

My Ref: PT/dam

24 October 2019

The Examining Authority (Esso Southampton to London Pipeline)
National Infrastructure Planning
Temple Quay House
2, The Square
Bristol
BS1 6PN

Email: SouthamptontoLondonPipeline@planninginspectorate.gov.uk

REF: EN070005: Runnymede Borough Council – Local Impact Report

Dear Sir or Madam,

I am pleased to submit the Local Import Report for Runnymede Borough Council regarding the Esso Southampton to London Pipeline.

Yours faithfully,


P TURRELL
Chief Executive

paul.turrell@runnymede.gov.uk
Tel: 01932 425500

Section 60 ♦ Planning Act 2008

Esso Petroleum Company Limited
Southampton to London
Pipeline Project

Application for a
Development Consent Order

Project reference no. EN070005

**Runnymede Borough Council
Local Impact Report**

October 2019

**Runnymede Borough Council
Runnymede Civic Centre
Station Road
Addlestone
Surrey
KT15 2AH**

Contents

One	Introduction	5
	Background Runnymede Borough Council Report structure Local policy The principle of the development	
Two	Matters of common concern with neighbouring local authorities	11
	Introduction Tree protection Ecology and biodiversity Transport and highways Residential amenity	
Three	Local Impacts	21
	DCO plan references Introduction Cockcrow Hill to Sandgates including Salesian School Canford Drive and Roakes Avenue, Chertsey Abbey Rangers Football Club and playing pitches and Chertsey High School Chertsey Meads Other considerations raised in RBC's Relevant Representation	
Four	Conclusions	37

One ♦ Introduction

BACKGROUND

- 1.1 Esso Petroleum Company Limited ('Esso' or 'the Applicant') has applied for a Development Consent Order (DCO) for a replacement aviation oil pipeline running from east of Southampton to the company's West London Terminal Storage Facility south of London Heathrow Airport (LHR or 'Heathrow'). The proposed pipeline passes through Runnymede Borough in Surrey and if built will exert a range of environmental and amenity impacts in the locality, principally during the construction phase.
- 1.2 This report provides details of the likely impact of the proposed development on Runnymede and is intended to assist the examination of Esso's application by the Examining Authority (ExA) on behalf of the Secretary of State. The report has been prepared for Runnymede Borough Council (RBC) by Savills, which has provided planning and environmental impact assessment consultancy under guidance from the Council.

RUNNYMEDE BOROUGH COUNCIL

- 1.3 The Borough of Runnymede lies in north-west Surrey some twenty miles south-west of Central London. Its three largest settlements are Chertsey, Egham and Addlestone.
- 1.4 The Borough also contains a number of smaller villages and suburban centres including Virginia Water, Thorpe, Englefield Green, Woodham, new Haw, Ottershaw and Lyne.
- 1.5 Runnymede borders the boroughs of Spelthorne to the east, Elmbridge to the south-east, Woking to the south, Surrey Heath to the west and the Royal Borough of Windsor and Maidenhead in Berkshire to the north.
- 1.6 Surrey operates a two-tier local government system and Surrey County Council (SCC) is responsible amongst other things for the provision of education, highways and social care services in the borough. SCC is also the minerals and waste planning authority.
- 1.7 RBC operates primarily from offices at Runnymede Civic Centre in Addlestone. In local elections on 2 May 2019 the Conservatives retained majority control of the Council, winning 26 of a total of 41 seats.

- 1.8 The parliamentary constituency of Runnymede is represented by the Right Honourable Philip Hammond MP.

REPORT STRUCTURE

- 1.9 Under section 60(2) of the Planning Act 2008 (as amended by the Localism Act 2011), the Secretary of State must invite local authorities in areas subject to a DCO application to submit a Local Impact Report (LIR). According to section 60(3) of the 2008 Act ‘A “local impact report” is a report in writing giving details of the likely impact of the proposed development on the authority’s area (or any part of that area)’.
- 1.10 Guidance on the content and preparation of LIRs is provided in the Planning Inspectorate’s *Advice Note One: Local Impact Reports* (version 2, April 2012). RBC has sought to follow the guidance in the preparation of this LIR. Accordingly, this report is structured as follows.
- *Chapter 2* explains generic concerns about the proposals that Runnymede BC shares with neighbouring local authorities in north Surrey, namely Spelthorne Borough Council and Surrey Heath Borough Council.
 - *Chapter 3* identifies the local impacts of the proposed pipeline through the Borough of Runnymede. Areas of concern include the likely effects on Salesian School and playing pitches; Canford Drive and Roakes Avenue in Chertsey; Abbey Rangers Football Club and playing pitches and Chertsey High School, also in Chertsey; and Chertsey Meads, an open area to the south of the River Thames. Chapter 3 also reiterates and updates points made in the Council’s Relevant Representation of 25 July 2019.
 - *Chapter 4* offers some concluding comments.

LOCAL POLICY

Runnymede Local Plan 2001 saved policies

- 1.11 The development plan for Runnymede currently comprises the Runnymede Local Plan 2001.
- 1.12 The 2001 Local Plan covered the period to the end of 2006, but from September 2007 the majority of the policies were 'saved' and continue to form part of the development plan.
- 1.13 For the reasons given in chapter 3 of this LIR, RBC considers that the following

saved policies of the Runnymede Local Plan 2001 are relevant to the determination of Esso's pipeline DCO application in the Borough of Runnymede.

- Policy GB1: *Development within the green belt*. This sets a strong presumption against development that would conflict with the purposes of the green belt or adversely affect its open character.
- Policy NE8: *Areas of landscape importance*. The following landscapes in Runnymede are designated as areas of landscape importance and are shown on the proposals map:
 - a) Coopers Hill, Egham Hill, Callow Hill and Runnymede Meadows
 - b) St. Ann's Hill
 - c) Woburn Hill and Chertsey Meads
 - d) Land adjacent to the River Thames

In these areas the Council will apply the following policies.

- 1) special care will be taken in relation to any proposed development to ensure its siting, scale, height, design and materials are in keeping with the surrounding landscape.
 - 2) the Council will safeguard the tree cover and require extensive landscaping of new development.
 - 3) informal recreational use of and public access to these areas will normally be encouraged.
- Policy NE10: *Landscape problem area*. In the landscape problem area shown on the Location Map in Appendix 'F' of the Local Plan 2001 the Council will seek to improve the appearance of the landscape through development control and other powers and negotiations. This policy applies only within the green belt and sites covered by Policy GB8, and is applicable to Chertsey Meads and the Wey Valley Area. According to the policy:

Various sites within this area have been worked for minerals. Much of this area has potential and recreational uses [sic] and part is of ecological importance. The area adjoining the Weybridge Trading Estate suffers from an urban industrial character.

There are some landscape and environmental problems (especially associated with Chertsey Meads and Blackboy Farm/Wey Meadows) which require physical and management treatment.

- Policy NE12: *Protection of trees*. The Council will continue to protect significant trees, hedgerows and woodlands and make provision for new planting, through the use of development control powers, tree preservation orders and

through countryside management.

- Policy NE18: *Enhancement of Sites of Nature Conservation Importance*. The Council will promote the positive management and enhancement of areas of nature conservation value. Opportunities to secure such action, particularly by way of management agreements, will be pursued where appropriate. The policy notes that a management scheme is in place for Chertsey Meads.
- Policy NE20: *Species protection*. Under this policy a development proposal will only be permitted where it does not cause demonstrable harm to species of animal and plant or its habitat protected by legislation. To avoid harm to the species the Council may consider the use of conditions and planning obligations that seek to:
 - a) facilitate the survival of individual members of the species;
 - b) reduce disturbance to a minimum;
 - c) provide adequate alternative habitats to sustain at least the current levels of populations.
- Policy R1: *General provision*. The Council will resist development proposals that would result in the loss or reduced availability of existing open spaces and buildings (without their replacement on alternative sites acceptable to the council) which make a valuable contribution to recreation and leisure facilities in the Borough. The Council will encourage the provision of facilities where deficiencies exist if this is appropriate and feasible.
- Policy R8: *Chertsey Meads*. Under this policy Council will implement the policies and objectives of the Chertsey Meads Management Plan in order to protect the nature conservation interest and enhance the open space areas used for recreation. The Council wishes to see the Chertsey Meads Site of Nature Conservation Importance restored to its former SSSI status as soon as possible. As a step towards this process, the Meads was designated a Local Nature Reserve in 1992 (see policy NE19).
- Policy SV2: *Flooding*. Within areas liable to flood, shown on the Proposals Map, development will not normally be permitted for new residential or non-residential development, including extensions, unless it can be demonstrated to the satisfaction of the Borough Council, following consultation with the Environment Agency, that the proposal would not of itself, or cumulatively in conjunction with other development -
 - i. impede the flow of flood water; or
 - ii. reduce the capacity of the flood plain to store flood water; or
 - iii. increase the number of people or properties at risk from flooding.

