

# Southampton to London Pipeline Project

## Deadline 2

Response to the Examining Authority's First Written  
Questions General Questions (GQ)

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Southampton to London  
Pipeline Project

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## Response to the Examining Authority's Written Questions - General Questions (GQ)



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# 1 Response to the Examining Authority's Written Questions – General Questions (GQ)

**Table 1.1: Applicant response to Question**

ExQ1	Question:	Applicant response to Question:
<b>GQ.1.1</b>	<p>The Application describes the Proposed Development as a replacement pipeline. However, the Proposed Development is a new pipeline in its own right, thus the description could be deemed to be misleading.</p> <p>Comment as to whether clarification is needed and whether/how decommissioning would need to be secured in the draft Development Consent Order (draft DCO).</p> <p>N.B – There is an overlap between this question and questions CA.1.17 and DCO.1.29 and you may therefore wish to provide a</p>	<p>1.1 The Applicant does not agree that the description of the proposed development is misleading. The new replacement pipeline is replacing an existing pipeline. Once the replacement pipeline is operational, the existing pipeline will cease to operate.</p> <p>1.2 The decommissioning of the existing pipeline is not secured in the draft DCO (<b>Document Reference 3.1 (3)</b>) and does not need to be in the Applicant's view.</p> <p>1.3 The decommissioning of the existing pipeline would be carried out in accordance with the requirements of the Pipeline Safety Regulations 1996 and in accordance with good industry practice. Because of the way the replacement pipeline ties into the existing pipeline at Boorley Green, Hampshire, and at the end point at West London Terminal storage facility, it is impossible to operate both pipelines concurrently, and once the replacement pipeline is commissioned, the existing pipeline cannot be operated and would be decommissioned. No additional development consents or land rights are required to undertake this work and it is not included in the scope of the SLP Project. The need for other consents such as environmental permits or species protection licences would be fully assessed and sought as necessary. This is not anticipated to be problematic and it is the basis on which the Applicant has operated and maintained its pipelines for the last 60 years. Decommissioning is addressed in the response to questions CA.1.17 and DCO.1.29.</p>



ExQ1	Question:	Applicant response to Question:																																	
	combined response to these questions.																																		
<b>GQ.1.2</b>	Provide information with regards to the number of leaks that have occurred to the current pipeline over the last 10 years.	1.1 The Applicant regularly inspects and tests the existing pipeline and this has shown no leaks have occurred in the last 10 years.																																	
<b>GQ.1.3</b>	The indicative start and finish points and the location of the Order Limits shown on the Works Plans [AS-046], [AS-047] and [AS-048] are not defined by grid reference and are only capable of being located on the ground by means of scaling off the works plans and by reference to existing on site features shown on the Ordnance Survey base of the works plans. There are also no definitions of the maximum sizes or heights of the pipeline marker	<p>1.1 Grid reference coordinates of the start and finish points of the Order Limits are as shown in the table below:</p> <table border="1"> <thead> <tr> <th>Works Number</th><th>Start coordinate</th><th>End Coordinate</th></tr> </thead> <tbody> <tr> <td>1A</td><td>451212, 114394</td><td>462437, 127578</td></tr> <tr> <td>1B</td><td>462437, 127578</td><td>472190, 137629</td></tr> <tr> <td>1C</td><td>472190, 137629</td><td>480032, 148248</td></tr> <tr> <td>1D</td><td>480032, 148248</td><td>485298, 154836</td></tr> <tr> <td>1Ei</td><td>485298, 154836</td><td>487342, 157100</td></tr> <tr> <td>1Eii</td><td>487342, 157100</td><td>487898, 157319</td></tr> <tr> <td>1Eiii</td><td>487898, 157319</td><td>490961, 158789</td></tr> <tr> <td>1F</td><td>490961, 158789</td><td>503406, 165928</td></tr> <tr> <td>1G</td><td>503406, 165928</td><td>505876, 167153</td></tr> <tr> <td>1H</td><td>505876, 167153</td><td>507109, 173371</td></tr> </tbody> </table> <p>1.2 The standard (ground-visible) pipeline marker posts would have a maximum overall height of 0.6m, a width of 0.22m and buried in the ground to a depth of 0.6m. A photograph of a standard marker</p>	Works Number	Start coordinate	End Coordinate	1A	451212, 114394	462437, 127578	1B	462437, 127578	472190, 137629	1C	472190, 137629	480032, 148248	1D	480032, 148248	485298, 154836	1Ei	485298, 154836	487342, 157100	1Eii	487342, 157100	487898, 157319	1Eiii	487898, 157319	490961, 158789	1F	490961, 158789	503406, 165928	1G	503406, 165928	505876, 167153	1H	505876, 167153	507109, 173371
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ExQ1	Question:	Applicant response to Question:
	posts and cathodic protection test posts. Provide this information.	<p>post is shown as Photograph 3.3 in the Environmental Statement Chapter 3 (<b>Application Document APP-043</b>).</p> <p>1.3 The cathodic protection test posts would have a maximum overall height of 1.2m, a width of 0.22m and a depth of 0.13m.</p> <p>1.4 The pipeline marker posts used for aerial inspections would be typically 2m high. A photograph of a marker post used for aerial inspections is shown as Photograph 3.1 in the Environmental Statement Chapter 3.</p>
<b>GQ.1.6</b>	Respond to RR-184 in respect to conflict between the route of the Proposed Development and its operations.	<p>1.1 The Applicant is in discussions with Brett Aggregates with regards to the interface between the project and Brett Aggregates' proposed development to install a new conveyor belt tunnel across Ashford Road (B377). The Applicant has received Brett Aggregates design drawings for the proposed development and is satisfied that it would be feasible to construct the new conveyor belt tunnel under the pipeline. The vertical limits of deviation for the project enable the pipeline to be installed at a depth that would be shallow enough to enable the conveyor belt tunnel to be constructed under the pipeline.</p> <p>1.2 Discussions between the Applicant and Brett Aggregates are ongoing with regards to a voluntary option and deed of easement.</p>
<b>GQ.1.9</b>	Affinity Water Ltd (AWL) in its RR [RR-219] have raised concerns that the depth of the Proposed Development and their water mains are very similar, which would be in contravention of Affinity Water guidance. AWL have suggested that the	<p>1.1 The pipeline would be installed at depths greater than those recommended in Volume 1 of 'Street Works UK Guidance on the Positioning and Colour Coding of Underground Utilities' Apparatus' Issue 9:2018 and Affinity Water's guidance document titled 'Developing and working near our pipes and apparatus' dated 17-04-2019. As such, where the pipeline crosses or runs parallel to Affinity Water's water mains, the intention would be to install it to a lower depth than the water mains where practicable.</p>



ExQ1	Question:	Applicant response to Question:
	<p>Proposed Development should be at a lower level as this could also address concerns regarding leaks/contamination.</p> <p>Respond.</p>	
<b>GQ.1.10</b>	<p>AWL in its RR [RR-219] have raised concerns that the proposals to install cathodic protection on the Proposed Development could adversely affect AWL's cast iron and spun water mains.</p> <p>Respond.</p>	<p>1.1 The cathodic protection system for the replacement pipeline would be designed and installed to prevent cathodic interference with the existing cast iron and spun iron water mains.</p>
<b>GQ.1.11</b>	<p>Paragraph 1.7.2 of the Planning Statement [APP-132] confirms that other consents and permits would be required by the Proposed Development.</p> <p>State in a table format what these are and provide an update on progress or signpost where in the application</p>	<p>1.1 The Applicant has provided in paragraph 1.7.2 of the Planning Statement (<b>Application Document APP-132</b>) a list of potential licences and permits that may be required to implement the project. This list also appears in the response to question 24 on the Application Form (<b>Application Document APP-002</b>). This list has been refined for the basis for the Table of Potential Consents and Permits in Appendix GQ.1.11.1 below. This table signposts where the information regarding permit applications can be found in the application documentation and gives an update on the progress that has been made towards compliance.</p> <p>1.2 Whilst there has been progress in complying with the relevant other consents, final licence and permit applications would only be submitted once detailed design and further detailed site conditions are known. At this stage, the Applicant is not aware of any obstacle to the grant of these consents. It should be noted, however, that commitments to comply with consents and permits are embedded</p>



ExQ1	Question:	Applicant response to Question:
	documentation this information can be found.	<p>into the project; for example, commitment G44 within Environmental Statement Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>) states that <i>'The project would be run in compliance with all relevant legislation, consents and permits'</i>.</p> <p>1.3 Commitments in Environmental Statement Code of Construction Practice (<b>Document Reference 6.4 Appendix 16.1 (2)</b>) such as G44 are secured through Requirement 5 in the draft DCO (<b>Document Reference 3.1 (3)</b>). Requirement 5 requires that <i>'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'</i>.</p> <p>1.4 The Planning Statement paragraph 5.5.3, (<b>Application Document <a href="#">APP-132</a></b>) states that <i>'all measures and method statements within licences and permits would be incorporated into the CEMP'</i>.</p> <p>1.5 Requirement 6 of the draft DCO (<b>Document Reference 3.1 (3)</b>) relating to the CEMP states:  <i>'(1) No stage of the authorised development must commence until a CEMP relating to that stage has been submitted to and approved by the relevant planning authority.</i>  <i>(2) The CEMP must be substantially in accordance with the outline CEMP and, so far as relevant to that stage, must—</i>  <i>(a) reflect the mitigation measures set out in the REAC; and</i>  <i>(3) The construction of the authorised development must be carried out in accordance with the approved CEMP.'</i></p> <p>1.6 Commitments in the Register of Environmental Actions and Commitments (REAC) within Environmental Statement Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>) are also secured through the CEMP.</p>



ExQ1	Question:	Applicant response to Question:
<b>GQ.1.12</b>	<p>i) Provide an update on whether planning applications have been submitted for the proposed logistics hubs as suggested in paragraph 1.9.2 of the Planning Statement [APP-132].</p> <p>ii) Explain the implications, if these applications were consented, for the draft DCO [AS-059] given that the proposed logistics hubs form part of this Application.</p> <p>iii) Explain whether a scenario exists whereby the logistical hubs could be implemented under the Town and Country Planning Act 1990 (TCPA 1990) as opposed to this Order, and thus be subject to different and perhaps less onerous restrictions.</p>	<p>1.1 In answer to (i), the Applicant can confirm that no planning applications have been submitted by it for the proposed temporary logistics hubs and no pre-application discussions with local planning authorities have yet commenced. Paragraph 1.9.2 of the Planning Statement (<b>Application Document APP-132</b>) stated that applications may be submitted later in 2019 or in early 2020. The Applicant is continuing to keep the need for potential planning applications under review.</p> <p>1.2 In response to (ii), the Applicant does not consider that there would be significant implications for the draft DCO (Application Document AS-059) if planning applications for the logistic hubs were granted. The Applicant would nevertheless seek the flexibility to construct the proposed temporary construction hubs under the draft DCO as associated development. The Applicant considers that this is necessary, since there is a risk that any decision to grant planning permission may be subject to a successful challenge by judicial review. Permission might also be granted so late in the programme that the benefit of carrying out works pursuant to any planning permission as opposed to the draft Order is effectively negated. At this stage, the Applicant does not consider that it is necessary to consider the relationship between the draft DCO and any advanced planning permission in the wording of the draft Order, in circumstances where no planning application(s) has been submitted and no pre-application discussions have taken place with the local planning authority.</p> <p>1.3 In answer to (iii), the proposed temporary logistics hubs could only be implemented under the Town and Country Planning Act 1990 (TCPA 1990) following the grant of planning permission by the relevant local planning authority. As part of determining any such applications, the relevant local planning authority can impose planning conditions. No pre-application discussions have commenced with any relevant local planning authorities over planning applications for the proposed temporary logistics hubs, and as a result it is not possible to determine the number or nature of likely planning conditions at this time. However, the Applicant intends that the environmental and other commitments it has made as part of the application for development consent, identified in the Code of Construction Practice (<b>Document Reference 6.4 Appendix 16.1 (2)</b>), that are relevant to the proposed temporary logistics hubs would be mirrored in any planning applications submitted under</p>



