

# Southampton to London Pipeline Project

## Deadline 2

Comments on Local Impact Reports

Application Document: 8.7

Planning Inspectorate Reference Number: EN070005

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Southampton to London  
Pipeline Project

## Contents

<b>1</b>	<b>Introduction.....</b>	<b>1</b>
1.1	Purpose of this document.....	1
1.2	Structure of this document.....	1
1.3	References to commitments in this document.....	1
<b>2</b>	<b>Hampshire County Council.....</b>	<b>3</b>
<b>3</b>	<b>Eastleigh Borough Council.....</b>	<b>7</b>
<b>4</b>	<b>Winchester City Council .....</b>	<b>9</b>
<b>5</b>	<b>South Downs National Park Authority .....</b>	<b>12</b>
<b>6</b>	<b>Rushmoor Borough Council.....</b>	<b>21</b>
<b>7</b>	<b>Surrey County Council.....</b>	<b>30</b>
<b>8</b>	<b>Surrey Heath Borough Council .....</b>	<b>35</b>
<b>9</b>	<b>Runnymede Borough Council .....</b>	<b>43</b>
<b>10</b>	<b>Spelthorne Borough Council .....</b>	<b>52</b>
<b>11</b>	<b>London Borough of Hounslow .....</b>	<b>65</b>

# 1 Introduction

## 1.1 Purpose of this document

1.1.1 Ten individual Local Impact Reports (LIRs) were submitted by (ordered geographically from South to North):

- Hampshire County Council,
- Eastleigh Borough Council,
- Winchester City Council,
- South Downs National Park Authority,
- Rushmoor Borough Council,
- Surrey County Council,
- Surrey Heath Borough Council,
- Runneymede Borough Council,
- Spelthorne Borough Council,
- London Borough of Hounslow,

in accordance with the requirements set out in the Planning Act 2008 and the Advice Note One: Local Impact Reports (version 2, April 2012, The Planning Inspectorate).

1.1.2 This document sets out Esso Petroleum Company, Limited's response to the LIRs. It demonstrates that the local issues and impacts reported in them have been identified, understood and carefully addressed to aid the Examining Authority in its consideration of the project.

## 1.2 Structure of this document

1.2.1 This document responds to each of the submitted Local Impact Report in turn and provides a cross-reference to other Application Documents, to the Relevant Representation Responses (**Document Reference [REP1-003](#)**) and to Responses to the Written Questions from the Examining Authority (**Document Reference 8.6**) where relevant.

## 1.3 References to commitments in this document

1.3.1 All project commitments are listed within the Register of Environmental Actions and Commitments (REAC), which is included within ES Chapter 16 Environmental Management and Mitigation (**Application Document [APP-056](#)**). Commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects. This document references a number of project commitments that reduce impacts on the environment. These are indicated by a reference number like this: (G20). Good practice measures are set out in the REAC and secured through Development Consent Order (DCO)



requirements such as requirement 5, which obliges the production of a Code of Construction Practice.

## 2 Hampshire County Council

Table 2.1: Applicant's response to Hampshire County Council's Local Impact Report

LIR Para Ref.	LIR raised	Response to LIR
6.1 to 6.4	<b>Landscape and Visual Impacts</b> Expect to see mitigation including replacement planting controlled and secured, with details reflecting and enhancing local landscape and character.	<p>Measures to manage the effects on the landscape will be implemented through specific landscape and visual measures and commitments listed in the REAC (Table 16.2 – Pages 38 to 40 of ES Chapter 16 Environmental Management and Mitigation (<b>Application Document APP-056</b>)) and secured by draft DCO (<b>Document Reference 3.1 (3)</b>). Requirements including the Code of Construction Practice (DCO Requirement 5), Construction Environment Management Plan (CEMP) (DCO Requirement 6), the Landscape and Ecological Management Plan (LEMP) (DCO Requirement 12) and Hedgerows and Trees (DCO Requirement 8).</p> <p>Draft DCO Requirement 8 (<b>Document Reference 3.1 (3)</b>) requires that the details of replacement tree or shrub planting would be identified within the LEMP. Both the CEMP and LEMP must be submitted to the relevant planning authority for approval prior to the commencement of the stage of the development and so the details of replacement and mitigation planting will be approved by the relevant planning authority.</p>
7.1 to 7.6	<b>Highways and Transportation Impacts</b> Clarity is sought on the potential use of trenchless techniques at Caker Lane (LIR Para 7.2)	<p>Caker Lane is classified as a B-road. During the regular meetings, the highway authority has raised with the Applicant that, due to the amount of traffic that uses the road, it would prefer trenchless installation. Therefore, the Applicant has assessed both trenchless and open cut techniques in the ES. Appendix 3.1 Table of Trenchless Crossings (<b>Application Document APP-075</b>) states that the crossing of Caker Lane may be trenchless or open cut.</p> <p>Once the Applicant has confirmed the construction schedule (timing of installation across Caker Lane), it will confirm the installation method with the highway authority.</p>
	The local authority has some reservations on how construction will	Discussions are ongoing between the Applicant and the local authority regarding the requirement for the powers sought under the draft DCO, its interaction with existing legislation

LIR Para Ref.	LIR raised	Response to LIR
	be managed to enable the highway network to continue to operate, and requests the DCO includes provisions for the operation of the County Permit Scheme, consistent with the approach in the Thames Tideway Tunnel DCO (LIR Para 7.4-7.6)	and the local authority's permit scheme. The latest position is set out in the draft SoCG with the local authority, submitted at Deadline 2. The Applicant will provide an update on these discussions as the examination progresses.
8.1 to 8.3	<b>Public Rights of Way Impacts</b> The DCO must include provisions to ensure the permission of the local authority is sought for any works affecting PROW, including a Temporary Closure Order where rights of way are affected.	<p>Project commitment relating to the management of the impact of the project on PROW is found in commitment G114 in the REAC which states '<i>All designated Public Rights of Way would be identified, and any potential temporary closures applied for/detailed in the draft DCO. All designated Public Rights of Way crossing the working area would be managed, including National Trails, with access only closed for short periods while construction activities occur</i>' (<b>Application Document <a href="#">APP-056</a></b>).</p> <p>The Applicant remains in discussions with the local authority on this issue raised in the LIR, and the outcome of these discussions would be reported through the SoCG with the Council.</p>
9.1 to 9.2	<b>Ordinary Watercourses</b> As Lead Local Flood Authority (LLFA) the local authority states that suitable protective provisions are required in the DCO to require appropriate consents	<p>A Flood Risk Assessment (FRA) was submitted as part of the application (<b>Application Document <a href="#">APP-134</a></b>). Meetings with relevant statutory authorities were undertaken which included the local authority as an LLFA responsible for local sources of flooding (see paragraph 6.2.1 of <b>Application Document <a href="#">APP-134</a></b>).</p> <p>The conclusion of the assessment of risk to and from the project during the construction phase has identified the need for the implementation of mitigation measures to address the potential for the project to exacerbate flood risk (see paragraph 13.1.4 of <b>Application Document <a href="#">APP-134</a></b>). The Applicant is in discussions with the local authority on the issues raised in the LIR, and the outcome of these discussions will be reported through the SoCG with them.</p>

LIR Para Ref.	LIR raised	Response to LIR
10.1 to 10.5	<b>Ecology Impacts</b> The local authority considers (for the parts of Hampshire outside of Hart and Rushmoor) that the range of proposed mitigation/compensation measures in the DCO is appropriate and it has no overriding concerns regarding the impact on the scheme on biodiversity (LIR para 10.3).	The local authority's confirmation is welcomed.
11.1 to 11.4	<b>Historic Environment Impacts</b> The local authority identified a number of issues it has raised as part of SoCG discussions on the content of the Archaeological Mitigation Strategy (AMS), noting that it considers the issues can be resolved in an amended AMS.	The Applicant will be issuing an updated Archaeological Mitigation Strategy. The Applicant believes that this will address the stated concerns, and if the Council agrees, this will be documented in a revised SOCG after Deadline 2.
12.1 to 12.5	<b>Minerals and Waste Impacts</b> The local authority states it would welcome the recovery of minerals excavated as part of the construction and for them to enter the supply chain (LIR para 12.3).	The Applicant remains in discussions with the local authority on this issue raised in the LIR, and the outcome of these discussions will be reported through the SoCG with the Council.
	The local authority seeks suitable construction procedures through	The project has considered historic landfill and construction procedures, as listed in the REAC (Table 16.1 – Page 10 of ES Chapter 16 Environmental Management and Mitigation)

LIR Para Ref.	LIR raised	Response to LIR
	areas of historic landfill (LIR para 12.4).	( <b>Application Document <a href="#">APP-056</a></b> ) and the Code of Construction Practice (CoCP) (Table 2.1 – Page 11 of ES Appendix 16.1) ( <b>Application Document <a href="#">APP-128</a></b> ) and secured through draft DCO ( <b>Application Document <a href="#">AS-059</a></b> ) Requirement 5 (CoCP) these include commitments G71, G72, G74 and G75.
	The local authority highlights Rushmoor BC's concerns about open trenching through a former landfill site (now SINC) in the Blackwater Valley. (LIR para 12.5)	The response to this issue is set out in paragraph 23.3.51 in Table 23.1 of the Applicant's Responses to Relevant Representations ( <b>Application Document <a href="#">REP1-003</a></b> ) and in the response to issues raised in the Rushmoor Borough Council Local Impact Report (Section 6 of this document).
13.1 to 13.3	<b>Socio-economic and community impacts</b>  The local authority identifies the need for careful consideration of mitigation for impacts on residents and users of open and green spaces during construction, including restrictions on times/seasons of activity.	The response to this issue is set out in Planning Statement Chapter 16 ( <b>Application Document <a href="#">APP-132</a></b> ) and Section 4 of the Responses to Relevant Representations ( <b>Application Document <a href="#">REP1-003</a></b> ).



### 3 Eastleigh Borough Council

**Table 3.1: Applicant's response to Eastleigh Borough Council's Local Impact Report**

LIR Para Ref.	LIR raised	Response to LIR
1.3	<b>Erratum – ES Chapter 3 Figures</b> The local authority has identified an erratum in one of the plans in the Figures supporting ES Chapter 3.	The local authority has correctly identified an erratum in the ES Figure. This incorrectly labels a pigging station as being proposed near Maddoxford Lane in Eastleigh Borough. The pigging station is proposed north of the borough boundary, within Winchester district, and is correctly identified in that location on all of the Works Plans, Land Plans and General Arrangement Plans submitted as part of the application for development consent.
4.1 to 4.6 and 5.9 to 5.13	<b>Planning History</b> The local authority identifies relevant applications and consents in the Boorley Green Area, and interactions between the SLP and those schemes.	The Applicant has, and is continuing, to engage with the local authority and with relevant landowners and prospective developers in the Boorley Green area to discuss the timing and detail of implementation of planned residential development in that area alongside the implementation of the project. Appropriately worded planning conditions are being sought as part of the determination of planning applications for residential development in the area, which will secure the submission of phasing and implementation information for the Authority's approval. The latest position is reflected in the local authority's Local Impact Report (LIR) and will be updated as appropriate in the Statement of Common Ground (SoCG).

LIR Para Ref.	LIR raised	Response to LIR
5.2 to 5.8 and 5.14 to 5.16	<p><b>Details of mitigation</b></p> <p>The local authority identifies potential impacts on issues including biodiversity, water quality, land contamination and pollution, and other topics, and highlights the importance of securing appropriate mitigation.</p>	<p>The project has been developed through an iterative process of consultation and engagement with consultees, including the Environment Agency, Natural England, Hampshire County Council, Hampshire and Isle of Wight Wildlife Trust and this local authority. Commitments on good practice and mitigation are set out in the Register of Environmental Actions and Commitments (REAC) in Chapter 16 of the Environmental Statement (<b>Application Document APP-056</b>). The REAC also includes reference to how the commitments would be implemented (or secured) through the Development Consent Order (DCO). The good practice, mitigation and other commitments in the REAC are included within the Code of Construction Practice (CoCP) (<b>Document Reference 6.4 Appendix 16.1 (2)</b>). Draft DCO (<b>Document Reference 3.1 (3)</b>) 5 secures that the construction of the replacement pipeline must accord with the submitted CoCP.</p> <p>A Construction Environmental Management Plan (CEMP) will be prepared by the Applicant and submitted for approval by the local authority prior to the commencement of the works, secured under Draft DCO Requirement 6. This CEMP will provide further detailed information on the commitments and mitigation in the REAC and CoCP for the local authority's approval.</p>

## 4 Winchester City Council

Table 4.1: Applicant's response to Winchester City Council's Local Impact Report

LIR Para Ref.	LIR raised	Response to LIR
Section 6	<b>Landscape and Visual, and Biodiversity</b>	The landscape and visual assessment in Environmental Statement Chapter 10 ( <b>Application Document APP-050</b> ) assesses both year 1 and year 15 to take into account the time taken for vegetation to mature. Paragraph 10.2.2 states ' <i>Effects arising from pipeline installation were assessed for three periods: during the construction works themselves; year 1 post construction; and year 15 post construction... year 1 assessment identifies the effects before reinstatement planting would be established; and assessment at year 15 identifies the effects when reinstatement planting would have established</i> '. This is a standard approach taken within landscape and visual assessment as set out in the Landscape Institute and Institute of Environmental Management and Assessment Guidelines for Landscape and Visual Impact Assessment (2013).
Section 7	The local authority identifies concerns that the removal of hedgerow sections, including trees, is not adequately mitigated in the application proposals, highlighting that new planting will take time to mature and that there would be impacts in the intervening period. The local authority considers that additional mitigation, specifically within Winchester District, is needed.	<p>Measures to manage the effects on the landscape would be implemented through specific landscape and visual measures and commitments listed in the Register of Environmental Actions and Commitments (REAC) (Table 16.2 – pages 38 to 40 of Environmental Statement (ES) Chapter 16 (<b>Application Document APP-056</b>)) and secured by draft Development Consent Order (DCO) (<b>Document Reference 3.1 (3)</b>) Requirements including the Code of Construction Practice (DCO Requirement 5) Construction Environment Management Plan (CEMP) (DCO Requirement 6), the Landscape and Ecological Management Plan (LEMP) (DCO Requirement 12) and Hedgerows and Trees (DCO Requirement 8).</p> <p>Where hedgerows or trees are removed, these would be replaced, except for within the 6.3m pipeline easement where there would be a restriction on tree planting. Hedgerow planting can be made within the easement. The Applicant is of the view it has adequately mitigated,</p>

