

**Surrey Heath Borough Council's responses to the Examining
Authority's Written Questions and requests for information
(ExQ1)
Deadline 2 submission**



**Esso Petroleum Company Limited Southampton to London Pipeline Project Application for a Development
Consent Order**

Project reference no. EN070005

ExQ1	Question to:	Question:	Surrey Heath Response
General Questions			
GQ.1.4	<i>Updates on Development</i> All Relevant Planning Authorities	Provide an update of any planning applications that have been submitted, or consents that have been granted, since the Application was submitted that could either effect the proposed route or would be affected by the Proposed Development.	As of 12 th November 2019 - No planning applications submitted or granted that would affect the proposed route or would be affected
BIODIVERSITY AND HABITATS REGULATIONS ASSESSMENTS			
BIO.1.2	<i>Landscape and Ecological Management Plan</i> All Relevant Planning Authorities	<p>Comment on the absence of an Outline LEMP in the Examination and whether it is agreed that such a document could be submitted as part of the discharge of Requirement 12 of the draft DCO [AS-059].</p> <p>N.B – There is overlap between this question and LV.1.2 you may therefore wish to provide a combined response to both questions.</p>	<p>The Council's Local Impact Report (LIR) submitted on 24 October 2019 identifies the specific landscape and ecology concerns raised by the pipeline proposals, particularly during the construction phase of the project. These concerns include the lack of detail over the effects on landscape and wildlife habitats at any given point along the pipeline route and the specific mitigation that would be implemented.</p> <p>As the LIR explains, the Council lacks in-house ecological expertise and is concerned to avoid a situation where the burden of finding practical solutions to specific landscape and ecological sensitivities falls to the relevant planning authority when DCO Requirements are being discharged.</p> <p>The Applicant's Environmental Statement (ES) places reliance relies on the measures contained in the LEMP to mitigate the effects on trees and wider biodiversity. Draft Requirement 12 provides for the submission and approval of the LEMP prior to the commencement of the relevant stage of development. However, with no</p>

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			<p>outline LEMP provided as a part of the DCO application, it is unclear whether the measures that are being relied upon will be able to sufficiently mitigate the likely adverse effects identified.</p> <p>The Council therefore considers that the specific measures proposed to remedy the effects upon biodiversity and landscape should be set out in an outline LEMP, made available for consideration during the current DCO examination. The outline LEMP should be presented in sufficient detail to enable ExA and interested parties to arrive at informed judgements at the likely effectiveness of the protective measures and mitigation that would be implemented should the development proceed.</p> <p>To this end it would be helpful if the outline LEMP identified the surveys, consultations, licences, mitigation, site management and aftercare that the Applicant proposes to ensure satisfactory outcomes on the ground. In this context the Council recommends that the project should seek to achieve biodiversity net gain within each local authority area affected, rather than across the pipeline as a whole.</p>
BIO.1.43	Thames Basin Heaths SPA The Applicant	Respond to the points raised in Surrey Heath Borough Council's RR [RR-093] with regards to the potential adverse effects on the integrity of the Thames Basin Heaths SPA that would result from the Proposed Development's effect on the two SANGs (St	The SHBC LIR (Deadline 1 Submission) and Written Representation (Deadline 2 Submission) sets out in detail the Council's position on the potential for likely significant effects on the Thames Basin Heaths SPA that would arise from construction activities on St Catherine's Road SANG.

