

Southampton to London Pipeline Project

Deadline 3

Comments on Responses to ExA's Written Questions
Application Document: 8.27

Planning Inspectorate Reference Number: EN070005

Revision No. 1.0

December 2019



Southampton to London
Pipeline Project



Contents

1	Comments on Responses to ExA's Written Questions - Environment Agency	1
2	Comments on Responses to ExA's Written Questions - Hampshire County Council	3
3	Comments on Responses to ExA's Written Questions - Independent Educational Association Limited	12
4	Comments on Responses to ExA's Written Questions - Notcutts Limited	15
5	Comments on Responses to ExA's Written Questions - Runnymede Borough Council	18
6	Comments on Responses to ExA's Written Questions – Rushmoor Borough Council	32
7	Comments on Responses to ExA's Written Questions - South Downs National Park Authority	39
8	Comments on Responses to ExA's Written Questions – Spelthorne Borough Council	40
9	Comments on Responses to ExA's Written Questions -Surrey County Council	57
10	Comments on Responses to ExA's Written Questions - Surrey Heath Borough Council	73
11	Comments on Responses to ExA's Written Questions - Winchester City Council	89

1 Comments on Responses to ExA's Written Questions - Environment Agency

Table 1.1: Applicants comments on responses to Written Questions

Question FR.1.3: Baseline Data Confirm whether the baseline data included within Chapter 8 of the ES [APP-048] and the accompanying appendices are acceptable." and "ii) If issues with the baseline have been identified, state what these are		
Interested Party	Interest Party Response to Written Question	Applicant comments
Environment Agency REP2-065	<p>1.5.1 We have identified three areas where baseline data may not be included, or it is unclear whether data has been included.</p> <p>1.5.1.1 Strategic Flood Risk Assessment (SFRA) data (including for example Flood Zone 3b extents) has only been provided for two local authorities (Surrey Heath and Rushmoor Borough Councils). We would expect the Flood Risk Assessment (APP-134) to consider the SFRAs and associated data for all of the local authorities that the pipeline, compounds and hubs are located within.</p> <p>1.5.1.2 It is unclear whether the applicant has used all of the best available flood risk modelling data to assess flood risk for works in fluvial flood risk areas, notwithstanding that</p>	<p>The project reviewed the latest Strategic Flood Risk Assessments (SFRA) produced by each Local Planning Authority to assist with the assessment of the impacts of the project on flood risk. Locations where this has informed the Flood Risk Assessment (FRA) are listed below:</p> <ul style="list-style-type: none"> • Section 7.1.5 of the FRA (Application Document APP-134) highlights where SFRAs define Flood Zone 3b (Rushmoor Borough Council and Surrey Heath Borough Council) or rather identify the entirety of Flood Zone 3 to be Flood Zone 3b; • The Surrey Heath SFRA was specifically reviewed to obtain information about the Cove Brook FSA; and • Section 10.2.2 notes that the SFRAs were used to ensure no further reservoirs, beyond those already included on the Environment Agency's mapping, could impact on the project. <p>All available flood risk modelling data were requested by the project from the Environment Agency at the beginning of the project. The Environment Agency has supplied the following modelling data, which is limited to 1-Dimensional results for fluvial main river modelling for the following locations:</p> <ul style="list-style-type: none"> • Addlestone Bourne (including the Hale Bourne); • River Blackwater (including the Cove Brook);



Question FR.1.3: Baseline Data Confirm whether the baseline data included within Chapter 8 of the ES [APP-048] and the accompanying appendices are acceptable.” and “ii) If issues with the baseline have been identified, state what these are

Interested Party	Interest Party Response to Written Question	Applicant comments
	<p>some of this modelling data will be not be required until assessment at detailed design stages.</p> <p>1.5.1.3 It is not clear that the applicant has included Chemical Status in the baseline or WFD assessment (APP-107). Chemical status combines with Ecological Status to form the Overall waterbody WFD status. If they have decided to scope Chemical Status out of the assessment, we would expect to see further justification. We note that in other parts of the Environmental Statement land contamination has been identified on the route. Dewatering activities or effecting pathways between ground and surface waters could pose a risk to surface water WFD chemical status, and therefore the overall WFD status for the waterbody.</p>	<ul style="list-style-type: none"> Hoe Stream (not used in final FRA as route does not cross this watercourse); and River Thames (including the Chertsey Bourne and River Ash). <p>As noted in Section 7.4.7 of the FRA, the results of the hydraulic modelling have been used to establish the flood level within a floodplain area (flood cell) to determine the approximate floodplain volume using LiDAR topography. The results of the hydraulic modelling have been used to establish the 1% AEP peak water level and determine the level above which temporary buildings will be raised at Mead Lane construction compound</p> <p>Explicit reference to chemical WFD quality elements has not been made in the assessment. However, they have been considered alongside physico-chemical quality elements given the strong relationship between the two elements. Compliance with the WFD objective to reduce priority pollutants is assessed in Table 36 in Appendix 8.6 (Application Document APP-107).</p>

