
Esso Petroleum Company Limited: Southampton to London Pipeline Project
Development Consent Order application ♦ Project reference no. EN070005

Spelthorne Borough Council

Response to the Examining Authority's first written questions
and requests for information (ExQ1)

**Spelthorne Borough Council
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GQ.1.4: UPDATES ON DEVELOPMENT

Question addressed to 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.

Spelthorne BC appended a list of relevant major developments in the Borough to its Local Impact Report submitted on 24 October 2019.

BIO.1.2: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

Question addressed to all Relevant Planning Authorities

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]

N.B – There is overlap between this question and LV.1.2 you may therefore wish to provide a combined response to both questions.

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.

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.

The Applicant's Environmental Statement (ES) places reliance 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 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.

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.

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.

DCO.1.15: PART 3 ARTICLE 14 – ACCESS TO WORKS

Question addressed to all Relevant Planning Authorities

Comment on the provision contained within Part 3 Article 14 of the draft DCO [AS-059]

Article 14 of the draft DCO (AS-059) provides:

Access to works

14. The undertaker may, for the purposes of the authorised development, form and layout means of access, or improve existing means of access, at such locations within the Order limits as the undertaker reasonably requires for the purposes of the authorised development.

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.

The Explanatory Memorandum (paragraphs 6.70-71) refers to provisions for consent from the street authority for the creation of additional accesses. This explanation is inconsistent with the draft Article, which does not contain a consent provision.

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.

DCO.1.16: PART 4 ARTICLE 17 – DISCHARGE OF WATER

Question addressed to all Relevant Planning Authorities

Comment on the provision contained within Part 4 Article 17 of the draft DCO [AS-059]

Article 17(1) provides:

17. —(1) Subject to paragraphs (3) and (4) the undertaker may use any watercourse or any public sewer or drain for the drainage of water in connection with the carrying out or maintenance of the authorised development and for that purpose may lay down, take up and alter pipes and may, on any land within the Order limits, make openings into, and connections with, the watercourse, public sewer or drain.

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.

DCO.1.30: SCHEDULE 2 REQUIREMENT 3 – STAGES OF THE AUTHORISED DEVELOPMENT

Question addressed to the Applicant, all Host Relevant Planning Authorities

The ExA is concerned by this Requirement as it considers there is a lack of clarity in how it is worded and would operate in practice.

To the Applicant

- i) Explain how this Requirement would function when dealing with multiple authorities.
- ii) Explain whether it is the intention for all 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.
- 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 circumstances outlined).

To the Host Local Authorities and National Park Authority

- i) Comment on the effectiveness of this Requirement.

Schedule 2 Requirement 3 of the draft DCO [AS-059] states:

‘The authorised development may not commence until a written scheme setting out all stages of the authorised development relevant to it has been submitted to the relevant planning authority.’

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'. Furthermore there is no provision for approval of the stages, which relates to a broader concern about the potential duration of the works.

DCO.1.33: SCHEDULE 2 REQUIREMENT 6(2) – CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Question addressed to all Relevant Planning Authorities

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.

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.

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 examination for consideration. This could provide important reassurances that are currently lacking.

The concern implicit in Written Question DCO.1.33 is exemplified in respect of tree protection (see paragraphs 4.3-4.14 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.

DCO.1.34: SCHEDULE 2 REQUIREMENT 6(2) – CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Question addressed to all Relevant Planning Authorities

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.

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.

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.

DCO.1.35: SCHEDULE 2 REQUIREMENT 8(3) – HEDGEROWS AND TREES

Question addressed to all Relevant Planning Authorities

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.

Comment on the adequacy of the Requirement and on the time period allowed for reinstatement and management.

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.

However, 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.

Paragraphs 4.3-4.14 of the Council's LIR offers further observations in respect of the tree protection and replacement.

DCO.1.37: SCHEDULE 2 REQUIREMENT 20 – FURTHER INFORMATION

Question addressed to the Applicant and all Relevant Planning Authorities

To the Applicant:

- 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.**

To All Relevant Planning Authorities:

- ii) **Comment on the above.**

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.

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:

“Business days” means days other than Saturdays, Sundays, bank holidays or days on which General or Local Elections are held.

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.

DCO.1.38: SCHEDULE 2 PART 2 – PROCEDURE FOR DISCHARGE OF REQUIREMENT

Question addressed to all Relevant Planning Authorities

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.

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 *require* prior notification under paragraph 19 of Schedule 2 Part 2, which would mean that a period of 20 days for consultation between the authorities before an application covering multiple authorities would be required. That provision could be amended as follows:

‘19. ~~Without limiting the scope of paragraph 18 above,~~ Where 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 shall 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’.

FR.1.2: SURFACE AND FOUL DRAINAGE SYSTEM

Question addressed to all Relevant Planning Authorities, The Environment Agency

Comment on the absence of an Outline SFDS in the Examination and whether it is agreed that such a document could be submitted as part of the discharge of Requirement 9 of the draft DCO [AS-059]

Specific flood and drainage considerations raised by the section of pipeline passing through the Borough are identified in paragraphs 5.17-5.21 of the Council’s LIR. As a general point it is desirable that arrangements for 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.