ExQ1	Question:	Applicant response to Question:
		<p>the TCPA 1990. As a result, the Applicant does not consider it likely that any planning permissions would be subject to different or potentially less onerous restrictions.</p> <p>1.4 It should be noted that at Deadline 1 in the examination timetable, the Applicant advised the Examining Authority (<a href="#">REP1-001</a>) that it proposes to submit a change request to reduce the number and size of the temporary logistics hub sites included with the application for development consent. That proposed change does not alter the response provided above.</p>
<b>GQ.1.13</b>	Explain the applicability of National Policy Statement (NPS) EN-4 for the Proposed Development given that the proposal would be for the distribution of aviation fuel.	<p>1.1 The Applicant's position on the relevant NPS is set out in Section 1.5 of the Planning Statement (<b>Application Document</b> <a href="#">APP-132</a>). Paragraphs 1.5.6 to 1.5.8 specifically relate to the applicability of NPS EN-4, following the Planning Inspectorate's Section 51 advice requesting that this be set out in the application. The Applicant stated in paragraph 1.5.8 of the Planning Statement that '<i>EN-4 applies to this project because aviation fuel is a petroleum, or hydrocarbon, product and, therefore, falls within the definition of 'oil' for the purposes of EN-4. This view is reinforced by paragraph 2.19.1, which specifically refers to aviation fuel pipelines when describing the gas and oil pipeline networks in the UK.</i>' This is expanded on in the following paragraphs.</p> <p>1.2 It is considered that paragraphs 1.8.1 and 1.8.2 of NPS EN-4 together indicate that the intention of those drafting the document was firstly to include all NSIPs included in sections 17–21 of the 2008 Act (as referred to in the first sentence of NPS EN-4 paragraph 1.8.1); and then, NPS EN-4 paragraph 1.8.2 is intended to exclude 'other substances', e.g. carbon capture pipelines, and chemical pipelines, but not cross-country oil pipelines covered by the Pipe-lines Act 1962.</p> <p>1.3 Furthermore, paragraphs 3.9.4 to 3.9.8 of NPS EN-1 deal with petroleum product distribution. They refer to finished petroleum products being distributed from the refineries to around 50 major distribution terminals in the UK by pipelines (NPS EN-1 paragraph 3.9.4) and in the following paragraph it is explained that '<i>The 2,400km of privately owned UK pipeline network carries a variety of oil products from road transport fuels to heating oil and <u>aviation fuel</u></i>'. Of this 2,400km of oil products pipelines, a sizeable proportion are aviation fuel pipelines. Aviation fuel is clearly treated as an oil product per paragraph 2.19.1 of the NPS EN-4.</p>



ExQ1	Question:	Applicant response to Question:
		<p>1.4 Paragraph 3.9.6 of EN-1 also refers to the drivers of demand for 'new downstream oil infrastructure such as pipelines' and first on the list is 'meeting increasing demand by end users, particularly for diesel and <u>aviation fuel</u>'. Aviation fuel is again clearly treated as oil infrastructure.</p> <p>1.5 This section of EN-1 concludes at paragraph 3.9.8: '<i>In the light of the above, the IPC should expect to receive a small number of significant applications for oil pipelines and start its assessment from the basis that there is a significant need for this infrastructure to be provided</i>'. There is a footnote to this paragraph (footnote 71) which notes the need for '<i>investment in new pipeline capacity to both Heathrow and Stansted and regional airports to transfer fuel inland from import points</i>'. The Applicant maintains that reading the footnote together with the main paragraph, it is clear that the reference to the pipeline transferring fuel inland to Heathrow is referring to aviation fuel in the context of oil pipelines.</p> <p>1.6 The Applicant's oil refinery at Fawley is the largest in the UK, and as with all oil refineries the incoming product is crude oil. The process that takes place at the refinery transforms crude oil into useful products such as liquefied petroleum gas (LPG), gasoline or petrol, kerosene, aviation fuel, diesel oil and fuel oils through distillation into fractions. These are all oil products that can be transported by pipelines around the country.</p> <p>1.7 When reference is made in the UK to an 'oil' pipeline, that includes pipelines that carry aviation fuel. For example, the 'Oil and Pipelines Agency' was established by the UK Government in 1985 to manage the Government-owned oil pipeline network. These pipelines, which were subsequently sold to Compañía Logística de Hidrocarburos (CLH) include lines that carry aviation fuel. The UK Petroleum Industry Association (UKPIA) refers to pipelines carrying aviation fuel in its work as a key part of the downstream oil distribution network.</p> <p>1.8 The Government (the Department for Business, Energy and Industrial Strategy (BEIS)) identifies aviation fuel as an oil product in its research and publications, e.g. the quarterly UK Oil and Oil Products Statistics bulletins, the latest of which is available at: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834101/Oil_and_Oil_Products_September_2019.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834101/Oil_and_Oil_Products_September_2019.pdf</a>.</p>



ExQ1	Question:	Applicant response to Question:
		<p>1.9 In the Applicant's view it is clear that NPS EN-4 applies to this application as aviation fuel is an oil product. This is because:</p> <ul style="list-style-type: none"> <li>• it was the intention of those drafting NPS EN-1 and NPS EN-4 that their scope should include oil products such as aviation fuel and exclude non-oil products such as carbon capture and chemical pipelines;</li> <li>• paragraphs 3.9.4 to 3.9.8 of NPS EN-1 describe petroleum product distribution, and refer to a range of oil products, including aviation fuel more than once. Demand for aviation fuel is also referred to in the text on drivers of demand for new oil pipelines;</li> <li>• the concluding paragraph on need for petroleum product distribution, links the need for future oil pipelines to the transfer of [aviation] fuel to airports;</li> <li>• aviation fuel is an oil product produced through the refining process; and</li> </ul> <p>in the UK the phrase 'oil distribution networks' includes aviation fuel. This includes BEIS publications.</p>
<b>GQ.1.14</b>	Explain how the mitigation measures suggested within NPS EN-4 in relation to noise and vibration (2.20.7), biodiversity (2.21.5, 2.21.6), water quality and resources (2.22.6, 2.22.7), and soil and geology (2.23.7, 2.23.8), are secured by the draft DCO either in terms of the inherent design of the Proposed Development or	<p>1.1 The structure for this response follows the topics in order as they appear in NPS EN-4 and then extracts the project accordance table text and the commitments proposed in the REAC to manage the impacts generated by the construction of the replacement pipeline. The REAC indicates the appropriate securing mechanism within the DCO for each of the mitigation measures and commitments identified within the Environmental Statement (<b>Application Document <a href="#">APP-056</a></b>). For example, some commitments are flagged as being implemented through the Construction Environmental Management Plan (CEMP) to be approved by the relevant planning authorities prior to the commencement of construction. The draft DCO (<b>Document Reference 3.1 (3)</b>) requires the CEMP to reflect the mitigation measures set out in the Register of Environmental Actions and Commitments (REAC) and the development to be carried out in accordance with the CEMP (Requirement 6).</p> <p>1.2 All commitments are listed within the REAC (<b>Application Document <a href="#">APP-056</a></b>), which is included within Chapter 16 Environmental Management and Mitigation. Commitments, include embedded</p>





ExQ1	Question:	Applicant response to Question:
	as a result of requirements to the draft DCO.	<p>design measures, good practice measures and mitigation required to reduce potentially significant effects.</p> <p>1.3 Project commitments to reduce impacts on the environment are indicated by a reference number like this (G20). Good practice measures are set out in the REAC and secured through DCO requirements such as the CEMP (Requirement 6). These are applicable to all areas unless stated otherwise. The assessment is based on these good practice measures being in place.</p> <p><b>Noise and vibration</b></p> <p>1.4 Paragraph 2.20.7 of NPS EN-4 states:</p> <p><i>'Noise mitigation measures for gas and oil pipelines, in particular their associated above-ground installations, include screening or enclosure of compressors and pumps. Other measures could include the use of sound attenuators on ventilation systems, acoustic lagging on pipework, multi-stage (inherently quiet) control valves, gas turbine exhaust silencers, and high efficiency low speed cooler fans, depending on the specific issues. Vibration mitigation measures could include the use of non-impact piling such as augur boring.'</i></p> <p>1.5 The Applicant has provided a noise and vibration assessment of the project and related mitigation measures, in accordance with NPS EN-1 sections 4.10 and 5.11 and paragraph 4.14.2, and NPS EN-4 section 2.20. The noise assessment can be found in ES Appendix 13.3 (<b>Application Document <a href="#">APP-121</a></b>). It concludes at paragraph 8.1.1 that there are <i>'No significant effects identified for the following activities:</i></p> <ul style="list-style-type: none"> <li>• <i>noise and vibration due to traffic on the public highway during installation;</i></li> <li>• <i>vibration from compaction, piling and drilling activity during installation; and</i></li> <li>• <i>noise and vibration due to operation.'</i></li> </ul> <p>1.6 The NPS EN-4 Accordance Table – in the entry for paragraph 2.20.7 (see Appendix 7.1, Table 5 of the Planning Statement <b>Application Document <a href="#">APP-132</a></b>) – reports the following:</p>





ExQ1	Question:	Applicant response to Question:
		<p><i>'The pipeline would be located mainly underground and it is not expected any significant effects arising during its operation. With regard to pigging stations, the movement of PIGs along buried pipelines, and the entry or exit of PIGs at pigging stations is a quiet activity with no noticeable noise above ground. Over the lifetime of the existing pipeline, there have been no known instances of perceptible noise or vibration above ground due to pigging operations. The replacement pipeline would use existing pumping facilities located at Fawley Oil refinery which are used to pump fuel in the existing pipeline. Upon completion the pumps would be transferred to the replacement pipeline when the existing pipeline is taken out of use. Other existing above ground infrastructure does not generate noise.'</i></p> <p>The ES identified that effects relating to noise and vibration are expected during the construction phase.</p> <p>1.7 With regard to impacts relating to noise and vibration, the relevant commitments include:</p> <ul style="list-style-type: none"> <li>• G98 relating to a hierarchy of mitigation measures for construction plant and machinery;</li> <li>• G99 to require a Noise and Vibration Management Plan;</li> <li>• G100 stipulates the contents of the plan; an</li> <li>• G102 the method of control.</li> </ul> <p>1.8 The Applicant has carried out further work to identify specific locations where there is a significant impact from noise of specific receptors and to reduce these impacts, the Applicant is proposing an update to commitment G107 which will be included in an updated CoCP to be submitted at Deadline 2 (<b>Document Reference 6.4 Appendix 16.1 (2)</b>). This commitment would be added to the Noise and Vibration Management Plan within the CEMP and secured through requirements 5 and 6 of the draft DCO. The updated commitment states:</p> <p><i>'Temporary noise screening would be put in place to screen receptors at the following locations from installation activity, unless a detailed assessment is undertaken which demonstrates that no</i></p>



