

**Comments appertaining to  
ESSO's Site Specific Plans  
for SCP**

**Application by ESSO Petroleum Company Ltd  
for an Order Granting Development  
Consent for the Southampton to London  
Pipeline Project**

**Application Reference EN070005**

**Interested Party Reference 20022787**

**Internal Reference 19/00432/PINS**

## Southwood Country Park Site Specific Plan

### 1. Introduction

1.1.1 There have been a number of amendments to this document that increase its effectiveness in regards to mitigating the impacts of the project on the Thames Basin Heaths SPA, due to recreational pressure

- The construction program now has clear timings with much of the works being undertaken at the end of or outside the bird breeding season, thus meeting with one of our requirements for SPA mitigation. The council continues to have concerns regarding the timing of the auger bores and would request clarification as to why this work cannot be undertaken at a less sensitive time.
- The council also notes that a commitment has been made to phase the work with works on site falling into four distinct phases, enabling works, HDD within the Cove Brook Dam, auger boring and open cut trenching. This appears to indicate that the works on site will be limited to 45 weeks with open only lasting for 14 weeks. This schedule satisfies our requirement for works to be of limited duration with only the compounds being on site throughout the project.
- The only key mitigation measure yet to be resolved is the provision of temporary Suitable Alternative Natural Greenspace within Cove Brook Greenways. Discussion have been ongoing in relation to delivery of this project however RBC continue to be of the view that this project should be delivered as part of a s106 agreement and linked to the planning process, rather than funded as an EIP project. A costed Cove Brook Habitat Restoration project has been included within our submission entitled *Information Submitted in relation to the Thames Basin Heaths and Southwood Country Park SANG at Deadline 6 and 6a'*

1.1.2 In relation to habitat mitigation and compensation the council is pleased to note that seed harvesting within the marsh and acidic grassland habitats and a condition survey have been included within site specific plan. RBC would advocate that the biodiversity loss caused by loss of maturity within these habitats and the woodland and trees to be lost should be mitigated by provision of biodiversity offsetting. Although creation of additional acid grassland within Southwood Woodland, and marsh habitat within the Southwood Golf Course West SINC, the Cove Brook SINC and along the Ively Brook has been discussed with the applicant, it is the council's view that the mitigation strategy should be delivered as part of a s106 agreement rather than EIP. A habitat mitigation plan is provided within Appendix A.

### 2. Construction Program

2.1.1 This is the first opportunity RBC have had to comment on the proposed construction program in paragraph 2.1.9. The council is very pleased to note that much of the work will be undertaken outside the SPA bird breeding season. This is an essential part of our suggested mitigation to avoid visitors being deflected onto the SPA during the works. However we continue to have concerns that the auger bores are to be

undertaken within the summer months. This work should be rescheduled to be undertaken during the autumn or clear justification provided within the document as to why the works are seasonally sensitive. Within discussions RBC only agreed that the works to the Flood Alleviation Area could be undertaken in the drier months however we are happy to consider the auger bores if there is a valid construction reason why the work is seasonally sensitive.

### **3. Enabling Works**

- 3.1.1 Within 3.1.4 there is mention of removal of 10m of a woodland belt. If this removal is essential for access then RBC would expect the tree loss to be mitigated on site, with mitigation negotiated after a biodiversity offsetting calculation or some other mechanism has been undertaken to assess the biodiversity loss.
- 3.1.2 Within discussions with the applicant they have not agreed to mitigate tree loss using offsetting but will only provide one to one compensation for mature tree felled. The council assume the mitigation will be in the form of whips and therefore tree loss on site is likely to lead to significant biodiversity loss. RBC is of the view that this is not adequate mitigation and would request that a mitigation package, including appropriate mitigation for tree loss within the Country Park be secured through a s106 agreement.

### **4. TC14 (A327 Ively Road)**

- 4.1.1 Again there appears to be significant tree loss to facilitate the auger bore this will require mitigation as above.

