

Esso London to Southampton Pipeline

Application by Esso Petroleum Company, Limited for an Order Granting Development Consent

Local Impact Report

Hampshire County Council

1. Introduction

- 1.1 For the purposes of this application, Hampshire County Council is the statutory Local Highway Authority (which includes not only metalled vehicular roads but also public rights of way), Lead Local Flood Authority and Minerals & Waste Planning Authority for that part of the pipeline that is proposed to be developed in Hampshire. The County Council also has interests related to economic development & tourism, landscape, and archaeology and we provide advice, guidance and support to the district authorities across the County on these matters.
- 1.2 The County Council is currently in discussions with the applicant with the intention of preparing a Statement of Common Ground (SoCG) on a number of matters of particular relevance to this application. Accordingly, this Local Impact Report has been prepared to provide a general overview of the key impacts that Hampshire County Council consider it appropriate to highlight given its responsibilities and interests. Further, more detailed comments on the specifics of the identified impacts (and the County Council's perspective therein) are likely to be forthcoming within the context of the SoCG and written representations at the invitation of the Examining Authority.
- 1.3 This report should be read alongside more locally specific Local Impact Reports produced by the respective boroughs and districts across the County.

2. Site description and surroundings/location

- 2.1 The proposed alignment of the pipeline passes through approximately 40 miles of a varied, albeit predominantly rural, landscape within Hampshire including a significant incursion into the South Downs National Park. The proposed alignment inevitably involves crossings of (or close proximity to) highways, watercourses, public open spaces and areas of environmental and archaeological interest including part of the Thames Basin Heaths Special Protection Area in Rushmoor District and wider impact zone which also affects parts of Hart District. In addition the pipeline is proposed to cross areas known as Suitable Alternative Natural Greenspace (SANG), provided as mitigation for the impacts otherwise anticipated to arise from residential development the Thames Basin Heaths Special Protection Area.

- 2.2 The most significant proposed incursions into urban areas occur in the northern part of Hampshire, within Hart District and Rushmoor Borough. An overview of the landscape character of Hampshire is available here: <https://www.hants.gov.uk/landplanningandenvironment/environment/landscape/integratedcharacterassessment>
- 2.3 Within Hampshire the pipeline is also proposed to cross a number of roads, public rights of way, areas at risk of flooding (including watercourses) and areas of interest from a minerals and/or waste perspective.

3. Details of the proposal

- 3.1 Esso Petroleum Company Limited launched its Southampton to London Pipeline Project late in 2017. The project proposes to replace the majority of the aviation fuel pipeline that runs from the Fawley Refinery near Southampton, to the West London Terminal storage facility in Hounslow. The pipeline proposed to be replaced through this application runs from Boorley Green in Hampshire through to the storage facility in Hounslow. In Spring 2018, Esso held a non-statutory consultation which helped it to select the preferred corridor for the replacement pipeline. In Autumn 2018, it held a statutory consultation on the preferred route for the replacement pipeline. In early 2019, it held a second phase of statutory consultation on design refinements. The application for Development Consent was submitted to the Planning Inspectorate on 14 May 2019.
- 3.2 The internal diameter of the pipeline is proposed to be 30cm (12 inches), albeit the working width of the alignment of the corridor is between 30-36 metres, reduced to 10 metres when crossing field boundaries with mature hedgerows, trees or watercourses. When the construction of the pipeline is completed there is proposed to be a 3-metre easement either side of the pipeline, within which operations involving below ground activity would be restricted.
- 3.3 Ancillary to the construction of the pipeline itself, a new 'Pigging Station' is proposed close to the start of the new pipeline at Boorley Green, with a replacement pump provided for at the existing Alton Pumping Station. Open-cut trenching techniques are proposed for the majority of the route, with trenchless cutting proposed where the route crosses A class roads, motorways, other heavily trafficked roads, railways and some watercourses.
- 3.4 The construction period for the project is expected to begin after the granting of the Development Consent Order and be completed by 2023. The decommissioning of the existing pipeline does not form part of this application as it is proposed to be covered by the existing pipeline's original consent.

4. Relevant planning history and any issues arising:

- 4.1 The planning history provided in the applicant's Planning Statement accompanying the submission is considered to sufficiently capture the relevant planning history within Hampshire, albeit that the LIR's of individual district and borough councils may be of relevance in relation to any subsequent applications and decisions considered to be of relevance to the determination of this application.

