



Your reference EN070005

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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
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Date 15 November 2019

Sent via email

Dear Sir or Madam

Application by Esso Petroleum Company, Limited for an Order Granting Development Consent for the Southampton to London Pipeline Project

We write in relation to the examination timetable set out in the Rule 8 letter dated 16 October 2019 and the notification of hearings letter dated 28 October 2019.

In response to Deadline 2, we attach the following: -

- Our Written Representations; and
- Responses to the ExA's Written Questions

In relation to the scheduled hearings, we plan to attend all hearings and wish to speak at the Issue Specific Hearings (on the draft DCO and Environmental Matters) and the Compulsory Acquisition Hearing. We would be grateful to have four allocated seats at those hearings.

Yours faithfully

Luisa Stuart

Ref	Matter	Question	RBC response
ALT1.6	Trenchless Techniques	<p>Paragraph 7.4.159 of the Planning Statement [APP-132] also states that the feasibility of using trenchless techniques to avoid protected hedgerows and protected trees has been considered throughout the design development of the project. The conclusion was reached that it was not feasible to use trenchless techniques to avoid these features along the route because of the number of protected hedgerows and trees, which would result in additional engineering, environmental, social, planning and cost/scheduling challenges and impacts. Explain and justify the basis on which this conclusion was reached.</p>	<p>RBC is of the view that all hedgerows which qualify as important under the Hedgerow Regulations must be preserved and not fragmented. Other strategic landscape schemes such as Boorley Green Sewer have agreed to this undertaking in recognition of the hedgerows ecological value.</p> <p>RBC would wish all notable and TPO trees to be identified and preserved by using HDD or rooting the Pipeline outside the root Zones.</p>
ALT1.7	Cove Brook Flood Storage Area	<p>The Register of Environmental Actions and Commitments (REAC), which is</p>	<p>Rushmoor Borough Council shares the concerns of the Environment Agency and would highlight the importance of this area to the prevention of flooding within a wider area.</p>

		<p>contained within Chapter 16 of the ES [APP-056], indicates the proposed method of crossing the Cove Brook Flood Storage Area. The Environment Agency (EA) in its Relevant Representation (RR) [RR-239] has identified that these measures may result in structural weakness to the embankment, which could in turn increase the likelihood of embankment failure which would in turn risk life.</p> <p>Respond to this and explain why a trenchless crossing method has not been proposed at the Cove Brook Flood Storage Area.</p>	
BIO.1.2 and LV 1.2	<p>Landscape and Ecological Management Plan</p> <p>All Relevant Planning Authorities</p>	<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 (pg 71) of the draft DCO</p>	<p>Rushmoor Borough Council has concerns that the 'Register of Environmental Actions and Commitments', as set out in Chapter 16 of the Environmental Statement, does not provide a sufficiently clear and informative framework to guide the preparation of a future landscape and ecological management plan. It is suggested that an outline LEMP should be provided to the Examination, reflecting and supporting the Landscape and Visual Aspects of the Environmental Statement, including Design and Good Practice Commitments.</p>

		[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	
BIO 1.62	Paragraph 2.2.0 of the RR [RR-293] states that you consider that there is not adequate information provided for the ExA to undertake an Appropriate Assessment.	Please expand on why you consider this to be the case and what information you consider needs to be submitted in order for the ExA to be able to undertake an Appropriate Assessment	<ul style="list-style-type: none"> • Rushmoor Borough Council has detailed in its written representations why it considers there is insufficient information to enable the ExA to undertake an appropriate assessment. In summary the information to inform the HRA: Contains an incomplete survey for breeding bird territories • Does not consider direct habitat loss and the impact on bird territories • Gives inadequate consideration to avoidance measures such as alternate routes and working methods • Provides few safeguards to minimise the risk of pollution and contamination of SPA habitats • Does not consider adequately or calculate the increases in recreational pressure that would occur due to construction within the SANGS both individually and throughout the SANG network <p>It is RBC's view that the application as it stands will adversely affect the integrity of the SPA and therefore Regulation 63(5 & 6) could not be fulfilled.</p>
DCO.1.11	Part 3 Article 9 – Power to alter layout, etc. of streets. and Part 3 Article 10 – Street works	The ExA considers that the explanation contained within the EM [AS-061] , which centres on the need for consent from the highway authority, is	<p>RBC's Traffic Management Team act as agents to HCC as the Local Traffic Office. We are concerned that the broad powers detailed within the Article, which could amount to significant changes to the network would occur with only presumed consent from the HA. It is suggested that a clear process of consultation is established and that no alteration occur until HCC/RBC having confirmed consent to the proposals.</p> <p>It is important that a detailed Traffic Management Plan and traffic Impact Study is</p>