ExQ1	Question:	Applicant response to Question:
		<p><i>significant noise impacts would occur without screening. The screening would comprise acoustic barrier material (such as Echo Barrier™ or similar) fitted to site fencing.</i></p> <ul style="list-style-type: none"> <li>• <i>Nash Close and Cove Road, Farnborough, Hampshire,</i></li> <li>• <i>Burdock Close and Blackthorn Drive, Lightwater, Surrey,</i></li> <li>• <i>Canford Drive, Roakes Avenue, Chertsey Road and Addlestone Moor, Addlestone, Surrey, and</i></li> <li>• <i>Station Road and Station Approach, Ashford, Surrey'</i></li> </ul> <p><b>Biodiversity</b></p> <p>1.9 Paragraphs 2.21.5 and 2.21.6 of NPS EN-4 state:</p> <p><i>'Mitigation measures to protect the landscape and ecology could include reducing the working width required for the installation of the pipeline in order to reduce the impact on the landscape where it will not be possible to fully reinstate the route.</i></p> <p><i>In circumstances where the habitat to be crossed contains ancient woodland, trees subject to a Tree Preservation Order, or hedgerows subject to the Hedgerows Regulations 1997, the applicant should consider whether it would be feasible to use horizontal direct drilling under the ancient woodland or thrust bore under the protected tree or hedgerow and the IPC should consider requiring this, where not included in the proposal.'</i></p> <p>1.10 The Applicant has provided a biodiversity assessment of the project, and related good practice measures, in accordance with NPS EN-1 section 5.3 and NPS EN-4 section 2.21.</p> <p>1.11 The replacement pipeline route was selected to reduce the impact on biodiversity, by avoiding sensitive areas where practicable. Where potential impacts on designated and non-designated sites have been identified, the project has embedded measures into the design and construction process and adopted good practice measures to be implemented as detailed in the ES Chapter 7 Biodiversity (see Section 7.6 of <b>Application Document APP-047</b>) and Chapter 16 Environmental</p>



ExQ1	Question:	Applicant response to Question:
		<p>Management and Mitigation (see Appendix 16.1 of <b>Application Document APP-056</b>). The project has also identified potential sites for habitat enhancement as well as habitats for restoration.</p> <p>1.12 The NPS EN-4 Accordance Table – in the entry for paragraphs 2.21.5 and 2.21.6 (see Appendix 7.1, Table 5 of the Planning Statement (<b>Application Document APP-132</b>) – reports the following:</p> <p><i>‘Where specific width restrictions exist, for example for street works in urban areas, the working width has been narrowed. When crossing through boundaries between fields where these include hedgerows, trees or ditches watercourses, the working width would be reduced to 10m wide to reduce habitat loss. In locations of high ecological sensitivity such as Chobham Common trenchless techniques and or reduced working widths have been adopted to reduce the environmental impact of construction’</i> (see Appendix 7.1, Table 5 of the Planning Statement <b>Application Document APP-132</b>).</p> <p><i>‘The detailed route for the replacement pipeline avoids any direct loss of ancient woodland, where protected hedgerows and protected trees are impacted, narrow working or trenchless techniques have been adopted where practicable. Best practice would be applied for all hedgerow crossings and construction impacts on protected trees, this would be controlled through the REAC and CoCP.’</i> (see Appendix 7.1, Table 5 of the Planning Statement <b>Application Document APP-132</b>).</p> <p>1.13 The commitments to manage biodiversity impacts relating to the construction of the pipeline includes:</p> <ul style="list-style-type: none"> <li>• Overarching commitments O1 relating to reduced working width through boundaries, hedgerows, trees and watercourses;</li> <li>• overarching commitment O2 to avoid impacts on all Ancient Woodland;</li> <li>• G60 relating animal welfare;</li> <li>• G65 to reduce working widths and root protection measures to reduce impact on trees and hedgerows;</li> <li>• G88 and G93 reinstatement; and G171 relates to specific watercourse crossings.</li> </ul>



ExQ1	Question:	Applicant response to Question:
		<p><b>Water quality and resources</b></p> <p>1.14 Paragraphs 2.22.6 and 2.22.7 of NPS EN-4 state:</p> <p><i>'Mitigation measures to protect the water environment may include techniques for crossing rivers and managing surface water before and after construction, including restoring vegetation and using sustainable drainage systems to control run-off.</i></p> <p><i>Mitigation measures to protect water quality may include:</i></p> <ul style="list-style-type: none"> <li><i>• the avoidance of vulnerable groundwater areas or appropriate use of above ground pipeline facilities;</i></li> <li><i>• use of the highest specification pipework and best practice in the storage and handling of pollutants to prevent spillage;</i></li> <li><i>• careful storage of excavated material away from watercourses and facilities for the disposal of sewage and waste;</i></li> <li><i>• use of sustainable drainage systems; and</i></li> <li><i>• careful reinstatement of riverbanks and reed beds'.</i></li> </ul> <p>1.15 The Applicant has provided a water quality and resources assessment of the project, and related mitigation measures, in accordance with NPS EN-1 section 5.15 and NPS EN-4 section 2.22 (see Planning Statement (<b>Application Document <a href="#">APP-132</a></b>)).</p> <p>1.16 The NPS EN-4 Accordance Table – Entry for paragraphs 2.22.6 and 2.22.7 (see Appendix 7.1, Table 5 of the Planning Statement (<b>Application Document <a href="#">APP-132</a></b>)) reports that there are no significant effects on the water environment as a result of the construction and operation of the replacement pipeline, good practice measure to manage the effects are secured through REAC, CoCP and outline CEMP.</p> <p>1.17 With regard to impacts relating to the water environment the relevant commitments include:</p>



ExQ1	Question:	Applicant response to Question:
		<ul style="list-style-type: none"> <li>• Overarching commitments O1 relating to reduced working width through boundaries, hedgerows, tees and watercourses;</li> <li>• Overarching commitment O5 relating to trenchless construction for crossing waterways over 30m wide;</li> <li>• Overarching commitment O6 to route the pipeline to avoid Source Protection Zone 1;</li> <li>• Overarching commitment O7 to install 'stanks' where required;</li> <li>• G11 and G12 to control runoff; G116 requires the production of an Erosion and Sediment Plan;</li> <li>• G118 requires detailed design of HDD methods to reduce the risk of groundwater breakout;</li> <li>• G122 relates to open cut watercourse crossings; G123 controls works within or adjacent to watercourses in line with the required permits; G128 confirms compliance with consents; and</li> <li>• G130 measures to be included in the CEMP.</li> </ul> <p><b>Soils and geology</b></p> <p>1.18 Paragraphs 2.23.7 and 2.23.8 of NPS EN-4 state:</p> <p><i>'Mitigation measures to minimise any adverse effects on soil and geology should include measures to ensure that residual impacts on the surface are minor, for example some differential vegetation growth. Mitigation measures should include appropriate treatment of soil (and in particular topsoil) during site construction and other infrastructure activity (and appropriate soil storage and reinstatement in line with the principles and practices outlined in the Code of Practice for the Sustainable Management of Soils on Construction Sites<sup>8</sup>. The IPC should consider what appropriate conditions should be attached to any consent.</i></p> <p><i>Where HDD is proposed, the applicant should provide an alternative plan for installing the pipeline in the event that HDD fails. Such alternative means could include open cut, micro-tunnelling and tunnelling.'</i></p>



ExQ1	Question:	Applicant response to Question:
		<p>1.19 The Applicant has provided a soil and geology assessment of the project, and related good practice measures, in accordance with NPS EN-1 section 5.3 and NPS EN-4 section 2.21 (see Planning Statement (<b>Application Document</b> <a href="#">APP-132</a>)).</p> <p>1.20 The NPS EN-4 Accordance Table – Entry for paragraphs 2.23.7 and 2.23.8 (see Appendix 7.1, Table 5 of the Planning Statement <b>Application Document</b> <a href="#">APP-132</a>) reports the following:</p> <p>1.21 The predominant soils are freely draining slightly acid to acid loamy soils with more limited areas of freely draining lime-rich soils along with more limited areas of freely draining lime-rich soils and seasonally waterlogged loamy and clayey soils. The area of soil mapped as peat is relatively small. The scheme also identifies the bedrock geology of the study area and its underlying strata. The scheme has also assessed the value/ sensitivity of geology aspects which includes unstable ground, soil conditions, mineral resources and contamination - these are described in ES Chapter 11 Soils and Geology (see Section 11.3 of <b>Application Document</b> <a href="#">APP-051</a>).</p> <p>1.22 <i>'The soils and geology impact assessment process has been iterative, mitigation measures identified as required in early assessments and subsequently identified in the ES Chapter 11 Soils and Geology [see Section 11.4 and 11.5 of <b>Application Document</b> <a href="#">APP-051</a>] are incorporated in the design of the project and inform the CoCP'.</i></p> <p>1.23 <i>'The scheme design takes account of various construction techniques which included: open cut trenching methods, open cut trench watercourse crossings, trenchless construction, micro-tunnelling technique as well as horizontal directional drilling and augur boring' (see Appendix 7.1, Table 5 of the Planning Statement <b>Application Document</b> <a href="#">APP-132</a>).</i></p> <p>1.24 The relevant commitments relating to soils and geology to manage the impact of the project include:</p> <ul style="list-style-type: none"> <li>• G1 to produce a CEMP for approval by the relevant planning authority;</li> <li>• G11 to control run off from the construction sites;</li> <li>• G13 to protect earthworks and soil;</li> <li>• G29 to manage soil security;</li> </ul>



ExQ1	Question:	Applicant response to Question:
		<ul style="list-style-type: none"> <li>• G71 to manage contaminated land;</li> <li>• G150 production and approval of a soil management plan;</li> <li>• G151 to provide a method statement for stripping, handling and storage of soils and</li> <li>• G155, G158 and G159 management of soil.</li> </ul>
<b>GQ.1.15</b>	<p>i) Explain maximum possible length that a trenchless crossing can be.</p> <p>ii) Explain the circumstances that would prevent or restrict the use of trenchless crossings.</p> <p>iii) If known, explain the current longest length of trenchless crossing proposed and where.</p> <p>N.B – You may wish to combine the response to this question with GQ.1.16 below</p>	<p>1.1 In response to i), the length of any trenchless technique is dependent on ground conditions; these techniques could either be horizontal directional drilling or auger bore.</p> <p>1.2 In response to ii), the major influence would be ground conditions, and then the footprint for compounds and pipe stringing.</p> <p>1.3 In response to iii), the potentially longest trenchless crossing is circa 500m, which would cross the Frimley Hatches at Farnborough.</p>
<b>GQ.1.16</b>	Appendix 8.2 of the ES [APP-103] provides an assessment of where trenchless techniques are to be used. The ExA	<p>1.1 In response to i), one of the project commitments is that '<i>Trenchless techniques are to be used for all crossings of trunk roads, motorways and railways</i>' (commitment O4). Due to the complex nature of trenchless crossings the Applicant has chosen this method where an open cut would not necessarily be practical or preferred by either the highways authority or the environmental agency. The construction methods for road crossings were discussed and agreed with the two highway</p>