LIR Para Ref.	LIR raised	Response to LIR
		<p>by providing replacement planting. Commitments set out within the REAC in ES Chapter 16 (<b>Application Document <a href="#">APP-056</a></b>) that relate to replacement replanting include:</p> <ul style="list-style-type: none"> <li>• G87: 'Vegetation clearance, retention, protection and replanting/reinstatement drawings would be produced prior to the construction phase. The contractor(s) would implement these plans including agreed mitigation where practicable'.</li> <li>• G88: 'Where possible, reinstatement of vegetation would generally be using the same or similar species to that removed (subject to restrictions for planting over and around pipeline easements)'.</li> <li>• G93: 'Hedgerows, fences and walls would be reinstated to a similar style and quality to those that were removed, with landowner agreement'.</li> </ul> <p>G98: 'Where woodland vegetation is lost and trees cannot be replaced due to the restrictions of pipeline easements, native shrub planting approved by the Applicant would be used as a replacement'.Draft DCO Requirement 8 (<b>Document Reference 3.1 (3)</b>) requires that the details of replacement tree or shrub planting would be identified within the LEMP. Both the CEMP and LEMP must be submitted to the relevant planning authority for approval prior to the commencement of the stage of the development.</p> <p>The Applicant remains in discussions with the local authority on this issue raised in the LIR, and the outcome of these discussions would be reported through the Statement of Common Ground with the Council.</p>
<p>Section 6 Section 7 Section 8</p>	<p><b>Proposed Ropley Dean Logistics Hub</b></p> <p>The local authority has identified concerns relating to the proposed Ropley Dean logistics hub,</p>	<p>It should be noted that at Deadline 1 the Applicant confirmed to the Examining Authority (<b>Document Reference <a href="#">REP1-001</a></b>) that it will be submitting a change request to reduce the number and size of the temporary logistics hub sites included with the application for Development Consent. The Applicant is proposing to remove the Ropley Dean Logistics Hub from the project. The Applicant considers that the removal of the proposed logistics hub would resolve the local authority's concerns as expressed in the LIR.</p>

LIR Para Ref.	LIR raised	Response to LIR
	including potential landscape and amenity impacts.	
9.2	<p><b>Archaeology and important hedgerows</b></p> <p>The local authority has concerns on the assessment of the historic value of Important Hedgerows in the ES</p>	<p>The Applicant has assessed the historic value of important hedgerows in relation to the Hedgerows Regulations 1997 (as outlined in Environmental Statement Appendix 9.3 Section 1.3) (<b>Application Document <a href="#">APP-111</a></b>). In addition, historic hedgerows have been considered as part of the historic landscape within the assessment in ES Chapter 9 (<b>Application Document <a href="#">APP-049</a></b>).</p> <p>The Applicant has a commitment only to use a 10m width when crossing through boundaries between fields where these include hedgerows, trees or watercourses (good practice measure O1), which would reduce the impact on the hedgerows.</p>
	<p><b>Other Topics</b></p> <p>The local authority comments on other aspects of the application, indicating that it is in agreement with the proposed DCO requirements securing the submission and approval of details of mitigation.</p>	<p>The local authority's comments are noted.</p>

## 5 South Downs National Park Authority

Table 5.1: Applicant's response to South Downs National Park Authority's Local Impact Report

LIR Para Ref.	LIR raised	Response to LIR
3.5-3.8	<b>NPA duty</b> The Authority notes that its duties are to conserve and enhance the National Park, as do other public bodies when exercising their roles in relation to it.	National Policy Statement EN-1 states at paragraph 5.9.9 'The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.', i.e. when taking decisions on DCO applications it is only conservation, and not enhancement, that should be given weight. The Applicant, therefore, considers that it is not under a duty to provide enhancement, indeed it cannot do so as part of the DCO since such enhancement would not be 'associated development'. Nevertheless it is undertaking a non-statutory Environmental Investment Programme, albeit separate to the DCO.
5.1 to 5.7	<b>Principle of Development</b> The Authority does not accept that the pipeline needs to re-enter the South Downs National Park (SDNP). It considers an assessment must be undertaken to demonstrate that the pipeline could not be located outside of the northern part of the SDNP, within a less sensitive environment.	<p>The Applicant has provided an assessment of the proposed routing of the pipeline through the SDNP against the policy tests in NPS EN-1 and NPS EN-4, including impacts upon the designated landscape, in paragraphs 7.4.170 to 7.4.190 in the Planning Statement (<b>Application Document <a href="#">APP-132</a></b>).</p> <p>The Applicant considers that the Authority's request for an assessment to demonstrate "<i>that the pipeline could not be located outside of ... the SDNP ...</i>" goes beyond the policy requirements of the relevant NPS. The Applicant considers that its assessment, as described in the Planning Statement, meets the requirements of the NPS and demonstrates the exceptional circumstances for the proposed development within the National Park.</p>
5.8 to 5.12	<b>Landscape</b> The Authority does not consider that the proposals accord with Local Plan Policy or the statutory	Section 6.1 of the Planning Statement ( <b>Application Document <a href="#">APP-132</a></b> ) outlines the basis for decision making under the Planning Act 2008 (PA2008), highlighting that S104(3) of the PA2008 identifies that applications must be determined in accordance with the relevant NPS, which in this case are NPS EN-1 and NPS EN-4.

LIR Para Ref.	LIR raised	Response to LIR
	<p>requirement to conserve and enhance, highlighting a number of principal issues of concern (LIR para 5.10). The Authority highlights concerns about a specific temporary logistic hub and compound location, and other landscape impacts.</p> <p>The Authority considers that appropriate planning obligations are required to address a number of the principal issues of concern but in the current absence of such obligations the proposal is not considered to be in accordance with Local Plan Policy (LIR para 5.11).</p>	<p>Section 6.2 of the Planning Statement sets out the relationship between the NPS and other policy documents, including Local Plans. The Applicant has provided an assessment of the proposed pipeline against the policy tests in NPS EN-1 and NPS EN-4, including impacts upon the designated landscape, in paragraphs 7.4.170 to 7.4.190 in the Planning Statement.</p> <p>The Applicant is continuing to discuss the Authority's landscape concerns as part of the Statement of Common Ground but does not consider it necessary for a planning obligation to be secured. As a good neighbour and responsible operator, the Applicant is developing an Environmental Investment Programme (EIP), in order to contribute to the communities who may be affected by the replacement pipeline. The EIP comprises a range of activities along the replacement pipeline route to carry out localised environmental improvements and enhance local biodiversity, within environmentally designated sites and/or areas of social/community importance over and above what is required by planning policy.</p> <p>The Applicant is consulting on proposed changes to the number and size of the temporary logistics hubs included within the application for development consent. The proposed change to the logistics hub at Alton (Work No. 6B) will reduce the size of the hub and locate it within the site to reduce visual impacts from within the SDNP. The Applicant considers that this responds to the Authority's concerns about this site.</p> <p>The Applicant is also committing to not using the proposed temporary construction compound at Stephens Castle Down (Work No. 4F). This commitment (D6a) has been included in the revised CoCP (<b>Document Reference 6.4 Appendix 16.1 (2)</b>). The Applicant considers that this responds to the Authority's concerns about this site.</p>
	<p>The Authority requests an additional DCO Requirement for the location of all marker posts to be submitted to and approved by the relevant</p>	<p>It would be inappropriate for the Applicant to agree to this requirement as marker posts are a safety requirement and must be placed to identify the pipeline's location.</p> <p>The British Standards Institution have published a code of practice for pipelines (PD 8010) which includes standards for the location of pipeline markers. The documents states that</p>



LIR Para Ref.	LIR raised	Response to LIR
	local planning authority (LIR para 5.12).	<p><i>Distinctive markers should be erected at all road, rail, river and canal crossings and elsewhere as necessary to identify the pipeline, and to indicate its position and other details. Markers should be placed at field boundaries and not in fields, in such a way that they are not obscured by vegetation and do not interfere with agricultural operations. Markers should also be included at points of change of pipeline direction.</i></p> <p>Pipeline markers need to be located close enough so that an observer can see adjacent markers from each location (in both directions). Maximum spacing between markers should be less than:</p> <ul style="list-style-type: none"> <li>• 500 m in rural areas. However, in farmed land, where sign locations are challenged by the landowner, an acceptable alternative is to place signs at fence lines and every gate giving access to each paddock where the spacing is greater than recommended</li> <li>• 250 m in rural residential areas</li> <li>• 100 m residential or industrial locations</li> <li>• 50m in high density residential and other sensitive locations.</li> </ul> <p>In practice this means that there will be marker posts located at every field boundary, either side of roads, rivers, rail crossings and additionally where practicable to achieve line of sight in both directions.</p>
5.13 to 5.15	<p><b>Trees and Woodland</b></p> <p>The Authority does not consider that the proposals accord with Local Plan Policy or the statutory requirement to conserve and enhance, highlighting a number of</p>	<p>The environmental impacts of the project, including on ancient woodland, trees and hedgerows, are considered and assessed in the application for development consent in accordance with the NPS EN-1 Parts 4 and 5, and NPS EN-4 Sections 2.19 to 2.23. The Planning Statement (<b>Application Document <a href="#">APP-132</a></b>) sets out the project's accordance with NPS EN-1 and EN-4 in detail.</p>



LIR Para Ref.	LIR raised	Response to LIR
	principal issues of concern relating to ancient woodland, trees and hedgerows (LIR para 5.14).	<p>The Applicant has responded to concerns relating to the assessment of ancient woodland, trees and hedgerows in Section 3 of its Responses to Relevant Representations document (<b>Document Reference <a href="#">REP1-003</a></b>).</p> <p>Natural England has signed a SoCG with the Applicant (<b>Document Reference <a href="#">REP1-005</a></b>), section 3 of which sets out agreement on matters including:</p> <ul style="list-style-type: none"> <li>• avoiding classified ancient woodland and reducing impacts on potential ancient woodland;</li> <li>• the mitigation proposed in chapters 7 (<b>Application Document <a href="#">APP-047</a></b>) and 16 (<b>Application Document <a href="#">APP-056</a></b>) of the ES</li> <li>• working methods in relation to ancient woodland and veteran trees; and</li> <li>• the Environmental Investment Programme.</li> </ul> <p>The Forestry Commission has signed an SOCG with the Applicant (8.4.20) section 3 of which sets out agreement on matters including:</p> <ul style="list-style-type: none"> <li>• that the proposed approach to mitigating effects on Ancient Woodland, potential ancient woodland and veteran trees, as described in the ES (<b>Application Document <a href="#">APP-083</a></b>) and the further information included in the (<b>Written Question Response BIO.1.18</b>) are appropriate.</li> <li>• that appropriate measures have been taken to identify all areas of Ancient Woodland, and areas of Potential Ancient Woodland that do not appear on Natural England's Ancient Woodland Inventory;</li> <li>• that the Order Limits avoid all areas of existing classified Ancient Woodland;</li> <li>• that the route will avoid all recorded ancient trees identified by the Ancient Tree Forum/Inventory. Technical Note: Ancient Woodland and Veteran Trees provides clarity.</li> </ul>

LIR Para Ref.	LIR raised	Response to LIR
	The Authority sought clarification that the LEMP will cover the entirety of the pipeline route in the SDNP (LIR para 5.15 (I)).	<p>The LEMP will provide details of landscape and ecological measures secured through Draft DCO (<b>Document Reference 3.1 (3)</b>) and so will cover all locations where landscape and ecological measures are proposed. The LEMP must be submitted and approved for a stage of development prior to commencement, with the stages to be defined in the Written Scheme under Draft DCO (<b>Document Reference 3.1 (3)</b>) Requirement 3. At this point the stages have not been defined, however the Applicant notes this request.</p> <p>The Applicant has set out considerations regarding the scope of, and detail to be included in, the LEMP in its response to <b>Written Question Response BIO.1.1 and LV.1.1</b> submitted to the ExA alongside this document.</p>
	The Authority requested that the Applicant table information to an appropriate and proportional level of detail on vegetation to be removed, so the Authority can judge the appropriateness of the mitigation (LIR para 5.15 (I)).	<p>The Applicant's approach adopted to the assessment of impacts from vegetation removal in the Environmental Statement, is set out in Paragraph 10.5.1 of the Environmental Statement (ES) Chapter 10 (<b>Application Document <a href="#">APP-050</a></b>).</p> <p>The Landscape Environment Management Plan (LEMP) will be subject to approval by the Authority. As set out in the REAC (<b>Application Document <a href="#">APP-056</a></b>) this would include G91 and G87 which require the appropriate plans to be provided prior to construction.</p>
	The Authority requested a period of at least 5 years for maintenance, management and replanting of hedgerows and trees, rather than the 3 years in Requirement 8 (LIR para 5.15 (ii)).	The Applicant's position, set out in the answer to <b>Written Question Response DCO.1.35</b> , is that DCO Requirement 8(3) is considered adequate, as it is likely that plants that are defective or failing would have generally failed or showed signs of failure within the three-year aftercare period.
5.16 to 5.17	<p><b>Biodiversity</b></p> <p>The Authority defers to Natural England on biodiversity and is</p>	Natural England has signed a SoCG with the Applicant ( <b>Application Document: 8.4.04 <a href="#">REP1-005</a></b> ), section 3 of which sets out matters agreed, including:

LIR Para Ref.	LIR raised	Response to LIR
	broadly supportive of the approach taken by the Applicant, and supportive of DCO Requirement 12 (LEMP). The Authority provides comments on a number of matters, including a request that hedgerow gaps have temporary hedging installed between working hours and until replanting takes place, particularly where Dormice are present (LIR 5.17.4).	<ul style="list-style-type: none"> <li>the mitigation proposed in chapters 7 (<b>Application Document <a href="#">APP-047</a></b>) and 16 (<b>Application Document <a href="#">APP-056</a></b>) of the ES</li> <li>the mitigation described in the draft license applications, including for dormice (<b>Application Document <a href="#">APP-095</a></b>)</li> </ul> <p>Natural England issued a Letter of No Impediment for dormice on 30 April 2019. Location-specific embedded design measures to avoid impacts to hedges and habitats, including utilising existing gaps in hedges, within the SDNP are set out in Tables 1.2 and 3 of ES Appendix 4.1 (<b>Application Document <a href="#">APP-077</a></b>). Section D3 of the Draft Dormouse EPS Licence Application (<b>Application Document <a href="#">APP-095</a></b>) sets out potential impacts of construction of the project on dormouse habitats from fragmentation and isolation. It concludes that the temporary creation of a single 10m wide gap in boundary features and woodland would not affect the favourable conservation status of dormice, especially given the ability of this species to cross narrow gaps between suitable areas of habitat.</p>
5.30 to 5.32	<b>Highways</b> The Authority requests that the Construction Traffic Management Plan (CTMP) secured in DCO Requirement 7 be submitted to the relevant Local Planning Authority and not the Highway Authority for approval. The relevant planning authority would consult with the highway authority.	The Applicant considers that the CTMP should be submitted to, and approved by, the relevant Highway Authority (Hampshire County Council). This is to ensure a consistent and co-ordinated approach along the route of the replacement pipeline.
5.23 to 5.26	<b>Dark Night Skies</b>	Lighting is assessed in relation to specific topic areas in ES Chapter 10 ( <b>Application Document <a href="#">APP-050</a></b> ). Paragraphs 10.3.9 to 10.3.10 and 10.5.71 to 10.5.72 relate to Dark Skies

LIR Para Ref.	LIR raised	Response to LIR
	<p>The Authority is concerned that temporary construction lighting has the potential, unless appropriately mitigated to harm Dark Night Skies. The Authority notes it is in discussion with the Applicant, but also seeks the inclusion of an amendment to the wording of Requirement 8 (CEMP) to require the CEMP to include a Lighting Management Plan, at least as it relates to the SDNP. (LIR para 5.26)</p>	<p>within the SDNP. Commitments to cover the control of artificial lighting are identified in the Code of Construction Practice (CoCP) (<b>Document Reference 6.4 Appendix 16.1 (2)</b>), and include the following:</p> <ul style="list-style-type: none"> <li>• Commitment G25 ‘Any activity carried out or equipment located within a logistics hub or construction compound that may produce a noticeable nuisance from dust, noise, lighting etc. would be located away from sensitive receptors such as residential properties or ecological sites where practicable’, and;</li> <li>• Commitment G45 ‘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’.</li> </ul> <p>The Applicant considers that through these commitments, the project will avoid or reduce impacts from artificial light on the SDNP, so that any impacts are at an acceptable level. The project therefore complies with the requirements of section 5.6 of NPS EN-1 in relation to artificial light.</p> <p>Notwithstanding this position, the Applicant is continuing to discuss Dark Night Skies with the Authority as part of the Statement of Common Ground with the objective of meeting the E1a criteria (Dark Night Skies, Technical Advice Note, April 2018, South Downs National Park Authority) within the Park.</p>
5.27 to 5.31	<p><b>Tranquillity</b></p> <p>The Authority is concerned about temporary and significant localised impacts on tranquillity within SDNP during construction. The Authority requests that Requirement 14 (working hours) be amended to</p>	<p>Paragraphs 10.3.8 and 10.5.66 to 10.5.70 of ES Chapter 10 (<b>Application Document <a href="#">APP-050</a></b>) relate to tranquillity within the SDNP.</p> <p>Section 5 of the Responses to Relevant Representations (RR) document (<b>Document Reference <a href="#">REP1-003</a></b>) sets out the Applicant’s responses regarding managing construction impacts, including those which could affect tranquillity within the SDNP. The Applicant considers that any impacts on tranquillity within the SDNP during construction of the project would be largely transient, of short duration and highly localised.</p>

LIR Para Ref.	LIR raised	Response to LIR
	restrict working hours on a Saturday to 0800 to 1300. (LIR para 5.31)	Restricting working hours would extend the construction period. The Applicant considers that, as well as the potential to lead to other impacts on the wider project, this would increase the duration of the construction period within the SDNP and therefore could be counter-productive.
5.32 to 5.37	<b>Public Right of Way Network</b> The Authority generally agrees with the Applicant's assessment of impacts on rights of way within the SDNP. It highlights it is in continuing discussions with the Applicant over the management of the crossing of the South Downs Way during major events and identifies concerns about temporary impacts on rights of way at two specific locations.	As noted in the LIR, discussions are continuing between the Authority and the Applicant regarding rights of way, and the management of the crossing of the South Downs Way during major events. The Applicant has provided the Authority with a commitment that would be included within the revised CoCP ( <b>Document Reference 6.4 Appendix 16.1 (2)</b> ).
5.47 to 5.49	<b>Archaeology</b> The Authority confirms the Applicant's approach, and Requirement 8, are appropriate. The Authority is concerned about the adequacy of archaeological archiving capacity in the South East and considers suitable provision needs to be secured by the Applicant. (LIR para 5.49)	The Applicant does not consider that it is the responsibility of the project to provide archaeological archiving capacity, as this is the legal duty of the relevant public body. The Applicant will comply with its duty to record, report and provide this information.

LIR Para Ref.	LIR raised	Response to LIR
5.60	<p><b>Decommissioning</b></p> <p>The Authority request an additional requirement to ensure that in the event that the pipeline ceases to operate, all above ground infrastructure must be removed and the land restored within 6 months.</p>	<p>Section 7 of the Responses to Relevant Representations (RR) document (<b>Document Reference <a href="#">REP1-003</a></b>) sets out the Applicant's responses regarding decommissioning of both the existing and replacement pipelines. Paragraphs 7.3.18 to 7.3.26 in particular cover decommissioning of the replacement pipeline.</p> <p>Removal of above ground infrastructure would be part of the decommissioning plans that would be carried out as per the regulatory requirements in effect at the time. Any related above ground infrastructure that is not being used in connection with other operational pipelines would be removed and the land restored, although this may take longer than 6 months from when the line ceases to be in use. Given the intended operational life of the pipeline, the Applicant does not consider it necessary to provide for specific requirements in the DCO.</p>
Section 5	<p><b>Heritage, Residential Amenity, Flood Risk, Socio Economic, Water, Agricultural Land, Public Open Space, Air Quality, Waste Management, Contaminated Land and Open Access Land</b></p> <p>The Authority comments on a number of topics, identifying no or minor concerns.</p>	<p>The Authority's comments are noted.</p>

## 6 Rushmoor Borough Council

Table 6.1: Applicant's response to Rushmoor Borough Council's Local Impact Report

LIR Para Ref.	LIR raised issue	Response to LIR
8.1	<p><b>Habitat Loss within the Thames Basin Heaths</b></p> <p>The local authority considers that the proposals could have a direct negative impact on the Thames basin Heaths SPA due to habitat loss and species disturbance. (LIR para 8.1.4). This issue was also raised in the local authority's relevant representation.</p>	<p>The Local authority's comments on habitat loss within the Thames Basin Heaths are responded to in Table 23.1, paragraph 23.3.11, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>).</p> <p>The signed Statement of Common Ground with Natural England (<b>Document Reference <a href="#">REP1-005</a></b>) states that, '<i>Natural England support the conclusion of the Habitats Regulations Assessment that there would be no adverse effects on the integrity of the Thames Basin Heaths SPA after implementation of appropriate mitigation and good practice measures</i>'.</p>
8.4	<p><b>Pollution on Eelmoor Marsh SSSI and Ball Hill SINC</b></p> <p>The local authority is concerned about potential indirect impacts on the designated sites during construction and requests a detailed CEMP. This issue was also raised in the Local authority's relevant representation.</p>	<p>The local authority's comments on the risk of pollution on Eelmoor Marsh SSSI and Ball Hill SINC are responded to in Table 23.1, paragraphs 23.3.13 to 23.3.15 and paragraphs 23.3.18 to 23.3.19, respectively, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>). The local authority's comments on a detailed CEMP are covered in the Applicant's response to <b>Written Question Response DCO.1.33</b>.</p>
8.5	<p><b>Impacts on mature trees in Old Ively Road</b></p> <p>The local authority notes the commitment to construct the pipeline</p>	<p>The local authority's comments on the risk of impacts on mature trees in Old Ively Road are responded to in Table 23.1, paragraphs 23.3.16 to 23.3.17, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>).</p>



LIR Para Ref.	LIR raised issue	Response to LIR
	<p>in the road to avoid impacts on trees but requests details on avoiding root zones during construction, which could be secured in the CEMP. This issue was also raised in the local authority's relevant representation.</p>	
8.6	<p><b>Loss of Amenity (and therefore function within the SANGs network)</b></p> <p>The local authority considers there is no certainty that the proposals will not impact on the access and amenity of the Southwood Country Park SANG or increase visitor pressure on the SPA. This issue was also raised in the local authority's relevant representation.</p> <p>The local authority suggests a requirement for a construction plan in the DCO for mitigation and avoidance measures for recreational impacts (LIR para 8.6.7)</p> <p>The Local authority suggests site specific enhancements both on and off site within all SANGs to be</p>	<p>The Applicant's response to relevant representations relating to Suitable Alternative Natural Greenspaces (SANGs) is responded to in Table 4.1, paragraphs 4.3.35 to 4.3.46, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>). The Applicant does not accept that enhancements for SANGs being disturbed are necessary. The local authority's comments on the Southwood Country Park SANG are responded to in Table 23.1, paragraphs 23.3.1 to 23.3.10, of that document. The Applicant does not consider the local authority's request for a construction plan is necessary, given the commitments in the CoCP, and the detailed plans to be prepared and submitted to discharge DCO requirements, particularly the CEMP, LEMP and CTMP.</p> <p>As explained in the Applicant's response to relevant representations, although it is too early to make a commitment about the schedule of construction activity and define the phasing for construction, the Applicant would continue to engage with the Council regarding the construction timings.</p> <p>The Applicant would ensure crossing points are provided so that the SANGs are useable during construction and would not prevent its use by the community, see commitment OP04 in the Code of Construction Practice (CoCP) (<b>Document Reference 6.4 Appendix 16.1 (2)</b>): '<i>Principal pedestrian routes within SANGs crossing the working area would be managed with access only closed for short periods while construction activities occur. Additional signage for diversions on to alternative existing paths would be utilised as appropriate</i>'. This would be secured through the CoCP and secured through Requirement 5 of the DCO.</p>



LIR Para Ref.	LIR raised issue	Response to LIR
	disturbed should be committed to (LIR para 8.6.8)	
8.7 and 8.8	<p>Impacts on SINC within Southwood Country Park</p> <p><b>Impacts on the ecology of Southwood Country Park and Cove Brook</b></p> <p>The local authority highlights concerns relating to potential impacts and mitigation and enhancements for Southwood Country Park and Cove Brook. This issue was also raised in the local authority's relevant representation.</p>	<p>The local authority's comments on the potential impacts on SINC within Southwood Country Park are responded to in Table 23.1, paragraphs 23.3.20 to 23.3.38, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>).</p>
	In respect of Hedgerow 218, the local authority requests a requirement for Auger drilling underneath all hedgerows thought to be important (LIR para 8.7.2)	The local authority's comments on crossings of important hedgerows are covered in the Applicant's response to <b>Written Question Response ALT.1.6</b> .
	The local authority requests that the trenchless crossing of Ively Road is extended to also pass under Ively Brook to avoid disturbance to the river	The local authority's comments on potential impacts on Ively Brook are responded to in Table 23.1, paragraphs 23.3.27 to 23.3.28, of the Applicant's Responses to Relevant Representations ( <b>Document Reference <a href="#">REP1-003</a></b> ). The Applicant's commitments to reinstatement are set out in

LIR Para Ref.	LIR raised issue	Response to LIR
	corridor and adjacent habitats. (LIR para 8.8.6)	Table 23.1, paragraphs 23.3.27 to 23.3.28, of the Applicant's Responses to Relevant Representations ( <b>Document Reference <a href="#">REP1-003</a></b> ).  In response to the local authority's specific request to extend the trenchless crossing of Ively Road, the Applicant will discuss this with the Council. However at this stage the Applicant would highlight that trenchless installation may also give rise to other potential impacts at this location.
	The local authority wishes to explore the need for the proposed haul road across Cove Brook to determine if a less ecologically damaging solution can be found. If no other solution the local authority requests details on the impact on the brook and protection against contaminants in the detailed CEMP. (LIR para 8.8.7)	The local authority's concerns are understood to relate to the haul road over Cove Brook, to the south of West Heath Road. The Applicant will continue discussions with the Council on this issue but considers that good practice measures and commitments in the CoCP ( <b>Document Reference 6.4 Appendix 16.1 (2)</b> ) and the CEMP to be prepared and submitted to discharge DCO requirement 6, would ensure appropriate protection against contaminants.
	The local authority is concerned at the proposal to trench through the EA flood storage bund at Cove Brook (LIR para 8.8.12)	The Applicant can confirm that a trenchless crossing is now the proposed method of crossing the Cove Brook FSA as stated in Table 18.1, paragraph 18.3.1, of the Applicant's Responses to Relevant Representations ( <b>Document Reference <a href="#">REP1-003</a></b> ), responding to the relevant representation from the Environment Agency. This commitment is secured in the revised CoCP submitted at Deadline 2 ( <b>Document Reference 6.4 Appendix 16.1 (2)</b> ).
8.9	<b>Disruption to Southwood Playing Fields and Cove Cricket Club</b>  The local authority is concerned about impacts on the sports facilities during construction, and subsequent restrictions on the future management	The local authority's comments on potential disruption to Southwood Playing Fields and Cove Cricket Club are responded to in Table 23.1, paragraphs 23.3.39 to 23.3.42, of the Applicant's Responses to Relevant Representations ( <b>Document Reference <a href="#">REP1-003</a></b> ). The Applicant is continuing to discuss the issues with the Council and the Cricket Club.