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		Catherine's Road and Windlemere) within the borough.	
BIO.1.53	<i>St Catherine's Road SANG</i> Surrey Heath Borough Council	Confirm the boundary, location and size of the St Catherine's Road SANG.	Appendix 2 of the Surrey Heath LIR details the layout plan of St Catherine's Road SANG. The site is 1.6ha and located east of St Catherine's Road, opposite Keaver Drive, Frimley.
DRAFT DEVELOPMENT CONSENT ORDER			
DCO.1.15	<i>Part 3 Article 14 – Access to works</i> All Relevant Planning Authorities	Comment on the provision contained within Part 3 Article 14 of the draft DCO [AS-059].	<p>Given the length of the scheme, and the wide order limits along on the route corridors, this is a particularly broad power. Potentially it would authorise substantial works by way of the creation of new site accesses for construction traffic, which may have highways implications. It could also result in the loss of hedgerows, trees and other vegetation (pursuant to the power in Article 41) with (unassessed) biodiversity and landscape/visual impact issues. Since proposed means of access are identified on the Order plans, this is an additional power, which does not appear to be necessary. The applicant justifies the width of its pipeline working areas in part by reference to the need to construct a haul road along much of the route (see e.g. Statement of Reasons, 6.5.9). This means that the proposed means of access are sufficient, since the remainder of the route can be accessed through the internal haul road. In those circumstances, it is not necessary to also include a power for the creation of additional means of access.</p> <p>The Explanatory Memorandum (paragraphs 6.70-71) refers to provisions for consent from the street authority for the creation of additional accesses. This</p>

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			<p>explanation is inconsistent with the draft Article, which does not contain a consent provision.</p> <p>The Council considers that either Article 14 should be deleted, or subject to approval provisions which will allow consideration of the effects of any additional site accesses including appropriate mitigation measures if required.</p>
DCO.1.16	<p><i>Part 4 Article 17 – Discharge of water</i></p> <p>All Relevant Planning Authorities</p>	<p>Comment on the provision contained within Part 4 Article 17 of the draft DCO [AS-059]. .1.16</p>	<p>This is a very broad power, but is subject to the limitations in Article 17(3) which include the consent of the person who owns the relevant watercourse, drain etc. Accordingly, the provision is subject to an appropriate consent provision.</p>
DCO.1.30	<p><i>Schedule 2 Requirement 3 – Stages of the authorised development</i></p> <p>The Applicant All Host Relevant Planning Authorities</p>	<p>The ExA is concerned by this Requirement as it considers there is a lack of clarity in how it is worded and how it would operate in practice.</p> <p><u>To the Applicant:</u></p> <ul style="list-style-type: none"> i) Explain how this Requirement would function when dealing with multiple authorities. ii) Explain whether it is the intention for <u>all</u> stages or Work Nos to be approved before development commences, or just individual stages and Work Nos with individual host authorities. iii) If the former, explain when and how these stages will be identified. 	<p>It is agreed that there is a lack of clarity in this provision for the reasons set out by the ExA. It is unclear whether the written scheme for all stages will be sent for the approval of each local authority. If not, as would appear to be the only practicable option, it is unclear how the authority would control the "stages". Further there is no provision for approval of the stages, which relates to a broader concern about the potential duration of the works.</p>

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		<p>iv) If the latter, explain whether this approach differs with the definition of "commence" in Part 1 Article 1 of the draft DCO [AS-059] or that all stages and all relevant Requirements must be approved by all host authorities prior to commencement (except in the circumstances outlined).</p> <p><u>To the Host Local Authorities and National Park Authority:</u></p> <p>i) Comment on the effectiveness of this Requirement.</p>	
DCO.1.33	<p><i>Schedule 2 Requirement 6(2) – Construction environmental management plan</i></p> <p>The Applicant All Relevant Planning Authorities</p>	<p>Requirement 6 of the draft DCO [AS-059] states that the Construction Environmental Management Plan (CEMP) must be substantially in accordance with the Outline CEMP. However, the Outline CEMP [APP-129] contains scant and in some cases no details regarding the plans and measures set out in Requirement 6(2)(d). The ExA is concerned that in discharging the Requirement, relevant planning authorities would be determining information and evidence which is not before the Secretary of State, and subsequently the CEMP will be a substantial departure from the Outline CEMP.</p> <p><u>To the Applicant:</u></p> <p>i) Respond and justify the current approach.</p>	<p>For the various reasons given throughout the Council's LIR, the Council shares ExA's concern that the outline CEMP submitted by the applicant (application document 6.4 – ES appendix 16.2, ref APP-130) suffers a near-complete lack of detail, offering instead the vague reassurance that it would be for Esso's contractors to work up the detail of the document.</p> <p>Whilst appreciating the need for flexibility on matters such as the micro-siting of the pipeline, the Order Limits, Limits of Deviation and powers provided to the Undertaker of the Order are so broadly drawn that they could equally admit an acceptable development solution or one that would give rise to significant and unacceptable harm. A detailed draft CEMP could help to assuage this concern. It is requested that ExA invites the applicant to submit a detailed draft CEMP within a reasonable timeframe during the current DCO</p>

