

Southampton to London Pipeline Project

Deadline 2

Response to the Examining Authority's First Written
Questions Safety and Security (SS)

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Southampton to London
Pipeline Project



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Table 1.1: Applicant response to Question

ExQ1	Question:	Applicant response to Question:
SS.1.1	Respond to [RR-024] and [RR-199] and the points raised in respect to health and safety, including blasts, leakages and the reliance on the biodegrading qualities of diesel to conclude low risk.	<p>1.1 The Applicant cannot find any reference to blasts and leakages or reliance on the biodegrading qualities of diesel within (RR-199). This response is therefore provided in relation to the points raised within (RR-024). (RR-024) requests details of blast zones and information relating to leakage, both in terms of the existing pipeline and its decommissioning and when implementing the proposed pipeline.</p> <p>1.2 Blast zones are not relevant to the application, as aviation fuel is of very low flammability under UK ambient conditions, and the project would also not create confined spaces that would be necessary for creation of explosion risk. Paragraph 14.2.2 of Environmental Statement (ES) Chapter 14 (Application Document APP-054) confirms that the project does not meet the hazard thresholds to fall under the remit of the Control of Major Accident Hazard Regulations 2015, and similarly does not classify as a Major Accident Hazard Pipeline under the Pipelines Safety Regulations 1996. Aviation fuel would be transported in a subsurface pipeline and at a temperature well below its flash point (nominally 38°C), which is the temperature at which a flammable liquid will give rise to vapour that would be capable of producing an explosive atmosphere. This is confirmed in paragraph 14.5.58 of ES Chapter 14 (Application Document APP-054).</p> <p>1.3 Operation of the existing pipeline does not form part of the application, and as such its operation is not assessed or reported in the ES. However, the Applicant regularly inspects and tests the existing pipeline and this has shown that no leaks have occurred in the last 10 years. The rights required to decommission the existing pipeline are included in the original pipeline consent and pipeline deeds, and therefore these do not form part of this application for development consent. Please refer to Section 7 of the Applicant's Responses to Relevant Representations (REP1-003).</p> <p>1.4 The new pipeline would be located underground and protected by an easement strip and its presence indicated by industry standard pipeline marker posts along the length of the route. The</p>



ExQ1	Question:	Applicant response to Question:
		<p>pipeline design includes a cathodic protection (CP) system to protect the pipeline against corrosion and maintain its integrity, and regular inspections and testing of the new operational pipeline and valves would be undertaken as set out in paragraph 14.4.49 of ES Chapter 14 (Application Document APP-054).</p> <p>1.5 Whilst not referred to in representation RR-024, the Applicant notes that the Examining Authority has sought a response in regard to 'the reliance placed upon the biodegrading qualities of diesel to conclude low risk'. Diesel would only be required on site for construction phase plant/equipment, in relatively low volumes and containment typical of similar construction sites. Biodegradability of fuels is referred to in the context of water habitats in paragraph 14.5.72 of ES Chapter 14 (Application Document APP-054). However, the assessment of major accidents does not place reliance on the biodegrading qualities of diesel to conclude low risk. Potential impacts of diesel spills/releases in this context are considered in paragraphs 14.4.29 to 14.5.35 of ES Chapter 14 (Application Document APP-054), with the potential for a major accident threat to the environment (MATTE) informed primarily by relatively low inventories (volume) of diesel being required on site during construction, alongside containment of diesel fuel in industry-standard bowzers and fuel tanks. Diesel use during construction would be subject to good practice commitments as set out in ES Chapter 16 (Application Document APP-056) and these are secured by Requirements 5 (Code of construction practice) and 6 (Construction environmental management plan) of the draft DCO (Document Reference 3.1 (3)):</p> <ul style="list-style-type: none"> • Commitment G8: <i>'The CEMP would include proactive actions and measures to control pollution risks. This could be either directly from the construction works or due to external factors such as extreme weather. Measures would include appropriate storage and handling of fuels and other substances hazardous to the environment.'</i> • Commitment G119: <i>'Potentially hazardous materials used during construction would be safely and securely stored including use of secondary containment where appropriate.'</i> • Commitment G121: <i>'All refuelling, oiling and greasing of construction plant and equipment, would take place above drip trays and also away from drains as far as is reasonably</i>