LIR Para Ref.	LIR raised issue	Response to LIR
	and use of the pitches. This issue was also raised in the local authority's relevant representation.	
8.10	<p><b>Traffic disruption along Cove Road and Restricted Access to Nash Close</b></p> <p>The local authority is concerned about impacts of construction works on these roads, including restrictions on access for residents. The local authority requests a detailed transport plan within the DCO.</p>	<p>The local authority's comments on traffic disruption along Cove Road and restricted access to Nash Close residents are covered in the Applicant's response to <b>Written Question Response TT.1.17</b>.</p> <p>The Applicant has committed to prepare a Construction Traffic Management Plan (CTMP) as set out in commitment G110 in Table C1 of the CoCP (<b>Document Reference 6.4 Appendix 16.1 (2)</b>). The submission of the CTMP for approval by the relevant highway authority is secured by draft DCO (<b>Document Reference 3.1 (3)</b>) Requirement 7.</p>
8.11	<p><b>Habitat loss within the Cove Brook Greenways</b></p> <p>The local authority has no objection to a compound in the open space but requests that the DCO includes a requirement to negotiate the exact location and requires the enhancement of any replaced habitat and contributions to the Cove Brook Greenways project. This issue was also raised in the local authority's relevant representation.</p>	<p>The local authority's comments on habitat loss are responded to in Table 23.1, paragraphs 23.3.26 to 23.3.28, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>). The maximum extent of the proposed compound north of West Heath Road (works item 4AD) is identified on sheet 104 of the plans submitted as part of the application for development consent. Discussions are continuing with the Council on this issue, in its roles as landowner and local planning authority.</p>

LIR Para Ref.	LIR raised issue	Response to LIR
8.12 8.13	<p><b>Habitat loss along railway corridor and within Queen Elizabeth Park</b></p> <p>Impacts on access and amenity within Queen Elizabeth Park</p> <p>The local authority raises a number of concerns about potential impacts during construction and the need for and adequacy of mitigation and replanting, and on recreational access and use of the park. These issues were also raised in the local authority's relevant representation.</p> <p>The local authority specifically states (LIR para 8.12.2) that "a 65m corridor of broadleaved trees will be felled." and that "5.8 acres of the 23.15 acres will be clear felled with 25.1% of the woodland being lost".</p> <p>The local authority requests a planning obligation or a requirement in the DCO to secure an ecological compensation package (LIR para 8.12.8) and the management of the park during and post construction (LIR para 8.13.3)</p>	<p>The Applicant's response on concerns raised by the local authority in relation to Queen Elizabeth Park are set out in Section 10 of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>).</p> <p>The local authority's LIR statements on the quantum of trees to be felled is not considered to be accurate, nor to reflect the Applicant's commitments to narrow working. At this stage (prior to a detailed alignment for the pipeline construction), it is not possible to quantify the precise number of trees that would be affected by construction, including the number of trees that would be felled. The Applicant's response on the issue of trees within Queen Elizabeth Park is set out in Table 10.1, paragraphs 10.3.8 to 10.3.12, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>). The Applicant's responses to comments on trees in general is set out in Section 3, Table 3.1, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>).</p> <p>The Applicant's response on an Environmental Investment Programme (EIP) within Queen Elizabeth Park is set out in Section 10, paragraphs 10.3.13 to 10.3.16, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>). The Applicant is continuing to engage with the local authority on potential impacts arising from construction through Queen Elizabeth Park as part of the Statement of Common Ground.</p>

LIR Para Ref.	LIR raised issue	Response to LIR
8.14	<p><b>Farnborough Hill Conservation Area and A325 Green Corridor</b></p> <p>The local authority states that a TPO and important group of trees have not been mapped (LIR para 8.14.1).</p> <p>The local authority is concerned about impacts of construction works on Ship Lane and requests a detailed transport plan within the DCO.</p>	<p>The local authority has not identified the location of the Tree Preservation Order (TPO) and group of trees it is referring to and is requested to do so. The Applicant has identified TPOs from information provided to it by relevant local planning authorities. Notable trees and veteran trees have been identified in the Environmental Statement from surveys undertaken by the Applicant.</p> <p>The local authority's comments on parking and access are considered to be covered in the Applicant's response to <b>Written Question Response TT.1.17</b>. The Applicant has committed to prepare a CTMP as set out in commitment G110 in Table C1 of the CoCP (<b>Document Reference 6.4 Appendix 16.1 (2)</b>). The submission of the CTMP for approval by the relevant highway authority is secured by draft DCO (<b>Document Reference 3.1 (3)</b>) Requirement 7.</p>
8.15	<p><b>Pollution and access to Ship Lane Cemetery SINC</b></p> <p>The local authority is concerned about potential indirect impacts on the SINC during construction and requests a detailed CEMP. (LIR para 8.15.1) This issue was also raised in the local authority's relevant representation.</p> <p>The local authority also requests that access to Ship lane Cemetery will be available at all times during construction. (LIR para 8.15.2)</p>	<p>The local authority's comments on pollution risks to Ship Lane Cemetery SINC are responded to in Table 23.1, paragraphs 23.3.46 to 23.3.47, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>). The local authority's comments on a detailed CEMP are covered in the Applicant's response to <b>Written Question Response DCO.1.33</b>.</p> <p>The Applicant has a commitment to maintain pedestrian access to and from residential, commercial, community and agricultural land uses throughout the construction period in commitment G79 in Table C1 of the CoCP (<b>Document Reference 6.4 Appendix 16.1 (2)</b>) and secured through draft DCO (<b>Document Reference 3.1 (3)</b>) Requirements 5.</p>
8.16	<p><b>Disruption to Farnborough Hill Football and Bowls Club</b></p> <p>The local authority is concerned about impacts on the sports facilities during</p>	<p>The local authority's comments on Farnborough Gate Football and Bowls Club are responded to in Table 4.1, paragraphs 4.3.18 to 4.3.19, and Table 23.1, paragraphs 23.3.48 to 23.3.50, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>).</p>

LIR Para Ref.	LIR raised issue	Response to LIR
	<p>construction, and subsequent restrictions on the future management and use of the pitches. This issue was also raised in the local authority's relevant representation.</p>	<p>Compensation for landowners is covered by the easement agreement and this includes costs incurred by sports clubs. However, the Applicant is seeking clarification on the club(s) impacted and their use of the pitch as at the point of assessment prior to submission of the application for development consent, the Open Space Assessment at Appendix 16.1 to the Planning Statement (<b>Application Document <a href="#">APP-132</a></b>) identified that the pitch looked to be unused and that there was uncertainty as to whether a new club had taken on the lease for the pitch.</p> <p>The Applicant is committed to reinstating all land used temporarily in the construction of the project to an appropriate condition relevant to its previous use, as soon as practicable after construction, as set out in commitment G94 in Table 3.4 and commitment G2 in Table C1 of the CoCP (<b>Document Reference 6.4 Appendix 16.1 (2)</b>), secured through draft DCO (<b>Document Reference 3.1 (3)</b>) Requirement 5.</p>
8.17	<p><b>Tree Loss along the North Downs Railway Green Corridor</b></p> <p>The local authority states that 380m of trees will need to be felled along the railway in order to undertake the directional drill under the Blackwater valley, 180m of which are in Rushmoor borough.</p>	<p>The local authority's LIR statements on the quantum of trees to be felled is not considered to be accurate.</p> <p>As noted by the Council the trenchless crossing starts from Farnborough Hill Football Club's sports pitch. Furthermore, the narrow band of trees along the railway in this area is positioned on or near to the railway embankment, and as a result would be avoided by installation activity.</p>
8.18	<p><b>Habitat loss within Blackwater Valley Frimley Bridge SINC</b></p> <p>The local authority raises a number of concerns about potential impacts during construction, the need for detailed measures to control potential</p>	<p>The local authority's comments on the Blackwater Valley Frimley Bridge SINC are responded to in Table 23.1, paragraphs 23.3.51, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>).</p> <p>The Applicant has a commitment to produce a Construction Environmental Management Plan (CEMP) as set out in commitment G1 in Table C1 of the CoCP (<b>Document Reference 6.4</b></p>

LIR Para Ref.	LIR raised issue	Response to LIR
	pollution, and the need for and adequacy of mitigation. This issue was also raised in the local authority's relevant representation.	<b>Appendix 16.1 (2))</b> and secured through draft DCO ( <b>Document Reference 3.1 (3))</b> Requirement 6.
8.19	<p><b>Decommissioning of the existing and new pipelines</b></p> <p>The local authority states that it cannot find information on decommissioning of the existing or replacement pipeline in the application. It requests an in-combination assessment relating to decommissioning of both pipelines. This issue was also raised in the Local authority's relevant representation.</p>	<p>The Applicant's response to comments on decommissioning is provided in Table 7.1, paragraphs 7.3.1 to 7.3.2, of the Applicant's Responses to Relevant Representations (<b>Document Reference <a href="#">REP1-003</a></b>).</p>



## 7 Surrey County Council

Table 7.1: Applicant's response to Surrey County Council's Local Impact Report

Para Ref.	LIR raised	Response to LIR
3.4.1 to 3.8	<p><b>Minerals and Waste</b></p> <p>Impacts on minerals and waste safeguarding areas, existing minerals or waste sites covered by safeguarding policies in the adopted minerals plan or adopted waste plan, and on land allocated or otherwise identified as suitable for waste or minerals related development in the adopted minerals plan or adopted waste plan.</p>	<p>The Applicant notes that the local authority finds most aspects of its proposals through mineral and waste sites acceptable.</p> <p>The Applicant is in active dialogue with the companies that have land rights or licences for these sites.</p> <p>The Applicant has the details of the conveyor and is in discussions with the operator (Brett Aggregates) to ensure that both projects can proceed as planned. The Applicant's response in respect of these discussions is set out in <b>Written Question Response GQ.1.6</b>.</p> <p>In particular, the Applicant notes that the order limits and limits of deviation give it the flexibility to locate the pipeline route outside Homers Farm to avoid conflict with this mineral site, should that prove necessary.</p>
4.1	<p><b>Local Transport</b></p> <p><b>Works within the highway</b></p> <p>SCC has stated that any party wishing to undertake works affecting the highway are required to obtain a permit before carrying out such works. As the Applicant will be carrying out works that will affect the</p>	<p>With respect to the management and co-ordination of activities on the county's highways, the Applicant is continuing discussions with SCC in respect of the powers sought in the draft Development Consent Order (DCO), its interaction with the New Roads and Street Works Act 1991, the Traffic Management Act 2004 and the South East Permit Scheme as operated by SCC. Any updates on this matter will be reported to the Examining Authority through the Statement of Common Ground (SoCG) between SCC and the Applicant.</p>



Para Ref.	LIR raised	Response to LIR
	highway, SCC is seeking a requirement in the draft DCO to make reference to this permitting scheme, referred to as the South East Permit Scheme (SEPS).	
4.6	<p><b>Local Transport</b></p> <p><b>Transport Assessment</b></p> <p>SCC has commented that the content and extent of the scoping for the TA was acceptable.</p>	The Applicant notes that the scope and assessment is acceptable to SCC.
4.15 to 4.20	<p><b>Local Transport</b></p> <p>Public Rights of Way (PRoWs)</p> <p>SCC acknowledge that there will be some disruption caused to PRoWs and specifically refer to the proposed route through Turf Hill, Lighwater, where the route runs along a Public Bridleway. The Applicant has assured SCC that disruption will be kept to a minimum. SCC set out the users to be taken into account for the different status of PRoWs when</p>	The Applicant notes that the impact on Public Rights of Way (PRoWs) is acceptable to SCC.