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		<p><u>To All Relevant Planning Authorities:</u></p> <p>ii) Comment on the above.</p>	<p>examination for consideration. This could provide important reassurances that are currently lacking.</p> <p>The concern implicit in Written Question DCO.1.33 is exemplified in respect of tree protection (see paragraphs 2.4-2.18 of the Council's LIR), in respect of which Requirement 6(2)(d)(ix) requires the submission and approval of an Arboricultural Management Plan. As things stand the impacts of the proposed development on trees at any individual point along the pipeline route are unquantified and not accurately assessed.</p>
DCO.1.34	<p><i>Schedule 2 Requirement 6(2) – Construction environmental management plan</i></p> <p>The Applicant All Relevant Planning Authorities</p>	<p>Requirement 6(2)(d)(vi) makes provision for a Community Engagement Plan to form part of the CEMP. The ExA places considerable importance on the need for such a plan to ensure effective engagement with the local community prior to and during construction. However, the ExA considers that a Community Engagement Plan or Local Liaison Officer should form a separate Requirement in draft DCO.</p> <p>Respond.</p>	<p>Given the number of communities and individuals that will be affected by construction of the pipeline, a separate DCO Requirement for a Community Engagement Plan is considered appropriate and is supported by the Council.</p> <p>Local liaison groups with representatives from Esso and the relevant local authority would ensure that there is a clear channel of communication between the local community, the Applicant and the Applicant's contractors.</p>
DCO.1.35	<p><i>Schedule 2 Requirement 8(3) – Hedgerows and trees</i></p> <p>The Applicant All Relevant Planning Authorities</p>	<p>Requirement 8(3) of the draft DCO [AS-059] states that any hedgerow or tree planting which is removed, uprooted, destroyed, dies or becomes seriously damaged or defective within a three-year period must be replaced.</p> <p>Comment on the adequacy of the Requirement and on the time period allowed for reinstatement and management.</p>	<p>The Council is pleased that Esso is committed to ensuring that the mitigation planting would be cared for post-construction, not least because the loss of trees and other vegetation is one of the most significant adverse effects of the pipeline project.</p> <p>However, the Council considers that a three year aftercare period is insufficient to ensure that the proposed planting has established properly. A five-year</p>

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			<p>aftercare period would be more appropriate, in keeping with widespread planning practice.</p> <p>Paragraphs 2.13-2.18 of the Council's LIR offers further observations in respect of the tree protection and replacement.</p>
DCO.1.37	<p><i>Schedule 2 Requirement 20 – Further information</i></p> <p>The Applicant All Relevant Planning Authorities</p>	<p><u>To the Applicant:</u></p> <p>i) Justify the time period of two business days from receipt of the application that the relevant planning authority has for requesting further information, which the ExA is concerned is unreasonably short.</p> <p><u>To All Relevant Planning Authorities:</u></p> <p>ii) Comment on the above.</p>	<p>The Council agrees that the period of two business days from receipt of an application to discharge a DCO Requirement to the relevant planning authority requesting further information when necessary is unreasonably short and unrealistic.</p> <p>It is recommended that a period of fifteen business days is specified, with 'business days' defined expressly in Schedule 3 Part 1 Requirement 1: Interpretation of the draft DCO as follows:</p> <p>"Business days" means days other than Saturdays, Sundays, bank holidays or days on which General or Local Elections are held.</p> <p>The logic of the latter provision is that many local authority members of staff are deployed to polling station duties on days when elections are held.</p>
DCO.1.38	<p><i>Schedule 2 Part 2 – Procedure for Discharge of Requirement</i></p> <p>All Relevant Planning Authorities</p>	<p>Comment on the Requirements in Schedule 2 Part 2 of the draft DCO [AS-059] in particular regard to the timescales given and the deemed consent provisions.</p>	<p>The provisions for approvals are inadequate. In light of the potential involvement of multiple local authorities there is likely to be a need to adopt a coordinated approach, which is likely to take some of the determination period. It is suggested that the provision could be amended to <i>require</i> prior notification under paragraph 19, which would mean that a period of 20 days for consultation between the authorities before an application covering multiple authorities would be</p>