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: *Surface and foul water drainage* 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.

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.

HE.1.2: WRITTEN SCHEME OF INVESTIGATION

Question addressed to 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 Archaeologist, 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.

LV.1.2: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

Question addressed to all Relevant Planning Authorities

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].

N.B – This question is repeated in BIO1.2. The Relevant Planning Authorities may wish to address the issue in a combined response to both questions.

Please refer to the Council's response to Written Question BIO.1.2 above.

LV.1.20: PLANTING MITIGATION

Question addressed to all Relevant Planning Authorities

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.

Comment on the appropriateness of this measure and time length proposed.

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.

Requirement 12: *Landscape and Ecological Management Plan* of the draft DCO (application 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:

Aftercare of trees

- (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*
- (vii) re-firming of trees after strong winds, frost heave or other disturbances;*
- (viii) pruning to remove dead, dying or diseased wood.*
- (ix) remove suckers and formatively prune if necessary to achieve natural shape, healthy growth and to favour a single leader; and*
- (x) topping up mulch at the end of the rectification period to achieve a 75mm layer.*

Aftercare of shrubs

- (i) Control and removal of weeds;*
- (ii) pruning of shrubs for floral, foliage and stem colour effect and to remove weak, dead and diseased branches;*
- (iii) pruning of species to ensure correct form; plus to promote flowering/berry production/retention (where appropriate);*
- (iv) remove any dead growth, avoiding damage to any new shoots that have emerged;*
- (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;*
- (vi) watering of plants to ensure moisture levels are maintained appropriate for optimum growth;*
- (vii) removal of litter from all planting beds to maintain site in a tidy condition; and*
- (viii) top up mulch annually to achieve a 75mm layer.*

LV.1.25: VIEWPOINTS

Question address to 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.**

Chapter 10 of the ES (application document 6.2, PINS ref. App-050) states in paragraph 10.2.31 that all LPAs were contacted by the Applicant by e-mail on 14 August 2018 to request comment on the proposed Representative Viewpoints.

The Representative Viewpoints are set out in Appendix 10 of the Applicant's ES (application document 6.4, ref. APP-114). Those viewpoints either in or with some theoretical views towards, the administrative area of Spelthorne are:

- 57: Thames Path National Trail at Chertsey – *Representative of views towards Order Limits from promoted National Trail and Chertsey Bridge (scheduled monument and Grade II* listed)*

- 58: Thames Path National Trail – *Views from promoted national trail next to Woburn Hill and Chertsey Meads Area of Landscape Importance. The views are described with Surrey Landscape Character Assessment (Thames River Floodplain) as being relatively open, and long distance, particularly across large water bodies towards surrounding settlement.*
- 59a: Ashford Road, Staines-upon-Thames – *Representative of views of Order Limits along Ashford Road*
- 60: Woodthorpe Road, Ashford – *Representative of views from Woodthorpe Road, Ashford Road and nearby sports complex towards Order Limits and construction compound*
- 61: Fordbridge Park, Staines-upon-Thames – *Close views towards Order Limits from Fordbridge Park*
- 62: Ashford Cemetery, Ashford – *Close views towards Ashford Cemetery*
- 63: Bedfont Country Park – *Viewpoint requested by the Planning Inspectorate.*

The Council is content that these viewpoints are representative of the areas of the Borough likely to be affected by the proposed pipeline. The photographs in ES Appendix 10 helpfully illustrate the extensive tree cover in the areas affected by the pipeline.

PC.1.1: COMMUNITY RECEPTORS

Question addressed to 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: WORKING HOURS

Question addressed to the Applicant and 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].

To the Applicant:

- 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 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.

To All Relevant Planning Authorities:

v) Comment on the working hours proposed.

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 disruptive to normal traffic operation; cleaning/testing of the pipeline; or overnight traffic management measures (G5).*
- 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.*
- 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.*

Requirement 5: *Code of Construction Practice* in Schedule 2 Part 1 of the draft DCO (application document 3.1, ref. AS-059) states that:

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.

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 outset without any enforceable means of variation should a Relevant Planning Authority consider this necessary.

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.

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.

In recognition of this it is proposed that:

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 effective implementation of the proposed construction mitigation strategies.
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.

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.

EIA.1.7: CUMULATIVE EFFECTS

Question addressed to all Relevant Planning Authorities

- 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].**
- ii) Confirm that potential inter-project cumulative effects have been fully assessed in the ES.**

Taking these questions in turn:

- i) Appendix 15.1 of the ES (application reference 6.4, ref. APP-125) sets out the

developments within the administrative area of Spelthorne that have been considered for inter-project effects. There are three developments listed as major applications within Spelthorne, with only one development taken through to the cumulative effects assessment (CEA).