2 Comments on Responses to ExA's Written Questions - Hampshire County Council

Table 2.1: Applicants comments on responses to Written Questions

Question BIO.1.2: Landscape and Ecological Management Plan 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.		
Interested Party	Interested Party Response to Written Question	Applicant comments
Hampshire County Council REP2-066 <i>(Also relates to LV.1.2)</i>	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.	The Applicant committed at the Issue Specific Hearing on the draft DCO to submit an outline Landscape and Ecological Management Plan (LEMP) as part of the Examination by Deadline 4.



<p>Question 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 insufficient justification for such wide powers conveyed within the Article. To the Applicant: i) Provide justification for the wide powers sought in these Articles. To All Relevant Local Highway Authorities: ii) Provide a response as to the appropriateness of the powers sought by these Articles.</p>		
Interested Party	Interested Party Response to Written Question	Applicant comments
<p>Hampshire County Council REP2-066 <i>(Also relates to DCO.1.15; DCO.1.16; DCO.1.30; FR.1.2; PC.1.8)</i></p>	<p>The County Council provided comments on various specific the draft DCO in its written question responses.</p>	<p>The Applicant's comments on the local authority's response to written questions of the Examining Authority's first round of written questions can be found in Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO on Wednesday 27 November 2019 (Document Reference 8.17).</p>



Question DCO.1.33 Schedule 2 Requirement 6(2) – Construction environmental management plan
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. To the Applicant: i) Respond and justify the current approach. To All Relevant Planning Authorities: ii) Comment on the above

Interested Party	Interested Party Response to Written Question	Applicant comments
Hampshire County Council REP2-066	The County Council requested further details be provided in the Outline CEMP, including the Annexes.	At the Issue Specific Hearing on the draft DCO (dDCO) held on Wednesday 27 November 2019, the Applicant confirmed that an updated outline CEMP would be prepared and submitted to the examination by Deadline 4 in the examination timetable.



<p>Question DCO.1.34 Schedule 2 Requirement 6(2) – Construction environmental management plan 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.</p>		
Interested Party	Interested Party Response to Written Question	Applicant comments
<p>Hampshire County Council REP2-066</p>	<p>The County Council considered that the Community Engagement Plan should be a separate DCO Requirement.</p>	<p>At the Issue Specific Hearing on the draft DCO (dDCO) held on Wednesday 27 November 2019, the Applicant confirmed that the Community Engagement Plan would be a separate DCO Requirement.</p>

<p>Question DCO.1.35 Schedule 2 Requirement 8(3) – Hedgerows and trees 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.</p>		
Interested Party	Interested Party Response to Written Question	Applicant comments
<p>Hampshire County Council REP2-066 <i>(Also relates to LV.1.20)</i></p>	<p>The Council requested that the period for the maintenance and replacement of planting be extended to five years.</p> <p>The County Council also requested a modification to the wording of Requirement 8 (3) to allow for a “different” specification</p>	<p>The Applicant has considered the comments raised by interested parties regarding the timescales for replacement planting and can confirm that Requirement 8(3) in the draft DCO submitted at deadline 3 (Document Reference 3.1 (4)) has now been amended to refer to a period of 5 years.</p> <p>The intention would be to replant as soon as possible which would be the next planting season. The methodology and timing of replacement planting would be set out in detail in the LEMP to be approved by the relevant planning authorities for each stage of the authorised development under draft DCO Requirement 12. As noted at</p>



Question DCO.1.35 Schedule 2 Requirement 8(3) – Hedgerows and trees 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.		
Interested Party	Interested Party Response to Written Question	Applicant comments
	of planting to that approved to be implemented, where the original specification was no longer suitable.	<p>the Issue Specific Hearing, landowner consent is relevant to the local authorities request for different specifications.</p> <p>At the Issue Specific Hearing on the draft DCO (dDCO) held on Wednesday 27 November 2019, the Applicant confirmed that an outline LEMP would be prepared and submitted to the examination by Deadline 4 in the examination timetable.</p>

Question DCO.1.37 Schedule 2 Requirement 20 – Further information 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.		
Interested Party	Interested Party Response to Written Question	Applicant comments
Hampshire County Council REP2-066	The County Council requested that the period in Schedule 2 Requirement 20 be extended from two days to fourteen calendar days.	The Applicant recognises that concerns have been raised by interested parties regarding the timing requirements in paragraph 20(2) of Schedule 2 and can confirm that the reference to 2 business days in paragraph 20(2) has now been amended to 5 business days in the revised draft DCO submitted at deadline 2 (REP2-003).