5. Planning Policy

- 5.1 The County Council is content with the planning policy context as presented by the applicant's in their Planning Statement, and as supplemented by the individual LIRs of the affected district and borough councils in Hampshire.

6. Impacts: Landscape and Visual

- 6.1 It is noted that effort has been made to avoid sensitive areas and significant areas of vegetation. In general, the County Council has not identified any major issues regarding the route of the pipeline and associated above-ground equipment, particularly when considering the longer-term impacts once mitigation measures have had the chance to be more fully established.

6.2 Where the proposed route results in the loss of significant trees, hedgerows and other landscape features the County Council would expect to see mitigation including replacement planting to ensure there is no permanent landscape or visual impact. The mitigation package proposed by the applicant appears to be broadly accepted in principle, albeit this will need to be appropriately controlled and detailed through conditions on any subsequent consent order.

6.26.3 Mitigation should take account of ecosystem services, including recreational and wellbeing benefits as well as microclimate regulation, carbon capture, oxygen production and water interception.

6.36.4 Where existing features or structures are lost or impacted, reinstatement should reflect and enhance the local landscape or townscape character in its design and materials.

7. Impacts: Highways and Transportation

- 7.1 This project affects over 60 different highways across Hampshire alone, with the DCO proposing that the majority of the pipeline crossings of these highways will be through open cut construction although all trunk roads and railways would be crossed through trenchless construction techniques. The affected routes are part of a wider highway network that is

predominantly the responsibility of Hampshire County Council, as Local Highway, Traffic and Street Authority, to maintain and manage.

- 7.2 The southern part of the highway network potentially affected by the construction of the pipeline generally serves the rural parts of Hampshire. These highways are considered to operate effectively and within their designed capacity. It is noted that further trenchless crossings, over and above those proposed on the trunk road network and railway, are proposed at: Stakes Lane (TC002), Petersfield Road (TC005) and potentially at Caker Lane (TC007), albeit clarity is sought on this particular proposed intervention. Please note that the County Council has prepared a good practice document to guide the use of trenchless construction and technology in Hampshire. See section 11 of <https://www.hants.gov.uk/transport/roadmaintenance/newroadsact>.
- 7.3 Within the northern part of the highway network in Hampshire, particularly within the vicinity of Church Crookham/Fleet and Farnborough, the area is more urbanised and thus the highway network is both more extensive, and more fully utilised to (and above) its designed capacity and therefore any works will have a significant impact on traffic movement.
- 7.4 The County Council has no, in-principle, objection to the impact of the proposed pipeline on the highway network but has some reservations about how the construction of the pipeline would be managed in enabling the highway network to continue to operate.
- 7.5 In order to ensure that the impact of the construction of the pipeline on the highway can be satisfactorily managed, the Local Highway Authority would expect the DCO to include provisions for the County Permit Scheme; <https://www.hants.gov.uk/transport/roadmaintenance/county-permit-scheme>; The scheme has been enabled under Part 3 of the Traffic Management Act 2004 (TMA) and facilitates the County Councils duties under Section 16 of the TMA.
- 7.6 This approach was agreed by the Secretaries of State in their Decision Letter relating to the Thames Tideway Tunnel DCO. Further contact with TFL regarding the London permit scheme which operates in the same way as the County Permit Scheme within the area of the Thames Tideway Tunnel has confirmed that the permit scheme is running well and that the bespoke scheme which was negotiated but not agreed prior to the decision on that scheme has not been required.

8. Impacts: Public Rights of Way

- 8.1 The existing route of the pipeline from Boorley Green to Heathrow in Surrey runs through approximately 100 public rights of way, as well as the Pilgrims Trail, the Wayfarers Way, St Swithuns Way and Hangers Way, which are long- distance promoted routes, and the South Downs Way, which is a national trail. The pipeline also goes through the Basingstoke

Canal (SSSI), and Blackwater Valley (SINC), which are Hampshire County Council Sites.

- 8.2 As the Local Highway Authority for public rights of way, the County Council has a duty to protect and assert the rights of the public to use the rights of way network. There must be no surface alterations to any rights of way, nor any works carried out which could affect their surface, without first seeking the permission of the County Council. In order to ensure this the DCO will need to include provisions which enable the Local Highway Authority to approve any works prior to them being carried out.
- 8.3 It is noted that the application states that the installation of the pipeline could take one to two months in any given area, and may take longer in more complex locations. Where the construction process may affect a right of way, the DCO will need to make provision for a Temporary Closure Order to be secured (details here: <https://www.hants.gov.uk/landplanningandenvironment/rightsofway/temporaryclosures>), and where possible, a suitable alternative route provided for the duration of the works.

