

From: [REDACTED]
To: [Southampton to London Pipeline Project](#)
Cc: [REDACTED]
Subject: National Infrastructure Process: Examination of Southampton to London Pipeline
Date: 02 April 2020 10:25:00
Attachments: [Deadline 7 Submission V3 010420.docx](#)
Importance: High

Dear Mr. Allen,

As part of our on-going objections to the latest proposals to the Applicant's Site Specific Plan for Turfhill Park, we submitted additional papers during March in order for the Inspectorate to have adequate time to consider the contents ahead of the completion of the examination on Thursday 9th April 2020.

The Case Team advised that the ExA considered the information contained in those papers were to form the Residents Associations' response to Deadline 7 and that the documents will be published as soon as that deadline has passed, along with other Deadline 7 responses.

Those documents, alongside our formal submission for Deadline 7 on 2nd April which is attached, represent some of the consistent concerns of the considerable number of Lightwater residents who have been able to use Turfhill Park as a haven of peace and quiet for exercise during the current lockdown due to Covid 19. We sincerely hope that our case will ensure that the ambience and scenery will emerge as an on-going feature of community life in the village in the future and ensure the unnecessary destruction of trees.

As the Examination reaches its conclusion and for many of us, who are new to this type of Project, we have been surprised at the manner in which the Applicant has treated the entire process, the ExA and all contributors. In their appearances at ISH's, their failures to respond to documented requests by the ExA, their copious written responses to questions as recorded in the Project library and in the face of reasoned and well represented arguments, they have displayed a degree of arrogance in refusing to consider change, and have resolutely and cynically worked to thwart the process and, in doing so, consume time until the conclusion of the Examination.

As affected Residents we are still adamant that the Applicant, apart from its two current pipelines, has other routes, rather than the one they have chosen for this short stretch of the pipeline. These they have refused to explore or consider with implacable consistency throughout the Examination completely ignoring the damage they will inflict. We submit our final papers in the hope that the Inspectorate will support our views.

We would also like to take the opportunity to commend and thank your Case Team, particularly Hefin and K-J, for their supportive professionalism throughout the convoluted legal, written process and for providing friendly advice and clarification on the many matters relating to this Project.

And finally, to thank the Inspectorate for letting us express our serious concerns about these proposals for Turfhill Park as we await your final recommendations. As usual, we remain available to answer any questions you may have for us after the filings of Deadline 7 papers.

Lightwater Residents Association
Colville Gardens Residents Association
Lightwater Residents

**SLP PIPELINE
TURFHILL PARK, LIGHTWATER, SURREY**

**Opposition of Heronscourt and Colville Gardens
Residents' Associations to the route of the
Southampton to Heathrow Pipeline across
Turfhill Park**

**Presentation to the Examining Authority
Ahead of Deadline 7: 02/04/2020**

APRIL 2020

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Introduction

As part of our on-going objections to the latest proposals to the Applicant's Site Specific Plan for Turfhill Park, we submitted additional papers during March in order for the Inspectorate to have adequate time to consider the contents ahead of the completion of the examination on Thursday 9th April 2020.

We were subsequently advised by the Case Team that the ExA considered the information contained in those papers were considered to form the Residents Associations' response to Deadline 7 and that the information will be published as soon as the deadline has passed, along with other Deadline 7 responses.

Nevertheless, in anticipation that the Case Team and the Inspectorate have fully considered the points the RAs have raised both in written and oral submissions during the course of the ExA Examination, we take this last opportunity to submit a late update on the Affinity water main and some other final comments for Deadline 7 in acknowledgement that matters after this date will be entirely in the hands of the Inspectorate and the relevant Secretary of State.

Update on the SSP Turfhill Park and the Water Main

As mentioned, the RAs have already submitted objections to the Applicant's revised SSP for Turfhill Park for Deadline 7, and have raised the issues of the two abandoned efforts to trace the route of Affinity's water main.