Question DCO.1.38 Schedule 2 Part 2 – Procedure for Discharge of Requirement 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.		
Interested Party	Interested Party Response to Written Question	Applicant comments
Hampshire County Council REP2-066	<p>The County Council seeks clarification of the 'pre-application' intentions of Requirement 19, and also considers that the twenty day period is increased to twenty-eight days.</p>	<p>The Applicant can confirm that the intention of Requirement 19 is to provide a mechanism through which the Applicant may submit draft documentation to more than one relevant local authority for comments, prior to a formal application to discharge a requirement.</p> <p>Please refer to Appendix 1 of the Applicant's summary of the draft DCO Issue Specific Hearing which took place on Wednesday 27 November 2019 (Document Reference 8.17).</p>



Question FR.1.3 Baseline Data i) Confirm whether the baseline data included within Chapter 8 of the ES [APP- ExQ1: 16 October 2019 Responses due by Deadline 2: Thursday 14 November 2019 Page 46 of 94 ExQ1 Question to: Question: The Environment Agency Lead Local Flood Authorities (LLFA) 048] and the accompanying appendices are acceptable. ii) If issues with the baseline have been identified, state what these are.		
Interested Party	Interested Party Response to Written Question	Applicant comments
Hampshire County Council REP2-066	The County Council highlighted concerns about the adequacy of the baseline information and flood risk assessment.	A conference call between the Applicant and Hampshire and Surrey County Councils as Lead Local Flood Authorities (LLFA) took place on 11 December 2019. The Applicant is preparing additional information for the LLFA and the Applicant will continue to engage directly with the Authority in relation to its comments and update the examination through the SoCG or in written submissions.

Question TT.1.2 Construction Traffic Management Plan 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].		
Interested Party	Interested Party Response to Written Question	Applicant comments
Hampshire County Council REP2-066	The County Council requests that an outline CTMP is submitted as part of the Examination.	At the Issue Specific Hearing on the draft DCO (dDCO) held on Wednesday 27 November 2019, the Applicant confirmed that an outline CTMP would be prepared and submitted to the examination by Deadline 4 in the examination timetable.



Question TT.1.4: Study Areas

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.

Interested Party	Interested Party Response to Written Question	Applicant comments
Hampshire County Council REP2-066	The County Council confirmed the methodology is broadly accepted, but notes that Appendix 3 to the Transport Assessment is missing.	The Applicant submitted the previously omitted Appendix 3 at Deadline 2 (REP2-057). This document had previously been sent to the County Council in January 2019.

Question TT.1.16 Rural Road Network

i) Given the rural nature of the road network on the lower part of the route, comment on whether the road network is capable of taking the volume of traffic and loads proposed and would not be damaged as a result of the use by construction traffic; and ii) Explain who would be responsible for its repair if the road network were to be damaged by construction traffic. iii) Comment on the adequacy of mitigation proposed by the Applicant in the ES.

Interested Party	Interested Party Response to Written Question	Applicant comments
Hampshire County Council REP2-066	As already identified above, in the absence of an outline Construction Traffic Management Plan (CTMP), it is difficult to provide an informed	The Applicant has discussed the access proposals in the application for development consent with the County Council as Highway Authority. The detailed proposals will be included within the CTMP and the approval of the Highway Authority is secured through draft DCO Requirement 7.



Question TT.1.16 Rural Road Network		
i) Given the rural nature of the road network on the lower part of the route, comment on whether the road network is capable of taking the volume of traffic and loads proposed and would not be damaged as a result of the use by construction traffic; and ii) Explain who would be responsible for its repair if the road network were to be damaged by construction traffic. iii) Comment on the adequacy of mitigation proposed by the Applicant in the ES.		
Interested Party	Interested Party Response to Written Question	Applicant comments
	<p>view on the potential impacts arising on the road network.</p> <p>In accordance with Section 82 of the New Roads and Street Works Act, the applicant would be liable for any damage to the highway as a result of construction traffic. The DCO should therefore include provisions for highway condition surveys prior to work in any particular area commencing and a requirement to put right any damage that occurs to the satisfaction of the Local Highway Authority.</p>	<p>At the Issue Specific Hearing on the draft DCO (dDCO) held on Wednesday 27 November 2019, the Applicant confirmed that an outline CTMP would be prepared and submitted to the examination by Deadline 4 in the examination timetable.</p> <p>There is already a duty to reinstate streets under s. 70 of the New Roads and Street Works Act 1990. That provision is not disapplied by the draft DCO and the Applicant understands that it continues to operate alongside the Hampshire County Permit Scheme, which would apply (subject to modifications and ongoing discussion with the County Councils) to the construction and maintenance of the authorised development. The Hampshire County Permit Scheme also includes provisions enabling the Council to impose conditions upon the grant of any permit. The Applicant does not therefore consider that further provision to this effect is required in the draft DCO.</p>