9. Ordinary Watercourses

- 9.1 As the Lead Local Flood Authority, Hampshire County Council note that a number of ordinary watercourses are proposed to be crossed by the pipeline. Discussions have been held with the applicant in relation to the design, construction and maintenance of measures required to cross ordinary watercourses.
- 9.2 It is the Lead Local Flood Authority's position that suitable protection provisions should be included within the DCO to require appropriate consents to effectively manage the function of these watercourses taking into account the potential cumulative effects of other activities within the vicinity of these watercourses during the construction of the pipeline.

10. Impacts: Ecology

- 10.1 The County Ecologist was previously consulted on the scope of ecological assessments. No major concerns were raised.
- 10.2 The range of species and habitats scoped within the ES is considered to be appropriate. Impacts are likely to be limited in extent and duration and so, whilst disruption may be high at particular locations, the long-term impacts are likely to be more limited. There may be cases where impacts are more significant for certain species (e.g. the severance/fragmentation of habitat for hazel dormice).

- 10.3 Given the relatively limited extent and short duration of the proposed works, it should be possible to employ well-recognised mitigation measures to ensure impacts are avoided/minimised. With reference to areas in mid and south Hampshire (outside of Hart and Rushmoor administrative areas) it is broadly considered that the range of proposed mitigation/compensation measures identified in the DCO is appropriate and therefore the County Council has no overriding concerns regarding the impact of the scheme on biodiversity.
- 10.4 Proposed trenchless crossings are proposed at Bourley and Long Valley SSSI to avoid harm to these wetlands. Trenchless crossings are also proposed at the Basingstoke Canal SSSI, where the County Council is looking to agree a Statement of Common Ground with the applicant.
- 10.5 Nevertheless, the concerns raised by Rushmoor District Council and others relating to:
- the disruption of the Suitable Alternative Natural Greenspaces (SANGs) as mitigation for the otherwise impacts of existing housing development on the Thames Basin Heath SPA;
 - absence of sufficient information on potential loss of habitat within the SPA itself and impacts on SINC's; and
 - harm to Queen Elizabeth Park and Farnborough Gate Sports Ground

are noted and broadly agreed with.

11.Impacts: Historic Environment

- 11.1 The Archaeological Mitigation Strategy submitted with the application is being discussed with the applicant and it is hoped that it can be made acceptable to the County Archaeologist and form part of the Statement of Common Ground.
- 11.2 Issues highlighted to be resolved include:
- Paragraph 2.1.6 of the Archaeological Mitigation Strategy sets out the different methods that will be applied. The areas of trial trenching and strip map and sample are shown on the maps. Until the geophysics and the trial trenching is complete it would be premature to identify where excavation and watching briefs will take place. None the less it needs to be made clear that excavation, 'strip map and sample' and watching brief will be applied (one technique or another) along the full length of the project unless it has been demonstrated that the archaeological potential is void.
 - Paragraph 2.2.5 indicates that trial trenching is not needed in all places. This should be reflected in the criteria on which areas were selected and not selected for trial trenching.

- Paragraphs 2.3.5 to 2.3.8 address the strip map and sample approach, where the topsoil strip is under archaeological supervision (strip) and that which is revealed is planned (map) and then excavated as appropriate (sample). This section sets out the approach to the first two but not to the third critical element, what approach will be taken to archaeological recording.
 - Paragraph 2.39 secures topographic recording. The criteria for selection should be clearer. It is presumed that this is applied where preservation is not achievable; given archaeological survival as an earthwork is often a criteria of significance (eg a burial mound) then an avoidance (preservation) approach would be taken). Where it is unavailable such as a linear boundary, if it has archaeological merit, the topographic recording should be followed up by archaeological excavation or recording.
 - Para 2.3.12 is titled 'targeted' watching brief. The criteria for that targeting should be set out, although as stated above it should take place unless some other archaeological recording is in place or it has been demonstrated that archaeological levels have already been removed. This section does not set out the criteria or application but merely quote existing standard guidance documents.
 - The applicant has also been made aware that, as the project cuts across the Second World War GHQ line at Crondall and to the rear of Church Crookham, it should avoid impacting or demolishing any pillboxes (their arrangement in this location being sufficiently intact as to suggest it is a nationally significant survival of a stop line).
- 11.3 It is considered that these matters can be resolved but the County Council is awaiting the submission of an amended Archaeological Mitigation Strategy in order to be able to confirm this.
- 11.4 The County Council acknowledges the potential impacts arising on other heritage assets across the County including impacts on listed/locally important buildings, conservation areas and historic landscapes/gardens. These impacts are anticipated to have been addressed in the LIR's of the individual district/borough councils affected.