	<p>The Applicant All Relevant Local Highway Authorities</p>	<p>insufficient justification for such wide powers conveyed within the Article.</p> <p>To the Applicant: i) Provide justification for the wide powers sought in these Articles.</p> <p>To All Relevant Local Highway Authorities: ii) Provide a response as to the appropriateness of the powers sought by these Articles. (page 9 & 10 of the DCO here)</p>	<p>undertaken for each area of road closure or diversion whether the roads are private or public and whether the activity is for more or less than four weeks.</p>
DCO.1.15	<p>Part 3 Article 14 – Access to works</p> <p>All Relevant Planning Authorities</p>	<p>Comment on the provision contained within Part 3 Article 14 of the draft DCO [page 12 AS-059].</p>	<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 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.</p>

DCO.1.16	<p>Part 4 Article 17 – Discharge of water</p> <p>All Relevant Planning Authorities</p>	<p>Comment on the provision contained within Part 4 Article 17 of the draft DCO [AS-059].</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 in many regards subject to an appropriate consent provision. However it refers to the use of a watercourse or public sewer for the drainage of water however this should include caveats to ensure that water is not contaminated and adequately reflects the current situation such that flows and volumes are not increased in said infrastructure.</p> <p>In the remaining sections, more emphasis needs to be given to the Lead Local Flood Authority (LLFA) and any works in relation to ordinary watercourses require consent from them in the same way that the Environment Agency manage works to main rivers. In addition, the LLFA should be consulted on surface water elements for major applications and although this falls outside of the usual planning format, the same principles should apply.</p>
DCO.1.30	<p>Schedule 2 Requirement 3 – Stages of the authorised development</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>To the Host Local Authorities and National Park Authority:</p> <p>i) Comment on the effectiveness of this Requirement</p>	<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>
DCO.1.33	<p>Schedule 2 Requirement 6(2) – Construction environmental management plan</p> <p>The Applicant</p>	<p>Requirement 6 of the draft DCO [AS-059] states that the Construction Environmental Management Plan (CEMP) must be substantially in</p>	<p>Rushmoor Borough Council shares the Examining Authority’s concerns in this regard. It is suggested that the applicant should provide considerably more detail in the outline CEMP, particularly the annexes, which would serve to provide a more appropriate framework for the preparation of the detailed CEMP.</p> <p>Rushmoor Borough Council also seeks further requirements which would address specific</p>

	<p>All Relevant Planning Authorities</p>	<p>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>To the Applicant: i) Respond and justify the current approach.</p> <p>To All Relevant Planning Authorities: ii) Comment on the above.</p>	<p>scheme impacts, particularly on open space. A draft requirement is provided below:</p> <p>Management of Works in Open Space</p> <p>X.—(1) No stage of the authorised development which includes works in open space must commence until, for that stage, a scheme for the management of the open space during the period of construction has been submitted to and approved by the local planning authority.</p> <p>(2) The scheme submitted under requirement X(1) must include:</p> <ul style="list-style-type: none"> (a) Details of the method of construction within that open space (b) The proposed dates of construction activity within that open space (c) The proposed working hours for construction activity within that open space (d) Details of how public access to the open space will be maintained during the course of construction (e) Details of how the open space will be restored at the end of the construction period. <p>(3) Where the open space affected by the works is identified as Suitable Alternative Natural Greenspace for the purposes of the avoiding recreational pressure on the Thames Basin Heaths SPA, the scheme submitted under requirement X(1) must include an assessment of how the details of the works and measures in the scheme will avoid any displacement of recreational activity from the open space.</p>
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			(4) The works comprised in any stage must be constructed in accordance with the scheme approved under requirement X(1).
DCO.1.34	Schedule 2 Requirement 6(2) – Construction environmental management plan The Applicant 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. Respond.	Rushmoor Borough Council agrees with the ExA that a Community Engagement Plan (and potentially a Local Liaison Officer) should form a separate requirement in the DCO in recognition of the important role of ensuring that local communities and businesses are kept well informed of construction activities that could affect them.
DCO.1.35	Schedule 2 Requirement 8(3) – Hedgerows and trees The Applicant 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.	The Council considers that the proposed three-year period for the management and replacement of hedgerows and trees is unjustifiably short. It is generally accepted good practice that a five-year period is more appropriate in ensuring that the trees/hedgerows are sufficiently established. Rushmoor Borough Council would also suggest that the final sentence of Requirement 8 (3) is modified to allow for planting material of <u>different</u> specification to be planted as a replacement in circumstances where the original specification of tree/hedgerow may no longer be considered to be suitable subject to agreement of the Council