3 Comments on Responses to ExA's Written Questions - Independent Educational Association Limited

Table 3.1: Applicants comments on responses to Written Questions

Question GQ.1.18: General Questions Land Contamination With reference to concerns raised in RR-095 regarding potential land contamination of the site (point 5), provide further details with particular reference to how the site was remediated and how the Proposed Development would affect it.		
Interested Party	Interest Party Response to Written Question	Applicant comments
The Independent Educational Association Limited REP2-101	The School is concerned that the construction of the pipeline through potentially contaminated land would result in unacceptable adverse impacts on the health and safety of the school and local community	This matter raised in the Written Representation has been addressed in the Responses to Relevant Representations (REP1-003), Section 13, Table 13.1. The Applicant has reviewed the information provided by IEAL at Deadline 2 (REP2-101) and this will be considered as the Applicant progresses the detailed design of the works. The Applicant does not anticipate the need for any changes to commitment G71.

Question CA.1.9: Compulsory Acquisition/ Temporary Possession
Additional Information

- i) Provide information on the consented planning permission for a new assembly hall and the planning application for 'redevelopment' referred to in the RR [RR-095] that would be affected by the proposed compulsory acquisition of this land.
ii) Annotate the relevant Land Plan [AS-042], [AS-043] and [AS-044] to show the footprint and extent of these proposals in relation to the proposed pipeline.

Interested Party	Interested Party	Interested Party
<p>The Independent Educational Association Limited REP2-101</p>	<p>i)Concerns relating to extant planning permissions</p> <p>Assembly Hall Permission</p> <p>The School has obtained and implemented a planning permission, and an associated Listed Building Consent, for the redevelopment of the School granted under reference 10/00460/FUL (Assembly Hall Permission)</p> <p><i>"Erection of phase 2 of a senior school quadrangle including 2 storey laboratories classrooms and an assembly hall. Erection of a new junior school quadrangle including classrooms following demolition of existing classrooms. Demolition of St. David's House and adjoining sheds and erection of new</i></p>	<p>The Applicant attended a meeting with several representatives from the St James School on 30 July 2019 to discuss how the project could mitigate the application route to address the school's concerns and present an assessment of alternative routes which the school had proposed at a meeting on 26 June 2019.</p> <p>The Applicant has made its own assessment of the IEAL alternative route and provided that detailed assessment to the IEAL on the 8 October 2019. The Summary of the Applicants Assessment of the Alternative Route Proposal (Document Reference 8.22 Appendix 1) concluded that the route proposed by the IEAL has several significant disadvantages when compared against the Applicant's own route and performs less favourably when considered against the project's guiding principles. The IEAL route has increased engineering risks and increased potential impacts to users of the school, its infrastructure and future development opportunities. As a result, the Applicant does not propose to submit any request for a material change to the Examining Authority.</p> <p>The Applicant has agreed to produce a method statement detailing construction activity and mitigation in all schools impacted by the pipeline project and this would be submitted at Deadline 4.</p>



<p><i>Boarding House. Erection of new changing room facilities and new pavilion."</i></p> <p>Sports Hall Permission</p> <p>A planning application for redevelopment of the School's Land has been submitted to the local planning authority and permission was granted on 9 July 2019 under reference 19/00428/FUL (Sports Hall Permission)</p> <p><i>"Erection of new sports hall facility to include 4 no. badminton courts, fitness suite, 2 no. changing rooms, storage, first aid room and reception area. Demolition of existing multi use games area (MUGA) and provision of an outdoor 5-a side pitch and car park."</i></p>	
--	--



4 Comments on Responses to ExA's Written Questions - Notcutts Limited

Table 4.1: Applicants comments on responses to Written Questions

Question CA.1.10: Easements Provide further explanation of concerns over easements and how they affect the land and the route of the Proposed Development as expressed in the RR [RR-167]		
Interested Party	Interest Party Response to Written Question	Applicant comments
Notcutts Ltd REP2-111	As requested, we are writing to provide further explanation of our concerns over easements and how they affect the land and the route of the Proposed Development as expressed in our representation [RR-167]. The property owned by Notcutts Limited, which is due to be crossed by the proposed pipeline, is a former nursery site. Negotiations are currently nearing completion for a conditional sale of the site for redevelopment. Detailed plans of the proposed development are not yet available and at this stage flexibility as to layout needs to be accommodated. The site is already crossed by three pipelines (2 Esso and 1 Cadent Gas) and an overhead power	The Applicant has been in detailed discussions with Notcutts Limited throughout the project. Recently on 22 November 2019 the Applicant issued a letter of confirmation clarifying the intended routing of the pipeline to be as close as practicable to the existing pipelines. The Applicant is hopeful this addresses Notcutts Limited's concerns and awaits a response.