12. Impacts: Minerals and Waste

- 12.1 The County Council, as Minerals and Waste Planning Authority, has concerns in relation to the potential sterilisation of mineral resources along the proposed pipeline. Safeguarded material is identified in the vicinity of the pipeline proposals in the northern area of Hampshire, in particular as the pipeline route passes Alton, Fleet area and Farnborough Area where there are significant bands of mineral resources. There are small bands of reserves between the initial pipeline start at Boorley Green and the Bishops Waltham area which would also need to be considered.

- 12.2 In accordance with the National Planning Policy Framework, the County Council has defined a Minerals Safeguarding Area for Hampshire and adopted appropriate policies in order to prevent the needless sterilisation of specific mineral resources. These policies are contained within the Hampshire Minerals and Waste Plan (2013) and associated Safeguarding SPD. The purpose of this policy is to protect potentially economically viable mineral resource deposits from needless and unnecessary sterilisation. The policy seeks to encourage the recovery, where possible, of potential viable mineral resources. The Minerals Safeguarding Area is based on BGS data and can be found online along with the safeguarding policies: <http://www3.hants.gov.uk/mineralsandwaste/planning-policy-home/hmwp-spds.htm>
- 12.3 The Hampshire Minerals and Waste Plan does contain a shortfall in supply of minerals which is expected to be met by windfall developments. The County Council, as Minerals and Waste Planning Authority, would welcome any material recovered as part of excavation for the pipeline to enter into the supply chain. There are some existing permitted quarries nearby to the east of Alton at Kingsley and Frith End quarries as well as in the north at Bramshill Quarry, where there is potential for the material to be taken for processing. However, discussions would need to be had with the quarry operators to ensure that there was sufficient capacity to undertake this additional operation. The mechanism for recovering and recording the level of material recovered should be detailed in a construction management plan, which should be developed as the development proposals become more refined.
- 12.4 The proposed route does not appear to impact any existing mineral or waste sites currently operating in Hampshire. However, it is noted that as the route of the pipeline passes Alton, there are some historic landfill sites already identified that will need to be considered, including Upper Froyle Land at Manor Farm which is proposed to be within the order limits. Work should be undertaken to ensure that suitable construction management procedures are undertaken in this environment.
- 12.5 Similarly, we would highlight the concerns of Rushmoor Borough Council relating to the former landfill site now known as Blackwater Valley Frimley Bridge Site of Importance for Nature Conservation where it would appear that an open trenching construction method is proposed for this part of the pipeline.

13. Impacts: Socio-economic and community matters

- 13.1 The construction of the pipeline is likely to have a series of temporary impacts on communities across Hampshire during its construction which require scrutiny within the context of the more detailed advice being provided by the respective local planning authorities.

- 13.2 These include noise/disturbance and the direct impact these could have on the amenities of residents living along the route. The pipeline is also proposed to pass through a number of valued public open spaces and natural green spaces which provide a significant asset and contribution to the health and well-being of residents. During the construction of the pipeline, it is understood that the use of these areas will be significantly restricted.
- 13.3 Hampshire County Council considers that careful consideration will need to be given as how these impacts can be suitably mitigated against through careful design of the construction processes, including restrictions to the times/seasons of activity.

14. Conclusion

- 14.1 Whilst the County Council is supportive of the principle of the proposed development, there are outstanding concerns relating to the draft consent order which remain unresolved.
- 14.2 These are mainly related to the mechanisms through which construction will be managed in relation to potential impacts on the local highway network, public rights of way network and mineral safeguarding areas. The County Council recognises the concerns expressed by Rushmoor Borough Council, and others, in relation to potential ecological impacts affecting the northern part of Hampshire.
- 14.3 Nevertheless, the County Council is confident that these concerns can be addressed through minor modifications to the consent order, as to be detailed through further written representations.