- 1.14 Also of relevance to the current DCO application is Runnymede BC's *Trees, Woodlands and Hedgerows Supplementary Planning Guidance*, approved by the Council in July 2003.

Replacement Local Plan

- 1.15 Runnymede BC has an emerging 2030 Local Plan, which was submitted to the Secretary of State on the 31st July 2018.
- 1.16 RBC considers that the following policies in the emerging Local Plan are relevant to the consideration of Esso's DCO application insofar as it relates to the Borough of Runnymede.
- Draft policy SL25: *Existing Open Space*. Under this policy the Council will seek to protect, maintain, and where possible, enhance existing open spaces to encourage quality and accessibility improvements in order to ensure a continued contribution to the health and well-being of local communities.
 - Draft policy EE9: *Biodiversity, geodiversity and nature conservation*. Development on or adjacent to the following hierarchy of important sites in the Borough will need to pay particular attention to the requirements of this policy.
 1. Ramsar sites (international).
 2. Special Protection Areas and Special Areas of Conservation (European).
 3. Sites of Special Scientific Interest and National Nature Reserves (National).
 4. Ancient Woodland, ancient or veteran trees; and/or trees and hedgerows protected by a Tree Preservation Order.
 5. Sites of Nature Conservation Importance, Local Nature Reserves.
 6. Other priority habitats and priority species not identified in 1, 2, 3, 4 or 5 above (Local); designated Local Green Space where richness of wildlife has been identified as a contributing factor in its designation; and any area in Runnymede that may be in future identified as a Nature Improvement Area; trees considered to make a significant contribution to their surroundings, individually or as a group.
 - Draft policy E11: *Green infrastructure*. The Council will seek to avoid further habitat fragmentation of green infrastructure by encouraging development proposals that restore, maintain and enhance habitat connectivity, in particular in Biodiversity Opportunity Areas as shown on the policies map. The Council will ensure the effective use of Tree Preservation Orders to protect significant trees and will encourage the proper care and maintenance of trees by requiring owners to submit applications to work on protected trees and ensure that protected trees are replaced if they have to be felled.

- Draft policy EE13: *Managing flood risk*. Any development proposed in either flood zone 2, flood zone 3, on sites over 1ha in flood zone 1, or in a dry island (all types of development excluding minor development in a dry island), must be accompanied by a site-specific Flood Risk Assessment proportionate to the scale of development that demonstrates that all forms of flooding have been taken into account, in keeping with the Council's Strategic Flood Risk Assessment.
- Draft policy EE18: *Engineering operations in the green belt*. Proposals for engineering operations including the laying of roads and hardstanding, material changes in land levels and formation of bunds are considered inappropriate development unless the applicant has demonstrated that the operations preserve the openness of the Green Belt at the site and its vicinity, and do not conflict with the purposes of the Green Belt relevant to the proposal. The extent and visual impact of the changes in land levels will be taken into account in assessing such proposals, as will the purpose and intent of future use of the hardstanding in order to ensure the visual effects are not harmful.

THE PRINCIPLE OF THE DEVELOPMENT

- 1.17 RBC does not object in principle to the proposed pipeline. For the various reasons given in this LIR the Council's objective is to ensure that adequate protection is provided to the communities and physical and environmental assets affected by the proposals.
- 1.18 The Council does not underestimate the challenge of designing and promoting a lengthy linear project of this type. Nonetheless the Council is concerned that inadequate attention has been given to the specific impacts of pipeline construction in individual locations.
- 1.19 With this in mind the Council will contribute constructively to the current DCO examination with a view to securing the safeguards it considers necessary to render the impacts on Runnymede acceptable. As signaled in this LIR, these safeguards include enhanced and additional DCO requirements, method statements for works near trees and guarantees about the content of the Construction Environmental Management Plan (CEMP).
- 1.20 In respect of the outline CEMP submitted by the applicant (application document 6.4 – ES appendix 16.2, ref APP-130) the Council is particularly concerned at the near-complete lack of detail and the vague and recurrent statement that it would be for Esso's contractors to work up the detail of the document.

Two ♦ Matters of common concern with neighbouring local authorities

INTRODUCTION

- 2.1 Esso's proposed pipeline runs through three local authority areas in north-west Surrey - Surrey Heath, Runnymede and Spelthorne ('the Councils'). Discussions between the three boroughs have revealed matters of generic concern in respect of the local impacts of the pipeline. These concerns are explained in this chapter, which appears in the LIRs submitted by all three authorities, along with potential remedies that the DCO could usefully afford. Later chapters of this LIR will demonstrate how these generic concerns arise in specific locations in Runnymede.
- 2.2 This chapter is arranged under the following headings:
- Tree protection
 - Ecology and biodiversity
 - Transport
 - Residential amenity

TREE PROTECTION

- 2.3 The proposed pipeline has, where possible, crossed undeveloped land including farmlands and heaths. Where a route through urban areas is considered by the Applicant to be unavoidable, the pipeline where possible follows roads with wide verges, or crosses public open space and playing fields.
- 2.4 The general logic of such a routing strategy is acknowledged. However, in Surrey a sensitivity is the extent of woodland in both rural and urban areas. According to aerial mapping company *BlueSky*, Surrey is England's most wooded county. A survey in 2014 indicated that 40.6% of Surrey Heath is wooded, as is 37.8% of Runnymede. In the more urban parts of the county including towns in Runnymede, trees are prized assets in the townscape and make a valuable contribution to local amenity.
- 2.5 In places Esso has sought to direct the pipeline corridor around blocks of woodland. However, some sections of woodland would incur significant tree loss without the potential to replant trees above the finished pipeline afterwards. These include trees that are the subject of Tree Preservation Orders (TPOs), are ancient woodland or have ancient or veteran tree status. In other sections of the pipeline the DCO Order Limits or the Limits of Deviation for the pipeline route are

wide enough to admit the possibility of tree loss or harm to root systems.

- 2.6 Areas subject to TPOs are shown on the Applicant's General Arrangement Plans (application document 2.6 rev. 2 vols 1-3, September 2019, ref APP-022 to APP-024). Schedule 8 of the applicant's draft DCO (application document 3.1 rev. 2, September 2019, ref APP-026) identifies trees subject to TPOs. In total, 31 tree groups or individual trees subject to TPOs in Surrey would be affected by the pipeline proposals. For 22 of these TPOs, the proposed works would include tree felling. Works otherwise generally comprise crown lifting and pruning to prevent damage during the movement of construction plant and machinery.
- 2.7 Environmental Statement (Volume D) Appendix 10.2 provides a Schedule of Notable Trees (application document 6.4, ref. APP-115). According to paragraph 10.2.10 of ES chapter 10: Landscape and visual, (application document 6.4, ref APP-050), *'notable trees are defined as prominent trees within the landscape and by nature will generally be the larger more mature specimens'*.
- 2.8 The Councils are content that the Applicant has identified protected and notable trees accurately. Of more concern is the assessment of undesignated mature trees, which can include trees in local authority parks and open spaces. ES paragraph 10.2.19 (second bullet) reports the Planning Inspectorate's advice at the EIA scoping stage of the project that *'Any undesignated mature trees or areas of woodland that could be affected by the project should be assessed in terms of their contribution to the landscape'*. Esso's response in the same bullet point is *'The impacts on trees has been informed by an arboricultural assessment and has been taken into account in Section 10.5 within the assessment of Potential Landscape Effects: Landscape Character'*. As explained in the site-specific sections of this LIR, the Councils are concerned that undesignated trees have not always been assessed accurately in terms of their landscape and visual amenity value.
- 2.9 In respect of mitigation for tree loss, ES chapter 10: *Landscape and visual* (application document 6.4, ref APP-050) states that:

10.6.1 Mitigation has been identified in the form of native species hedge and tree planting. Native trees and hedgerows would be planted within areas identified as tree planting and hedge infilling on Figure 7.5 of the ES (LV1). This is a holistic approach to partly offset the envisaged loss of trees from the overall pipeline installation project . . .