		Comment on the adequacy of the Requirement and on the time period allowed for reinstatement and management.	
DCO.1.37	Schedule 2 Requirement 20 – Further information The Applicant All Relevant Planning Authorities	<p>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.</p> <p>To All Relevant Planning Authorities: ii) Comment on the above.</p>	<p>The Council agrees with the ExA that this provision is unreasonably short and is concerned that in the likely event that we were unable to comply with it and the submission was then found to be inadequate, the Council's only option would be to refuse consent within the 28 day period. In considering applications for discharging the requirements of the DCO, it is anticipated that there will be a need for internal consultation within individual local authorities, as well as the potential need to liaise with neighbouring local authorities and other key stakeholders.</p> <p>Taking into account the need to effectively and efficiently manage resources within local authorities, it is considered that 14 calendar days is a more appropriate timescale for requesting further information.</p>
DCO.1.38	Schedule 2 Part 2 – Procedure for Discharge of Requirement 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.	<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 required. That provision could be amended as follows:</p> <p>"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 <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</p>

			or approval required by the Requirement.”
FR.1.2	Surface and Foul Drainage System 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].	<p>We have concerns regarding the lack of information in relation to surface water particularly given the disparity of information between the flood risk assessment and draft DCO. For example, the DCO refers to attenuation ponds but the FRA states that no areas of hardstanding will be provided so no drainage will be required. Although the FRA is not considered to be sufficiently developed, given the nature of the development, this could be addressed through the discharge of Requirement 9 providing it is enhanced to cover the requirements the LLFA require from all developments. We would also request that the FRA provided is not considered as an approved document as we do not feel that some of the conclusions drawn in relation to surface water management are valid. For example, section 13.2.11 of the Flood Risk Assessment states ‘However, it is acknowledged that there is a risk of the ground becoming compacted due to the movement of plant, reducing its permeability. In such circumstances and where appropriate, cross-fall would be installed on access and haul roads, to direct runoff away from the pipeline trench (G186)’. We do not consider it acceptable to direct runoff away from the pipeline trench as this could directly increase flood risk unless an appropriate level of assessment is undertaken.</p> <p>We would ask that the text within the DCO Requirement 9 specifically references the LLFA as well as the Environment Agency etc and also refers to requirements for an appropriate submission as detailed on HCC website - https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning</p> <p>We would also ask that groundwater is covered here as well with groundwater monitoring requested in susceptible areas (between Nov – Apr) and where a 1m unsaturated zone is required for any surface water drainage to function.</p> <p>This section also refers to the REAC but the items identified are so high level they do not provide any confidence that surface water will be appropriately considered at a later date. Therefore we would request that an additional item is included to consist of a suitably developed flood risk assessment and drainage strategy containing those elements listed on our website.</p>

			<p>There are 61 construction hubs. While the access roads may be permeable, there will still be site offices and impermeable areas so can not be fully considered as permeable. A factor will need to be applied and some form of drainage assessment undertaken. We would like to see more detailed proposals for each of these hubs (within Hampshire) to allow us to assess the level of flood risk in the form of a site specific flood risk assessment and drainage strategy.</p> <p>Alternatively, if surface water is to be addressed through the discharge of Requirement 9 then we would request that the wording is enhanced to sufficiently cover the elements identified above.</p>
HE.1.2	Written Scheme of Investigation 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].	<p>Rushmoor Borough Council understands that HCC is currently negotiating on this matter with the applicant. "Insofar as it relates to the route through Rushmoor, the Examination panel is referred to the attached map based on GIS information provided by Hampshire County Archaeology Service. This indicates that there are no 'alert red' sites within Rushmoor on or near the proposed route, there is one 'alert yellow' area potentially affected, and five 'alert green' areas close to the route boundaries. This information is consistent with that in application documents APP-049 and the corresponding map (Sheet 9 of 18) in APP-063. The former references the involvement of the Hampshire County Archaeologist in discussions leading to the preparation of these documents. Rushmoor relies on HCC for archaeological advice under a service level agreement. Subject to the views of the County Archaeologist, a WSI could be submitted pursuant to Requirement 11 of the draft DCO."</p>
LV.1.2	Landscape and Ecological Management Plan All Relevant Planning Authorities	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].	See BIO 1.2