ExQ1	Question:	Applicant response to Question:
	<p>considers that a plan showing these areas is necessary.</p> <p>i) Provide the criteria used to select trenchless over open cut;</p> <p>ii) Provide a cost per metre for open cut versus trenchless;</p> <p>iii) Provide a plan of trenchless crossing areas; or</p> <p>iv) Signpost where this can be found in the Application; and</p> <p>v) Explain how this is secured in the draft DCO [AS-059].</p> <p>N.B – You may wish to combine the response to this question with GQ.1.15 above</p>	<p>authorities, Hampshire Highways Authority and Surrey Highways Authority, during the design development of the pipeline route. This is reflected in the Statements of Common Ground with the two authorities (<b>Document References 8.4.23 and 8.4.30</b>). The crossing of the watercourses was discussed with the Environmental Agency and Canal trust.</p> <p>1.2 In response to ii), the project has not appointed a Contractor(s), so any costs are unknown at the present time.</p> <p>1.3 In response to iii), trenchless crossings which are listed in the Code of Construction Practice (CoCP) (<b>Document Reference 6.4 Appendix 16.1 (2)</b>) are shown within the General Arrangement Plans (<a href="#">AS-056</a>, <a href="#">AS-057</a> and <a href="#">AS-058</a>).</p> <p>1.4 In response to iv), trenchless crossing area plans are listed in the Register of Environmental Actions and Commitments (<b>Application Document APP-056</b>) and detailed in Annex B of the CoCP (<b>Document Reference 6.4 Appendix 16.1 (2)</b>). Annex B of the CoCP makes clear that the relevant references are also expressed within the General Arrangement Plans <a href="#">AS-056</a>, <a href="#">AS-057</a> and <a href="#">AS-058</a>).</p> <p>1.5 In response to v), compliance with the CoCP (including Annex B) is secured under Requirement 5 of the draft DCO (<b>Document Reference 3.1 (3)</b>).</p>
<b>GQ.1.17</b>	Provide a plan showing the existing and proposed route with the Relevant Planning Authority	<p>1.1 A plan showing the existing and proposed route with the Relevant Planning Authority boundaries was not submitted with the Application Documents.</p>





ExQ1	Question:	Applicant response to Question:
	boundaries or signpost where such a plan exists in the Application documents.	1.2 Therefore, plans are submitted to the Examining Authority in response to this question. The main plan (Figure GQ.1.17.1 – Key Plan) shows, at a scale of 1:250,000, the existing pipeline and the proposed Order Limits from Boorley Green to the West London Terminal storage facility, with the Relevant Planning Authority boundaries. This plan is also split into five sheets (Figure GQ.1.17.2 – Sheets 1 to 5) at a scale of 1:50,000, which also show the existing pipeline and proposed Order Limits with the Relevant Planning Authority boundaries in more detail.
<b>GQ.1.19</b>	<p>Chapter 3 of the ES [APP-043] states that the above ground components are, through design and materials, resilient to climate change effects.</p> <p>Explain how this conclusion has been reached and which effects have been considered.</p>	<p>1.1 Section 3.4.1 of the Flood Risk Assessment (FRA) (<b>Application Document APP-134</b>) states that <i>‘the replacement pipeline would be buried underground for its entire length with the exception of the pigging station and smaller elements such as valves, cabinets and marker posts. During the operational phase the buried pipeline has no effect on flood risk and only the above ground infrastructure needs to be considered’</i>.</p> <p>1.2 The FRA (<b>Application Document APP-134</b>) has assessed the vulnerability of the above ground infrastructure to flood risk over the operational phase from all sources of flooding. Table 15.1 summarises the flood risk impacts for the operational phase. <i>‘The risk to and from the project in the operational phase is therefore considered to be very low and no specific mitigation measures are proposed.’</i> This indicates that the above ground components of the project are not vulnerable to the predicted impacts of climate change on flood risk (increased rainfall intensity and increased peak river flow) over the operational phase.</p> <p>1.3 The pigging station is only operated approximately twice per year for the purposes of cleaning and/or inspecting the pipeline which can be planned when weather conditions are appropriate. The associated pipeline and valves would not be affected by floods or other extreme weather events as a result of climate change effects.</p>
<b>GQ.1.20</b>	Explain why the proposed pipeline is 5cm larger in diameter than the existing pipeline.	1.1 Paragraphs 2.4.18 to 2.4.28 of the Planning Statement ( <b>Application Document APP-132</b> ) set out the need for this specific pipeline, to maintain and improve resilience of supply of aviation fuel. Also set out here is the benefit to resilience of supply of having multiple pipeline supply routes into



ExQ1	Question:	Applicant response to Question:
		<p>airports. It should be noted that the replacement pipeline is not linked to, or necessary for, the proposed expansion of Heathrow through the construction of a third runway.</p> <p>1.2 As noted in Paragraphs 2.2.4 – 2.2.7 and 2.4.29 – 2.4.35 of the Planning Statement, the existing pipeline is working adequately, but the need for inspections and maintenance is increasing, and as a result the Applicant has decided to seek the necessary consents to construct a replacement pipeline. In 2002, ten kilometres (six miles) of pipeline were replaced between Hamble and Boorley Green in Hampshire. Therefore, the project is to replace the remaining 90km of pipeline from Boorley Green to the Applicant's West London Terminal storage facility. The Applicant has determined that a replacement pipeline will need to be built, commissioned and brought into operation before the existing pipeline is decommissioned, to ensure the continuous supply of aviation fuel to the West London Terminal storage facility and onwards to customers. It should be emphasised that the need for the project is first and foremost driven by the requirement to replace the existing pipeline, not to increase its capacity.</p> <p>1.3 Given the need for a replacement pipeline, paragraphs 2.4.36 to 2.4.38 of the Planning Statement set out the decision for the replacement pipeline to be future-proofed. The diameter of the replacement pipeline is a business decision taken by the Applicant, the increased diameter allowing the Applicant to respond flexibly to both seasonal fluctuations in aviation fuel demand, and shorter-term changes in demand. From an environmental, engineering and practical perspective there is no difference between the installation of a 25cm diameter pipeline and a 30cm diameter pipeline.</p> <p>1.4 Paragraphs 2.4.42 to 2.4.46 of the Planning Statement also set out the need for the pipeline to protect against potential supply interruptions elsewhere which could affect aviation fuel supplies. As noted above, the increased diameter provides additional flexibility to respond to such fluctuations. Here the Planning Statement also references more recent work by the Department for Business, Energy and Industrial Strategy which sets out the rationale for increased resilience of fuel supplies within the UK.</p>



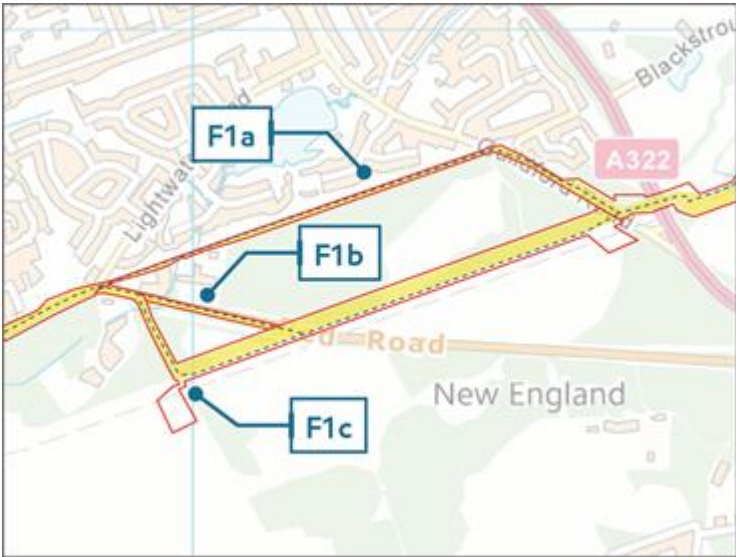
ExQ1	Question:	Applicant response to Question:
<b>GQ.1.21</b>	<p>Paragraph 4.1.17 of the Planning Statement (APP-132) states that the working width for the route is typically 30m but that “where the new pipeline is routed adjacent to Esso’s existing pipelines a 36m wide Order Limit is designed to provide flexibility for detailed routing and construction methodologies for pipeline installation adjacent to these existing pipelines”.</p> <p>Clarify where there is more than one existing Esso pipeline and explain why a greater working width is required adjacent to existing pipelines.</p>	<p>1.1 The locations where the new pipeline is routed adjacent to the Applicant’s existing pipelines are shown on the maps of existing pipeline plans (<a href="#">AS-014</a>).</p> <p>1.2 The project would not necessarily utilise a greater working width adjacent to the Applicant’s existing pipelines but it is seeking a greater Order Limit to enable the working width to be separated from the 6m wide easements of the existing pipelines as and when necessary, dependent on ground conditions encountered at the time of installing the new pipeline. This would enable provision of adequate safety separation between the existing pipelines, the stockpiles of excavated soil, the haul road and trench excavation.</p>



ExQ1	Question:	Applicant response to Question:
<b>GQ.1.22</b>	<p>Paragraph 4.9.1 of the Planning Statement [APP-132] states that once the pipeline is installed and operational it will be protected by an easement strip that extends 3m either side of the pipeline.</p> <p>Confirm that the Limits of Deviation do not extend to within 3m of the Order Limits at any point along the proposed route.</p>	<p>1.1 The Applicant would not be seeking to acquire easements where the replacement pipeline would be in a street, so in these areas the limits of deviation do extend to within 3m of the Order Limits. Article 28 of the draft DCO (<b>Document Reference 3.1 (3)</b>) would empower the Applicant to enter onto, appropriate and use a street for the purposes of the authorised development without having to acquire any part of the street or any easement in it.</p> <p>1.2 Where the replacement pipeline would not be in a street, the Applicant can confirm that the limits of deviation do not extend to within 3m of the Order Limits at any point along the proposed route in order to allow for the rights expressed at paragraph 8(b) of the Book of Reference (<a href="#">AS-011</a>) over a 6.3m easement strip to be included within the Order Limits.</p>
<b>GQ.1.23</b>	<p>Paragraph 4.6.8 of the Planning Statement [APP-132] indicates that where temporary fencing around working areas is in close proximity to residential properties, the fence may also serve to provide acoustic and visual screening.</p> <p>Clarify what type of fencing is proposed and whether the acoustic and visual screening is an</p>	<p>1.1 Environmental Statement (ES) Chapter 3 (<b>Application Document APP-043</b>) states that '<i>the choice of fencing would be decided following a risk assessment, relevant to the work location.</i>' The following example is provided: '<i>Within all urban areas, and areas where an interface with the general public is anticipated, the use of either strong wall or block and mesh fencing e.g. HERAS fencing would be used. If the area is near a school, or on a pedestrian route to a school, double thickness fencing that has been multi-clipped may be used.</i>' At locations where a continuous solid type of fencing material (such as plywood) is required for site security or public safety reasons, it would also provide incidental acoustic attenuation and visual screening.</p> <p>1.2 The project has committed to installing necessary acoustic mitigation in the form of acoustic screening, at certain specific locations where temporary significant effects are likely. This would also provide incidental visual screening. The following new commitment will be added to the Code of Construction Practice (<b>Document Reference 6.4 Appendix 16.1 (2)</b>) and added to the next version of the document submitted to the Examining Authority:</p>