10.7.5 The design of the route and the application of good practice measures, including narrow width working and trenchless crossings set out in the REAC, has reduced the impacts arising from pipeline installation on woodland, TPOs and protected trees within Conservation Areas. Whilst reinstatement planting would establish to reinstate lost vegetation, it would not be possible to fully mitigate the potential permanent loss of TPO trees in the same location. There would be

restrictions to planting trees over and around pipeline easements. There may also be less scope to accommodate reinstatement of trees within the wider urban area because of restrictions caused by built development, proximity to highways and underground services for example . . .

DCO provisions

- 2.10 In respect of the protection afforded by the draft DCO for trees (see application document 3.2 rev. 2, ref. APP-026, Schedule 2 Part 1: Requirements), Requirement 6: *Construction Environmental Management Plan* states in part (d)(ix) that the CEMP must include an Arboricultural Management Plan. Requirement 8: *Hedgerows and trees* provides for a written plan of reinstatement for hedgerows and, which must form part of the *Landscape and Ecological Management Plan* to be approved in accordance with Requirement 12.
- 2.11 The ES offers no quantification of the overall likely tree loss to the proposed pipeline and its mitigation proposals are vague. The Applicant's ES offers at best a hazy view of the effects on trees and woodlands, cumulatively and at any given point along the pipeline.
- 2.12 As things stand any details of tree loss and mitigation would not become available until the DCO was already made. The Council does not consider that Requirements R6: *Construction Environmental Management Plan*, R8: *Hedgerows and trees* and R12: *Landscape and Ecological Management Plan* explicitly provide the level of protection for trees that should be a precondition for a DCO being made.
- 2.13 To address the paucity of detail about the measures that would be taken to work around and protect existing trees during construction, the Councils request that ExA invites Esso to submit a **Tree Survey and Protection Strategy** for consideration during the DCO examination process. The Strategy should explain in detail the working principles that Esso and its contractors will apply to minimise harm to trees, whether or not protected, during pipeline construction.
- 2.14 The DCO should enforce compliance with the Tree Survey and Protection Strategy and to ensure its implementation at the local level, the following DCO Requirement should be included in the Order.

NEW REQUIREMENT: Before the commencement of work in any local authority borough or district through which the pipeline passes, a detailed Local Tree Protection Plan should be submitted to and approved by the relevant planning authority in accordance with the Tree Survey and Protection Strategy.

(1). The Local Tree Protection Plan should be prepared by a qualified member of the Arboricultural Association and should include:

- (a) a plan showing the location of, and allocating a reference number to, each existing tree on the site which has a stem with a diameter, measured over the bark at a point 1.5 metres above ground level, exceeding 75 mm, showing which trees are to be retained and the crown spread and estimated root spread of each retained tree;*
- (b) details of the species, diameter (measured in accordance with paragraph (a) above), and the approximate height, and an assessment of the general state of health and stability, of each retained tree and of each tree which is on land adjacent to the site and to which paragraphs (c) and (d) below apply;*
- (c) details of any proposed topping, lopping or root severance of any retained tree, or of any tree on land adjacent to the site;*
- (d) details of any proposed alterations in existing ground levels, and of the position of any proposed excavation, within the crown spread of any retained tree or of any tree on land adjacent to the site;*
- (e) details of the specification and position of fencing and of any other measures to be taken for the protection of any retained tree from damage before or during the course of development.*

In this Requirement 'retained tree' means an existing tree which is to be retained in accordance with the plan referred to in paragraph (a) above.

- (2) The Local Tree Protection Plan should include details of the species, diameter (measured in accordance with paragraph (1)(a) above), approximate height and an assessment of the general state of health and stability of any trees proposed for felling, and a scheme for their replacement or for other compensatory landscape and planting works. A written explanation of why the subject trees cannot be retained should be provided for each tree proposed for felling.*
- (3) The Local Tree Protection Plan should include a scheme for the long-term after care of trees affected by the proposed works and trees planted in compensation for those lost. The scheme should be applicable for five years following the first operation of the oil pipeline.*

ECOLOGY AND BIODIVERSITY

- 2.15 The proposed pipeline passes through or close to a range of European, statutory and non-statutory protected habitats.

- 2.16 All of Surrey Heath and parts of Runnymede lie within 5km of the Thames Basin Heaths Special Protection Area (SPA), which was designated by the European Union in March 2005. The Thames Basin Heaths SPA is a network of heathland sites designated for its ability to provide a habitat for three internationally important rare bird species - Dartford warbler, woodlark and nightjar. The SPA is protected from adverse effects under the Conservation of Habitats and Species Regulations 2017 (as amended) and European Directive 2009/147/EC.
- 2.17 The Thames Basin Heaths Joint Strategic Partnership Board (JSPB) was established to promote a coordinated approach between local authorities and other organisations responsible for protection of the Thames Basin Heaths SPA. The JSPB has adopted a Strategic Delivery Framework to manage and protect the SPA through measures including the provision of Suitable Alternative Natural Greenspace (SANG). These are areas that were not previously in use for recreation and which offer the capacity to absorb the additional recreational demand generated by new residential development, so relieving pressure on the SPA.
- 2.18 Elsewhere along the pipeline there are extensive areas designated as non-statutory Sites of Nature Conservation Importance (SNCI), many of which provide habitats for statutorily protected flora and fauna including the great crested newt. These sites are identified in the figures and appendices of the Applicant's ES.
- 2.19 The Council considers that specialist ecological advice is required to evaluate the potential impact of the construction of the pipeline on biodiversity and nature conservation interests. The Councils do not possess such expertise in-house and can offer only high-level comments on the local impacts of the proposed pipeline on the natural environment.
- 2.20 It is noted that Natural England has submitted a Relevant Representation (document ref. EN070005-000383, dated 26 and 27 July 2019) advising that it is content with Esso's approach to the protection of nature conservation interests and that a Statement of Common Ground between Esso and Natural England is due. It is encouraging that the Applicant has engaged with Natural England in a timely manner to address the sensitivities of running a pipeline through European protected habitats. However, it appears to the Council that there remain detailed and site-specific points of concern relating to the effects of the project on protected habitats that will warrant Natural England's close and continued attention throughout the DCO examination process.
- 2.21 Natural England's Relevant Representation indicates that it does not intend to engage closely with the examination of the pipeline proposal. Whilst Natural England's budget stringencies are acknowledged, local authorities are reliant on Natural England to provide timely advice on these matters.
- 2.22 It is requested that the Examining Authority directs written questions towards

Natural England and requests senior representation from Natural England at relevant hearings to ensure that nature conservation interest are properly represented. This will ultimately be in the applicant's interest by facilitating a positive conclusion to the Habitats Regulations Assessment process and helping to ensure that the Order, if finally made, is robust in these terms.