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			<p>required. That provision could be amended as follows:</p> <p>"19. Without limiting the scope of paragraph 18 above, <u>Where</u> an application is required to be made to more than one relevant authority for any single consent, agreement or approval under a Requirement, the undertaker <u>shall</u> submit a request for comments in respect of its proposed application to each relevant authority and, where it does so, each relevant authority must provide its comments in writing on the proposed application within a period of 20 days beginning with the day immediately following that on which the request is received by the authority, so as to enable the undertaker to prepare a consolidated application to each relevant authority in respect of the consent, agreement or approval required by the Requirement."</p> <p>In addition, the Council requests that the ExA consider a prior notification process to address potential timing issues when considering conditions submissions pursuant to the proposed requirements set out in the DCO. The Council would also request that the ExA considers an appropriate fee be payable for such a prior notification process due to the resource implications for all relevant Planning Authorities.</p>
FLOOD RISK, WATER RESOURCES AND GEOLOGY			
Fr.1.2	<i>Surface and Foul Drainage System</i>	Comment on the absence of an Outline SFDS in the Examination and whether it is agreed that such a document could be submitted as	Specific flood and drainage considerations raised by the section of pipeline passing through the Borough are identified in paragraphs 6.2-6.5 of the Council's LIR. As a general point it is desirable that arrangements for

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	All Relevant Planning Authorities The Environment Agency	part of the discharge of Requirement 9 of the draft DCO [AS-059].	<p>drainage during the construction works are clearly specified and approved before implementation. These waters, if not disposed of correctly will have the potential to impede or cause damage to the works themselves and to contaminate watercourses and cause local disruption.</p> <p>The Council appreciates why detailed site-specific provisions for surface and foul drainage will only become available post-consent. Subject to the Environment Agency's advice, Requirement 9: <i>Surface and foul water drainage</i> in the draft DCO (application document 3.1, ref. AS-059) appears to make appropriate provision for the submission and approval of surface and foul water drainage provisions.</p> <p>However, the Council considers that it would assist the Examination and fill a lacuna in the current information base if the Applicant was asked to produce a SFDS method statement, explaining how the measures identified in the REAC would be implemented for the range of engineering works Esso proposes and in the general range of environments that the pipeline would pass through.</p> <p>The Council requests that, as foul water falls within the remit of Thames Water within Surrey Heath, questions relating to this matter are also directed to Thames Water.</p>
HISTORIC ENVIRONMENT			

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HE.1.2	<i>Written Scheme of Investigation</i> All Relevant Planning Authorities	Comment on the absence of an Outline WSI in the Examination and whether it is agreed that such a document could be submitted as part of the discharge of Requirement 11 of the draft DCO [AS-059].	Subject to the advice of Historic England and the Surrey County Archeologist, the Council is content that Requirement 11 of the draft DCO provides adequate protection for archaeological interests along the pipeline route. An outline WSI would presumably be a broad-brush document, unlikely to add materially to the information base on which the DCO application would be determined.
LANDSCAPE AND VISUAL			
LV.1.2	<i>Landscape and Ecological Management Plan</i> All Relevant Planning Authorities	<p>Comment on the absence of an Outline LEMP in the Examination and whether it is agreed that such a document can be submitted as part of the discharge of Requirement 12 of the draft DCO [AS-059].</p> <p>N.B – This question is repeated in BIO.1.2. The Relevant Planning Authorities may wish to address the issue in a combined response to both questions. 1.2</p>	Please refer to the Council's response to Written Question BIO.1.2 above.
LV.1.20	<i>Planting Mitigation</i> All Relevant Planning Authorities	<p>The REAC (Ref: G92 Table 16.2) [APP-056] states that a three-year aftercare period would be established for all mitigation planting and reinstatement.</p> <p>Comment on the appropriateness of this measure and time length proposed.</p>	<p>As explained in response to Written Question DCO.1.35 (above), the Council considers that a three year aftercare period is insufficient to ensure that the proposed planting has established properly. A five-year aftercare period would be more appropriate, in keeping with widespread planning practice.</p> <p>Requirement 12: Landscape and Ecological Management Plan of the draft DCO (application</p>