ExQ1	Question:	Applicant response to Question:
	incidental benefit or necessary mitigation.	<p><i>'Temporary noise screening would be put in place to screen receptors at the following locations from installation activity, unless a detailed assessment is undertaken which demonstrates that no significant noise impacts would occur without screening. The screening would be comprised of acoustic barrier material (such as Echo Barrier™ or similar) fitted to site fencing.</i></p> <ul style="list-style-type: none"> <li><i>Nash Close and Cove Road, Farnborough, Hampshire;</i></li> <li><i>Burdock Close and Blackthorn Drive, Lightwater, Surrey;</i></li> <li><i>Canford Drive, Roakes Avenue, Chertsey Road and Addlestone Moor, Addlestone, Surrey; and</i></li> <li><i>Station Road and Station Approach, Ashford, Surrey.'</i></li> </ul>
<b>GQ.1.24</b>	<p>Paragraph 13.3.9 of the Planning Statement [APP-132] appears to have text missing at the start of page 379.</p> <p>Clarify and provide it.</p>	<p>1.1 <i>'Following engagement wi</i> was inadvertently omitted from paragraph 13.3.9 of the Planning Statement (<b>Application Document <a href="#">APP-132</a></b>). The paragraph is reproduced below with the new text underlined.</p> <p><i>'13.3.9 Sub-options F1a, F1b and F1c at Red Road are shown in Illustration 13.2. These sub-options were considered in order to identify a route in the area surrounding Red Road.</i></p>

ExQ1	Question:	Applicant response to Question:
		<p><b>Illustration 13.2: Sub-options F1a, F1b and F1c</b></p>  <p><i>Following engagement with the Ministry of Defence (MoD) at the Pirbright Ranges, it has been agreed to route the proposed pipeline alongside the existing pipeline utilising the track, where possible, that lies adjoining the security fencing for the firing ranges. Sub-option F1a and F1b follows this track alongside The Maultway and Red Road, the route diverts away from the existing pipeline along the northern edge of the ranges because of the presence of wetland heath conditions and sensitive designated biodiversity. At this point, the proposed pipeline will be constructed in Red Road with traffic management in place to allow the road to remain open to traffic during construction.'</i></p>



ExQ1	Question:	Applicant response to Question:
<b>GQ.1.25</b>	<p>i) Explain whether any Best and Most Versatile (BMV) land be affected/lost as a result of the Proposed Development.</p> <p>ii) If it would be affected/lost confirm whether this be on a temporary or permanent basis. If permanent provide details of how much BMV would be lost.</p> <p>iii) Confirm whether the Proposed Development would result in any severance issues for farms along the proposed route.</p> <p>iv) Explain how short and long-term breaches of Agri-Environment schemes caused by the Proposed Development be dealt with and who would take responsibility for dealing with any breaches, the applicant or</p>	<p>1.1 In response to i), the project would have the potential to affect Best and Most Versatile (BMV) land during construction. The area potentially affected is detailed in Table 12.8 in Environmental Statement (ES) Chapter 12 (<b>Application Document APP-052</b>). As detailed in paragraph 11.2.22 of ES Chapter 11 (<b>Application Document APP-051</b>), the amount of BMV land within the Order Limits is likely to be overstated in Table 12.8, as where Grade 3 land is mapped and not differentiated between Subgrades 3a (good quality) and 3b (moderate quality) it is assumed to be Subgrade 3a (that is, BMV land).</p> <p>1.2 The Code of Construction Practice (<b>Document Reference 6.4 Appendix 16.1 (2)</b>) contains commitments which would limit the impacts to BMV land, through careful planning and management of soil resources, including:</p> <ul style="list-style-type: none"> <li>• Commitment G148: <i>'Where identified in the Soil Management Plan, a SEP would be employed to oversee the management of soil during soil stripping, handling, storage and reinstatement'.</i></li> <li>• Commitment G150: <i>'The contractor(s) would produce a Soil Management Plan. In developing the plan, the contractor would take note of the principles within the guidance 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' (Department for Environment, Food and Rural Affairs, 2009) and 'Good Practice Guide for Handling Soils' (Ministry of Agriculture, Fisheries and Food, 2000). The Soil Management Plan would include, but not be limited to:</i> <ul style="list-style-type: none"> <li>➢ <i>specification of maximum storage periods, angles and heights of soil stockpiles;</i></li> <li>➢ <i>reference to published soil types;</i></li> <li>➢ <i>specification for where a soils watching brief may be required;</i></li> <li>➢ <i>controls on use of construction machinery in areas where soils have not been stripped; and,</i></li> <li>➢ <i>specification of the role of the Suitably Experienced Person. (SEP)'</i></li> </ul> </li> </ul>





ExQ1	Question:	Applicant response to Question:
	<p>the signatory of the scheme, if it is the signatory is the Applicant proposing to provide any support/advice.</p> <p>v) If this information has been provided, signpost where in the Application documents it can be found.</p>	<ul style="list-style-type: none"> <li>• Commitment G151: <i>'A method statement would be produced for stripping, handling, storage and replacement of all soils to reduce risks associated with soil degradation. This would include:</i> <ul style="list-style-type: none"> <li>➢ <i>identification of appropriate plant to strip, reinstate and otherwise handle soils;</i></li> <li>➢ <i>methods for compaction and grading of stockpiles;</i></li> <li>➢ <i>methods for working in naturally wet soils; and</i></li> <li>➢ <i>specification of appropriate decompaction measures to be used during reinstatement.'</i></li> </ul> </li> <li>• Commitment G154: <i>'Where topsoil stripping is required, the normal working practice (where not otherwise specified within a method statement) would be to strip full depth of topsoil (where present) from:</i> <ul style="list-style-type: none"> <li>➢ <i>construction compounds and logistics hubs;</i></li> <li>➢ <i>access roads;</i></li> <li>➢ <i>across the working width; and</i></li> <li>➢ <i>any other areas to be trafficked.</i></li> </ul> <p><i>The topsoil would be reinstated above the subsoil'.</i></p> </li> <li>• Commitment G155: <i>'Topsoils and subsoils intended for reinstatement would be temporarily stockpiled as close to where they were stripped from as practicable'.</i></li> <li>• Commitment G157: <i>'Appropriate techniques would be used when necessary to provide protection for subsoils from compaction and smearing in areas subject to heavy trafficking. The specific protection measures and their required locations would be set out in the appointed contractor's method statement and agreed between the contractor(s) and overseeing SEP prior to construction commencing'.</i></li> </ul>





ExQ1	Question:	Applicant response to Question:
		<ul style="list-style-type: none"> <li>• Commitment G158 <i>'Stripping and reinstatement of topsoils would only be carried out when topsoils are in a reasonably dry state'</i>.</li> <li>• Commitment G159: <i>'Different soil types and made ground would be stripped and stored separately where applicable'</i>.</li> <li>• Commitment G29: <i>'Topsoil would be returned to its final location at the earliest suitable time of year'</i>.</li> <li>• Commitment G94: <i>'Land used temporarily would be reinstated to an appropriate condition relevant to its previous use'</i>.</li> </ul> <p>1.3 As detailed in paragraph 11.5.6 of ES Chapter 11 (<b>Application Document <a href="#">APP-051</a></b>), it is considered that there would be a minor adverse impact across the range of soil receptors and this would be short term following adherence to the good practice measures. Paragraph 12.5.33 of ES Chapter 12 (<b>Application Document <a href="#">APP-052</a></b>) also concludes that there would be no significant impacts on agricultural land during construction.</p> <p>1.4 In response to ii), the permanent loss of land would be limited to the proposed pigging station southwest of Netherhill Lane (approximately 23m x 30m in size) and a pressure transducer (approximately 7m x 5m in size), of which 13 would be below ground and descriptions of which are detailed in paragraphs 3.2.7 to 3.2.13 of ES Chapter 3 (<b>Application Document <a href="#">APP-043</a></b>). The proposed pigging station and ten of the valves would be sited on BMV land, a total footprint of approximately 1040m<sup>2</sup>. The project would affect BMV land on a temporary basis (during construction) and as detailed in paragraph 11.5.6 of ES Chapter 11 (<b>Application Document <a href="#">APP-051</a></b>). This is assumed to be less than six months.</p> <p>1.5 In response to iii), the project would cause no permanent severance issues along the route. With regard to temporary severance during construction, the Applicant provides the following agreement within the Deed of Easement in Schedule 1, Methods of Agreement, <i>'The Company will, in the exercise of the Rights, provide facilities for maintaining and affording means of communication and access between parts of any land temporarily severed by reason of the construction of any works</i></p>



ExQ1	Question:	Applicant response to Question:
		<p><i>by the Company such facilities being such as will enable the land to be properly worked having regard to the purposes for which communication and access may be required and the period for which and the time of year at which it may be expected to be used’.</i></p> <p>1.6 In addition, the following commitments would limit the impacts of severance during construction:</p> <ul style="list-style-type: none"> <li>• Commitment G79: <i>‘Pedestrian access to and from residential, commercial, community and agricultural land uses would be maintained throughout the construction period. Vehicle access would be maintained where practicable. This may require signed diversions. The means of access would be communicated to affected parties at least two weeks in advance’.</i></li> <li>• Commitment G80: <i>‘Where field to field access points would require alteration as a result of construction, alternative field access would be provided in consultation with the landowner/occupier. Recessed field access from local roads would be reinstated where agreed with the landowner’.</i></li> </ul> <p>1.7 In response to iv), the project, in the short-term, would affect Agri-Environment Agreements (referred to hereafter as Land Management Agreements) within the study area as detailed in paragraphs 12.5.30 and 12.5.31 in ES Chapter 12 (<b>Application Document <a href="#">APP-052</a></b>). It is anticipated there would be no long-term breaches of Agri- Environmental schemes caused by the Proposed Development. Paragraph 12.5.33 of ES Chapter 12 (<b>Application Document <a href="#">APP-052</a></b>) concludes that there would be no significant impacts on agricultural land (including land on which there is a Land Management Agreement) during construction.</p> <p>1.8 The Applicant expects the signatory to the Land Management Agreements to have responsibility for notifying the relevant Managing Organisation of any breaches. The Applicant will provide support/advice to the signatory including relevant information regarding the areas to be temporarily occupied and duration of occupation to enable them to submit a derogation application so that the impact on the holding is mitigated.</p> <p>1.9 In response to v), references to relevant application documents have been provided in the responses above.</p>



## **2 References**

Department for Environment, Food and Rural Affairs (2009). Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.

English Heritage (2002). Military Aircraft Crash Sites, Archaeological guidance on their significance and future management.