DCO provisions

- 2.23 As noted, the Councils lack in-house ecological expertise and are concerned to avoid a situation where the burden of finding practical solutions to specific ecological sensitivities falls to the relevant planning authority when DCO Requirements are being discharged.
- 2.24 Requirement 12: *Landscape and Ecological Management Plan* and Requirement 13: *Protected species* of the draft DCO afford protection for the natural environment (see application document 3.2 rev. 2, ref. APP-026, Schedule 2 Part 1: Requirements).
- 2.25 Requirement 12 provides for the submission to and approval by the LPA of a Landscape and Ecological Management Plan (LEMP), *'reflecting the survey results and ecological mitigation and other measures in the REAC, including the SSSI working plans . . .'* The REAC is a Register of Environmental Actions and Commitments set out in section 16.3 of ES chapter 16 *Environmental Management and Mitigation* (application document 6.2, PINS ref. APP-056).
- 2.26 The REAC includes embedded design measures and mitigation. It sets out commonsense high-level principles but there is little local or site-specific detail. This detail will be described or enforced through a range of subsidiary documents including a Code of Construction Practice (CoCP, provided as ES Appendix 16.1, ref. APP-128), an Archaeological Mitigation Strategy (AMS, provided as ES Appendix 9.5, ref APP-113), and a Construction Environmental Management Plan (CEMP, application document 6.4, ref. APP-130) and the LEMP. ES paragraph 16.1.4 explains that *'the CEMP and LEMP will require further design input that is not available at the time of the application'*.
- 2.27 An outline CEMP has been submitted by the Applicant (ES Appendix 16.2, ref. APP-130), but the Councils are concerned at the evident lack of detail in the outline document and the repeated disclaimer that it will be the contractor's responsibility to agree the details with local authorities. It is requested that ExA invites the applicant to submit a detailed draft CEMP within a reasonable timeframe during the current DCO examination for consideration.
- 2.28 Later sections of this LIR identify specific local impacts on ecology and biodiversity from the pipeline construction. In reviewing these specific impacts it is requested that ExA, advised as appropriate by Natural England, considers whether the

protections and safeguards proposed thus far by the Applicant would render specific impacts acceptable such that a DCO can be made. If not, it is requested that ExA seeks appropriate remedies from the Applicant before the examination closes and ensures that enforceable protective measures are incorporated in the draft DCO as submitted to the Secretary of State.

TRANSPORT AND HIGHWAYS

- 2.29 In general, crossings of primary roads would be achieved by means of trenchless working. Subject to certain site-specific concerns identified later in this LIR, the Council supports this approach.
- 2.30 Numerous sections of the proposed pipeline cross run along highway corridors. Although these are often secondary or tertiary routes they are often busy thoroughfares. Road closures or contraflow working during the construction of the pipeline could give rise to substantial traffic congestion. In turn, this could disrupt bus services and impede the passage of emergency service vehicles. Traffic congestion can also adversely affect local businesses that rely on the restricted route for access.
- 2.31 Surrey County Council is the Local Highway Authority (LHA) for the three boroughs affected by the proposed pipeline in Surrey. In response to the individual traffic impacts identified later in this LIR it is requested that ExA seeks the LHA's advice on the workability of the temporary highways restrictions proposed by the Applicant.
- 2.32 Some of the roads affected by pipeline construction are frequented by emergency service vehicles. It is requested also that ExA seeks advice from Surrey County Council in its capacity as the statutory Fire and Rescue Service provider, and from Surrey Police and the South East Coast Ambulance Service NHS Foundation Trust, on the issue of whether a reasonable standard of emergency service protection can be maintained during the proposed roadworks.

DCO provisions

- 2.33 Requirement 7: *Construction traffic* of the draft DCO provides for the submission to and approval by the relevant highway authority of a Construction Traffic Management Plan (CTMP). The Requirement states that '*The CTMP for each stage must reflect the mitigation measures set out in the REAC*'. This makes sense as far as it goes but the REAC is an all-embracing high-level list and does not, in its own right, provide a sufficient basis for a CTMP.
- 2.34 Accordingly it is requested that the following provision is added to Requirement 7:

ADDITION TO REQ7:

The CTMP for each stage will provide details of the following:

- a) Development phasing*
- b) Vehicle types*
- c) Abnormal indivisible load movements*
- d) Recording of construction vehicle movements*
- e) Local highway issues and constraints*
- f) Highway condition survey*
- g) Access and route strategy*
- h) Signage strategy*
- i) Core working hours*
- j) Use of banksmen*
- k) Management of public rights of way*
- l) Wheel-washing and maintenance of a clean highway*
- m) Travel plan for construction workers*
- n) Temporary traffic management procedures*
- o) Temporary repositioning of bus stops*
- p) Communications and community engagement*
- q) Liaison with emergency services*
- r) Monitoring arrangements*
- s) Compliance and enforcement procedures*

RESIDENTIAL AMENITY

- 2.35 The proposed pipeline would pass through many residential neighbourhoods. In the absence of effective mitigation, construction of the pipeline has the potential to give rise to a range of adverse effects on residential amenity including noise and vibration, airborne dust, mud on roads, disruption to utility services, restrictions of access to property and the loss of street trees and other vegetation.

DCO provisions

- 2.36 Along with draft DCO Requirements 7: *Construction traffic*, 8: *Hedgerows and trees* and 14: *Construction hours*, the primary protection for residential amenity is Requirement 6: *Construction Environmental Management Plan*. As acknowledged above in respect of ecology, an outline CEMP has been submitted by the Applicant (ES Appendix 16.2, ref. APP-130), but the Councils are concerned at the lack of detail in the outline document and the repeated disclaimer that it will be the contractor's responsibility to agree the details with relevant local authorities.
- 2.37 In view of the very close proximity of construction works to residential properties at various points along the pipeline route, including those identified later in this LIR, it is requested that ExA invites the applicant to submit a detailed draft CEMP

within a reasonable timeframe during the current DCO examination (e.g. Deadline 3, 11 December 2019) for consideration. This would provide interested parties with a clearer impression of the range of measures proposed to protect residential amenity, enabling refinements to be made as necessary.

- 2.38 Requirement 7 should then be amended to ensure that the detailed CEMPs submitted to relevant planning authorities for approval will embrace all relevant provisions from the draft CEMP.

Three ♦ Local Impacts

DCO PLAN REFERENCES

Works Plans

Application Document 2.2 rev. 3, September 2019 sheets 44, 45, 46, 47, 49, 58, 116, 117.

General Arrangement Plans

Application Document 2.6 rev. 2, September 2019 sheets 44, 45, 46, 47, 48, 49, 58, 115, 116, 117.

INTRODUCTION

- 3.1 This chapter considers the effects of Esso's proposals from the point where the pipeline enters the administrative area of Runnymede, from Surrey Heath in the west, to where it leaves Runnymede via a trenchless crossing of the River Thames into the administrative area of Spelthorne.
- 3.2 For much of its route through Runnymede the pipeline would pass through open or lightly developed areas. Subject to the additional safeguarding provisions proposed in chapter 2 of this LIR, the Council is content that the local impacts of these sections of the pipeline can be rendered acceptable. The outstanding areas of concern for Runnymede BC are described in this chapter under the following headings.
- Cockcrow Hill to Sandgates including Salesian School (M25 crossing near Chertsey South)
 - Canford Drive and Roakes Avenue, Chertsey
 - Abbey Rangers Football Club and playing pitches and Chertsey High School
 - Chertsey Meads
 - Other considerations raised in RBC's Relevant Representation – covering highways, ecology and biodiversity, ancient woodland, archaeology and cumulative effects.

**COCKCROW HILL TO SANDGATES INCLUDING SALESIAN SCHOOL
(M25 CROSSING NEAR CHERTSEY SOUTH)**

- 3.3 This section considers the impact that the pipeline will have on the Salesian School and playing pitches and on nearby residential amenity and flood risk. The Salesian School is a Roman Catholic comprehensive school that operates from two sites, including this campus to the west of the M25 in Chertsey South.
- 3.4 The relevant section of pipeline runs between the end of Trenchless Crossing TC029, from where it crosses the Salesian School playing pitches before the commencement of Trenchless Crossing TC030, which goes under the A320 (Guildford Road), open fields associated with Salesian School and the M25. Trenchless Crossing TC030 emerges on the north-eastern side of the M25.
- 3.5 The relevant plan for this element of the pipeline is General Arrangement Sheet 47 (application document 2.6 rev. 2 vols 1-3, September 2019, ref APP-022 to APP-024).

i). The effects of proposed Construction Compound 5L on school playing fields

- 3.6 On 6 December 2018 RBC granted planning permission (application ref. RU.18/1279) for the formation of sport pitches, associated earthworks and pavilion, with associated access, car parking and landscaping on land adjacent to Salesian School on the north-west side of the A320 Guildford Road. Development has commenced.
- 3.7 Proposed construction compound 5L is to be sited on the location of the pavilion that was approved under application RU.18/1279.
- 3.8 Paragraph 13.8.130 of Esso's Planning Statement (application document 7.1, ref. APP-133) states:
- 'The construction of the pipeline will temporarily impact on the use of the two proposed playing fields at Salesian school, however, the project will consult with the school to keep disruption to a minimum.'*
- 3.9 Paragraph 16.4.43 of the Planning Statement adds that:
- 'The project anticipates that these pitches will be in place and in use prior to the installation of the replacement pipeline, therefore the project would impact on the full-size rugby pitch and the use of the new pavilion during construction.'*
- 3.10 Table 13.16: *Impacts on Community and Recreation/Amenity Receptors in Section F* of Chapter 13: *People and Communities* in the applicant's ES (application document 6.2, ref. APP-053) states that the impact would be limited to one pitch.