Para Ref.	LIR raised	Response to LIR
	exercising powers in the draft DCO to temporarily stop up, divert or restrict public access. SCC request appropriate reinstatement of PRoWs.	
5.7	<p><b>Heritage</b></p> <p>Impact on archaeological Remains of medium – high potential.</p> <p>SCC state that there is a moderate – high potential for previously unknown archaeological remains to be encountered during the project works. SCC comment that discussions are ongoing to develop proposals for trial trench evaluation and further archaeological investigation.</p>	The SCC's comments are noted. The Applicant is in discussion with the SCC Archaeologist to manage the impact of the project in relation to the heritage environment.
5.14 & 5.15	<p><b>Abbeymoor Golf Club</b></p> <p>Impact of a planning application.</p> <p>SCC own the land occupied by Abbeymoor Golf Club and note that there will be an impact on a</p>	<p>The Applicant was consulted by the Council on planning application (LPA Ref. RU.19/0765), as a safeguarding direction is in place. At the time of writing the response, planning permission has not been granted.</p> <p>The Applicant requests the retention of a 3.5m track adjacent to the hedgerow for access to the works. The Applicant has, therefore, requested a condition be imposed preventing the applicant</p>

Para Ref.	LIR raised	Response to LIR
	proposed development at the Golf Club.	<p>building its development over this existing track, which runs along the southern edge of the Applicant's proposal, until the pipeline has been completed. There is no requirement for a permanent right/easement in this location</p> <p>Abbeymoor Golf Club has submitted an amended plan (dwg. no. 1142.L.002[E]) in respect of its planning application which shows the existing track and an accompanying note stating '<i>approx line of 3.5 [m] access track for Esso SLP use for limited period as agreed between applicant &amp; Esso SLP</i>'.</p>
5.16 to 5.24	<p><b>Abbey Rangers Football Club</b></p> <p>Impact on use of sports pitches and impact on the Football Club.</p> <p>SCC are concerned, as landowners, that if the pipeline were to be replaced in the closed football season that there would be damage to the pitches, there would be a severe and detrimental effect on playing conditions for the following season and there would be a financial loss to the Football Club as the summer tournament could not take place.</p>	<p>In terms of the impact on the pitches of the Abbey Rangers Football Club, this is addressed in the Applicant's response to written question PC.1.23. The response sets out the proposed construction methodology across the affected pitches and states that the project would endeavour to make available all of the football pitches for the summer junior football tournament.</p>
5.26	<p><b>Clarendon School</b></p> <p>Impact of construction works.</p>	<p>A meeting took place on 24 October 2019 between the Applicant, the Head Teacher of the school and a representative from the property team at SCC. The Head Teacher confirmed that the</p>

Para Ref.	LIR raised	Response to LIR
	<p>The School is owned by SCC. The proposed Order Limits will cross Clarendon School. SCC have requested that the proposed works will have some impact which needs to be clarified.</p>	<p>school has no issues with the Applicant's proposals. Discussions will continue throughout the project to manage the impact of the project on the operation and safety of the school.</p>

## 8 Surrey Heath Borough Council

Table 8.1: Applicant's response to Surrey Heath Borough Council's Local Impact Reports

Para. Ref.	LIR raised	Response to LIR
2.9	<p><b>Undesignated Trees</b></p> <p>The local authority has raised concerns in relation to the assessment of undesignated mature trees and, their landscape and visual amenity value.</p>	<p>The local authority's concerns regarding the project's approach to trees impacted by the proposed pipeline are addressed Environmental Statement (ES) Chapter 10 Landscape and Visual (<b>Application Document <a href="#">APP-050</a></b>), in the Applicant's Responses to Relevant Representations (Section 3, Table 3.1, paragraphs 3.3.1, 3.3.3 and 3.3.5; and Section 26 Surrey Heath Borough Council, Table 26.1, paragraphs 26.3.23 to 26.3.27 (<b>Application Document <a href="#">REP1-003</a></b>)) and in the responses to <b>Written Question Responses LV.1.8 and LV.1.9</b>.</p> <p>Landscape and visual impacts relating to trees including undesignated notable trees or woodland that could be affected by the project have been assessed. Notable trees within the Order Limits or immediately adjacent to it are identified in Appendix 10.2 Schedule of Notable Trees (see paragraph 10.3.25 of the ES Chapter 10 Landscape and Visual (<b>Application Document <a href="#">APP-050</a></b>) and ES Appendix 10.2 Schedule of Notable Trees (<b>Application Document <a href="#">APP-115</a></b>)).</p> <p>Therefore, the Applicant has assessed trees proportionately and appropriately and as set out in the Applicant's Scoping Report Appendix 3 (<b>Additional Submission <a href="#">AS-019</a></b>).</p>

Para. Ref.	LIR raised	Response to LIR
2.16	<b>Tree Loss</b> <p>The local authority requests the Applicant 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 the Applicant and its contractors will apply to minimise harm to trees, whether or not protected, during pipeline construction.</p>	<p>The Applicant cannot yet confirm the number of trees that would be retained or removed because the detailed construction design necessary to determine the precise location of the replacement pipeline is not required to support the application for development consent. This is normally undertaken prior to construction and as part of the detailed design work on the eventual alignment of the pipeline. However, the details of tree removal and retention, including any protective fencing requirements or other measures, would be set out within the Landscape and Ecological Management Plan. This would be submitted to and approved by the Relevant Planning Authority (Requirement 12 of the draft DCO (<b>Document Reference 3.1 (3)</b>)).</p> <p>Commitment G65 in Table 16.1 of Environmental Statement (ES) Chapter 16 (<b>Application Document APP-056</b>) states that ‘... Where notable trees would be retained within or immediately adjacent to the Order Limits, the trees and their root protection areas would be protected where they extend within the Order Limits and are at risk. This would be by means of fencing or other measures.’</p>
2.18	<b>Verbal commitment by the project to after care of trees in Lightwater</b>	<p>The Applicant does not recognise this statement and believes it to be factually incorrect.</p>
2.30 and 2.40	<b>Construction Environmental Management Plan (CEMP)</b> <p>The local authority requests that the Applicant submits a detailed draft CEMP for consideration during the DCO examination process.</p>	<p>The Applicant has responded to this issue in the response to written question DCO.1.33 relating to the approach to the outline CEMP. Further details can also be found in the Applicant’s <b>Written question Responses DCO.1.34, FR.1.20 and PC.1.6</b>.</p> <p>The production of a detailed CEMP is secured through commitment G1.</p>
2.37	<b>Transport and Highways</b> <p>The local authority requests the addition of various provisions to the</p>	<p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the local authority and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application</b></p>

Para. Ref.	LIR raised	Response to LIR
	scope of the Construction Traffic Management Plan.	<p><b>Document <a href="#">APP-056</a></b>). These commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects; and the Highways Authority will be agreeing CTMP, as per requirement 5. The Applicant will bear these points in mind at the appropriate time for drafting.</p> <p>Additional information can be found in the Applicant's response to <b>Written Question Responses TT.1.1</b> In particular the following commitments broadly cover the issues raised by the local authority: G111, G7, G15, G22, G26, G28 and G31 in the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>).</p> <p>The Applicant has been in discussions with Surrey County Highway Authority, as the Local Highway Authority in the Surrey Heath council area, about the management of the impact of the proposed street works to construct the replacement pipeline. These discussions will be agreed in the Statement of Common Ground (SoCG) and measures would be detailed and agreed in the CTMP.</p>
6.2, 6.5	<p><b>Flooding in Surrey Heath and mitigation measures.</b></p> <p>The local authority requests reassurance that the Applicant's individual proposed flood mitigation measures would be effective and the most appropriate and robust measures to address the issue of the increased risk of flooding.</p>	<p>The applicant is uncertain about the rationale or evidence the local authority has based its conclusion that the flood risk in Surrey Heath is "negative" based on the information provided in its LIR.</p> <p>The Applicant has undertaken a Flood Risk Assessment (<b>Application Document <a href="#">APP-134</a></b>) to assess the project's potential to be impacted by flood risk and to increase flood risk elsewhere in accordance with the policies of NPS-EN-1 and NPS EN-4. The flood resilience of the project has also been covered within the Flood Risk Assessment and ES Chapter 8 Water (<b>Application Document <a href="#">APP-048</a></b>), which includes an assessment of the potential flood risk effects and the proposed flood risk mitigation measures.</p> <p>The Applicant has sought input from the Lead Local Flood Authority and the Environment Agency, for the buried underground replacement pipeline. Furthermore, the Applicant has included good practice measures and mitigation to manage flood risk during construction in the</p>

Para. Ref.	LIR raised	Response to LIR
		<p>REAC, which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>).</p> <p>The applicant notes the local authority's concerns regarding residential flooding in Lightwater. The local authority notes previous flooding was due to a "combination of sewage, surface water and foul water incursions". None of these will be impacted by the project.</p> <p>The Applicant has been in discussions with Surrey County, Surrey Heath Council and the Environment Agency with regards to the impacts of the proposed project on flood risk. These discussions are reported in the SoCG.</p>
6.21	<p><b>St Catherines Road SANG</b></p> <p>The local authority has raised concerns regarding potential significant construction impacts on St Catherine's Road SANG and, as a consequence, the impact on the Thames Basin Heaths SPA.</p>	<p>The Applicant has responded to this issue in <b>Written Question Responses BIO.1.43, BIO.1.47, BIO.1.49, BIO.1.53</b> and in the Applicant's Habitats Regulations Assessment (<b>Application Documents <a href="#">APP-130</a> and <a href="#">APP-131</a></b>). In addition, the Responses to Relevant Representations (Section 26 Surrey Heath Borough Council, paragraphs 26.3.1 to 26.3.14 (<b>Document Reference <a href="#">REP1-003</a></b>)) addresses the local authority's concerns regarding the impact of the project on St Catherines Road Suitable Alternative Natural Greenspace (SANG) and the potential impact on the Thames Basin Heath Special Protection Area.</p> <p>In particular, the Applicant wishes to make the local authority (and Examining Authority) aware that Natural England, in their submission, stated: '<i>Natural England have no serious concerns with this application and will not be objecting to it</i>' (see <b>Additional Submission <a href="#">AS-030</a></b>) and did not raise SANGs as an issue. A Statement of Common Ground has been agreed with Natural England, with all matters relating to the application agreed. (<b>Document Reference <a href="#">REP1-005</a></b>)</p>
6.22, 7.5	<p><b>Construction compounds and St Catherines Road SANG</b></p> <p>The local authority has raised concerns regarding the number of construction compounds within a 1,000 metre stretch of the pipeline.</p>	<p>Temporary logistics hubs and construction compounds required during installation of the pipeline are described in ES Chapter 3 Project Description (<b>Application Document <a href="#">APP-043</a></b>). Areas of high environmental and social sensitivity were avoided where practicable, and the design development sought to reduce potential effects on receptors (see Planning Statement (<b>Application Document <a href="#">APP-132</a></b>)).</p>



Para. Ref.	LIR raised	Response to LIR
	The local authority requests that the ExA invites the Applicant to consider removing the St Catherine's Road construction compound and use the Balmoral Drive construction compound and/or the logistics hub on Deepcut Bridge Road, which connects to St Catherine's Road via Frith Hill Road. This to significantly reduce the impact upon the St Catherine's Road SANG.	<p>The compounds need to be adjacent to the working area. The location and number of construction compounds was determined through a balanced appraisal of the most efficient locations for construction management purposes, while accounting for potential environmental impacts (see Planning Statement (<b>Application Document APP-132</b>)).</p> <p>In the Frimley area, the compound in Balmoral Drive would serve the street works in Balmoral Drive itself. There is a significant change in topography levels between Balmoral Drive and St Catherines Road. It is therefore not possible to serve the street works in St Catherines Road without significant vehicle movements along residential roads. In addition, it should be noted that St Catherines Road is the only road that would be closed to all traffic during construction. Therefore, to serve these works without a compound on St Catherines Road would lead to additional construction traffic on residential roads. The Applicant has sought to balance the need to manage potential disruption for local residents with the impact on the open space at St Catherines Road SANG.</p>
6.26	<p><b>Great Crested Newts</b></p> <p>The local authority requests that ExA seeks specific advice from Natural England on the protection of this newt metapopulation and ensures that appropriate protective measures are provided for in the draft DCO.</p>	<p>The Applicant can confirm that the great crested newt (GCN) ponds in Windlemere SANG are only inside the Order Limits in order to allow for the release of GCN in these locations as part of the project's environmental mitigation.</p> <p>A draft EPS licence for GCN is provided in ES Appendix 7.15 (<b>Application Documents APP-096</b> and <b>APP-097</b>). Natural England issued a LONI on 30 April 2019, stating it is satisfied that the draft EPS licence demonstrates that the legal tests could be met prior to the start of construction. This can be found at the front of the draft EPS licence for GCN (<b>Application Documents APP-096</b>).</p>
6.28, 6.30 and 6.31	<p><b>Landscape and visual effects resulting from Tree loss</b></p> <p>The local authority has raised concerns regarding the Applicant's</p>	<p>The Applicant has responded to the local authority's concerns in the Responses to Relevant Representations (Section 26 Surrey Heath Borough Council, paragraphs 26.3.23 to 26.3.26; in Section 3 Trees, paragraphs 3.3.1 to 3.3.6; and Section 9 Turf Hill, paragraphs 9.3.25 to 9.3.35 (<b>Document Reference REP1-003</b>)). Furthermore, the issue is also addressed in the Applicant's answers to <b>Written Questions Responses LV.1.1 and LV.1.8</b>.</p>

Para. Ref.	LIR raised	Response to LIR
	assessment of impact on trees areas within different areas in the Council.	
6.32 to 6.34	<p><b>Noise, air Quality, and disturbance</b></p> <p>The local authority has raised concerns regarding noise and vibration impacts during construction works, including construction compounds, on local residents at Frimley Green, Balmoral Drive, on Frimley Community Centre and Frimley Baptist Church, and on St Catherine's Road SANG.</p>	<p>The concern raised by the local authority is addressed in the Applicant's <b>Written Question Responses GQ.1.14, PC.1.4, PC.1.6 and PC.1.12 to PC.1.14</b>.</p> <p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the local authority and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document APP-056</b>). Commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects. These include G25, G31, G98, G99, G107, G110 and G111.</p> <p>The Applicant has produced an addendum for ES Appendix 13.3 Noise and Vibration Technical Note (<b>Application Document APP-121</b>). This presents the likely noise effects at each location (see Applicant's Document Reference 8.12). The Applicant has committed to produce a Noise and Vibration Management Plan, Commitment G99 states:</p> <p><i>'The contractor would be required to produce a Noise and Vibration Management Plan for the approval of the relevant planning authority. The Noise and Vibration Management Plan would, having regard to the approved operational hours, set out, where applicable, the best practicable means (BPM) that would be used to reduce noise and vibration during installation'.</i></p>
6.38	<p><b>Disruption during construction</b></p> <p>The local authority has highlighted the concerns of residents in Lightwater in relation to disruption caused by construction activities including problems for anyone selling their</p>	<p>The issues raised relate to the issue of construction through Lightwater and Turf Hill in particular. The Applicant has responded in its Responses to Relevant Representations (Section 9 Turf Hill in <b>Document Reference REP1-003</b>) and the Applicant's to <b>Written Question Responses TH.1.1, TH.1.2, TH.1.3, TH.1.4, TH.1.5, TH.1.13 and TH.1.14</b>. In response to concerns relating to the future sale of property, the Applicant has responded to this issue in its Responses to</p>

Para. Ref.	LIR raised	Response to LIR
	home, noise/dust/fumes during construction, traffic congestion on the Guildford Road, and flood risk linked to removal of trees.	Relevant Representations (Section 9 Turf Hill, paragraphs 9.3.65 and 9.3.66 ( <b>Document Reference <a href="#">REP1-003</a></b> )).
6.39	<b>Disruption during construction and community facilities</b> The local authority has raised concerns regarding potential noise and vibration and highways impacts during construction to community facilities in Frimley Green.	<p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the council and can be found in project commitments listed within the REAC, which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>). These include: G25, G98, G99, G107, G110, G111 and G31.</p> <p>The Applicant has produced an addendum for ES Appendix 13.3 Noise and Vibration Technical Note (<b>Application Document <a href="#">APP-121</a></b>). This presents the likely noise effects at each location (see Applicant's Document Reference 8.12). The effects on traffic and transport can be found in Appendix 13.1, Traffic and Transport Technical Note (<b>Application Document <a href="#">APP-119</a></b>). The overall assessment on communities can be found in ES Chapter 13 (<b>Application Document <a href="#">APP-053</a></b>).</p> <p>The Applicant has committed to produce a Noise and Vibration Management Plan (Commitment G99) and also to produce a Construction Traffic Management Plan (Commitment G111) to help reduce effects to the local community during construction.</p>
6.41 and 6.42	<b>Highways and transport</b>	The Applicant has noted these remarks and has no further comment.
6.43 and 6.44	<b>Security and safety</b>	The Applicant has noted these remarks and has no further comment.