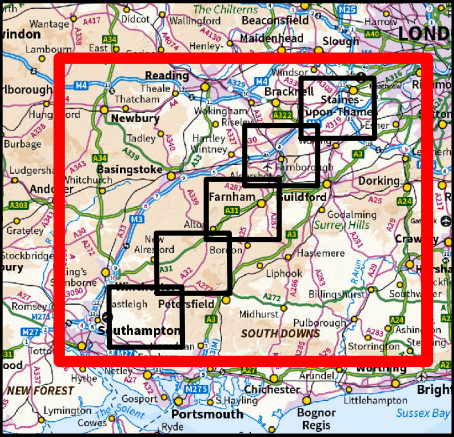
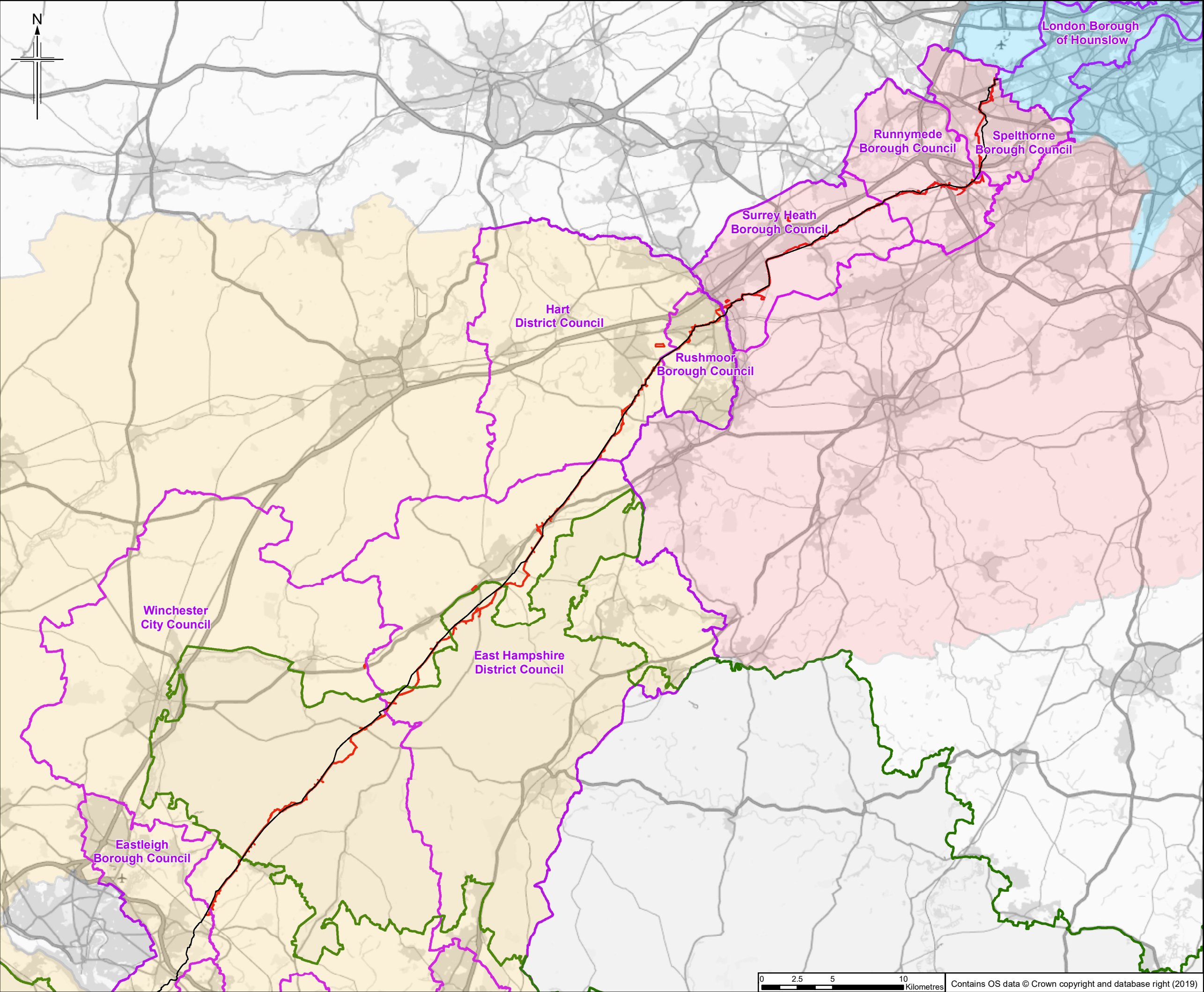
Ministry of Agriculture, Fisheries and Food (2000). Good Practice Guide for Handling Soils.




### **3 Figures**

**Figure GQ.1.17.1: Key Plan Showing the Existing and Proposed Pipeline Routes along with the relevant planning authority boundary**





- Legend**
- Existing pipeline route
  - ▭ Proposed Order Limits
  - Planning Authority Boundaries**
  - ▭ District, Borough and Unitary Authorities
  - ▭ South Downs National Park Authority
  - ▭ Greater London Authority
  - ▭ Hampshire County
  - ▭ Surrey County

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Project		 Southampton to London Pipeline Project				
Drawing title FIGURE 1- EXAMINING AUTHORITY FIRST WRITTEN QUESTION REFERENCE PLAN WQ.G.GQ.1.17: PLAN SHOWING THE EXISTING AND PROPOSED PIPELINE ROUTES, ALONG WITH THE RELEVANT PLANNING AUTHORITY BOUNDARY						
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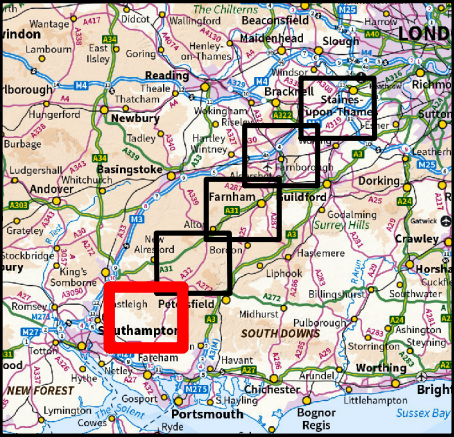
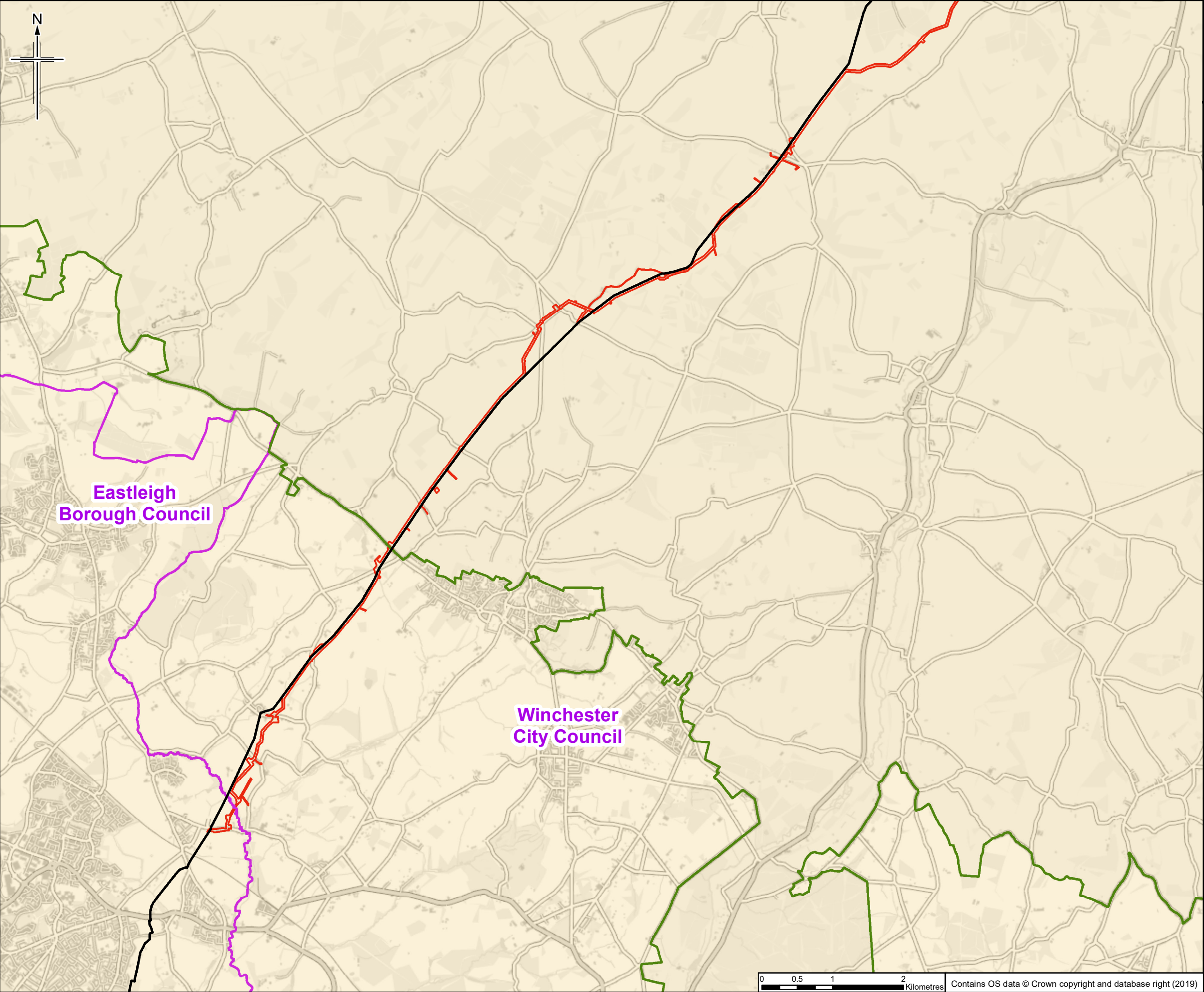


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**Figure GQ.1.17.2: Plans Showing the Existing and Proposed Pipeline Routes along with the relevant planning authority boundary**





- Legend**
- Existing pipeline route
  - Proposed Order Limits
  - Planning Authority Boundaries**
  - District, Borough and Unitary Authorities
  - South Downs National Park Authority
  - Hampshire County

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WQ.G.GQ.1.17: PLAN SHOWING THE EXISTING AND PROPOSED PIPELINE ROUTES, ALONG WITH THE RELEVANT PLANNING AUTHORITY BOUNDARY