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			<p>document 3.1, ref. AS-059) provides for the submission and approval of a LEMP by the Relevant Planning Authority. As drafted Requirement 12 only requires the LEMP to 'reflect' the survey results, ecological mitigation and SSSI working plans included in the Applicant's Register of Environmental Actions and Commitments (REAC), which is set out in section 16.3 of ES chapter 16: Environmental Management and Mitigation (application document 6.2, PINS ref. APP-056). The REAC offers only broad-brush commitments. In respect of planting mitigation, the Council considers that the LEMP should include the following aftercare provisions for all new tree and shrub planting:</p> <p>Aftercare of trees</p> <ul style="list-style-type: none"> (i) Maintenance of a weed free area around the base of each tree; (ii) watering to ensure moisture levels are maintained appropriate for optimum growth (establishment period only); (iii) application of a slow release fertiliser around the base of all trees, if required following soil fertility testing, to ensure soil fertility is maintained; (iv) remove any vandalised, unhealthy or dead specimens as soon as possible and replacement with trees of the same size to those adjacent, during the next available planting season; (v) inspection, adjustment and maintenance of anchors, stakes and ties; (vi) removal of any items that have been attached to trees

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			<p>(vii) re-firming of trees after strong winds, frost heave or other disturbances;</p> <p>(viii) pruning to remove dead, dying or diseased wood.</p> <p>(ix) remove suckers and formatively prune if necessary to achieve natural shape, healthy growth and to favour a single leader; and</p> <p>(x) topping up mulch at the end of the rectification period to achieve a 75mm layer.</p> <p>Aftercare of shrubs</p> <p>(i) Control and removal of weeds;</p> <p>(ii) pruning of shrubs for floral, foliage and stem colour effect and to remove weak, dead and diseased branches;</p> <p>(iii) pruning of species to ensure correct form; plus to promote flowering/berry production/retention (where appropriate);</p> <p>(iv) remove any dead growth, avoiding damage to any new shoots that have emerged;</p> <p>(v) remove any failed, vandalised, unhealthy or dead specimens as soon as possible and provide replacements of the same size to those adjacent, during the next available planting season;</p> <p>(vi) watering of plants to ensure moisture levels are maintained appropriate for optimum growth;</p> <p>(vii) removal of litter from all planting beds to maintain site in a tidy condition; and</p> <p>(viii) top up mulch annually to achieve a 75mm layer.</p>