Question CA.1.10: Easements Provide further explanation of concerns over easements and how they affect the land and the route of the Proposed Development as expressed in the RR [RR-167]		
Interested Party	Interest Party Response to Written Question	Applicant comments
	<p>line. The pipelines are largely confined to a narrow easement strip over which Esso and Cadent have pre-existing rights. The conditional sale has been negotiated in the knowledge of these previously existing pipelines and the respective burdens and impact they will have on future development of the site. However, the applicant's proposed pipeline is a new element that, if not located with all due consideration, risks sterilising additional land and imposing additional restrictions, beyond those already existing. This in turn would potentially risk the ability to properly develop the site. Careful and considered siting of the final new easement strip is therefore required. It is imperative that the new pipeline is located as close as possible to the existing lines for the following</p>	



Question CA.1.10: Easements Provide further explanation of concerns over easements and how they affect the land and the route of the Proposed Development as expressed in the RR [RR-167]		
Interested Party	Interest Party Response to Written Question	Applicant comments
	<p>reasons: 1) so that as little additional land is sterilised as possible 2) so that the easement strips over which the applicant will have rights overlap in order to limit any new rights being created beyond the area already subject to existing rights. Discussions are currently ongoing with Esso in an attempt to reach a voluntary agreement and we are awaiting confirmation of a commitment from them that they will endeavour to locate the new pipe along the northern extent of the Limits of Deviation so that the resulting easement strip overlaps with the existing one</p>	

5 Comments on Responses to ExA's Written Questions - Runnymede Borough Council

Table 5.1: Applicants comments on responses to Written Questions

Question GQ.1.4: General Questions 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		
Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	Recent Planning Applications A list is provided at Appendix RBC-1.	<p>The methodology for the assessment in respect of cumulative effects had a cut-off of January 2019, as set out in Chapter 16 Cumulative Effects of the Environmental Statement (Application Document APP-056). New developments submitted after this date would not have been considered within the assessment.</p> <p>In addition, many of the developments provided in RBC-1 would not meet the criteria in Table 15.3 in ES Chapter 16 (Application Document APP-056) as they would be classed as minor planning applications and would have been screened out of the assessment.</p> <p>Further – and while not related to the assessment of cumulative impacts – the project benefits from a Safeguarding Direction. Therefore, the Applicant is consulted and provides comments on any development proposals that interacts with the project.</p>



Question GQ.1.7: Further Information Provide the dates for when the Chertsey Agricultural Show is held and over how many days the event is held		
Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	Chertsey Show <p>The Show is held annually in the first half of August. It will be held the 8 to 9 August 2020. Set up and removal will be at least a week before and after these dates.</p>	<p>The Applicant notes the dates of the Chertsey Agricultural Show in the year 2020. The Applicant has engaged with the organisers of the Chertsey Show and Runnymede Borough Council and would continue this engagement up to and through construction and reinstatement post construction.</p> <p>Within the Environmental Statement Appendix 16.1 Code of Construction Practice (CoCP) (REP2-010), commitment PC1 states, <i>'The project would work with the Chertsey Agricultural Show to limit impacts to the Show at Chertsey Meads and along Mead Lane.'</i></p>

Question BIO.1.2: Landscape and Ecological Management Plan 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]		
Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	Outline Landscape and Ecological Management Plan <p>The Authority considers that there is a lack of detail in respect of the effects on the landscape and wildlife habitats, along with associated mitigation. The Authority's Local Impact Report</p>	<p>Following the Issue Specific Hearing on Environmental Matters (ISH2) on Tuesday 3 December 2019, under Action 3 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an Outline LEMP will be submitted at Deadline 4. The Applicant will consider the suggestion from the local authority as part of its preparations of the Outline LEMP.</p>



Question BIO.1.2: Landscape and Ecological Management Plan 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]		
Interested Party	Interest Party Response to Written Question	Applicant comments
	<p>(LIR) identifies the specific landscape and ecology concerns.</p> <p>The Applicant relies on the LEMP to mitigate the impacts, which is to be secured by Requirement 13 of the draft Development Consent Order (dDCO).</p> <p>To ensure that there will be sufficient mitigation, the Council requests that the Applicant submits an Outline LEMP during the Examination.</p> <p>The Outline LEMP should include surveys, consultations, licences, mitigation, site management, aftercare and net biodiversity gain in each local authority area.</p>	



Question BIO.1.43: Thames Basin Heaths SPA

Respond to the points raised in Surrey Heath Borough Council's RR [RR—093] with regards to the potential adverse effects on the integrity of the Thames Basin Heaths SPA that would result from the Proposed Development's effect on the two SANGs (St Catherine's Road and Windlemere) within the borough,

Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Runnymede Borough Council REP2-079</p>	<p>Thames Basin Heaths SPA The Authority shares the same concerns raised by Surrey Heath Borough Council (SHBC) in respect of the effects on the Thames Basin Heaths Special Protection Area (TBH SPA) and associated SANG.</p> <p>The Council supports the SHBC request for two Requirements to be included in the dDCO (1. Provision of SANG and 2. Management of Open Spaces during construction). The request for these Requirements was raised by SHBC in its Written Representation submitted at Deadline 2.</p>	<p>In response to SHBC's Relevant Representation (REP1-003), the Applicant stated at paragraph 26.3.13:</p> <p>‘...it is anticipated that visitors would typically continue to make use of the respective SANGs during the construction period and any displacement of recreational activity to the SPA is expected to be very low (see paragraph 5.8.28 of the HRA Application Document APP-130)...the project would not lead to adverse effects on the integrity of the SPA or its ecological functions as defined by Conservation Objectives (see paragraph 5.8.29 of the HRA (Application Document APP-130)).’</p> <p>The Applicant's comments on the Authority's suggestions on the draft DCO are contained in Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019 (Document Reference 8.17).</p>



The Applicant notes that the Authority has responded to the Applicant's dDCO drafting in the following questions:
 Question DCO.1.15: Part 3 Article 14 – Access to Works Question DCO.1.38: Schedule 2 Part 2 – Procedure for Discharge of Requirement, Question PC.1.8: Working Hours

Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	<p>DCO Part 3 Article 14</p> <p>The Applicant considers that Part 3 Article 14 of the dDCO should be deleted because of the potential impacts of creating new accesses upon, for example, vegetation. Or it should be amended to include approval provisions which will allow consideration of the effects of any additional site accesses.</p>	<p>As part of the updated dDCO submitted at Deadline 2 (REP2-003), the Applicant has amended article 14 to address these concerns.</p> <p>The Applicant's comments on the Authority's suggestions on the draft DCO are contained in Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019 (Document Reference 8.17).</p>



The Applicant notes that the Authority has submitted comments on the draft DCO in response to the following responses to FWQs:

Question DCO.1.30: Schedule 2 Requirement 3 – Stages of the Authorised Development, Question DCO.1.38: Schedule 2 Part 2 – Procedure for Discharge of Requirement,

Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	Various	<p>The Applicant's comments on the Authority's suggestions on the draft DCO are contained in Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019 (Document Reference 8.17).</p>



Question DCO.1.33: Schedule 2 Requirement 6(2) – Construction Environmental Management Plan
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.

To All Relevant Planning Authorities:

i) Comment on the above.

Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	<p>Outline Construction Environmental Management Plan</p> <p>The Authority considers that there is a lack of detail in the Applicant's Outline CEMP.</p> <p>The Authority also considers the same applies in respect of the impact upon trees where Requirement 6 of the dDCO requires the submission and approval of Arboricultural Management Plans, albeit at present the impact on trees are unquantified and not accurately assessed.</p>	<p>Following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday, 4 December 2019, the Applicant has committed that a more detailed Outline CEMP will be submitted at Deadline 4. The Applicant will take the local authority's comments into consideration in preparing the revised Outline CEMP.</p>



	The Authority requests that a detailed draft CEMP should be submitted during Examination in order to ensure that there are appropriate provisions to manage and mitigate the impacts of the development.	
--	--	--

Question DCO.1.34: Schedule 2 Requirement 6(2) – Construction Environmental Management Plan
Requirement 6(2)(d)(vi) makes provision for a Community Engagement Plan for 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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	DCO Schedule 2 Requirement 6(2) The Authority considers that given the number of affected communities and individuals that a Community Engagement Plan be a standalone Requirement and not part of Requirement 6.	Following the Issue Specific Hearing on Environmental Matters (ISH1) on Wednesday 27 November 2019 (as published on The Planning Inspectorate website dated 9 December 2019), as set out in Action 13 of the 'Hearing Action Points', Requirement 6 (2)(d) will be amended to remove the Community Engagement Plan and for this to be made a standalone requirement. The dDCO will be amended for submission at Deadline 3 (Document Reference 3.1 (4)).