Para. Ref.	LIR raised	Response to LIR
6.47	<b>Historic Environment</b>	The Applicant has noted these remarks and has no further comment.

## 9 Runneymede Borough Council

Table 9.1: Applicant's response to Runneymede Borough Council's Local Impact Report

Para Ref.	LIR raised	Response to LIR
1.20 and 2.27	<p><b>Construction Environmental Management Plan (CEMP)</b></p> <p>The local authority expresses concern regarding the level of detail provided in the Outline CEMP (application document 6.4 – ES appendix 16.2, ref APP-129).</p>	<p>The Applicant has responded to this issue in the response to written question DCO.1.33 relating to the approach to the outline CEMP. Further details can also be found in the answers to written questions DCO.1.34, FR.1.20 and PC.1.6.</p> <p>The production of a detailed CEMP is secured through commitment G1 in the Register of Environmental Actions and Commitments (<b>Application Document <a href="#">APP-056</a></b>).</p>
2.8	<p><b>Undesignated Trees</b></p> <p>The local authority states their concern regarding the assessment of undesignated mature trees, particularly in relation to the accuracy of their landscape and visual amenity value.</p>	<p>The local authority's concerns regarding the project's approach to trees impacted by the proposed pipeline are addressed Environmental Statement (ES) Chapter 10 Landscape and Visual (<b>Application Document <a href="#">APP-050</a></b>), in the Applicant's Responses to Relevant Representations (Section 3 Trees, Table 3.1, paragraphs 3.3.1, 3.3.3 and 3.3.5; and Section 22, Table 22.1, paragraph 22.3.38 (<b>Document Reference <a href="#">REP1-003</a></b>)) and in the Applicant's <b>Written Question Responses LV.1.8 and LV.1.9</b>.</p> <p>Landscape and visual impacts relating to trees including, undesignated notable trees or woodland that could be affected by the project have been assessed. Notable trees within the Order Limits or immediately adjacent to it are identified in Appendix 10.2 Schedule of Notable Trees (see paragraph 10.3.25 of the ES Chapter 10 Landscape and Visual (<b>Application Document <a href="#">APP-050</a></b>) and ES Appendix 10.2 Schedule of Notable Trees (<b>Application Document <a href="#">APP-115</a></b>)).</p> <p>Therefore, the Applicant has assessed trees proportionately and appropriately as set out in the Applicant's Scoping Report (<b>Additional Submission <a href="#">AS-019</a></b>).</p>

Para Ref.	LIR raised	Response to LIR
2.10 – 2.14	<p><b>Trees</b></p> <p>The local authority contends that the likely effects on, and mitigation proposals for trees and woodlands are vague. The council requests a Tree Survey and Protection Strategy from the Applicant to minimise harm to trees, whether protected or not, during pipeline construction.</p>	<p>The Applicant cannot yet confirm the number of trees that would be retained or removed because the detailed construction design necessary to determine the precise location of the replacement pipeline is not required to support the application for development consent. This is normally undertaken prior to construction and as part of the detailed design work on the eventual alignment of the pipeline. However, the details of tree removal and retention, including any protective fencing requirements or other measures, would be set out within the Landscape and Ecological Management Plan. This would be submitted to and approved by the Relevant Planning Authority (Requirement 12 of the draft DCO (<b>Document Reference 3.1 (3)</b>)).</p> <p>Commitment G65 in Table 16.1 of Environmental Statement (ES) Chapter 16 (<b>Application Document <a href="#">APP-056</a></b>) states that ‘... Where notable trees would be retained within or immediately adjacent to the Order Limits, the trees and their root protection areas would be protected where they extend within the Order Limits and are at risk. This would be by means of fencing or other measures.’</p>
2.34	<p><b>Transport and Highways</b></p> <p>The local authority requests the addition of various provisions to the scope of the Construction Traffic Management Plan.</p>	<p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the council and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>). These commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects; and the Highway Authority will be agreeing a CTMP, as per requirement 5. The Applicant will further consider these points at the appropriate time for inclusion in the drafting.</p> <p>Additional information can be found in the Applicant’s response to <b>Written Question Response TT.1.1</b>. In particular the following commitments broadly cover the issues raised by the council: G7, G15, G22, G26, G28, G31 and G111 in the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>).</p>

Para Ref.	LIR raised	Response to LIR
		The Applicant has been in discussions with Surrey County Highway Authority, as the Local Highway Authority in the Runnymede Borough Council Area, about the management of the impact of the proposed street works to construct the replacement pipeline. These discussions will be agreed in the Statement of Common Ground (SoCG) and measures would be detailed and agreed in the CTMP.
2.35 – 2.38	<b>Residential Amenity</b> The local authority raises its concern in relation to the level of detail given in the outline CEMP in terms of the impact on residential amenity, and the repeated disclaimer that it will be the contractor's responsibility to agree the details with relevant local authorities.	<p>The concern raised by the local authority is addressed in the Applicant's <b>Written Question Responses GQ.1.14, PC.1.4, PC.1.6 and PC.1.12 to PC.1.14.</b></p> <p>The impact of any disruption to people and communities as a result of significant effects from noise and vibration has been assessed within the Environmental Statement. These effects are not considered in isolation since this is considered to double count the effects that have been assessed in individual chapters and appendices. This approach represents best practice and professional experience of assessments of this nature and is considered a proportionate approach for the Environmental Impact Assessment.</p> <p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the council and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document APP-056</b>). Commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects.</p>
3.12, 3.18	<b>Salesian School</b> The local authority expresses its concerns in relation to the impact at Salesian School, and requests a written statement from Esso on its proposals for the reinstatement of the rugby pitch including whether any	<p>The Applicant is actively engaging with the school, as the landowner. The Applicant is aware of the future plans for the sports pitches and is working with the school to manage the impact of the project on these facilities.</p> <p>The Applicant has set out commitments within the Register of Environmental Actions and Commitments (REAC) in ES Chapter 16 (<b>Application Document APP-056</b>) which address the Council's items of concern relating to reinstatement of the sports pitches. Commitment G94 in the REAC states that '<i>Land used temporarily would be reinstated to an appropriate condition</i></p>



Para Ref.	LIR raised	Response to LIR
	restrictions would be placed on the use of groundskeeping machinery over the pipeline corridor and whether the new sports pavilion would be retained. Concerns are also raised in relation to the impacts of construction vehicles accessing the site at the school.	<p><i>relevant to its previous use</i>, which will be secured through DCO Requirement 5 (Code of Construction Practice), and commitment G173 states, '<i>The project would consult with educational facilities within the Order Limits to co-ordinate where practicable the construction timetable to reduce impacts</i>'. This is secured through both the CoCP and the CEMP by Requirements 5 and 6 of the draft DCO (<b>Document Reference 3.1 (3)</b>).</p> <p>As stated in Planning Statement Chapter 16 – Open Space (<b>Application Document <a href="#">APP-132</a></b>), in relation to the replacement rugby and football pitches at Salesian School, it is proposed to use open cut construction through this site before using a trenchless technique to cross the main school campus and the M25 motorway (paragraph 16.4.43).</p> <p>Access into the main school ground would only be needed to monitor the progression of the drill, which may not be required.</p> <p>There would be no restriction on the use of groundskeeping machinery over the pipeline once installed.</p>
3.13 - 3.16	<p><b>Residential amenity and proposed Construction Compound CO 5L</b></p> <p>In relation to use of low levels of luminosity at compounds near to residential property, the local authority notes that no explicit means of enforcing this is stated in the DCO. The council also requests that a new provision is added to the DCO requirements so that the CEMP includes a 'Construction Lighting Strategy'.</p>	<p>The concern raised by the local authority is addressed in the Applicant's <b>Written Question Responses GQ.1.14, and PC.1.12 to PC.1.14</b>.</p> <p>There are specific lighting commitments relating to construction compounds in the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>). These are secured through the DCO consent through requirement 6.</p> <p>Specifically, the following commitments to cover the control of artificial lighting are found in the REAC:</p> <p>Commitment G25: 'Any activity carried out or equipment located within a logistics hub or construction compound that may produce a noticeable nuisance from dust, noise, lighting etc. would be located away from sensitive receptors such as residential properties or ecological sites</p>



Para Ref.	LIR raised	Response to LIR
		<p>where practicable.’ This is secured through DCO Requirement 5 (CoCP) (<b>Document Reference 6.4 Appendix 16.1 (2)</b>).</p> <p>Commitment G45: ‘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.’ This is secured through DCO Requirement 5 (CoCP).</p>
3.27	<p><b>Access to properties during street works in residential roads</b></p> <p>The local authority expresses its desire for clarification on the local highways impact on Canford Drive and Roakes Avenue, requesting the opinion of Surrey County Council.</p>	<p>The Applicant has discussed the impact of construction of the pipeline on roads with the relevant Highways Authority. The Applicant is not aware of any concerns relating to these roads from Surrey County Council. In addition, the Applicant has undertaken a Transport Assessment, the scope of which was agreed with the Local Highway Authorities, and which concluded that there are no significant impacts on the transport network. The production of a Construction Traffic Management Plan which will be agreed with the Local Highway Authorities would set out the good practice measures required.</p> <p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the council and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>). Commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects.</p> <p>the Applicant has adopted commitment G79 ‘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 temporary diversions. The means of access would be communicated to affected parties at least two weeks in advance.’</p> <p>In addition, the Applicant would adopt a Community Engagement Plan (see commitment G31) which would manage the process to inform local residents of the proposed works and impacts locally.</p>

Para Ref.	LIR raised	Response to LIR
3.35 – 3.39	<p><b>Noise and Vibration</b></p> <p>The local authority notes that there is no noise and vibration chapter in the ES and instead a Noise and Vibration Technical Note is provided as ES Appendix 13.3 (application document 6.4, ref. APP-121). The council requests written clarification of the actual likely effects upon receptors in Canford Drive and the proposed mitigation measures.</p>	<p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the local authority and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document APP-056</b>). Commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects. These include G25, G31, G98, G99, G107, G110 and G111.</p> <p>The Applicant has produced an addendum for ES Appendix 13.3 Noise and Vibration Technical Note (<b>Application Document APP-13.3</b>). This presents the likely noise effects at each location (see Applicant's Document Reference 8.12). Canford Drive is likely to experience significant noise effects before mitigation. The Applicant has committed to produce a Noise and Vibration Management Plan, Commitment G99 states:</p> <p><i>'The contractor would be required to produce a Noise and Vibration Management Plan for the approval of the relevant planning authority. The Noise and Vibration Management Plan would, having regard to the approved operational hours, set out, where applicable, the best practicable means (BPM) that would be used to reduce noise and vibration during installation'.</i></p> <p>In addition, the Applicant has included a revised commitment (G107) to further reduce the significant effects as follows:</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 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> </ul>

Para Ref.	LIR raised	Response to LIR
		<ul style="list-style-type: none"> <li>• <i>Canford Drive, Roakes Avenue, Chertsey Road and Addlestone Moor, Addlestone, Surrey</i></li> <li>• <i>Station Road and Station Approach, Ashford, Surrey.</i></li> </ul> <p>With the existing good practice measures and the revised commitment in place, the conclusions of the noise addendum are that there would be no residual significant effects at Canford Drive.</p>
3.41, 3.42	<p><b>Abbey Rangers</b></p> <p>The local authority expresses its concerns in relation to the impacts on Abbey Rangers Football Club playing pitches and seeks further information on the proposals for construction of the pipeline and reinstatement of the pitches.</p>	<p>In terms of the impact on the pitches of the Abbey Rangers Football Club, this is addressed in the Applicant's <b>Written Question Response PC.1.23</b>.</p>
3.68 - 3.70	<p><b>Chertsey Meads</b></p> <p>The local authority requests the provision of a detailed Construction Environmental Management Plan given the high ecological value of Chertsey Meads Local Nature Reserve and asserts that the impacts cannot conclusively be assessed as minor without 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.</p>	<p>The Applicant has responded to the local authority's concern regarding Chertsey Meads in the Responses to Relevant Representations (Section 22 Runnymede Borough Council, paragraphs 22.3.26 to 22.3.30 (<b>Document Reference <a href="#">REP1-003</a></b>)) and the Applicant's <b>Written Question Response PC.1.24</b>.</p> <p>Chertsey Meads LNR and SNCI are assessed within the ES, including paragraphs 7.5.458 to 7.5.466 in Chapter 7 (Application Document APP-047). The position of the Order Limits has been aligned based on consultation responses from Runnymede Borough Council. Paragraph 7.5.460 states 'the pipeline across Chertsey Meads would be constructed largely by open cut. However, the working width would be reduced to 15m positioned towards the western half of the Order Limits (to reduce impacts to Lowland Meadows Priority Habitat) and ground protection matting would be used over an approximate distance of 720m (grid ref: TQ05626 66084 to TQ05972 66563). Turf would be stripped, stored and reinstated above the trench for an</p>