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LV.1.25	<i>Viewpoints</i> All Relevant Planning Authorities	i) Confirm acceptance of the representative viewpoints as set out in Appendix 10 of the ES [APP-114]; or ii) If not accepted, explain why.	SHBC confirms acceptance of the representative viewpoints as set out in Appendix 10 of the ES [APP-114].
PEOPLE AND COMMUNITIES			
PC.1.1	<i>Community Receptors</i> All Relevant Planning Authorities	Confirm that the study area applied to community receptors (500m from the Order Limits) in Chapter 13 of the ES [APP-053] is adequate.	The Council considers that 500 metres from the Order Limits represents a reasonable study area for the identification of community receptors. Significant community effects are considered unlikely to arise at greater distances and would in any event be temporary.
PC.1.8	<i>Working Hours</i> The Applicant All Relevant Planning Authorities	The proposed hours of work are 4 hours longer than a standard working day and would operate 6 days a week [APP-128]. <u>To the Applicant:</u> <ul style="list-style-type: none"> i) Advise why the extended working hours would be required. ii) Confirm that there would be no working on public as well as bank holidays. iii) What action is proposed to minimise the effect of deliveries and construction on the living conditions of residential properties particularly between the hours of 07:00 and 09:00. iv) Paragraphs 1.1.30 and 1.1.31 of the CoCP [APP-128] list a number of 	According to paragraphs 1.1.29 – 1.1.31 of the Applicant's Code of Construction Practice (CoCP; Environmental Statement appendix 16.1, application document 6.4, ref. APP-128): Working Hours 1.1.29 The project is required under the DCO to adhere to normal working hours of 07:00 to 19:00 Monday to Saturday. Sunday or Bank Holiday working is not anticipated as being typical. 1.1.30 Exceptions may be required for Bank Holiday and Sunday working (restricted to 08:00 to 18:00) or night-time working for activities such as: the continuous pulling phase for a major crossing using HDD; where daytime working would be excessively

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		<p>circumstances where working outside of these hours/days would be required. Explain the frequency that this may occur and what measures are proposed to inform residents when this does occur and what measures are proposed to minimise any harm to living conditions that may occur as a result of these alternative working hours.</p> <p><u>To All Relevant Planning Authorities:</u></p> <p>v) Comment on the working hours proposed.</p>	<p>disruptive to normal traffic operation; cleaning/testing of the pipeline; or overnight traffic management measures (G5).</p> <p>1.1.31 During the 24 month construction period, the works would encounter environmental and other constraints such as unforeseen ground conditions, weather conditions etc. This may require Sunday and Bank Holiday working, so prolonged disruption in any one area could be limited.</p> <p>1.1.32 To reduce congestion on the public highways, and to meet the requirements of the local authorities and the police, where practicable, abnormal loads would be transported outside normal working hours.</p> <p>Requirement 5: Code of Construction Practice in Schedule 2 Part 1 of the draft DCO (application document 3.1, ref. AS-059) states that:</p> <p>5. The authorised development must be undertaken in accordance with the code of construction practice, or with such changes to that document as agreed by the relevant planning authority.</p> <p>In other words, the CoCP would not be submitted to Relevant Planning Authorities for approval prior to the commencement of development. Requirement 14: Construction hours of the draft DCO recites the working hours set out in the CoCP, reinforcing the point that construction hours would be fixed by the DCO from the</p>

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			<p>outset without any enforceable means of variation should a Relevant Planning Authority consider this necessary.</p> <p>The Council appreciates that some construction activities might require work to take place outside of 'normal' working hours. The Council appreciates also that the sooner construction work can be completed, the sooner communities and environments affected can return to normal.</p> <p>However, Esso's non-negotiable 'one size fits all' formula for managing construction working hours omits to acknowledge the wide range of environmental and amenity conditions encountered along the pipeline route. There are places – for example, in open farmland remote from sensitive receptors – where extended working hours might well be acceptable. In others, such as where the pipeline weaves through residential neighbourhoods or close to schools, restricted working hours would be justified.</p> <p>In recognition of this it is proposed that:</p> <ol style="list-style-type: none"> 1. Draft DCO Requirement 5: Code of Construction Practice is amended to require its submission and approval by the Relevant Planning Authority prior to the commencement of construction works. This would have the additional benefit of enabling input by Esso's contractors, who have yet to be appointed and in whom great faith is currently placed by the Applicant for the

