

## **EN0700005: Southampton to London Pipeline Project**

### **Written representation on behalf of Blackwater Valley Friends of the Earth regarding the environmental impact in the Farnborough area of Hampshire**

15 December 2019

#### **To the Planning Inspectorate**

This representation is to voice Blackwater Valley Friends of the Earth concerns regarding the avoidable direct environmental impacts to the Farnborough area and the indirect negative environmental implications that will arise from this project in its current form. The main geographical areas of concern are:

#### **1. Queen Elizabeth Park**

QE park is the only woodland left in a high density urban environment in Farnborough. The park is very popular with local people both for leisure and also as a commuting corridor for cyclists and pedestrians. It has a high number of veteran trees (older than 50 years). The site also forms an important stepping stone for biodiversity in what is known as the South Western Main Green Corridor to allow safe routes for fauna.

BVForE has grave concerns over the 15m swathe through the park which will require over 25% of the trees being lost. This loss of trees will sever the continuous woodland corridor and would have a substantial negative impact on local biodiversity e.g. limit the roosting, nesting and foraging opportunities for bats, birds and invertebrates, as well as weakening the connecting corridor likely to be used by ground dwelling reptiles, amphibians, badgers and otters.

BVForE believes the applicant should be required to amend their plans so that the park is avoided by using the local roads as a detour. If this is not possible then drilling under the park (at sufficient depth to avoid the tree roots) should be required instead of the destructive "cut and covering".

#### **2. Thames Basin Heath Special Protection Area (SPA)**

The Thames Basin SPA is a network of heathland sites that cover 8,000ha of Berkshire, Hampshire and Surrey. BVForE is concerned that the affect the pipeline will have on this very important area of biodiversity. The application states that it will take at least five years for acidic grassland and heathland to grow back after the works. As it is known that the Dartford warbler, nightjar and woodlark, all protected under the Red List for Birds (2015), nest in these SPA grasslands this will have a detrimental effect on the species numbers for the foreseeable future.

No assessment has been performed by the applicant on the affect of the bird population in the SPA, contrary to the Conservation of Habitats and Species Regulations 2018 63(2). BVForE requests that the applicant be required to provide adequate information on the area of heathland and woodland lost and its value as bird feeding, breeding and displaying habitat.

### 3. Southwood Country Park SANG

Southwood Country Park (former Southwood Golf Course) Suitable Alternative Natural Greenspace (SANG) is being managed by Rushmoor to become an important biodiversity resource in the area. The Country Park already has a large population of slow worms, common lizards and palmate newts. The council has plans in 2020 to allow the floodplain to regenerate with existing drains and ditches naturalised. The proposed planned works of the pipeline after this date will lose acid grassland, wet woodland, and a significant number of trees thus negating any biodiversity gain from this regeneration.

Cove Brook and Marrow Brook also run close to the Country Park and are used to drain excess water. Both brooks have been assessed as “bad” under the Water Framework Directive (WFD). There is a high risk that pollution run-off from the works will worsen the water quality.

In summary, it should be noted that at a meeting of Rushmoor Borough Council held on 20th June, 2019 the Council unanimously acknowledged a ‘Climate Emergency’. Taking into account the responses from residents to the recent public engagement on a long-term vision for the Borough, the Council agreed to develop a plan to enable a green and sustainable Rushmoor and a carbon-neutral Council by 2030. In the developing action plan the Council resolved to increase tree cover in the Borough. The pipeline scheme is contrary to this, removing mature trees that effectively sequester carbon from the atmosphere whilst improving local air quality.

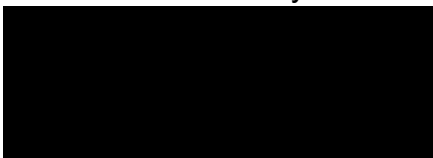
In conclusion, this proposal will negatively impact the green corridors and natural habitats of Farnborough, further degrading the biodiversity of the area which is already under significant pressure due to numerous other existing planning developments. BVFoE would hope the Planning Inspectorate would request that ESSO amend their plans for much more mitigation to take place in order to reduce the environmental damage that will occur under the present proposals.

Kind regards



Rick Kimber

Blackwater Valley Friends of the Earth



*Blackwater Valley Friends of the Earth are a licensed local group of Friends of the Earth England, Wales and Northern Ireland*