Since then, the RA's are astounded that at this late stage the Applicant has still failed to ascertain the route of this water main, which runs directly along the route line it is proposing to excavate in order to lay the new pipeline.

It is now the end of March and the Applicant, to the RAs knowledge, has still not verified the assumptions it must have made, in showing its route along F1a on the map attached to its latest SSP for the Park.

The latest map clearly indicates the fuel line following a route along F1a, which carefully skirts but often still encroaches on the minimum RPAs of many trees, all on the assumption that the water main follows tightly and continuously, alongside the bordering properties fence lines.

This in itself is incorrect as the demise of the bordering properties extend one metre into F1a. Secondly, as mentioned in other submissions, the known entry point of the water main is on the opposite side of F1a and needs to cross and negotiate a bend along F1a to arrive at its only other known location.

The planned route of the fuel line is the fundamental element of the SSP, particularly with the challenges of;

- negotiating the hundred plus trees on F1a

- negotiating a hidden water main

- the need to comply with BS5837:2012, a commitment which is again clearly stated in the Notes on the map.

Referring again to the Notes on the map, it is clear, once again that the problem of the trees and the water main will be that of the Contractor to solve, by which time the damage that the Residents and the local Community fear, will be done.

Surely, as the fundamental element of the SSP and without the route of the water main being charted, the Plan can have no credibility, cannot be left in the hands of the Contractor and cannot be sanctioned by the ExA?

SSP/Statement of Common Ground (SOCG) – Surrey Heath Borough Council

Our response to the SSP for Turfhill clearly demonstrates that Esso will not be conforming to BS5873;2012, a commitment it clearly made. As a result of that, more than 200+ trees in excess of 75mm will need to be removed. Esso states that only 21 trees will be removed from F1a+, but will leave the actual number and presumably, the work around the water main, to be **in the hands of the Contractor** and we know what that means. That cannot be allowed to happen.

Our second submission deals with the question of no comparative studies having been done on the differing impacts of the two routes F1c and F1a+.

Esso's failure to have done such tests demands that an Imperative Reasons of Overriding Public Interest (IROPI) test be carried out. Stage 3 of this test requires that an Assessment of Alternative Solutions be undertaken. Esso has done no such tests and we believe that is in breach of Infrastructure Planning Regulations 2009. In any event, it is enough for the Competent Authority not to consent to the Plan.

Additionally, we cannot see how the Council can sign off on this SSP for Turfhill Park or provide an unequivocal SOCG, given the above information.

Final Comments on the Examination Process

Since Esso submitted the Southampton to London Pipeline for Examination, they have steadfastly refused to carry out some of the important legitimate requests of the ExA.

How can it be possible for the ExA to make a sensible recommendation to the Minister, in order that he may make an informed decision, in the absence of fundamental information?

The Inspectorate are already aware of our frustrations at the legal constraints and process that have bedevilled their efforts to conduct a comprehensive Examination of this Project and point to our many covering comments supporting our formal submissions to the ExA.

'Common Sense' and 'Fairness' seem to be the major casualties in the drive by the Applicant to browbeat those involved and those affected into submission.

The legal and written Examination process together with the 6 month time restriction makes it virtually impossible for private interested parties to participate in any meaningful manner and for the ExA to pursue some of the important and necessary investigations.

The Examination of the Southampton to London Pipeline Project seems to have been hampered by an Applicant who is well-versed in the international process of executing major projects and capable of ensuring relevant answers remain unanswered.

Conclusion

We have been advised that the ExA will consider and report on all relevant matters in the Examination within its Recommendation Report to the Secretary of State, who will determine whether the Order is to be made for the Proposed Development.

The Report will be submitted to the SoS within 3 months of the close of the Examination. It is noted that the Report will be issued by the SoS alongside its Decision; it is not released prior to that and as a result all those involved in the Examination process will only be finally aware of the outcome, together with outstanding or incomplete responses, after the determination has been made.

Heronscourt Residents Association
Colville Gardens Residents Association
Lightwater Residents