- 3.11 The documents submitted by the applicant are silent on what impact construction compound 5L would have upon the associated sports pavilion. ES Appendix 16.1: *Code of Construction Practice* (application document 6.4, ref. APP-128) does not provide information on how the rugby pitch would be reinstated.
- 3.12 During the current DCO examination it is requested that ExA seeks a written statement from Esso on its proposals for the reinstatement of the rugby pitch. The statement should clarify whether any restrictions would be placed on the use of groundskeeping machinery over the pipeline corridor. It should clarify also whether the new sports pavilion would be retained or would have to be demolished to make way for Compound 5L.

ii). Residential amenity and proposed Construction Compound CO 5L

- 3.13 Construction compound 5L would be sited adjacent to a residential property addressed as Westbury, Guildford Road, Ottershaw, Chertsey KT16 9LX. The compound would come to within four metres of the dwelling.
- 3.14 Paragraph 3.4.33 of the Applicant's ES Chapter 3: *Project Description* (application document 6.2, ref APP-043) states in regard to construction compounds that '*Lighting would be of the lowest luminosity necessary for safe delivery of each task. It would be designed, positioned and directed to reduce the intrusion into adjacent properties and habitats (G45).*' RBC supports this approach but has identified no explicit means of enforcing it in the DCO as drafted.
- 3.15 It is requested that a new provision is added to the list of construction management plans identified under part (2)(d) Requirement 6: *Construction Environmental Management Plan* of the draft DCO (application document 3.2 rev. 2, Schedule 2 Part 1: Requirements) as follows: '*(x). Construction Lighting Strategy*'.
- 3.16 In this context the Council notes with satisfaction that part (2)(d) of draft Requirement 6: CEMP includes provisions for the management of dust, noise and vibration. Esso is encouraged to liaise closely with the affected property when setting up this construction compound.

iii). Trenchless Crossing (TC 030)

- 3.17 This trenchless crossing is supported by RBC, as it avoids a direct impact upon the A320 Guildford Road, the Salesian School grounds and the M25 Motorway. Paragraph 13.7.15 in the Planning Statement (application document 7.1, ref. APP-133) states

An access track is included in the Order Limits to allow for any issues during

construction under the school grounds. The route avoids the existing artificial turf pitches and passes under informal open space (this is open space used for casual recreational purposes such as sitting) within the school campus, this careful alignment reduces the potential to impact on the operation of the school.

- 3.18 RBC understands the necessity for construction access but queries the practicality of construction vehicles running through the heart of the school site and close to buildings when the school is open. It is requested that ExA seeks clarification about the measures that Esso proposes to render this a safe arrangement that does not conflict with school activities. This information should include the timescale over which access would be required, the type and number of vehicles, noise mitigation if construction works were to take place during school opening times and remediation measures if the land is disturbed.

iv). Flood risk

- 3.19 Part of the proposed Compound 5L is in flood zone 2. Areas deemed to be in flood zone 2 have been shown to have between 0.1% – 1% chance of flooding from rivers in any year (i.e. between 1:1,000 and 1:100 chance). As such, saved policy SV2: *Flooding* of the Runnymede Local Plan 2001 is relevant. According to the policy, development will not normally be permitted for new residential or non-residential development, including extensions, unless it can be demonstrated to the satisfaction of the Borough Council following consultation with the Environment Agency that the proposal would not of itself, or cumulatively in conjunction with other development -

- i. impede the flow of flood water; or
- ii. reduce the capacity of the flood plain to store flood water; or
- iii. increase the number of people or properties at risk from flooding.

- 3.20 Draft policy EE13: *Managing flood risk* of the emerging 2030 Local Plan is also relevant. As noted earlier in this LIR, the draft policy provides that any development proposed in flood zone 2, flood zone 3, on sites over 1ha in flood zone 1, or in a dry island (all types of development excluding minor development in a dry island), must be accompanied by a site-specific Flood Risk Assessment, proportionate to the scale of development and demonstrating that all forms of flooding have been taken into account.

- 3.21 The Council defers to the Environment Agency on the issue of whether the proposed works have any implications for flood risk at this location.

CANFORD DRIVE AND ROAKES AVENUE, CHERTSEY

- 3.22 This section considers the impact that the pipeline will have on Canford Drive and Roakes Avenue and the residential properties on these roads. This neighbourhood lies on the southern edge of Chertsey, close to the junction between the A317/A318 Chertsey Road and the A320 St Peter's Way. It comprises suburban two-storey detached and semi-detached housing built generally between the 1960s and 1980s.
- 3.23 The relevant section of pipeline commences with the end of trenchless crossing TC031, which would emerge from beneath the railway to the east, running along Canford Drive and continuing onto Roakes Avenue. At the point where Roakes Avenue meets A317 (Chertsey Road), trenchless crossing TC032 is proposed to run below the A317.
- 3.24 The relevant plan for this element of the pipeline is General Arrangement Sheet 48 (application document 2.6 rev. 2 vols 1-3, September 2019, ref APP-022 to APP-024).
- 3.25 250 metres of pipeline is proposed to be installed through Canford Drive and Roakes Avenue using open cut construction techniques. Table 4.2 *Key Working Assumptions* in the Planning Statement (application document 7.1, ref. APP-133) explains that, in urban areas, 90 metres of pipe can be laid per week.
- 3.26 Paragraph 4.6.28 in the Planning Statement (application document 7.1, ref. APP-133) states:
- Minor roads will typically be open cut. Roads being crossed using open cut techniques will need to be partially or completely closed during construction of the crossing, with appropriate traffic management measures and temporary diversions being put in place for the duration of the works. Partial and complete road closures will be kept as short as possible, typically a maximum of three working days for complete road closures, to reduce effects on local traffic and communities.*
- 3.27 It is requested that ExA seeks the opinion of Surrey County Council in its capacity as the Local Highways Authority (LHA) on the issue of whether the proposed works on Canford Drive and Roakes Avenue can proceed without giving rise to unacceptable local highway impacts.

ii). Trenchless Crossing TC031

- 3.28 Trenchless Crossing TC031 is proposed to cross under the Chertsey branch railway that runs between Virginia Water and Weybridge. The total length of the

trenchless crossing would be 71 metres, constructed using an auger bore trenchless technique.

- 3.29 TC031 would commence in Abbey Moor golf course on the south-western side of the railway line and emerge in Canford Drive on the northern side of the railway line.
- 3.30 The work area given over to the trenchless crossing on Canford Drive as shown on General Arrangement Sheet 48 (application document 2.6 rev. 2 vols 1-3, September 2019, ref APP-022 to APP-024), would be located between 10 and 20 metres of residential properties at 42, 44, 46, 48, 50, 52 and 54 Canford Drive.
- 3.31 Paragraph 4.8.7 in the Planning Statement (application document 7.1, ref. APP-133) states:

Trenchless techniques are proposed in a number of locations. The duration of such techniques varies according to the length of the pipe being installed and the technique used. For example, with horizontal directional drilling (HDD), the construction of a 100m long crossing would take around four to five weeks, with a further two weeks required per 100m increase in the length of the crossing. This also assumes that the works to install trenchless crossings would not be unduly restricted with regards to working hours and weather conditions. Certain activities would require continual 24 hours a day working, for example the pipe pulling phase for a HDD. If working hours for trenchless crossings are restricted, then the installation would take longer.

