronscourt and Colville Gardens should that be useful.

Kind regards,

Tony'

With best wishes,

Toby

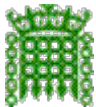
Toby Bell – Parliamentary Assistant

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