

From: [Karl Cradick](#)
To: [Southampton to London Pipeline Project](#)
Subject: EN070005: ESSO pipeline DCO - joint Deadline 3 submission by SPELTHORNE, RUNNYMEDE and SURREY HEATH BCs
Date: 18 December 2019 15:48:34
Attachments: [EN070005 Surrey LPAs site CMS outline 18.12.19.pdf](#)

18 December 2019

The Examining Authority Case Team
(Esso Southampton to London Pipeline)
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Ref. EN070005

Dear Sir / Madam,

**ESSO PETROLEUM COMPANY LIMITED: DCO APPLICATION FOR THE
SOUTHAMPTON TO LONDON PIPELINE PROJECT
JOINT DEADLINE 3 SUBMISSION BY SPELTHORNE BOROUGH COUNCIL,
RUNNYMEDE BOROUGH COUNCIL AND SURREY HEATH BOROUGH COUNCIL**

Savills is instructed by the three named Borough Councils in Surrey in connection with the planning and environmental aspects of Esso's DCO application.

In response to a request to local authorities by the Applicant's advocate during the 3 December 2019 ISH on environmental matters, Esso has been provided with drafts of a proposed outline for site-specific Construction Method Statements (CMS) covering identified 'hotspot' locations of highest sensitivity on the pipeline route. This approach aligns with observations made by ExA at the end of the Environmental Matters ISH on 4 December 2019.

A draft of the proposed CMS outline as it applies to host boroughs in Surrey is enclosed for Examination Deadline 3. Please confirm receipt.

I understand that Rushmoor BC is making a parallel submission in which its site-specific concerns are explained in more detail.

Yours faithfully,

Karl Cradick
Director
Planning

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 Before printing, think about the environment



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Proposed outline of site-specific Construction Method Statements for locations of highest sensitivity on the pipeline route

INTRODUCTION

Assessments of the local impacts of Esso's pipeline proposal by local authorities in Surrey have identified a small number of particularly sensitive sites for which the agreement of clear and enforceable environmental safeguards, beyond those set out in Esso's draft DCO and related documents, are considered essential before any Order is made.

From west to east the sites concerned are as follows.

Surrey Heath

- **Balmoral Drive in Frimley Green** - traffic disruption and loss of residential amenity, particularly of concern in the event of a full road closure being deemed necessary by Esso or the Local Highway Authority
- **Nature 2000 and SSSI sites generally** – working methods proposed to avoid significant adverse impacts, in conjunction with Natural England, local authorities and landowners. These should include measures to survey and protect or translocate sand lizards and great crested newts
- **SANGs** – St Catherine's Road and Windlemere, where clarification is required on matters including the duration of works, the retention of circular walks, avoidance of works in the bird breeding season and the maintenance of tranquility.
- **Lightwater / Turf Hill** – tree loss and flood protection

Runnymede

- **Cockcrow Hill to Sandgates** – including Silesian School
- **Canford Drive and Roakes Avenue** – traffic disruption and residential amenity
- **Abbey Rangers Football Club and Chertsey High School**
- **Chertsey Meads**

Spelthorne

- **Ashford Road** – tree loss, traffic disruption and residential amenity
- **Fordbridge Park and Celia Crescent** – tree loss, effects on open space and residential amenity
- **Ashford town centre** – specifically the area around Ashford railway station
- **Clarendon primary school**

The environmental, land use and amenity sensitivities raised by the proposed pipeline in

these individual locations are site-specific and have been identified in Local Impact Reports (LIRs) and evidence heard at in DCO hearings. The individual challenges presented by these sites warrants a bespoke response but in general it is proposed that Esso will prepare focused Construction Method Statements for consideration during the current DCO Examination, containing the information set out below.

SITE-SPECIFIC CONSTRUCTION METHOD STATEMENT: GENERAL CONTENTS

1. Introduction

Description of the location in which the CMS would apply and of the finished development proposed in the area concerned.

Overview of the works proposed by Esso to construct the pipeline in the location concerned and restore the land afterwards.

2. Programme

It is recognised that a specific calendar date for the commencement of works cannot be identified at this point. Instead the CMS should set out the programme of works from 'month one' and identify the main phases of development over a monthly timeline to completion, including likely gaps in construction activity (e.g. between preparatory tree works and species translocation, trenchless works and trenched construction), land access arrangements during these gaps, and the programme for the after-care of the sites. If works need to avoid or be suspended in ecologically sensitive seasons or during school term times, for example, this should be explained.

Subject to seasonal constraints it is hoped that this section of the CMS will specify work programmes shorter than the draft DCO and related documents currently envisage. However, the overall length of the programme should take into account restrictions in working hours required, for example, to protect residential amenity or maintain peak-hour road access.

3. Design

The CMS should specify the narrowest practicable construction corridor and smallest working areas in the subject locations.

It is acknowledged that precise pipeline routing and engineering design cannot be specified at this stage. Instead the CMS should describe the process by which Esso or its contractors will progress from the broad development parameters provided for in the draft DCO to a detailed route and mitigation-specific design. The description should cover detailed site investigation and commitments to meaningful engagement with interested parties. This should include the process for agreeing precise pipeline pathways through woodland, wildlife habitats, open spaces and along public highways with local authority representatives and statutory consultees, with the common aim of delivering the pipeline in a manner that minimises harm.

Where there are engineering constraints to, for example, weaving a pipeline through woodland with a view to minimising tree loss and farm to root systems, or crossing a watercourse using open-cut methods, these practical limitations should be described and justified in the CMS.

4. Implementation

The CMS should explain how relevant general commitments made in Esso's Register of Environmental Actions and Commitments (REAC) will apply in a specific sense in the subject locations. This should include the measures proposed to ensure the effective implementation of the CMS by contractors on individual construction sites, along with procedures for monitoring and responding to complaints.

It should also set out arrangements for managing contingencies.

5. Enforcement

The document should explain how the CMS will be embodied and enforced in the DCO and certified documents. Options to consider include DCO Requirements, appending the CMS to the Construction Environmental Management Plan or the Code of Construction Practice, or s.106 legal agreements with the relevant planning authorities.

6. Supporting provisions

The CMS can refer to and elaborate upon but does not need to repeat safeguards already offered in the draft DCO. That said, the local authorities request a commitment from Esso that the next draft of the DCO will include the following additional provisions, applicable to the entire pipeline route.

1. A new DCO Requirement on tree protection proposed in paragraph 4.13 of Spelthorne BC's Local Impact Report (LIR), para. 2.13 of Runnymede BC's LIR and paragraph 2.16 of Surrey Heath BC's LIR.
2. Additional provisions in Requirement 7: *Construction traffic* of the draft DCO, as set out in paragraph 4.34 of Spelthorne BC's Local Impact Report (LIR), para. 2.34 of Runnymede BC's LIR and paragraph 2.37 of Surrey Heath BC's LIR.
3. New DCO Requirements on the Provision of Suitable Alternative Natural Greenspace and the Management of Works in Open Space, as proposed under paragraph 13 of Surrey Heath BC's Written Representation submitted at Examination Deadline 2 (14 November 2019).

These provisions would be of benefit in understanding the effects of works in the locations subject to site-specific CMSs.