- 3.32 It appears that no information has been provided by the Applicant on the average length of construction per 100 metres when an Auger bore trenchless technique would be used. Based on the information provided above, it is considered that this trenchless crossing at 71 metres in length would take three to four weeks, to which time would be added for site restoration.
- 3.33 Due to the number of residential properties in close proximity to this trenchless crossing, RBC requests that ExA seeks clarification from the Applicant on the indicative construction time for trenchless crossing TC031.
- 3.34 Paragraph 4.6.66 in the Planning Statement (application document 7.1, ref. APP-133) sets out the amount of equipment that auger boring will require:

The construction of the pipeline will require use of plant and equipment including: welders; air compressors; excavators; mobile cranes; telehandlers; excavator mounted breakers; tipper lorries; haulage lorries; automatic welding machines; angle grinders; vibratory piling rigs; auger units; HDD units and concrete pumps.

- 3.35 There is no noise and vibration chapter in the ES. Instead a Noise and Vibration

Technical Note is provided as ES Appendix 13.3 (application document 6.4, ref. APP-121). Table 5.3 *Calculation of Average Daily Activity Noise Levels (Typical Construction Compounds, Logistics Hubs and Trenchless Locations)* and table 5.4 *Calculation of Average Daily Activity Noise Levels (Typical Out-of-Hours Working)* in ES Appendix 13.3 (application document 6.4, ref. APP-121) establishes Activity LAeq Project Plant Description at 10m, dB would be 84dB.

- 3.36 For comparison, noises that average around 80dB include:

Garbage disposal, dishwasher, average factory, freight train (at 15 metres). Car wash at 20 ft (89 dB); propeller plane flyover at 1,000 ft (88 dB); diesel truck 40 mph at 50 ft (84 dB); diesel train at 45 mph at 100 ft (83 dB). Food blender (88 dB); milling machine (85 dB); garbage disposal (80 dB). (source - <https://www.industrialnoisecontrol.com/comparative-noise-examples.htm>)

- 3.37 Table 4.1 *Good Practice Commitments within the REAC* in the Applicant's ES Appendix 13.3 (application document 6.4, ref. APP-121) states:

'The contractor would be required to produce a Noise and Vibration Management Plan for the approval of the relevant planning authority.'

- 3.38 Given the trenchless crossing construction at Canford Drive could take up to four weeks, and that Requirement 14: *Construction hours* in Schedule 2 Part 1: *Requirements* of the draft DCO states (part 14(3)(a)) that trenchless crossing construction may take outside the working hours of 07:00 and 19:00 on weekdays and Saturdays (or as set out above, continual 24 hours a day working), RBC is concerned that the cumulative effect on residents from trenchless crossing TC031 could be significantly adverse.

- 3.39 RBC requests that ExA seeks written clarification from the Applicant of the actual likely effects upon receptors in Canford Drive and the proposed mitigation measures, so that the acceptability of the works can be determined.

iii). Trenchless Crossing TC032

- 3.40 The A317 Chertsey Road is one of the main roads into the town of Chertsey. The A317 links Chertsey with junction 11 of the M25 and therefore the volume of traffic using the A317 is significant. For these reasons RBC supports the use of trenchless construction from Roakes Avenue under the A317 to avoid adverse traffic effects.

ABBEY RANGERS FOOTBALL CLUB AND PLAYING PITCHES AND CHERTSEY SCHOOL

- 3.41 This section considers the element of the proposed development from the eastern end of Trenchless Crossing TC032, where the pipeline runs through the Old Meads school playing fields at Addlestone Moor on a south-west to north-east direction before finishing at the start of Trenchless Crossing TC033. The relevant plan for this element of the pipeline is General Arrangement Sheet 48 (application document 2.6 rev. 2 vols 1-3, September 2019, ref APP-022 to APP-024).
- 3.42 The site comprises an area of c. 18 hectares within which are a club building, storage shed and several sports pitches. These facilities are used by Abbey Rangers FC, Pulse Chertsey Academy and Chertsey High School. Abbey Rangers FC operates 38 teams across different age groups, with a membership of over 450 people. The club is a member of the Combined Counties League Premier Division. The Council is aware that the Chairman of Abbey rangers FC has written to Esso to express frustration at the absence of a detailed plan of works for the site and the general disruption that the works are likely to cause.

i). Effects on the main FA standard playing pitch

- 3.43 Abbey Rangers FC's main playing pitch is located directly to the north of the clubhouse building. The main playing pitch for Abbey Rangers FC complies with relevant Football Association design, specification and maintenance requirements.
- 3.44 Table 13.17: *Impacts on Community and Recreation/Amenity Receptors in Section G* in Chapter 13: *People and communities* of the applicant's ES (application document 6.2, ref. APP-053) describes the effects on Abbey Rangers FC as follows:

The project Order Limits has potential to impact on six pitches (three full size and three 5-a-side/Junior). However, careful routing will reduce to a temporary impact from the installation of the pipeline to three five-a-side pitches and possibly the main match pitch. The 5-a-side pitch space can be provided using the newly installed artificial turf pitch. The project will work with the club to manage the impact of the installation of the replacement pipeline.

- 3.45 By reference to the following documents, it is currently unclear how the applicant intends for the pipeline to cross through the main Abbey Rangers playing pitch. Table 16.6 *Priority Sites Project Commitments* in the Applicant's Planning Statement (application document 7.1, ref. APP-133) proposes that trenchless construction techniques will be used to cross 'the FA match pitch' (i.e. Abbey Rangers FC's main playing pitch) in order to reduce the potential impact on the playing surface and allow for this pitch to be used throughout the construction period.
- 3.46 However, paragraph 16.4.54 of the Planning Statement (application document 7.1,

ref. APP-133) states:

The surface will be reinstated to FA/Sport England Performance Quality Standards (PQS), with appropriate reseeding/turf laying techniques and regular irrigation, to secure that the playing surface is enhanced and returned to use as soon as possible. The project will work with the club to secure an experienced playing pitch contractor with a proven track record in sports development to secure the correct surveys are undertaken and appropriate design specifications are applied. The pitches impacted will be restored to their current condition under a commitment secured through the CoCP under Requirement 5, the CEMP under Requirement 6, hedgerows and trees in Requirement 8 of the DCO and the LEMP in Requirement 12 of the DCO.

- 3.47 By reference to General Arrangement Sheet 48 (application document 2.6 rev. 2 vols 1-3, September 2019, ref APP-022 to APP-024), a trenchless crossing is not proposed across the Abbey Rangers FC main playing pitch.
- 3.48 ES Appendix 16.1: *Code of Construction Practice* (application document 6.4, ref. APP-128) does not provide information on how this football pitch would be reinstated.
- 3.49 RBC requests that ExA seeks clarification from the Applicant as to whether the main playing pitch is to be lost during construction due to the open cut construction technique or if a trenchless construction technique would be used. If the chosen construction method involves open cut installation of the pipeline, the impact upon Abbey Rangers Football Club would be significantly adverse due to the construction time and the time required for the pitch to be fully restored.
- 3.50 RBC requests that ExA seeks a written statement from Esso on its proposals for the reinstatement of this football pitch. Furthermore, to avoid times of most significant impact (i.e. during the football season which runs from August to May), RBC also requests that ExA seeks a detailed construction schedule from Esso to ensure the development in this part of the pipeline goes ahead at the time the pitch is not in use.

ii). Effects on spectator facilities

- 3.51 Runnymede BC granted planning permission (RBC ref. RU.16/1851) for the erection of a 50 seat spectator stand to the west of the Abbey Rangers FC's main pitch. This permission has since been implemented.
- 3.52 The evidence supplied with application RU.16/1851 setting out the need for this spectator stand is below:

The need for the club to install this stand is a requirement of The FA ground grading

in the National League System for Step 6 to provide a covered seated stand for 50 spectators. The club is a Community Charter Standard Football Club, the highest accreditation The FA give to grass roots clubs. We recently had a ground grading inspection by The FA and League and the location was from their recommendation to provide the most suitable to view the game. Meeting this requirement in addition to allow the clubs Men's First team to maintain affiliation to Combined Counties Football League and our Ladies team for South East Combination Ladies Football League. This also brings a revenue stream to the [football club] to help maintain our facilities by hiring the pitch for semifinal/finals for leagues and country competitions, and enhance others use within the community such as Surrey Schools Girls football.