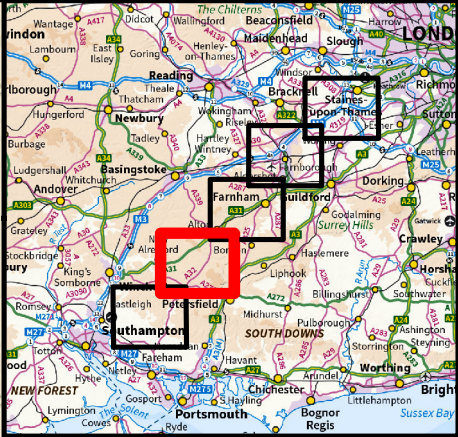
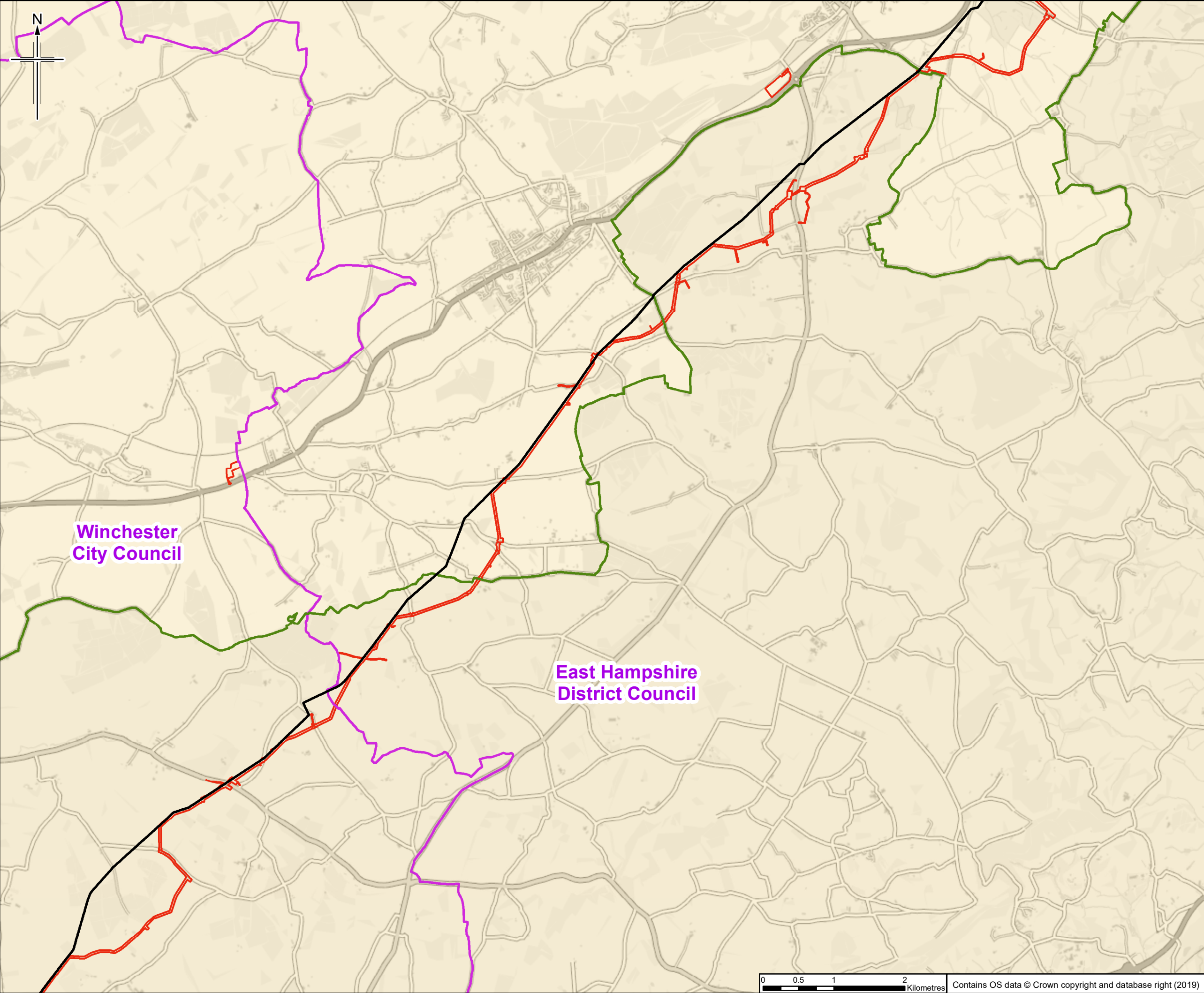
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- Legend**
- Existing pipeline route
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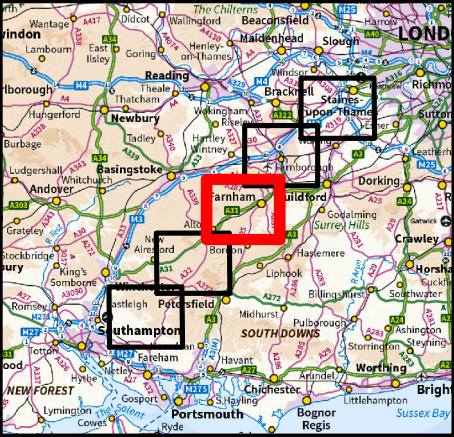
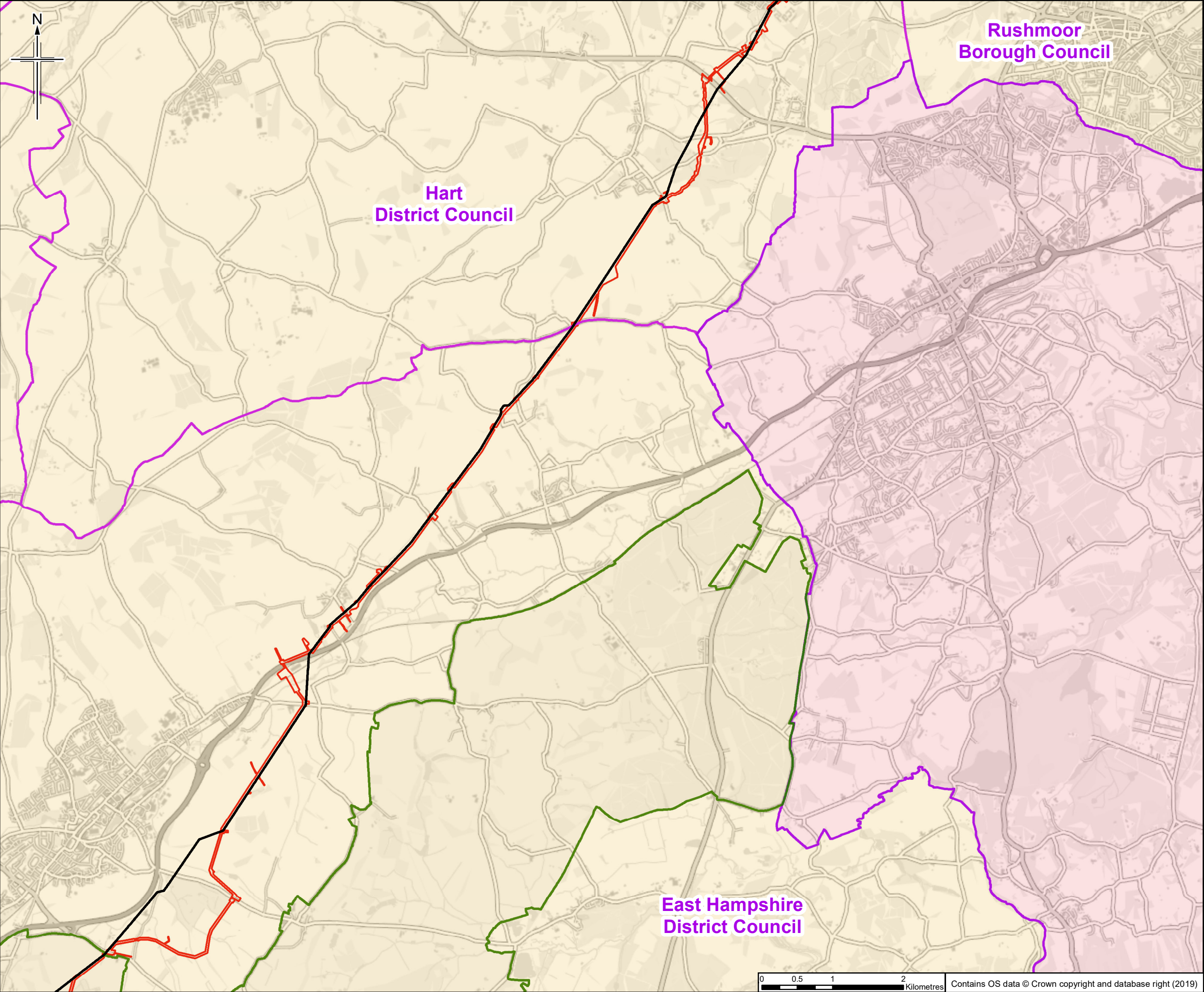
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- Legend**
- Existing pipeline route
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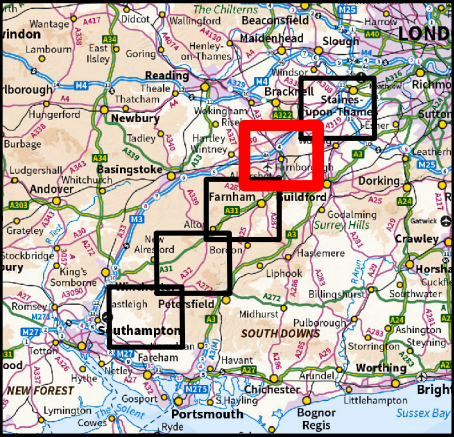
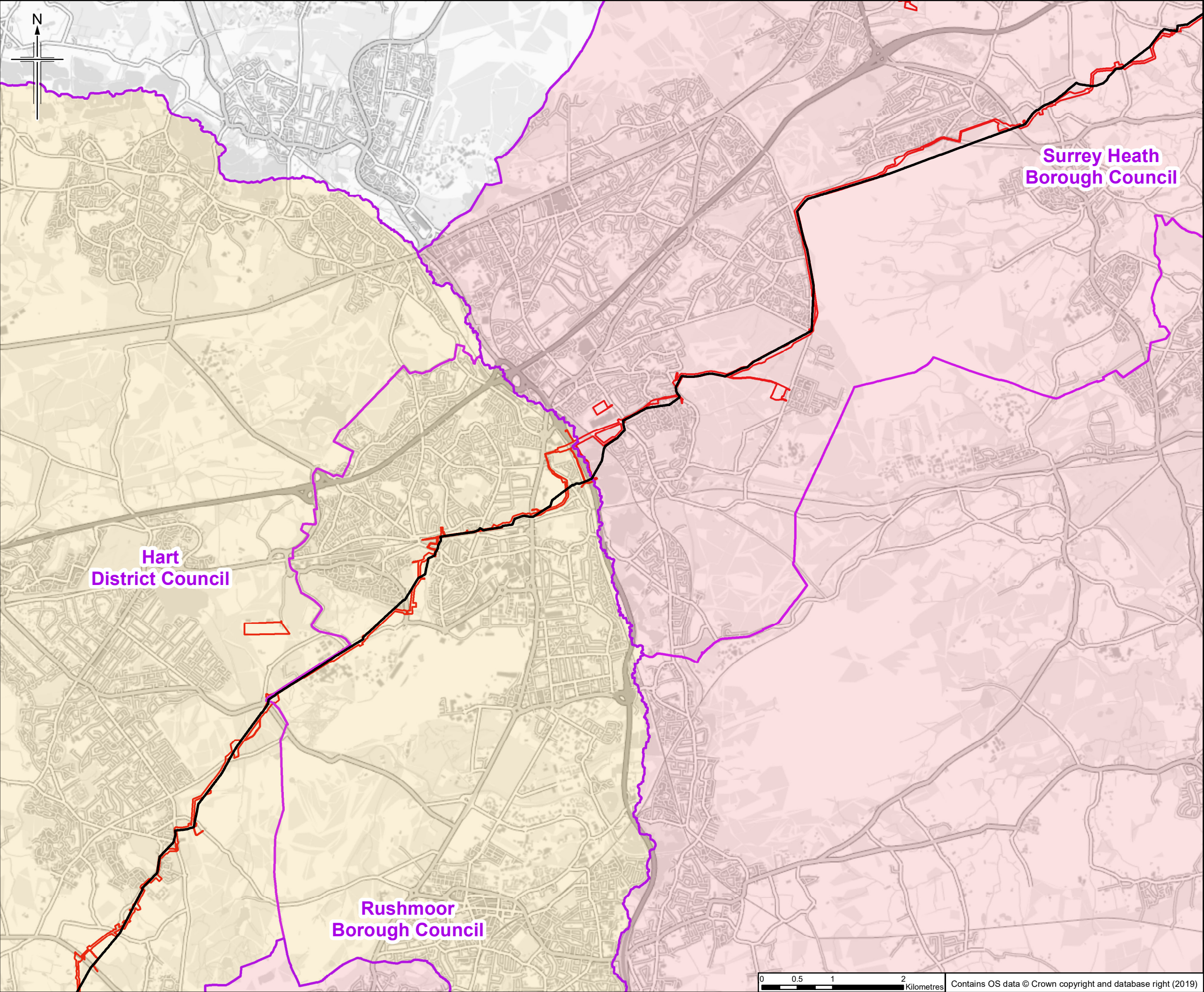
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**Legend**