Question DCO.1.35: Schedule 2 Requirement 8(3) – Hedgerows and Trees

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Runnymede Borough Council REP2-079</p>	<p>DCO Schedule 2 Requirement 8(3)</p> <p>The aftercare period for mitigation planning should be increased from three to five years.</p> <p>The Authority's LIR offers further observations in respect of the tree protection and replacement.</p>	<p>The Applicant has considered the comments raised by interested parties regarding the timescales for replacement planting and can confirm that Requirement 8(3) in the draft DCO submitted at Deadline 3 (Document Reference 3.1 (4)) has now been amended to refer to a period of 5 years.</p> <p>The intention would be to replant as soon as possible which would be the next planting season. The methodology and timing of replacement planting would be set out in detail in the LEMP to be approved by the relevant planning authorities for each stage of the authorised development under draft DCO Requirement 12.</p>



Question DCO.1.37: Schedule 2 Requirement 20 – Further Information
To All Relevant Planning Authorities

i) Comment on the above

Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	<p>DCO Schedule 2 Requirement 20</p> <p>The Authority requests that the period for requesting further information in respect of an application to discharge a Requirement of the dDCO be increased from 2 business days to 15 business days and that 'business day's' exclude days on which General or Local Elections take place.</p>	<p>The Applicant recognises that concerns have been raised by interested parties regarding the timing requirements in paragraph 20(2) of Schedule 2 and can confirm that the reference to 2 business days in paragraph 20(2) has now been amended to 5 business days in the revised draft DCO submitted at Deadline 2 (REP2-003)</p> <p>The Applicant's comments on the Authority's suggestions on the draft DCO are contained in Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019 (Document Reference 8.17).</p>



Question FR.1.2: Surface and Foul Drainage System

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].

Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Runnymede Borough Council REP2-079</p>	<p>Surface and Foul Drainage System</p> <p>The Authority raised flooding and drainage considerations in its LIR. The Authority understands why detailed site-specifications will not be available until after consent is granted. The Authority considers it would assist the Examination if a SFDS method statement were to be submitted.</p>	<p>The Applicant has included a number of commitments within the CoCP in relation to surface water and drainage during construction. Further details will also be contained within the appendices to the outline CEMP. Following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday, 4 December 2019, the Applicant has committed that a more detailed Outline CEMP will be submitted at Deadline 4. The Applicant will take the local authority's comments into consideration in preparing the revised Outline CEMP.</p> <p>In addition, following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday 4 December 2019, under Action 26 of the 'Hearing Action Points' (as published on The Planning Inspectorate website on 9 December 2019), an Outline strategy for surface and foul water will also be submitted at Deadline 4.</p> <p>The Applicant has been fully engaged with the Environment Agency and the Lead Local Flood Authorities (Hampshire and Surrey County Councils) in respect of the findings of the Flood Risk Assessment.</p>



Question LV.1.2: Landscape and Ecological Management Plan

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	Outline LEMP Refer to the Authority's response to Written Question BIO.1.2 above.	See the Applicant's response above in this document in respect of Written Question BIO.1.2.

Question LV.1.20: Planting Mitigation

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	Outline LEMP The Authority has requested that the LEMP should include provisions which specify the aftercare requirements for both trees and shrubs.	Following the Issue Specific Hearing on Environmental Matters on Wednesday 27 November 2019, as set out in Action 18 of the 'Hearing Action Points' (as published on The Planning Inspectorate website dated 9 December 2019), Requirement 8(3) will be amended to increase the time period to 5 years and to allow for the use of alternative species; this will be submitted at Deadline 3.



Question EIA.1.8: Cumulative Effects

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Runnymede Borough Council REP2-079	<p>Cumulative Effects</p> <p>The Authority comments that both the proposed Heathrow Airport Expansion and River Thames Scheme are not represented in the Environmental Statement and Habitats Regulations Assessment.</p>	<p>As noted in the Applicant's response to the Local Impact Report (LIR) (REP2-053), the long list of developments considered in ES Chapter 15 Cumulative Effects (Application Document APP-055) includes the River Thames Scheme, the proposed Heathrow Expansion and the Southern Rail Link.</p>



Question TT.1.2: Construction Traffic Management Plan

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].

Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Runnymede Borough Council REP2-079</p>	<p>Construction Traffic Management Plan</p> <p>The Authority requests that the Examining Authority invites the submission of a substantial draft CTMP.</p> <p>The Authority also requests that Requirement 7 (Construction Traffic Management Plan) be amended to specify the details that need to be addressed within the CTMP.</p>	<p>The Applicant notes that the contents of the CTMP were specified in the REAC (G111). Following the Issue Specific Hearing on Environmental Matters on Wednesday 4 December 2019, under Action 12 of the 'Hearing Action Points' (as published on The Planning Inspectorate website on 9 December 2019), an Outline Construction Traffic Management Plan will be submitted at Deadline 4.</p>

6 Comments on Responses to ExA's Written Questions – Rushmoor Borough Council

Table 6.1: Applicants comments on responses to Written Questions

Question 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 insufficient justification for such wide powers conveyed within the Article. To the Applicant: i) Provide justification for the wide powers sought in these Articles. To All Relevant Local Highway Authorities: ii) Provide a response as to the appropriateness of the powers sought by these Articles.		
Interested Party	Interested Party Response to Written Question	Applicant comments
Rushmoor County Council REP2-080 <i>(Also relates to DCO.1.15; DCO.1.16; DCO.1.30; DCO.1.35; DCO.1.37; DCO.1.38;. PC.1.8)</i>	<p>The authority made detailed comments on the drafting of the DCO, in response to the ExAs written questions.</p>	<p>The Applicant's comments on the Authority's response to written questions relating to the draft DCO can be found in the Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019 (Document Reference 8.17).</p>



Question DCO.1.33 Part 3 Article 9 – Power to alter layout, etc. of streets. and Part 3 Article 10 – Street works
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.