		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.	
LV1.17	Planting Mitigation	<p>The ExA is concerned with the approach taken by the Applicant and the use of the words “where practicable”. The wording would weaken the commitment to mitigation measures set out in the ES, REAC and draft DCO [AS-059] and could result in significantly greater long-term landscape and visual effects than assessed in the ES, for example, if the Order Limits were kept free of trees.</p> <p>i i) Confirm the circumstances in which it would not be practicable to implement the vegetation retention, protection and replanting or reinstatement;</p> <p>ii ii) Explain why the Applicant has not fully</p>	<p>Rushmoor Borough Council shares the ExA concerns about the potential impacts. However we also question why the applicant is unwilling to provide planting outside the order limits where appropriate to mitigate the loss, particularly of mature trees. This approach would enable in some cases full mitigation.</p>

		<p>committed to provide replacement planting;</p> <p>iii iii) Explain whether there is uncertainty as to the extent of mitigation possible in practice; and</p> <p>iv iv) Confirm whether the ES [APP-050] has presented a worst-case assessment.</p>	
LV1.19	Planting Mitigation	<p>The REAC (Ref: G97 of Table 16.2) [APP-056] proposes the use of native shrub planting where woodland vegetation is lost and trees cannot be replaced due to the restrictions of pipeline easements.</p> <p>i i) Confirm whether Local Authorities, the National Park Authority, NE and local wildlife trusts will be invited to, or have made comments on the proposed species for replacement shrub, hedgerow, tree and woodland planting.</p> <p>ii ii) Confirm how grass seed mixes would</p>	<p>Rushmoor Borough Council does not consider it has been consulted on proposed species for replacement planting. It would suggest that a requirement for the planting scheme to be agreed with the relevant Local Authority would be appropriate to ensure that it is in accordance with local green infrastructure, bio-diversity and other plans.</p>

		be selected.	
LV.1.20	Planting Mitigation 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>	Rushmoor Borough Council considers that the proposed three-year period for the management and replacement of hedgerows and trees is unjustifiably short. It is generally accepted good practice that a five-year period is more appropriate in ensuring that the trees/hedgerows are sufficiently established.
LV1.25	Viewpoints	Confirm acceptance of representative viewpoints	Reference to Environmental Statement (Volume D) Appendix 10.1 Representative Viewpoints. Agree in principle from description, however no map marking the location of the Reference viewpoints could be found
PC.1.1	Community Receptors 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.	Rushmoor Borough Council confirms that the 500 metre buffer zone from the Order Limits represents an appropriate buffer to apply to identify community receptors for this proposal.
PC.1.8	Working Hours The Applicant All Relevant Planning Authorities	<p>The proposed hours of work are 4 hours longer than a standard working day and would operate 6 days a week [APP-128].</p> <p>To the Applicant: i) Advise why the extended working</p>	<p>Reasonable working hours for construction are generally considered to be 0800-1800 Monday to Friday and 0800-1300 on Saturdays with no working on Sundays and Bank Holidays. Under Planning, these hours are generally stipulated within a condition attached to any permission granted. Work outside these hours are permitted in exceptional circumstance only.</p> <p>Requirement 14 (1) of the draft DCO [AS-059] stipulates that: Subject to Requirements 14(3) and 14(4), construction works must only take place between 0700 and 1900 on weekdays and Saturdays except in the event of an</p>