A list of the major development projects along the route was appended to Spelthorne BC's LIR. The list is more comprehensive than that set out in Appendix 15.1 of the ES. The Council considers the list in the LIR to be more reflective of developments that have the potential to give rise to cumulative effects in Spelthorne and recommends that these are considered in the CEA.

- ii) Given the limited list of cumulative projects that have been assessed to date in Spelthorne, the Council is unable at this stage to confirm that inter-project effects have been fully assessed.

Whilst the question appears to relate to *inter-project* effects, the Council has concerns over the *intra-project* assessment in the Applicant's ES. The Council is particularly concerned as to the level of scrutiny and detail that has been afforded to intra-project effects. This arises particularly in relation to effects on local community receptors - for example, those residents located at the northern end of Ashford Road close to a valve location and trenchless crossing (LIR paragraphs 6.11-6.35), and the effects on the users of Clarendon School (LIR paragraphs 9.12-9.19). The Council would appreciate further scrutiny of intra-project effects. Where significant intra-project effects are identified, appropriate remedies should be sought in or through the DCO.

EIA.1.8: CUMULATIVE EFFECTS

All Interested Parties

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.

Please see the response to question EIA.1.7 above.

TT.1.2: CONSTRUCTION TRAFFIC MANAGEMENT PLAN

Question addressed to all Relevant Highways and Planning Authorities

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].

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 (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.

As described in the Council's LIR (4.29-4.34) it is requested also that the following provision is added to DCO Requirement 7: Construction Traffic Management Plan:

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

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

TT.1.4: STUDY AREAS

Question addressed to the Applicant, all Relevant Highway and Planning Authorities

To the Applicant:

- 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.**

To all relevant Highway and Planning Authorities

- i) Explain whether the extent of the study area for this assessment is**

acceptable.

The Applicant's Transport Assessment (application document 7.4, PINS ref. APP-135), identifies those areas that have been part of the transport study. In Spelthorne the areas considered in the assessment are set out in the table below.

Location	Qualifying feature
B377 Ashford Road, Staines	Traffic Management - Location where works are expected to exceed four weeks.
Woodthorpe Road	
Brett Aggregates, Littleton Lane, Shepperton	Logistics Hub <i>(NB the Council notes, that this is no longer proposed as a location for a logistics hub, in accordance with the consultation material produced by Esso, November 2019).</i>
B376 Shepperton Road, M3 to B379	Construction Compounds
B376 Shepperton Road, B379 Brett Aggregates	
Ashford Station to Ashford Community Centre, Woodthorpe Road	
A30, West London Terminal, Short Lane	
A30 to Ashford Sports Ground, Staines Road	
A30, Orchard Way	

It appears to the Council that these are appropriate areas to include in the study area. Nonetheless, the Council defers to Surrey County Council in its capacity as the Local Highway Authority in respect of this question.

TT.1.11: HEAVILY TRAFFICKED ROADS

Question addressed to 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'.

To the Applicant:

- i) Explain the criteria which determined roads which are deemed to be 'heavily trafficked'

To all relevant Highway and Planning Authorities:

- ii) Confirm the roads selected as being correct.
- iii) Explain whether additional roads could be defined as 'heavily trafficked' and should benefit from trenchless crossings and if so, why.

The Council defers to Surrey County Council in its capacity as the Local Highway Authority in respect of this question. Subject to the LHA's advice:

- i). SBC is content that the roads identified for trenchless crossings within the Spelthorne administrative area are correctly identified as being heavily trafficked;
- ii). the Council does not consider that additional roads should be identified for trenchless crossings by virtue of being heavily trafficked.

TT.1.15: CONSTRUCTION TRAFFIC ROUTING

Question addressed to all relevant Planning Authorities

- 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.
- 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.

The Council defers to Surrey County Council in its capacity as the Local Highway Authority in respect of these questions, but in any event the Borough Council would highlight the following points in response to the two question in FWQ TT.1.15.

- i) The Council's general concerns with respect to the community and residential amenity are set out in its LIR and contained within paragraphs 4.29-4.34 (transport and highways) and paragraphs 4.35-4.38 (residential amenity).

Specific concerns are raised in chapter six (Ashford Road), chapter seven (Fordbridge Park and Celia Crescent), and chapter nine (Central Ashford and Clarendon Primary

School) of the Council's LIR. These chapters raise concerns that inadequate attention has been given to the specific impacts of pipeline construction in individual locations, including construction traffic. To that end, the Council concludes in paragraph 11.7 of the submitted LIR that if planning applications were submitted for the pipeline as currently presented in relation to the areas highlighted in Spelthorne LIR chapters six, seven and nine, it would be minded to refuse planning permission in view of considerations including highway congestion and adverse effects on local amenity.

- ii) The Council is concerned that the traffic assessment undertaken for the project has inadequately assessed the sensitivity of the receptors including for example, the status of Ashford Road and Celia Crescent, which in turn has led to the magnitude and significance of effects being undervalued. The current lack of information regarding the Applicant's site-specific traffic management intentions impedes any assessment of the suitability of roads to accommodate the construction traffic proposed.

Spelthorne Borough Council
November 2019