ExQ1	Question:	Applicant response to Question:
		<i>practicable. Vehicles and plant would not be left unattended during refuelling. Appropriate spill kits would be made easily accessible for these activities.'</i>
SS.1.2	Respond to [RR-281] in respect to emergency planning and Surrey County Council's concerns that the multi-agency measures are in place to respond to pipeline incidents and to confirm the statutory responsibility for the "Major Hazards Pipeline Plan".	<p>1.1 ES Chapter 14 Major Accidents (Application Document APP-054) states:</p> <p><i>'Pipelines are considered one of the safest modes of transport for conveying hazardous substances. The likelihood of failure in a fuel pipeline in the UK is extremely low. The pipeline would be operated in accordance with strict and comprehensive standard operating procedures (SOPs).</i></p> <p><i>The design includes the following aspects:</i></p> <p><i>an easement strip extending 3m to either side of the pipeline – no building or below ground activity would be permitted within this area without prior approval, which would protect the pipeline from damage; and industry standard pipeline marker posts at all road crossings and boundaries (plus additional markers along the route to enable aerial identification), minimising the risk of inadvertent disturbance of the buried pipeline.</i></p> <p><i>Regular inspections of the pipeline and valves would also be undertaken:</i></p> <ul style="list-style-type: none"> <i>• pipeline route patrols by vehicle/on foot in discrete areas, typically on a weekly basis;</i> <i>• inspections of valves, typically on a monthly basis; pipeline route helicopter inspections, typically every other week;</i> <i>• pipeline route walkover inspections, typically completed in the winter months every two years;</i> <i>• testing and inspection of the cathodic protection system; and</i> <i>• a programme of pipeline cleaning and inspection.'</i> <p>1.2 In addition, it is important to note that paragraph 14.2.2 of ES Chapter 14 (Application Document APP-054) states <i>'The proposed replacement pipeline does not meet the hazard thresholds to fall under the remit of Control of Major Accident Hazards Regulations 2015 (COMAH), and similarly</i></p>



ExQ1	Question:	Applicant response to Question:
		<p><i>does not classify as a Major Accident Hazard Pipeline (MAHP) under the Pipelines Safety Regulations (PSR) 1996'.</i></p> <p>1.3 The PSR 1996 defines a 'Major Accident Hazard Pipeline' (MAHP) as one which '<i>conveys a dangerous fluid and which has the potential to cause a major accident</i>'. Under these regulations, aviation fuel is not considered to be a dangerous fluid and the proposed pipeline does not classify as a MAHP (see ES Chapter 14 paragraph 14.3.34 of Application Document APP-054).</p> <p>1.4 ES Chapter 3 Project Description (Application Document APP-043) provides a full description of the project. In the context of both 'vulnerability to' and 'potential to cause' a major accident or disaster, the project design complies with the PSR 1996, which require the management of potential hazards to reduce accidents and disaster risk to an acceptable level (see ES Chapter 14 paragraph 14.4.4 of Application Document APP-054).</p> <p>1.5 The Applicant therefore confirms that the replacement pipeline is not a Major Accident Hazard Pipeline. However, the Council and the Applicant would work together to ensure that multi-agency measures are in place to respond to pipeline incidents.</p>
SS.1.3	Respond to the MoD's concerns raised in their RR [RR-200] and Additional Submission [AS-039] and at the Preliminary Meeting [EV-002] in relation to the ability for them to maintain their operations.	<p>1.1 The Applicant is in detailed discussions with the MoD to ensure that they are able to maintain their operations both during construction and in the operational phase of the pipeline. Provision will be made within the Voluntary Agreement to ensure that Military Operations are not compromised by the development. This is the Applicant's experience of operating and maintaining its existing pipelines that currently pass through the MoD estate along similar routeing.</p>



ExQ1	Question:	Applicant response to Question:
SS.1.5	Large sections of the proposed route would be publicly accessible. In response to concerns raised at the Preliminary Meeting [EV-002], explain what procedures and processes are proposed to ensure the safety of the general public during construction or signpost where in the Application documentation this information can be found.	<p>Health and Safety</p> <p>1.1 The Register of Environment Actions and Commitments (REAC) (Application Document APP-056) and the CoCP (Document Reference 6.4 Appendix 16.1 (2)). Contains commitments to manage the potential health and safety impacts of the construction of the replacement pipeline. The commitment relating to fencing states:</p> <p><i>Commitment G85: 'Working areas would be appropriately fenced. The choice of fencing would be decided following a risk assessment, relevant to the work location. Specific areas such as compounds may require additional security measures such as lighting, security guards or CCTV. For some locations the fence used may also serve to provide acoustic and visual screening of the work sites and reduce the potential for disturbance of users in the surrounding areas. Provision of additional fencing on a site by site basis may be used to reduce the potential for impacts on wildlife and trees. Fencing would be regularly inspected and maintained and removed as part of the demobilisation unless otherwise specified.'</i></p>