		<p>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.</p> <p>To All Relevant Planning Authorities: v) Comment on the working hours proposed.</p>	<p>emergency. However, 14 (4) states: Nothing in requirement 14(1) above precludes— (a) the receipt of oversize deliveries to site, the arrival and departure of personnel to and from site, on-site meetings or briefings, and the use of welfare facilities and non-intrusive activities; and (b) start-up and shut-down activities up to an hour either side of the core working hours.</p> <p>‘start-up and shut-down activities’ are not defined so clarity on this and what these activities could consist of would be welcome. 14 (4) appears to open the possibility that works could conceivably commence at 0600 Monday to Saturday, whilst staff arriving to site, having meetings on-site or the site taking of oversize deliveries could occur at any time, even before 0600 hours. Given the residential nature of Rushmoor, this could give rise to significant disturbance to amenity if not appropriately controlled or managed.</p> <p>Rushmoor Borough Council would want to see the hours of work restricted so that no activity can commence on site before 0800 on any day. The Applicant should have regard to BS 5228-1:2009 ‘Code of practice for noise and vibration control on construction and open sites’ in terms of hours of work in relation to noise sensitive receptors. The acceptable hours for the residents and occupiers of a particular area should be a consideration.</p> <p>The hours of work should be specified within the Outline CEMP.</p>
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EIA.1.7	Cumulative Effects All Relevant Planning Authorities	<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>The list is accurate at the time of the assessment. While roads in Rushmoor have been excluded due to the under 4 week criteria we do not anticipate any significant inter project effects from the schemes listed. We would draw the applicants attention to the proposed Farnborough and less significant for this project Aldershot Town Centre regeneration plans. Rushmoor currently anticipates an application for the redevelopment of the Civic Quarter in Farnborough to be submitted at during Qtr 2 2020 with a permission in Qtr 3 or 4 2020. This substantial scheme could have significant cumulative impact on the project as it would be anticipated to start within the lifetime of the project. The two major schemes in Aldershot are expected to have submissions of Planning Permission in the current quarter and first quarter of 2020 with starts during 2020. While it would not be possible at the current time to assess cumulative or in-combination effects these will need to be considered in the detailed planning of the project. The Farnborough Airshow is not subject to Planning Control and held on a two yearly basis. The Farnborough Airshow attracts 80,000 visitors. RBC considers that the impact of any closures, diversions or other preventions on the road network would be incompatible with the holding of the Airshow and will be seeking a requirement that no streetworks affecting access to Farnborough is undertaken during the period of the show. Farnborough International also holds other events and the applicant will need to liaise with them to ensure coordination of streetworks in light of what vis being held.</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] (click here for the list) have adequately assessed the cumulative or in-combination effects that could arise from other development, plans and projects along the proposed route.</p>	
TT.1.2.	Construction Traffic Management Plan	<p>Comment on the absence of an Outline CTMP in the Examination and whether it</p>	<p>"RBC consider that an outline CTMP should be provided at this stage to allow a proper consideration of the way in which construction traffic can be managed. A number of RBC's concerns relate to construction traffic impacts and the provision</p>

	All Relevant Highway and Planning Authorities	is agreed that such a document can be submitted as part of the discharge of Requirement 7 of the draft DCO [AS-059].	of an outline CTMP may assist in addressing these matters."
TT.1.4	Study Areas 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.	It is the view of RBC that an assessment of any diversion, delays or prevention should be included in the Traffic and Transport assessment study area. In the absence of more detailed information it is difficult to determine the areas. RBC strongly questions the restriction to works within roads anticipated to exceed 4 weeks as this fails to assess the extent of impact rather than the length of impact. Currently all roads in Farnborough are effectively excluded. This includes arterial routes such as the A325 and A311. Also the main routes within north Farnborough providing access to the town. We would use as an example Cove Road which is included in the proposals. Despite very careful planning very substantial impacts occurred when closed for only a day resulting in delays of 300% in travel times. While it is understood closure is not proposed one way traffic would clearly have a very substantial impact. We therefore consider the Traffic and Transport Study areas to be flawed by the assumptions made on assessing impact.
TT.1.11	Heavily-Trafficked Roads 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.	Rushmoor Borough Council would regard the main roads in the North of Farnborough to be heavily trafficked this would particularly include Cove Road and Ively Road which are directly affected. However while the smaller roads may not be technically heavily trafficked due to the relative scale the impacts can be greater and therefore the appropriate approach needs to be assessed on a case by case basis.

		<p>To the Applicant: i) Explain the criteria which determined roads which are deemed to be 'heavily trafficked'</p> <p>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.</p>	
TT1.12	Selection of route in Cove Road	RR-118 suggests that the change in route for the Cove Road section may have been undertaken for financial rather than technical reasons as it would enable the use of open cut as opposed to trenchless techniques even though this would potentially cause more disruption to road users.	Rushmoor Borough Council has significant concerns about the impact of works in Cove Road. Our experience has shown that closure of this road has a very substantial impact on the road network in the North of Farnborough increasing travel times three-fold. The use of trenchless techniques would be preferable. However if open cut as opposed to trenchless techniques can be justified a detailed traffic impact study based on the actual requirements for the work is necessary to establish the direct and diversionary impacts and to establish to what extent these can be mitigated through a Traffic Management Plan.
TT.1.15	Construction Traffic Routing All Relevant Planning	i)Comment on the extent to which the local community (including local businesses, schools and farms) might	Rushmoor Borough Council considers there is currently insufficient information to determine the likely extent of impact given that the Traffic Assessment Study excluded roads in Farnborough. However Rushmoor is a highly urbanised Borough with limited road capacity and impacts are likely to be significant. Requiring an outline CTMP which

	Authorities	<p>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>includes routeing for all construction compounds and includes roads where impacts are likely to be significant would be helpful in planning and managing the impacts on communities.</p>
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