Para Ref.	LIR raised	Response to LIR
		<p>approximate distance of 125m between approximate grid references TQ 05958 66596 to TQ 05997 66480 (NW29) (Figure 7.5). This would reduce the habitat potentially impacted to 3.82ha'.</p> <p>The Applicant is confident that with the good practice measures set out within the REAC and CoCP that the effect on Chertsey Meads LNR would be minor adverse (as stated in paragraph 7.5.466). The LEMP would set out details around vegetation removal and reinstatement at the site. The LEMP would be submitted to the relevant planning authorities for their approval in accordance with Requirement 12 of the draft Development Consent Order (DCO) (<b>Document Reference 3.1 (3)</b>).</p>
3.83	<p><b>Ancient Woodland</b></p> <p>The local authority reiterates its concern over the potential adverse effects of pipeline construction on Fan Grove Ancient Woodland, including the potential for the works to conflict with paragraph 175 of the NPPF. The council request that the Examining Authority seeks site-specific clarification on how harm to the woodland would be minimised.</p>	<p>Fan Grove is located outside of the Order Limits, along a section of the route that would be crossed using trenchless techniques (TC-028), see ES Appendix 3.1 (<b>Application Document APP-075</b>). This trenchless crossing is embedded in the application design. There are unlikely to be any impacts to this area of ancient woodland.</p>
3.85	<p><b>Cumulative Effects</b></p> <p>The local authority raises concerns in relation to the cumulative assessment of other major infrastructure projects taking place in the borough and seeks assurance from the Applicant that the effects of these projects have been assessed and continue to be</p>	<p>The long list of developments considered in ES Chapter 15 Cumulative Effects (<b>Application Document APP-055</b>) includes the River Thames Scheme, the proposed Heathrow Expansion and the Southern Rail Link.</p>



Para Ref.	LIR raised	Response to LIR
	monitored so that any significant adverse effects are avoided or mitigated. These projects include the River Thames Scheme, the impacts of the proposed Heathrow Expansion and potentially the Southern Rail Extension from London to Heathrow.	

## 10 Spelthorne Borough Council

Table 10.1: Applicant's response to Spelthorne Borough Council's Local Impact Report

Para Ref.	LIR raised	Response to LIR
	<b>Trees</b>	
4.8	<p><b>Undesignated trees</b></p> <p>The local authority has raised concerns in relation to the assessment of undesignated mature trees and their landscape and visual amenity value.</p>	<p>The local authority's concerns regarding the project's approach to trees impacted by the proposed pipeline are addressed in Environmental Statement (ES) Chapter 10 Landscape and Visual (<b>Application Document APP-050</b>), in the Applicant's Response to Relevant Representation (Section 3, Table 3.1, paragraphs 3.3.1, 3.3.3 and 3.3.5. and in Section 24 Spelthorne Borough Council, Table 24.1, paragraphs 24.3 49 to 24.3.52 (<b>Document Reference REP1-003</b>)) and in the Applicant's <b>Written Question Responses LV.1.8 and LV.1.9</b>.</p> <p>Landscape and visual impacts relating to trees including undesignated notable trees or woodland that could be affected by the project have been assessed. Notable trees within the Order Limits or immediately adjacent to it are identified in, Appendix 10.2 Schedule of Notable Trees (see paragraph 10.3.25 of the ES Chapter 10 Landscape and Visual (<b>Application Document APP-050</b>) and ES Appendix 10.2 Schedule of Notable Trees (<b>Application Document APP-115</b>)).</p> <p>Therefore, the Applicant has assessed trees proportionately and appropriately as set out in the Applicant's Scoping Report Appendix 3 (<b>Additional Submission AS-019</b>).</p>
4.13 4.14	<p><b>Tree Survey and Protection Strategy</b></p> <p>The local authority requests the Applicant to submit a Tree Survey and Protection Strategy for consideration during the DCO examination process. The Strategy should explain in detail</p>	<p>The Applicant cannot yet confirm the number of trees that would be retained or removed because the detailed construction design necessary to determine the precise location of the replacement pipeline is not required to support the application for development consent. This is normally undertaken prior to construction and as part of the detailed design work on the eventual alignment of the pipeline. However, the details of tree removal and retention, including any protective fencing requirements or other measures, would be set out within the Landscape and</p>

Para Ref.	LIR raised	Response to LIR
	the working principles that the Applicant and its contractors will apply to minimise harm to trees, whether or not protected, during pipeline construction.	Ecological Management Plan. This would be submitted to and approved by the Relevant Planning Authority (Requirement 12 of the draft DCO ( <b>Document Reference 3.1 (3)</b> )).  Commitment G65 in Table 16.1 of Environmental Statement (ES) Chapter 16 (Application Document APP-056) states that ‘... Where notable trees would be retained within or immediately adjacent to the Order Limits, the trees and their root protection areas would be protected where they extend within the Order Limits and are at risk. This would be by means of fencing or other measures.’
5.29 5.30	<b>Landscape and visual effects including trees</b>  A belt of priority habitat deciduous woodland identified by Natural England runs on the northern side of the M3 above area of the trenchless crossing (trenchless section no. TC035). The ES appears not to specifically identify this area of trees.	The Applicant has considered priority habitat identified by Natural England in the design, assessment and commitments for the replacement pipeline.  The belt of trees on the northern side of the M3 Motorway is not contained on the Priority Habitat Inventory. As the local authority has commented, this belt of trees is above the trenchless installation (TC035). And therefore would not be affected.
6.27 6.28	<b>Trees along Ashford Road</b>  The Order Limits for the Ashford Road section of the proposed pipeline include the full width of the Ashford Road carriageway along with the verge on the eastern edge of the road up to the designation of the TPO (listed as TPO75 in the General Arrangement Plans). Paragraph 10.2.33 in Chapter 10: Landscape and visual of the ES (application	A response to the local authority’s concerns regarding trees on Ashford Road can be found in ES Chapter 10 Landscape and Visual ( <b>Application Document <a href="#">APP-050</a></b> ), in the Applicant’s Response to Relevant Representation (Section 3 Trees, Table 3.1, paragraphs 3.3.3 and 3.3.5; Section 11 Ashford Road, Table 11.1, paragraphs 11.3.25 and 11.3.26; and in Section 24 Spelthorne Brough Council, Table 24.1, paragraphs 24.3.49 to 24.3.52 ( <b>Document Reference <a href="#">REP1-003</a></b> )) and in the Applicant’s <b>Written Question Responses LV.1.8 and LV.1.9</b> .  There are a number of trees along the verge of Ashford Road. At the time of application, none of these were on the Ancient Tree Inventory (Woodland Trust), but since this time, three trees have been added to the inventory as veteran trees (Ancient Tree Inventory, Woodland Trust, <a href="https://ati.woodlandtrust.org.uk/">https://ati.woodlandtrust.org.uk/</a> ). The Applicant has surveyed the trees along Ashford Road and



Para Ref.	LIR raised	Response to LIR
	<p>document 6.2, ref. APP-050 refers to the landscape impacts as being largely temporary, on the basis that vegetation can recover.</p> <p>The local authority is concerned that the loss of mature and valued trees from the landscape cannot be dismissed as temporary and that the effects of these losses on local receptors, including ecological receptors, has not been quantified and has been undervalued in the pipeline application, such that additional mitigation or avoidance measures have not been sought.</p>	<p>has estimated root protection areas for these. This information would be used to inform the pipeline routeing during detailed design at this location.</p> <p>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 design measures, good practice measures and mitigation required to reduce potentially significant effects that relate to trees.</p>
	<b>Ecology and Biodiversity</b>	
4.27	<p><b>Construction Environmental Management Plan (CEMP)</b></p> <p>An outline CEMP has been submitted by the Applicant (ES Appendix 16.2, ref. APP-130), but the local authority is 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 local authorities. It is requested that the ExA invites the</p>	<p>The Applicant has responded to this issue in the response to written question DCO.1.33 relating to the approach to the outline CEMP. Further details can also be found in the Applicant's <b>Written Question Responses DCO1.34, FR1.20 and PC.1.6</b>.</p> <p>The production of a detailed CEMP is secured through commitment G1 (<b>Application Document <a href="#">APP-056</a></b>).</p>



Para Ref.	LIR raised	Response to LIR
	applicant to submit a detailed draft CEMP within a reasonable timeframe during the current DCO examination for consideration.	
5.22 to 5.27	<p><b>Effects in relation to ecology and biodiversity</b></p> <p>Subject to the views of Natural England, the local authority is satisfied that the trenchless crossing on the edge of Dumsey Meadows SSSI would not lead to an adverse effect in regard to the integrity of the site, as all works in this area will be below the surface.</p>	The Applicant has noted these remarks and has no further comment. Natural England has confirmed through a signed Statement of Common Ground that they have no outstanding issues relating to the project ( <b>Document Reference</b> <a href="#">REP1-005</a> ).
	<b>Transport and Highways</b>	
4.33 4.34	<p><b>Transport and Highways</b></p> <p>The local authority requests the addition of various provisions to the scope of the Construction Traffic Management Plan</p>	<p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the local authority and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document</b> <a href="#">APP-056</a>). These commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects; and the Highways Authority will be agreeing CTMP, as per requirement 5. The Applicant will bear these points in mind at the appropriate time for drafting.</p> <p>Additional information can be found in the Applicant's <b>Written Question Response TT.1.1</b>. In particular the following commitments broadly cover the issues raised by the council: G7, G15, G22, G26, G28, G31 and G111 in the Register of Environmental Actions and Commitments</p>

Para Ref.	LIR raised	Response to LIR
		<p>(REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document <a href="#">APP-056</a></b>).</p> <p>The Applicant has been in discussions with Surrey County Highway Authority, as the Local Highway Authority in the Spelthorne Borough Council Area, with regard to the management of the impact of the proposed street works to construct the replacement pipeline. These discussions will be agreed in the Statement of Common Ground (SoCG) and measures would be detailed and agreed in the CTMP.</p>
6.13 6.14 6.15	<p><b>Effects on highways and traffic – Ashford Road and Kingston Road</b></p> <p>The local authority raised the issue that the B377 Ashford Road is a well-used route into the town centre of Ashford from the south and is an important and well-used route running between Chertsey and Laleham to the south and Ashford to the north; and that Ashford Road is a bus route and is frequented by vehicles running to and from the local authority's White House Depot, located on Kingston Road at the northern end of Ashford Road.</p>	<p>The Applicant has responded to this issue in the Response to Relevant Representation (Section 24 Spelthorne Borough Council, Table 24.1, paragraph 24.3.56 (<b>Document Reference <a href="#">REP1-003</a></b>)).</p> <p>The Applicant is aware of the need to maintain access to the White House Depot and this has led to the proposed trenchless crossing of Ashford Road and Kingston Road to ensure that this busy interchange, including the access to the White House Depot, is maintained. The details of the proposed trenchless crossing (TC038) are shown on the General Arrangement Plans, Sheet numbers 51 and 52; and 120 and 124 (<b>Additional Submission <a href="#">AS-009</a></b>). In addition, the Applicant confirms that there would be traffic management in place where the open cut works take place along Ashford Road itself to manage the impact of the works on the road network.</p>
8.20 8.21 9.7	<p><b>Access around Ashford in relation to: HMP Bronzefield</b></p>	<p>The access to HMP Bronzefield is treated as a highway and will not be closed but may be subject to traffic management measures.</p> <p>The Applicant has adopted commitment G79 'Pedestrian access to and from residential, commercial, community and agricultural land uses would be maintained throughout the</p>

Para Ref.	LIR raised	Response to LIR
9.8 9.9	<p>The local authority notes that the proposed pipeline would cross the entrance road to HMP Bronzefield in an open-cut section. Vehicular access needs to be maintained at all times for these traffic movements and for any emergency responses.</p> <p><b>Effects on the retail centre at the Station Approach area during construction</b></p> <p>The local authority raised concerns that there is a risk that pipeline construction will worsen trading conditions. Shops might be partly hidden by construction hoarding and severed from normal pedestrian flows.</p> <p><b>Effects on use of the railway station</b></p> <p>Station Approach provides the sole means of vehicular access to Ashford station.</p>	<p>construction period. Vehicle access would be maintained where practicable. This may require signed temporary diversions. The means of access would be communicated to affected parties at least two weeks in advance.'</p> <p>In the Ashford Station area, a trenchless crossing is proposed under Church Road (B378), which will involve the excavation of a pit in Station Road. However, Station Road is a one-way circulation system for Ashford Station and while the road layout will be amended, the circulation system will be unaffected. The Station will remain open and access to the Station car park maintained (<b>Application Document APP-132</b>).</p> <p>In addition, the Applicant would adopt a Community Engagement Plan (see commitment G31 in the Code of Construction Practice (<b>Document Reference 6.4 Appendix 16.1 (2)</b>)) which would manage the process to inform local residents of the proposed works and impacts locally.</p> <p>In line with these commitments access to the retail centre will be maintained and as part of the community engagement plan the Applicant will liaise with the local businesses.</p>
	<b>Residential Amenity</b>	
8.17	<b>Construction compound 51 (Works CO-5Q), Woodthorpe Road</b>	The concern raised by the local authority is addressed in the Applicant's <b>Written Question Responses GQ.1.14 and PC.1.12 to PC.1.14</b> .