- 3.53 As noted above, it is unclear whether the proposed pipeline is to be laid through the main playing pitch using trenchless crossing techniques or open cut construction methods. General Arrangement Sheet 48 (application document 2.6 rev. 2 vols 1-3, September 2019, ref APP-022 to APP-024), suggests that the 50 seat spectator stand approved under application RU.16/1851 is within the limits of deviation within which the pipeline may be laid.
- 3.54 RBC therefore requests that ExA seeks a written statement from Esso on how the pipeline construction would avoid any adverse impact on this spectator stand given the clear need for this stand to remain. If the stand cannot be retained, RBC requests an explanation of how and when the stand would be replaced after construction has finished.

iii). Impact upon the other sport pitches

- 3.55 Paragraph 16.4.52 in the Planning Statement (application document 7.1, ref. APP-133) states:

The remaining route through the Abbey Rangers Club will be open trench following the southern and eastern boundary of the site. This avoids any impact on the playing surface of the two remaining full-size pitches. The easternmost junior pitch may require re-marking further north than its current position. A small five-a-side pitch will be temporarily removed; this pitch's unavailability will be compensated for by the use of the proposed artificial turf pitch.

- 3.56 Table 3.1: *Planning Good Practice Measures* in the ES Appendix 16.1: *Code of Construction Practice* (application document 6.4, ref. APP-128) proposes 'Working width reduced to 15m (NW28) to reduce impacts on the football pitches at Abbey Rangers Football Club over an approximate distance of 500m'.
- 3.56 Provided that the impact can be reduced to the loss of one five-a-side pitch through careful construction and a narrow working area, RBC would consider that the impact from the temporary loss of this pitch would be minor.

- 3.57 Requirement 5: *Code of Construction Practice* in the draft DCO (application document 3.2 rev. 2, Schedule 2 Part 1: Requirements) states that: '*The authorised development must be undertaken in accordance with the code of construction practice, or with such changes to that document as agreed by the relevant planning authority.*' ES Appendix 16.1: *Code of Construction Practice* (application document 6.4, ref. APP-128) does not provide any details of how the play area will be reinstated.
- 3.58 During the current DCO examination it is requested that ExA seeks a written statement from Esso on its proposals for the reinstatement of the playing pitches affected by during construction. This statement should form an annex to the Code of Construction Practice provided for in Requirement 5 of the draft DCO (application document 3.2 rev. 2, Schedule 2 Part 1: Requirements).

iv). Impact on Chertsey High School

- 3.59 Construction access for the trenchless crossing of the A317 Chertsey Road (TC 032) and the open-cut pipeline across the Abbey Rangers site is proposed on a narrow route with a 90° bend beside buildings at Chertsey High School, a secondary School on Chertsey Road. The Council requests that ExA seeks clarification from the Applicant about how this access arrangement will operate without disrupting the operation of the school or compromise to the safety of students and staff.

CHERTSEY MEADS

- 3.60 The relevant plan for this element of the pipeline is General Arrangement Sheet 49 (application document 2.6 rev. 2 vols 1-3, September 2019, ref APP-022 to APP-024). Chertsey Meads is a Council-owned public open space of approximately 71 hectares, lying between the River Thames and River Bourne to the east of Chertsey town at the end of Mead Lane.
- 3.61 In 1975, The Nature Conservancy Council designated part of the area as a Site of Special Scientific Interest (SSSI), describing it as '*the only remaining Thames flood meadow of botanical importance*'. The Meads lost their status as a Site of Special Scientific Interest (SSSI) in the 1980s after parts were ploughed and fertilised, causing a decline in the number of rare wildflowers. However, in 1992 an area of 38 hectares was designated as a Local Nature Reserve. Initiatives are underway to restore the habitat value of Chertsey Meads and the areas is also being considered for designation as a Suitable Alternative Natural Greenspace (SANG), to reduce recreational pressure on European-protected habitats in the locality.

i). Chertsey Meads Local Nature Reserve

- 3.62 Paragraph 14.7.2 in the Applicant's Planning Statement (application document 7.1, ref. APP-133) explains why the proposed pipeline route goes through Chertsey Meads Local Nature Reserve:

The route goes through the Chertsey Meads Local Nature Reserve site as this land is required in order to string the pipework for the trenchless crossing of the River Thames and in order to provide an alignment that avoids Dumsey Meadow SSSI [on the northern bank of the River Thames in Spelthorne]. The route through Chertsey Meads will follow local roads rather than go across rural areas, to reduce impacts on sensitive flora.

- 3.63 Paragraph 14.3.222 in the Planning Statement (application document 7.1, ref. APP-133) sets how the proposed pipeline route has been modified following initial consultation with RBC.

Additional refinements relate to the crossing of Chertsey Meads, and the proposed route addresses concerns that were raised regarding biodiversity at Chertsey Meads. The Order Limits were amended in response to consultation feedback from the local council around floral biodiversity within Chertsey Meads. This has resulted in the pipeline now being installed along Meads Lane, the access lane to the car park. This will have different impacts on the local community, including access to public open space, compared to the previous route options, but these will be controlled using traffic management measures to ensure that access to Chertsey Meads is maintained during construction.

- 3.64 Paragraph 7.3.5 in Chapter 7: *Biodiversity* of the Applicant's ES (application document 6.2, ref. APP-047) identifies the ecological importance of Chertsey Meads Local Nature Reserve:

Chertsey Meads LNR, based on its designation, would be valued as medium. However, following detailed botanical survey and a review of citation and designation criteria (see Appendix 7.1 Habitats and Botany Factual Report), the valuation of Chertsey Meads LNR has been revised to high.

- 3.65 Paragraph 7.5.466 in Chapter 7: *Biodiversity* of the Applicant's ES (application document 6.2, ref. APP-047) considers the effects on Chertsey Meads Local Nature Reserve:

The potential effect on the high value habitats in Chertsey Meads LNR is of small magnitude due to the avoidance of the most sensitive habitats, the small proportion of the entire site impacted and the proposed good practice measures. The effect would be of minor adverse significance.

- 3.66 Paragraph 10.2.10 of ES chapter 10: Landscape and visual, (application document 6.4, ref APP-050) sets out that:

Trees along the Bourne and the Thames (Dumpsey Stump) would largely be retained due to the trenchless installations in these locations (TC033 and TC034).

- 3.67 These extracts from the Applicant's ES indicate to RBC that the Applicant has given consideration to the proposed route of the pipeline and the method of construction in a manner that acknowledges the ecological sensitivity of Chertsey Meads Local Nature Reserve.
- 3.68 In a presentation to the Chertsey Meads Liaison Group, of which the Council is active member, Esso informed the Group that it will employ 'narrow working' across Chertsey Meads to minimise the extent of surface damage. Nonetheless, the impacts upon Chertsey Meads Local Nature Reserve cannot conclusively be assessed as minor without the detailed mitigation measures for the site being identified during the course of the DCO examination instead of being deferred until after the DCO is made.
- 3.69 Given the high ecological value of Chertsey Meads and the longstanding objectives of RBC to restore Chertsey Meads Local Nature Reserve to a SSSI, RBC requests that ExA invites Esso to provide a detailed Construction Environmental Management Plan. This will allow Esso to demonstrate with evidence that the conclusions reached within the ES on the impacts can be achieved.
- 3.70 This additional information will allow RBC to ensure that the application complies with saved policies NE8: *Areas of Landscape Importance*, NE18: *Enhancement of Site of Nature Conservation Importance*, NE20: *Species Protection* and Policy R8: *Chertsey Meads* of the Runnymede Borough Local Plan 2001 (2007 saved policies).

ii). Construction Compound CO 5N, south of Mead Lane on Chertsey Meads

- 3.71 Proposed Compound 5N is in flood zone 3. Areas deemed to be in flood zone 3 have been shown to have a 1% or greater chance of flooding from rivers in any year (at least a 1:100 chance). As such, saved Policy SV2: *Flooding* of the RBC adopted 2001 local plan applies. This states that within the area liable to flood as shown on the Proposals Map, development will not normally be permitted for new residential or non-residential development, including extensions, unless it can be demonstrated to the satisfaction of the Borough Council, following consultation with the Environment Agency, that the proposal would not of itself, or cumulatively in conjunction with other development.
- iv. impede the flow of flood water; or
 - v. reduce the capacity of the flood plain to store flood water; or
 - vi. increase the number of people or properties at risk from flooding.