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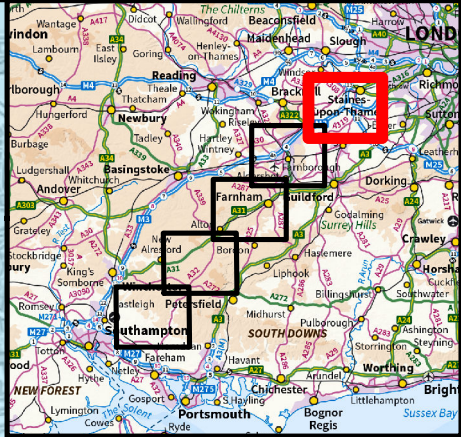
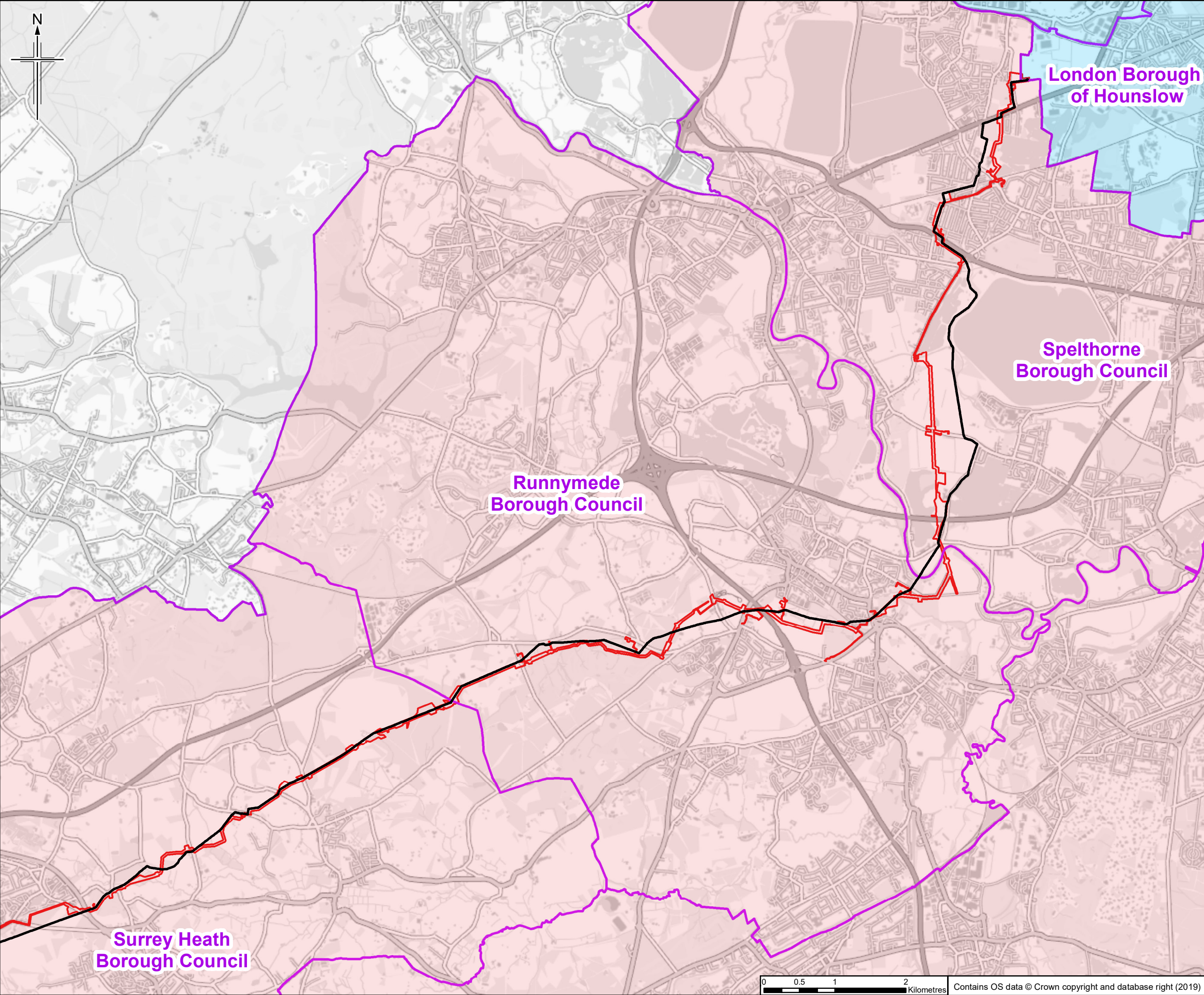
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## 4 Appendices

### Appendix GQ.1.11.1: Potential Consents and Permits

Table A.1.1: Potential Consents and Permits

Legislation	Signpost to Information	Progress
Conservation of Habitats and Species Regulations 2017 Protected Species Licence	<p>The Applicant has submitted draft licences for the following protected species:</p> <p>Appendix 7.14 Draft Dormouse EPS Licence Application (<b>Application Document <a href="#">APP-095</a></b>);</p> <p>Appendix 7.15 Draft Great Crested Newt EPS Licence Application (<b>Application Documents <a href="#">APP-096</a>, <a href="#">APP-097</a>, <a href="#">APP-098</a>, <a href="#">APP-099</a></b>);</p> <p>Appendix 7.16 Draft Rare Reptiles EPS Licence Application (<b>Application Document <a href="#">APP-100</a></b>);</p> <p>Appendix 7.17 Protected and Controlled Species Legislation Compliance Report (<b>Application Document <a href="#">APP-101</a></b>); and</p> <p>Habitats Regulations Assessment Report (<b>Application Documents <a href="#">APP-130</a> and <a href="#">APP-131</a></b>).</p>	<p>All the draft licence applications noted are subject to letters of no impediment (LONI) from Natural England. These state that:</p> <p><i>'Natural England sees no impediment to a licence being issued, should the DCO be granted.'</i></p> <p>The Applicant has submitted the LONI within the relevant appendices. The Statement of Common Ground between the Applicant and Natural England states <i>"Natural England agrees that the mitigation described in the draft licence applications is appropriate"</i>.</p> <p>A Draft Bat Licence cannot yet be submitted to Natural England as the detailed design of the project is still ongoing. When sufficient detail is known, a licence would be applied for in consultation with Natural England as for other licences.</p> <p>Water voles have not been identified within the project Order Limits. However, commitment G197 states:</p> <p><i>'Where there is evidence of water voles from pre-construction surveys, a class licence would be</i></p>

Legislation	Signpost to Information	Progress
		<i>applied for where necessary, and the following methods would typically be implemented’.</i>
Wildlife and Countryside Act 1981 SSSI activity consent		As required by law, the Applicant will seek Natural England’s consent for operations likely to damage a Site of Special Scientific Interest. The Applicant has extensively engaged with Natural England regarding its proposed works in the SSSIs forming part of the European Sites (that are the subject of its Habitat Regulations Assessment) and will apply for activity consents in due course.
Protection of Badgers Act 1992 Badger Licence	The Applicant has submitted Appendix 7.13 Draft Badger Licence Application ( <b>Application Document <a href="#">APP-094</a></b> ) (redacted).	The Draft Badger Licence is subject to a letter of no impediment (LONI) from Natural England. This states that:  <i>‘Natural England sees no impediment to a licence being issued, should the DCO be granted.’</i>
Environmental Permitting Regulations 2016 Flood Risk Activities		The Applicant is working with the Environment Agency and developing a Statement of Common Ground ( <b>Document Reference 8.4.01</b> ). The Applicant’s Responses to Relevant Representations ( <b><a href="#">REP1-003</a></b> ) Section 18.3 notes that discussions on disapplication of certain licences, consents and permits is subject to ongoing discussions between the Applicant and the Environment Agency and will be agreed through the Protective Provisions, with the outcome reflected within the updated DCO.
Environmental Permitting Regulations 2016		As required by law, where the replacement pipeline route passes through areas where there are active environmental permits (for example authorised landfill sites) the Applicant will work with the Environmental

Legislation	Signpost to Information	Progress
Variations of existing environmental permits		Agency and the permit holders to apply for permit variations. The Applicant's Responses to Relevant Representations ( <a href="#">REP1-003</a> ) Section 18.3 states that the project aims to gain agreement on permit variation in active landfill sites through further discussions with the EA permitting team.
Control of Pollution Act 1974 S61 prior consent for work on construction sites (if required)		The Applicant will produce a noise and vibration management plan as part of its Construction Environmental Management Plan (CEMP) to be approved by relevant planning authorities. Such a plan would, where applicable, set out the best practicable means to reduce noise and vibration during installation. The Applicant does not consider that separate section 61 consents are required however the Applicant (and its contractor) will engage with the local authorities over the role of the Control of Pollution Act 1974 as part of the preparation and agreement of the CEMP.
Construction (Design and Management) Regulations 2015 F10 Notification of Construction		The project is a "notifiable" construction project under the Construction (Design and Management) Regulations 2015 as it will exceed 30 working days and have more than 20 workers working at the same time. The overall project and the survey activity was notified to the Health & Safety Executive prior to the commencement of early works and the Applicant has agreed that it will submit subsequent notifications to the HSE to reflect the further stages of the project.
Ionising Radiations Regulations 2017		The Ionising Radiation Regulations 2017 could apply to flaw testing during welding. A certification of Registration would only be applied for should the X-

Legislation	Signpost to Information	Progress
Certificate of Registration for the use of Radioactive Substances (if required)		ray radiography test method be used. This decision would be made by the Applicant at a later date.
Protection of Military Remains Act 1986  Licence to carry out operations (if required)		<p>The Applicant would undertake preliminary metal detecting in areas within Order Limits which are due to be excavated (including trial trenches) that are within 300m of the recorded site of a military aircraft crash crash. This would be undertaken prior to the excavation and any potential items investigated by the project to determine if they could be of archaeological significance.</p> <p>The Applicant will apply for licence to carry out operations if necessary following an assessment of the significance of the archaeological remains according to the criteria for the selection of important sites, set out in 'Military Aircraft Crash Sites, Archaeological guidance on their significance and future management' (English Heritage, 2002).</p>