Para Ref.	LIR raised	Response to LIR
	<p>Compound No. 5Q is sited on a large rectangular parcel of land with access from Woodthorpe Road.</p> <p>Of greater concern to the local authority are the effects on residential amenity, particularly for residents living opposite compound CO 5Q and in Ashford Close immediately to the east.</p> <p>In this context the local authority 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 affected residents when setting up this and other construction compounds in Spelthorne.</p>	<p>The Applicant has considered the impacts on residential amenity within Environmental Statement Chapter 13 (<b>Application Document APP-053</b>) and has included commitments in the REAC to cover the control of dust, including the production of a Dust Management Plan (Commitment G30) and noise and vibration including the production of a Noise and Vibration Management Plan (Commitment G99). These would be approved but the relevant planning authorities.</p>
	<b>Hydrology and flood risk</b>	
5.19 5.21	<p><b>Effects in relation to hydrology and flood risk</b></p> <p>The local authority requests clarity on what would actually happen should a dynamic contaminated water problem arise.</p>	<p>The Applicant has undertaken a review of existing information which has been further informed by bore holes to understand the existing environment along the route.</p> <p>In relation to contamination risks, Requirement 10 of the draft DCO (<b>Document Reference 3.1 (3)</b>) and commitments G71 and G150 are adopted by the Applicant and are proactive measures to manage the potential impact of the project. Commitment G71 states that: <i>'For areas where</i></p>

Para Ref.	LIR raised	Response to LIR
	<p>The land to the north of the proposed logistics hub near the Littleton Lane trading estate is a former landfill site. The local authority seeks reassurance that suitable control measures specific to this issue will be provided in the CEMP (DCO Requirement 6). In this respect it is noted that Requirement 10: Contaminated land and groundwater of the draft DCO is reactive and only covers problems arising once the authorised development is underway.</p>	<p><i>potential contamination is known or strongly suspected to be present as a result of past activities, the following would also be undertaken:</i></p> <ul style="list-style-type: none"> <li><i>ground investigation information would be shared and developed as appropriate;</i></li> <li><i>risks to receptors would be assessed, and mitigation and working methods to control those risks would be developed. Risks would include: encountering contaminated dust, soils and groundwater; and where the presence of ground gas and/or vapours may lead to confined space risks, such as in excavations;</i></li> <li><i>a Suitably Experienced Person (SEP) would ensure that risk areas are identified, working methods followed and mitigation carried out appropriately;</i></li> <li><i>made ground and materials known or strongly suspected of being contaminated would be segregated from natural and inert materials; and</i></li> <li><i>ground arisings deemed unsuitable for re-use within the project would be disposed of appropriately for example to a soil treatment centre or landfill.'</i></li> </ul> <p>Should an unexpected dynamic contaminated water problem arise during construction, that was unforeseen, the Applicant would comply with Requirement 10.</p>
	<b>People and communities</b>	
9.12 9.18	<b>Clarendon School</b>	<p>The Applicant has met several times with the Head Teacher of Clarendon School, most recently on the 24 October 2019. The Head Teacher confirmed that the school has no issues with the Applicant's proposals. Discussions will continue throughout the project to manage the impact of the project on the operation and safety of the school.</p> <p>Commitment G173 states: 'the project would consult with educational facilities within the Order Limits to co-ordinate where practicable the construction timetable to reduce impacts'. This is secured through DCO Requirement 5 (CoCP) and Requirement 6 (CEMP).</p>

Para Ref.	LIR raised	Response to LIR
6.36	<p><b>Effects on the operation of the local authority's White House Depot</b></p> <p>The local authority's main operational base for community services including waste and recycling and grounds maintenance is the White House Depot at the northern end of Ashford Road. From this depot the primary route to the southern half of the borough is Ashford Road.</p>	<p>The Applicant has responded to this issue in the Responses to Relevant Representations (Section 24 Spelthorne Borough Council, paragraph 24.3.56 (<b>Document Reference <a href="#">REP1-003</a></b>)).</p> <p>The Applicant is aware of the need to maintain access to the White House Depot and this has led to the proposed trenchless crossing of Ashford Road and Kingston Road to ensure that this busy interchange, including the access to the White House Depot, is maintained. The details of the proposed trenchless crossing (TC038) are shown on the General Arrangement Plans, Sheet numbers 51 and 52; and 120 and 124 (<b>Additional Submission <a href="#">AS-009</a></b>). In addition, the Applicant confirms that there would be traffic management in place where the open cut works take place along Ashford Road itself to manage the impact of the works on the road network.</p>
5.28 6.37	<p><b>Green Belt</b></p> <p>Because the pipeline is underground the local authority is satisfied that there would be no conflict with green belt policy as set out in saved policy GB1 of the Spelthorne Borough Local Plan 2001 or section 13 of the NPPF.</p>	<p>The Applicant has noted these remarks and has no further comment.</p>
7.16 to 7.21  7.22 to 7.29	<p><b>Celia Crescent and Fordbridge Park</b></p> <p>There is a lack of detail about the effects of construction traffic on Celia Crescent. Residents have expressed their concern to the local authority about this matter. During the current DCO examination it is requested that ExA seeks a written statement from Esso on how construction traffic for</p>	<p>Following the final route release the Applicant published an information sheet on Celia Crescent to provide more information on the proposals and how installation is likely to take place. This is referenced in section 7.3.6 and can be viewed in Appendix 7.9 of the Consultation Report (<b>Application Document <a href="#">APP-032</a></b>)</p> <p>The Applicant has responded to the local authority's concerns and local resident's concerns relating to the proposed works in this location. Please see the Responses to Relevant Representation (Section 12 Celia Crescent/Fordbridge Park, paragraphs 12.3.13, 12.3.14,</p>

Para Ref.	LIR raised	Response to LIR
	the works in Fordbridge Park will be managed in liaison with local residents.	12.3.15, 12.3.16, 12.3.22 and 212.3.23; and Section 24 Spelthorne Borough Council, paragraphs 24.3.53 to 24.3.55 ( <b>Document Reference <a href="#">REP1-003</a></b> )).  On a day-to-day basis, the Applicant would aim to use the gate only for small vehicles such as vans to avoid the need to travel through the park itself. Such vehicle movements would typically be at the start and end of the working day.
8.12	<b>Woodthorpe Road Play Area</b>  During the current DCO examination it is requested that ExA seeks a written statement from Esso on its proposals for the reinstatement of the Woodthorpe Road play area and any arrangements for temporary alternative play facilities.	The reinstatement of the play area on Woodthorpe Road is secured through commitment G94 in the REAC, which states: ' <i>Land used temporarily would be reinstated to a similar style and quality to those that are removed, with landowner agreement</i> ' and a specific commitment to the CoCP to secure the Local Equipped Area for Play (LEAP) in Woodthorpe Road (Commitment OP07 within the revised CoCP ( <b>Document Reference 6.4 Appendix 16.1 (2)</b> )). This is secured through the CoCP in Requirement 5 of the draft DCO ( <b>Document Reference 3.1 (3)</b> )).  The Applicant is in discussions with the Local Authority regarding the details of the reinstatement of this play area, and outcomes will be reported through the SoCG.
	<b>Planning and Environmental Designations</b>	
10.7 10.8 10.9	<b>Allocation A11:</b> Play area west of Edward Way and south of the A30 Staines Road  The northern half of the field of scrubland to the west of Edward Way and south of the A30 Staines Road is subject to Allocation A11: Land to the West of Edward Way, Ashford (P/019/O) in the Spelthorne Local Development Framework Allocations	The local authority states in their Local Impact Report that this play area is an allocation and has not been implemented. The Applicant understands that there are no current plans to meet this allocation and that, from engagement with the local authority, this allocation is unlikely to be secured in the near future. The presence of the replacement pipeline, once completed, would have no long-term impact on the use of this land as a play area.



Para Ref.	LIR raised	Response to LIR
	Development Plan Document, adopted in December 2009.	
	<b>Noise and Vibration</b>	
6.19	<p><b>Sensitive receptors along Ashford Road</b></p> <p>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). This Technical Note does not identify any residential receptors to be significantly affected along Ashford Road, with the implication that the noise and vibration mitigation measures outlined in the technical note do not apply to Ashford Road.</p>	<p>The concern raised by the local authority is addressed in the Applicant's <b>Written Question Responses GQ.1.14, PC.1.4, PC.1.6 and PC.1.12 to PC.1.14.</b></p> <p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the local authority and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document APP-056</b>). Commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects. These include G25, G31, G98, G99, G107, G110 and G111.</p> <p>The Applicant has produced an addendum for ES Appendix 13.3 Noise and Vibration Technical Note (<b>Application Document APP-121</b>). This presents the likely noise effects at each location (see Applicant's Document Reference 8.12). The only receptors along Ashford Road likely to experience significant noise effects are Fordbridge Park and Fourth Ashford Scout Group. The Applicant has committed to produce a Noise and Vibration Management Plan, Commitment G99 states:</p> <p><i>'The contractor would be required to produce a Noise and Vibration Management Plan for the approval of the relevant planning authority. The Noise and Vibration Management Plan would, having regard to the approved operational hours, set out, where applicable, the best practicable means (BPM) that would be used to reduce noise and vibration during installation'.</i></p>
6.22, 6.23 6.24	<b>Time to construct along Ashford Road</b>	<p>The Applicant has carried out a cumulative effects assessment in ES Chapter 15 (<b>Application Document APP-055</b>) which has assessed the intra-project impacts and concluded that there are no significant impacts in any single location as a result of construction activity.</p>



Para Ref.	LIR raised	Response to LIR
	<p>Given the potential longevity of trenchless construction and the fact that the trenchless crossing point is in close proximity to the valve location, the local authority is concerned that the cumulative effect on receptors and the identification of suitable mitigation measures has not been adequately considered.</p>	<p>The Applicant has adopted good practice measures to manage the impact of construction and these broadly reflect the issues raised by the council and can be found in project commitments listed within the Register of Environmental Actions and Commitments (REAC), which is included within Chapter 16 Environmental Management and Mitigation (<b>Application Document APP-056</b>). These commitments include embedded design measures, good practice measures and mitigation required to reduce potentially significant effects, examples include;</p> <p>G1 – ‘A Construction Environmental Management Plan (CEMP) would be produced in line with the Outline CEMP. It would explain how the activities of sub-contractor(s) comply with its requirements and include subsidiary plans such as the management of waste and soils.’</p> <p>G2 – ‘The contractor(s) would provide a series of reviewed method statements. The number of construction activities subjected to this process would be decided on a risk-based approach and could include site preparation, pipe-laying, trenchless crossings and reinstatement. Each method statement would include the measures that need to be undertaken to meet the requirements outlined in the CEMP. All method statements would be reviewed and accepted by the Employer’s Representative.’</p> <p>G23 – ‘All plant and vehicles would be required to switch off their engines when not in use and when it is safe to do so.’</p> <p>G98 – ‘Noise and vibration from construction plant and machinery impacts would be mitigated by adopting measures in the following hierarchy:</p> <ul style="list-style-type: none"> <li>• control at source – for example the selection of quieter equipment;</li> <li>• the choice of location for equipment on site;</li> <li>• control of working hours; and</li> <li>• the provision of acoustic enclosures around equipment or barriers around work sites.’</li> </ul>

Para Ref.	LIR raised	Response to LIR
		Therefore, the likely effects and good practice measures have been considered in the construction of the replacement pipeline and more specifically for residents in the Ashford Road area.
6.25	<p><b>Related considerations - mud</b></p> <p>The two trenchless crossings proposed on Ashford Road would employ the horizontal directional drilling (HDD) method that will create muds that need to be treated. Paragraph 3.4.62 of ES Chapter 3: Project description (application document 6.2, ref. APP-043) states that ‘when the works are within an urban environment and it is not possible to have on-site treatment facilities, the mud would be removed from site using a sealed tanker’. The Council is concerned that the effects of managing mud arisings, including noise, drainage and tanker movements, has not been assessed clearly in the Applicant’s ES such that the local impacts can be understood</p>	<p>The ES has considered the full range of activities, and sub activities needed to install the pipeline, this includes the management of HDD and the resulting mud. It would not be appropriate to assess individual sub activities of installation within the ES, which covers the totality of installation activity and impacts.</p> <p>The ES has considered effects relating to the management of mud. Paragraph 3.4.62 of ES Chapter 3 Project Description (<b>Application Document <a href="#">APP-043</a></b>) states: ‘<i>When the works are within an urban environment and it is not possible to have on-site treatment facilities, the mud would be removed from site using a sealed tanker. The mud can then be dried and reused at a later date.</i>’ The Applicant has included Commitment G20 which manages the impact of construction and states ‘Water assisted road cleaners would be deployed on public roads where necessary to prevent excessive dust or mud deposits’.</p> <p>The Applicant has included the vehicle movements for construction are assessed in the Transport Assessment which concludes that the volume of traffic generated by construction would not be significant on the transport network. The assessment considered heavy goods vehicles and does not breakdown to specific activities and associated vehicles because the numbers are:</p> <p>The noise assessment has assessed the impact of construction traffic movements and the machinery on site, was no significant impact (ES Appendix 13.3 Section 5.2 <b>Application Document <a href="#">APP-121</a></b>).</p>

## 11 London Borough of Hounslow

**Table 11.1: Applicant's response to London Borough of Hounslow's Local Impact Report**

Para Ref.	LIR raised	Response to LIR
5.1 to 5.3	The Local Impact Report summarises the main planning issues for the local authority, noting no objections to the proposed land use. The local authority recognised that whilst there may be short term effects during construction, once complete the proposal would have a neutral effect on the borough.	The Applicant notes the content of the Local Impact Report (LIR) and is continuing to engage with the local authority as part of finalising the Statement of Common Ground (SoCG).