### **5. TC14a (Cove Brook Dam)**

- 5.1.1 RBC recognises the sensitivity of the Dam and has therefore agreed this work can be done to the end of the bird nesting season. As this area is biodiverse the council would request that vegetation clearance is minimised in this area. Any clearance required would need to be mitigated. The council is discussing the creation of addition marsh habitat within Southwood Golf Course West SINC as part of the EIP, however it continues to be the council's view that any habitat mitigation should be secured as part of a s106 agreement and be linked to the planning process, rather than delivery as part of the EIP which is intended for enhancements.

### **6. Open Cut Installation**

- 6.1.1 This process will lead to the greatest damage to the Country Park with loss of hedgerow and grassland habitat. The council is particularly eager to ensure the acid grassland and marsh habitats are restored and mitigated within the project.

### **7. Restoration**

- 7.1.1 RBC is pleased to note that seed collection and sowing is proposed as part of the mitigation of loss of acidic grassland and marsh habitats. We are also pleased to note that updated surveys will be undertaken within the acidic grassland habitats to the east to establish biodiversity value. To mitigate the loss of maturity within the habitats additional habitat should be provided. The council have identified works

within Southwood Golf Course West SINC and Southwood Woodlands for additional marsh and acidic grassland habitats respectively. However as this is mitigation to ensure no biodiversity loss RBC is still of the opinion that area of habitat to be provided should be determined by a biodiversity offsetting calculation, with delivery of the habitats secured as part of a s106 agreement. The majority of the works will be undertaken as part of the project and therefore do not require additional funding.

7.1.2 Within the Cove Brook SINC and the Cove Brook Southern Grassland SINC the habitats currently present are associated with marshland rather than acidic grassland. Therefore we would require seed collection from these areas in the autumn immediately before the works, with habitat restoration being undertaken in the first available season.

## 8. Protected Species Strategy

8.1.1 Throughout the examination RBC have expressed concerns regarding the lack of information and mitigation for protected species. Despite species being disturbed within both SCP and QEP the only mitigation provided are a few bat boxes on Cove Brook Greenways. As we have undertaken surveys on SCP we are aware that significant numbers of protected and priority species are present within the park. Although some of these species can be mitigated through the habitat mitigation package some species require bespoke mitigation. The table below provide suggestions as to the mitigation required. RBC requests that the ExA require the applicant to include a Protected Species Mitigation Strategy within the detail SCP SSP.

<b>Species</b>	<b>Mitigation</b>
Otter (Spraints found on Cove Brook)	Otter camera survey Watching brief Otter Holt
Foraging and roosting bats	Various species specific bat boxes Hedgerow and Copse creation
Badger	Nut and fruit rich hedgerow habitat
Reptiles and newts	Long grass habitats Creation of marsh habitat by willow alder clearance Hibernacula
Rare invertebrates	Acidic grassland restoration within the CP and acidic grassland creation within Southwood Woodlands SANG

<b>Habitat works</b>	<b>Reason</b>	<b>Cost</b>
<b>Encroaching birch removal.</b> Cutting of birch scrub in Southwood Woodland SANG	To reduce the successional growth of scrub and encourage the establishment of acidic grassland.	£7.500
<b>Encroaching willow/alder removal.</b> Cutting/ coppicing of willow and alder scrub in Southwood Country Park	To reduce the successional growth of scrub and encourage marsh grassland at Southwood Country Park.	£7500
<b>Tree thinning adjacent to Ively Brook.</b> Removal of trees and scrub adjacent to the brook	Dense trees are shading out much of the narrow channel for most of the day so more gaps than trees will increase the light reaching the stream.	£5.000
<b>Woodland/copse creation</b> to the west of the park	Woodland/copse creation to encourage a variety of habitat, which creates a matrix of habitats across the site.	£4.000
<b><i>Reprofiling of the ditches and watercourse to an agreed plan in the SCP western area and along Ively Brook</i></b>  <b><i>If any culverts are removed in the course of ESSO work we do not want them replacing but appropriately profiled ditch replacing them.</i></b>	Ditch and river enhancement to increase public enjoyment and enhancement of nature.  The applicant does not wish to deliver enhancement of the ditch and river network	
<b>Total</b>	<b>£31,500 + ditch remodelling</b>	