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			<p>effective implementation of the proposed construction mitigation strategies.</p> <p>2. Draft DCO Requirement 14: Construction hours is amended to require the submission of approval by the Relevant Planning Authority of construction working hours for defined sections of the pipeline. This would incentivise the Applicant or its contractor to negotiate practical local solutions with the relevant planning and highways authorities and environmental health officers.</p> <p>In the event that the approach recommended above is unacceptable it is requested that the normal working hours specified in the CoCP and DCO are specified as 08:00 to 18:00 Mondays to Fridays and 08:00 to 13:00 on Saturdays with no working on Sundays and Bank Holidays, unless otherwise agreed in writing by the Relevant Planning Authority.</p>
Turf Hill			
Th.1.10	<p><i>Sand Lizards</i></p> <p>Natural England</p> <p>Surrey Heath Borough Council</p>	<p>Numerous RRs have referred to the fact that the Sand Lizards were 'recently' reintroduced into the Turf Hill/Lightwater area.</p> <p>Provide details of this programme including: the reason why they were reintroduced; when they were reintroduced; the areas which were repopulated; and the numbers that were introduced.</p>	<p>The Sand Lizards were re-introduced to Turf Hill over 3 years, 2007, 2008 and 2009. The sand lizards were released on a gentle south-facing slope near the western end of Turf Hill. Each time 50 juvenile animals were released during the late summer by the Herpetological Conservation trust (H.C.T.). This number would allow for infant mortalities during the first season.</p> <p>The Sand Lizards were re-introduced to increase the Sand Lizard range to areas it once inhabited and to increase sites in Surrey where the lizard is present, which in turn will increase the number of potential</p>

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			<p>donor sites back to heaths that have been damaged, for example by fire.</p> <p>The re-introduction was agreed and consented to by Natural England.</p>
SCOPE OF DEVELOPMENT AND ENVIRONMENTAL IMPACT ASSESSMENT			
EIA.1.7	<i>Cumulative Effects</i> All Relevant Planning Authorities 1.7	<p>i) Comment on the long list of other developments that have the potential to lead to inter-project cumulative effects at Appendix 15.1 of the ES [APP-125].</p> <p>ii) Confirm that potential inter-project cumulative effects have been fully assessed in the ES.</p>	<p>i) No comments to add.</p> <p>ii) SHBC confirms inter-project cumulative effects have been fully assessed.</p>
EIA.1.8	<i>Cumulative Effects</i> All Interested Parties	<p>Confirm the ES [APP-055] to [APP-127] and the HRA report [APP-130] and [APP-131] have adequately assessed the cumulative or in-combination effects that could arise from other development, plans and projects along the proposed route.</p>	<p>SHBC confirms the ES [APP-055] to [APP-127] and the HRA report [APP-130] and [APP-131] have adequately assessed the cumulative or in-combination effects that could arise from other development, plans and projects along the proposed route.</p>
TRAFFIC AND TRANSPORT			
TT.1.2	<i>Construction Traffic Management Plan</i> All Relevant Highway and	<p>Comment on the absence of an Outline CTMP in the Examination and whether it is agreed that such a document can be submitted as part of the discharge of Requirement 7 of the draft DCO [AS-059].</p>	<p>Given the propensity of pipeline construction works to impede road access and disrupt traffic flows the Council is disappointed at the absence of a draft CTMP for consideration during the DCO examination. It is requested that ExA invites the submission of a substantial draft CTMP by Examination Deadline 5 (Thursday 13 February 2020) with comments on the draft CTMP to be submitted by Examination Deadline 6</p>

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	Planning Authorities		<p>(Thursday 5 March 2019). By 'substantial' we mean a draft document with reasoned content under each heading, in contrast with the Applicant's draft Construction Environmental Management Plan (CEMP, application document 6.4, ref. APP-130) which is only a skeleton document.</p> <p>As described in the Council's LIR (see paragraphs 2.36-2.37) it is requested also that the following provision is added to DCO Requirement 7: Construction Traffic Management Plan:</p> <p>The CTMP for each stage will provide details of the following:</p> <ul style="list-style-type: none"> a) Development phasing b)Vehicle types c) Abnormal indivisible load movements d) Recording of construction vehicle movements e) Local highway issues and constraints f) Highway condition survey g) Access and route strategy h) Signage strategy i) Core working hours j) Use of banksmen k) Management of public rights of way l) Wheel-washing and maintenance of a clean highway m) Travel plan for construction workers n) Temporary traffic management procedures

