

**SLP PIPELINE
TURFHILL PARK, LIGHTWATER, SURREY**

**Opposition of Heronscourt and Colville Gardens
Residents' Associations to the route of the
Southampton to Heathrow Pipeline across
Turfhill Park**

**Presentation to the Examining Authority
Ahead of Deadline 3: 18/12/19**

DECEMBER 2019

Introduction

Following the Issue Specific Hearings on the 3rd and 4th December, we were encouraged by the rigorous process that typified the Hearings and the relevant and focused questioning that the Examining Authority levelled at those attending in particular, the Applicant.

We were disappointed that the Applicant was able to rely on legal process to delay and obfuscate answers to many of the perfectly reasonable questions posed by all in attendance via the Examiners.

It is very clear that many of the issues that have been raised in formal and informal submissions by all those involved in the Turfhill Park section of the pipeline route are being subjected to close scrutiny by the Examiners who are requiring considerably more explanation and evidence from the Applicant.

We are now aware that because the ISH process was a Hearing rather than an examination we have to rely on the Examination process and the Inspectorate to obtain satisfactory answers to many of the questions that Heronscourt and Colville Gardens Residents' Associations have been seeking during the months before the Applicant submitted its Plan to the Examining Authority.

It had been expected (to those of us not fully aware of the Examination process) that Interested Parties would, at some stage, have an opportunity to question and get answers from Esso directly about relevant aspects of their proposals. This has not been the case and the recent ISHs made it very clear that the Examination was to be a mainly written process. Therefore we feel that we are obliged to submit our additional comments after the ISHs and ahead of Deadline 3 on 18th December 2019

The timing of outstanding points of action makes it difficult to give a comprehensive response to meet Deadline 3 until we have seen and considered the Applicant's many responses and attitude to your questions also due at that time.

We fully expect to be able to do this for Deadline 4 in January 2020 and welcome the ExA's determination to impose controls and demonstrations of accountability upon the Applicant.

Since we have not been able to engage Esso fully with our concerns and despite your comprehensive list of questions to the Applicant that do cover many of the points needing clarification, we set some of these out below in the expectation that these significant issues will be answered by the Applicant and covered in their Local Environment Management Plan (LEMP), Construction Environment Plan (CEMP) and the other documents you have requested from them and other Relevant Bodies.

Furthermore, since we have not been able to also engage fully with our local council representatives, we are not clear whether some of their issues relating to Turfhill Park, e.g. traffic, flood control, noise abatement and the necessary tree border around the Park will

be apparent to the Inspectorate once their Deadline 3 and/or Deadline 4 submissions have been received.

At this stage we have no idea whether they will provide any constructive suggestions in response to your relevant question number 26 of the Action Hearing Points about the implications of reversion to route F1c. Our comments are below.

Alternative Route

The Applicant indicated at ISH 2, that as F1c may no longer be within the Application Limits, any change back to it would now alter the state of this alternative route from 'non material' to one that is 'material'.

This causes the HCRA & CGRA and local residents' great concern.

Since the Associations were never recognised as Relevant Organisations, they had no opportunity, once the choice of route had been announced in March, to formulate and present their considered and researched support for F1c, before the Applicant had actually submitted its preferred route to the ExA.

Because the new route now ran in the immediate proximity of the two estates and as this was contrary to the statement made by the Applicant at ISH 2 that their policy is to avoid residences, at the very least, the Residents affected by this choice, should have been consulted. They were not.

The Applicant thereby wrongly avoided any opportunity for either the Associations or their Residents to make their case.

Had the Associations or its Residents been made aware of this choice of option through Turfhill Park in January, Route F1c, once exposed to public scrutiny, would not have been removed from the Application Limits and the question of 'materiality' not arisen.

Because of the disproportionate impact this decision has at this late stage, we have no alternative but to seek the ExA's assistance in clarification and support for the situation that all those affected by the pipeline now find themselves in.

Additional Points

All other matters relating to Turfhill Park were fully covered in our formal submission to the Inspectorate ahead of Deadline 2 but the Residents of Heronscourt and Colville Gardens remain concerned that a number of specific issues have not yet been adequately responded to either by the Applicant, Surrey County Council and Surrey Heath Borough Council.

These matters include, inter alia:

Water Pipeline

Whether the Applicant can persist with Route F1a+ given the presence of the Affinity Water Line on F1a? (The Bridle Path section of F1a+)

The Presence of Sand Lizards and their Habitat

Whether sand lizards and or their habitat remain within 40/50 metres of F1c? (the original release area)

In our minds, there is much doubt about sand lizards actually being in the vicinity of F1c. Given the gravity and severe permanent consequences of the use of F1a+, there is more than enough justification for an independent survey to be carried out to determine whether sand lizards or their habitat could be affected by using the F1c route.

Tree/Habitat loss

It was very apparent that many Local Authorities are not satisfied with the inability of the Applicant to produce even an estimate of the number of trees that will be affected.

Furthermore, since Natural England declined to attend the Issue Specific Hearings, the Examiners have not able to fully assess the impacts on biodiversity between the routes F1c and F1a+ which we presume is a matter for the Applicant to address?

Flood Risk

The Applicant does not seem to understand our concerns about the increased risk of flooding by the removal of trees.

Logistic Hubs/Compounds

What are the local impacts of the decision by the Applicant to reduce the number of hubs from 6 to 2 on the route? This has still to be explained including traffic for Just-In-Time deliveries to site and the additional tree loss where the Compounds need to be located, etc.

Conclusion

Originally, it had been intended that we would not submit any issues for Deadline 3 in the light of the Inspectorate's comprehensive list of questions requiring answers by the Applicant and other bodies for that date.

We still intend to submit a written submission to the Planning Inspectorate once we have considered the answers to your queries arising from the latest two Issue Specific Hearings. This we anticipate to be at or before Deadline 4 on Thursday 30th January 2020.

However, because of our concerns about materiality and our limited ability to question the Applicant once the project was submitted for examination has led us to highlight some of the on-going issues which we anticipate that the Examiners will be addressing over the coming weeks.

17th December 2017

Heronscourt Residents Association

Colville Gardens Residents Association