3.72 Draft policy EE13: *Managing Flood Risk* of the emerging 2030 Local Plan is also considered relevant. This states that any development proposed in either flood zone 2, flood zone 3, on sites over 1ha in flood zone 1, or in a dry island (all types of development excluding minor development in a dry island), must be accompanied by a site specific Flood Risk Assessment, proportionate to the scale of development that demonstrates that all forms of flooding have been taken into account (as detailed in the Council's Strategic Flood Risk Assessment).

3.73 The Council defers to the Environment Agency on the issue of whether the proposed works have any implications for flood risk on Chertsey Meads.

iii). The Chertsey Agricultural Show

3.74 This show is an important community event held over two days in August and approaching its 180th year. Paragraph 13.5.80 in Chapter 13: *People and communities* of the applicant's ES (application document 6.2, ref. APP-053) states in regards to the Show:

There would be the potential for significant adverse effects if construction was underway during the running of the two-day event. With the potential of significant adverse effects on this event impacting the people and communities locally, mitigation is proposed, as outlined in Section 13.6.

3.75 Paragraph 13.6.2 in Chapter 13: *People and communities* of the applicant's ES (application document 6.2, ref. APP-053) sets out the proposed mitigation:

'... there is the potential for significant adverse effects on the Chertsey Agricultural Show should construction take place at the same time as the event. As a result, the project would work with the Chertsey Agricultural Show to limit impacts to the Show at Chertsey Meads and along Mead Lane (PC1), within Section G of the project's Order Limits'.

3.76 Table 13.17: *Impacts on Community and Recreation/Amenity Receptors in Section G* in Chapter 13: *People and communities* of the applicant's ES (application document 6.2, ref. APP-053) states one car park in Chertsey Meads is expected to be directly impacted during the construction of the pipeline.

3.77 RBC consider that the loss of one car park during the Chertsey Agricultural Show could reduce attendance and subsequently revenue. To ensure that there would be no adverse effect on the show, RBC requests that ExA requests a definitive written commitment from the Applicant on how any adverse effects on this annual event will be mitigated.

OTHER CONSIDERATIONS RAISED IN RBC'S RELEVANT REPRESENTATION

Highways

- 3.78 As noted, RBC requests that ExA seeks the views of Surrey Council in its capacity as the Local Highway Authority on the effects of the proposed pipeline on local road conditions and the adequacy of Esso's proposed traffic management and mitigation measures.
- 3.79 RBC anticipates a high level of activity in housing delivery in the Borough at the same time proposed for the construction of the pipeline. This coincides with other developments taking place in Surrey Heath and Woking, with the potential for a cumulative impact on the A320 corridor.
- 3.80 As explained in the Borough Council's Relevant Representation of 25 July 2019, the Council has defined a package of mitigation measures to manage the impacts of growth and enable the delivery of the developments. The Council is actively pursuing a bid to the Housing Infrastructure Fund to implement these mitigation measures along the A320, including improvements to the junction of the A320 with Holloway Hill and Green Lane.
- 3.81 The information on the mitigation of highways impacts provided in Esso's Environmental Statement (ES) is generalised and not location-specific. RBC seeks reassurance that, through the Code of Construction Practice, the Construction Environmental Management Plan and the Construction Traffic Management Plan (respectively Requirements 5, 6 and 7 in Schedule 2 Part 1 of the draft DCO – application document ref. 3.1, ref. APP-026):
- i). the construction of the pipeline will not result in any significant capacity or congestion impacts on the transport network in accordance with paragraph 108 of the NPPF, particularly in the A320 corridor;
 - ii). highways condition surveys are undertaken and the results shared with Runnymede BC and the LHA before and after pipeline construction;
 - iii). satisfactory measures will be in place to manage parking by pipeline workers in areas where on-street parking is limited, to minimise the potential for conflicts with parking by residents;
 - iv). affected communities are engaged effectively by Esso or its contractor before and during pipeline works.

Ecology and biodiversity

- 3.82 In reinforcement of the general points made in chapter 2 of this LIR in respect to the protection of ecology and biodiversity, Runnymede BC reiterates points made in its Relevant Representation (not recited here in the interest of brevity) concerning the protection of Queenwood golf course SNCI, Chertsey Meads SNCI and other Biodiversity Opportunity Areas (BOAs).

Ancient woodland

- 3.83 Having regard to the general points made in chapter 2 of this LIR in respect of tree protection, the Council reiterates its concern over the potential adverse effects of pipeline construction on Fan Grove Ancient Woodland, north of Longcross Road. These works have the potential to conflict with paragraph 175 of the NPPF. It is requested that ExA seeks site-specific clarification from the Applicant on measures proposed to minimise harm to the woodland, taking into account the *Planning for Ancient Woodland* document published July 2019 by the Woodland Trust.

Archaeology

- 3.84 RBC is satisfied that Requirement 9 of the draft DCO (Schedule 2 Part 1 of application document ref. 3.1, ref. APP-026) provides adequate protection for features of archaeological interest in the Borough.

Cumulative effects

- 3.85 In addition to the identified housing development acceleration and upgrade of the A320, the Borough is potentially host to three additional major infrastructure projects in the lead up to and potentially during the proposed pipeline installation period. These include the River Thames Scheme, the impacts of the proposed Heathrow Expansion and potentially the Southern Rail Extension from London to Heathrow. RBC seeks assurance from Esso that the cumulative effects of these projects have been assessed and continue to be monitored as part of the pipeline project and their potential significant adverse effects avoided or mitigated.

Four ♦ Conclusions

LOCAL IMPACTS

- 4.1 This LIR has identified the likely impacts of Esso's proposed aviation fuel pipeline along the length of its route across Runnymede Borough in Surrey.
- 4.2 Chapter 1 of the LIR introduces Runnymede and identifies its salient characteristics. It confirms that RBC does not object in principle to the proposed pipeline but is concerned to ensure that adequate protection is provided to the communities and physical and environmental assets affected by the proposals.
- 4.3 Chapter 2 of this LIR identifies matters of generic concern in respect of the local impacts of the pipeline. These concerns are shared with neighbouring local authority areas in north-west Surrey affected by the proposed pipeline - namely Surrey Heath and Spelthorne – and are explained under the general headings of tree protection, ecology and biodiversity, transport and residential amenity. Chapter 2 identifies potential safeguards that the DCO could usefully afford for the communities and environments affected.
- 4.4 For much of its route through the Borough the pipeline would pass through open or lightly developed areas. Subject to the additional safeguarding provisions proposed in chapter 2 of this LIR, the Council is content that the local impacts of these sections of the pipeline can be rendered acceptable. The outstanding areas of concern for Runnymede BC are described in chapter 3 of this LIR under the following headings.
- Cockcrow Hill to Sandgates including Salesian School (M25 crossing near Chertsey South)
 - Canford Drive and Roakes Avenue, Chertsey
 - Abbey Rangers Football Club and playing pitches and Chertsey High School
 - Chertsey Meads
 - Other considerations raised in RBC's Relevant Representation
- 4.5 Based upon the evidence presented in this LIR, the Council is concerned that inadequate attention has been given to the specific impacts of pipeline construction in the locations identified above. Where possible this LIR has identified potential remedies and safeguards for consideration during the DCO examination.

NEXT STEPS

- 4.6 Having identified the local impacts, Runnymede BC will engage in further dialogue with Esso in pursuit of reinforced mitigation to address the adverse local impacts identified. Points of agreement will be set out in a Statement of Common Ground between the parties.
-