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			o) Temporary repositioning of bus stops p) Communications and community engagement q) Liaison with emergency services r) Monitoring arrangements s) Compliance and enforcement procedures
TT.1.4	<i>Study Areas</i> The Applicant All Relevant Highway and Planning Authorities	<u>To the Applicant:</u> i) Confirm that the Traffic and Transport assessment study area [APP-135] is established relevant to the locations of the proposed logistics hubs, construction compounds and where works are within roads which are anticipated to exceed four weeks in duration. <u>To All Relevant Highway and Planning Authorities:</u> i) Explain whether the extent of the study area for this assessment is acceptable.	SHBC confirms that the study area is acceptable.
TT.1.11	<i>Heavily-Trafficked Roads</i> The Applicant and All Relevant Highway and Planning Authorities	Paragraph 1.1.4 of the Planning Statement [APP-132] refers to the selection criteria for when trenchless as opposed to open cut techniques would be used. Amongst other things this includes 'heavily trafficked roads'. <u>To the Applicant:</u> i) Explain the criteria which determined roads which are deemed to be 'heavily trafficked'	ii) SHBC can confirm the roads being selected for Trenchless Crossing are the correct ones for Surrey Heath. iii) SHBC does not consider that it is necessary to undertake Trenchless Crossings for other roads on their network.

ExQ1	Question to:	Question:	Surrey Heath Response
		<p><u>To All relevant Highway and Planning Authorities:</u></p> <p>ii) Confirm the roads selected as being correct.</p> <p>iii) Explain whether additional roads could be defined as 'heavily trafficked' and should benefit from trenchless crossings and if so, why.</p>	
TT.1.15	<p><i>Construction Traffic Routing</i></p> <p>All Relevant Planning Authorities</p>	<p>i) Comment on the extent to which the local community (including local businesses, schools and farms) might be affected by the construction traffic routeing, diversions and related arrangements as proposed by the Applicant.</p> <p>ii) Comment on the suitability of the local road network for the size, quantity and type of construction traffic which is proposed would use it.</p>	<p>i.) There will be affects upon the local community arising from construction traffic, diversions and related arrangements. In Surrey Heath, the impacts will likely be significant for:</p> <ul style="list-style-type: none"> • The Balmoral Drive area due to the proposed road closure (as noted in the Council's response to TT.1.18). • St Catherines Road due to the planned road closure and potential for unsuitable construction related vehicles using the road to access the construction compound on St Catherines Road SANG. • Red Road due to the pipeline being routed under a section of the road. <p>ii.) SHBC has concerns regarding the suitability of St Catherines Road to accommodate site traffic, especially associated with the proposed construction compound on St Catherines Road SANG.</p>

ExQ1	Question to:	Question:	Surrey Heath Response
			As set out in the SHBC Local Impact Report, the Council has proposed an addition to Requirement 7: Construction traffic (see paragraph 2.36 and 2.37) which SHBC considers will limit the impacts of construction traffic routeing, diversions and related arrangements during the construction of the pipeline.
TT.1.18	Balmoral Drive Diversion Surrey County Council	In paragraph 3.1.7 of the Transport Assessment [APP-135] and other places in the assessment it is stated by the Applicant that the closure of Balmoral Drive to traffic while works are undertaken and the requirement for a diversion is at the request of the Highway Authority. Explain the reasoning for this closure.	The Council understands that it is Surrey County Council's view that it not possible to achieve the minimum distance to allow traffic to access the road and keeping the road open to traffic would result in 4 way lights being required. Whilst the Council recognises the points raised by Surrey County Council, Surrey Heath raises significant concerns in respect of the proposed road closure. SHBC was, until recently, of the understanding that traffic control measures would be in place to allow for one-way traffic along Balmoral Drive. This is the main access point for a significant number of residential properties (over 1000 homes) and for service vehicles accessing businesses on Balmoral Parade. The alternative roads which would be used for access to residential properties and business are all residential in nature, many with cars parked on either side of the road, and not suitable a high level of traffic or access for service vehicles. Moreover, the proposed road closure would sever access to Frimley Community Centre, which the Council considers to be unacceptable.