To the Applicant:

i) Respond and justify the current approach.

To All Relevant Planning Authorities:

ii) Comment on the above.

Interested Party	Interested Party Response to Written Question	Applicant comments
Rushmoor Borough Council REP2-080	<p>The local authority considers 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>The local authority also sought a further requirement to address specific scheme impacts, particularly on open space, and suggested wording for a draft requirement for the Management of Works in Open Space.</p>	<p>The Applicant committed at the Issue Specific Hearing on the draft DCO to submit further details in the outline Construction Environment Management Plan (CEMP) as part of the Examination, by Deadline 4.</p> <p>Please also see Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019. (Document Reference 8.17)</p>



Question FR.1.2: Surface and Foul Drainage System

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].

Interested Party	Interested Party Response to Written Question	Applicant comments
<p>Rushmoor Borough Council REP2-080</p>	<p>The Authority raised a number of concerns around Flood Risk.</p>	<p>The Applicant has included a number of commitments within the CoCP in relation to surface water and drainage during construction. Further details will also be contained within the appendices to the outline CEMP. Following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday, 4 December 2019, the Applicant has committed that a more detailed Outline CEMP will be submitted at Deadline 4. The Applicant will take the local authority's comments into consideration in preparing the revised Outline CEMP.</p> <p>In addition, following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday 4 December 2019, under Action 26 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an outline strategy for surface and foul water will be submitted at Deadline 4.</p> <p>The Applicant has been fully engaged with the Environment Agency and the Lead Local Flood Authorities (Hampshire and Surrey County Councils) in respect of the findings of the Flood Risk Assessment.</p>



Question LV.1.17: Planting Mitigation

The REAC (Ref G87 Table 16.2) [APP-056] states that “vegetation clearance, retention, protection and replanting/reinstatement drawings would be produced prior to the construction phase. The contractor(s) would implement these plans including agreed mitigation where practicable”. Chapter 10 of the ES [APP-050] states that “In order to consider a reasonable worst case, the assessment of potential impacts assumes loss of all trees and shrub vegetation within the Order Limits except where the good practice measures set out in Table 10.13 and reduced working widths identified within the REAC dictate otherwise”. The REAC (Ref G91 Table 16.2) also states that “the contractor(s) would retain vegetation where practicable and in accordance with, as a minimum, the vegetation retention drawings.” 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.

- i) Confirm the circumstances in which it would not be practicable to implement the vegetation retention, protection and replanting or reinstatement;
- ii) Explain why the Applicant has not fully committed to provide replacement planting;
- iii) Explain whether there is uncertainty as to the extent of mitigation possible in practice; and
- iv) Confirm whether the ES [APP-050] has presented a worst-case assessment

Interested Party	Interested Party Response to Written Question	Applicant comments
Rushmoor Borough Council REP2-080	The local authority shares the ExA concerns about the potential impacts. However it also questions 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.	There is no expected large-scale tree loss in Rushmoor which would lead to a change in the character of the borough. Therefore the Applicant does not consider it necessary to undertake additional planting outside of the Order Limits



Question EIA.1.7: Cumulative Effects

- 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

Interested Party	Interested Party Response to Written Question	Applicant comments
<p>Rushmoor Borough Council REP2-080</p>	<p>The local authority confirmed the list is accurate at the time of the assessment, however it drew attention to proposed Farnborough and Aldershot Town Centre regeneration plans noting that whilst 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 local authority also identified that the Farnborough Airshow is not subject to Planning Control and held on a two-yearly basis, attracting 80,000 visitors. The local authority is seeking a requirement that no streetworks affecting access to Farnborough is undertaken during the period of the show.</p>	<p>The cumulative effects assessment followed the methodology set out in Planning Inspectorate Advice Note 17 'Cumulative Effects Assessment Relevant to Nationally Important Infrastructure' version 1 (2015).</p> <p>The criteria for determining the longlist of projects and the longlist used within the assessment was included within a technical note that was issued to the relevant local planning authorities, including Rushmoor Borough Council, for comment on 18 January 2019.</p> <p>The Applicant is considering what commitments and reassurances it can offer related to streetworks around the time of the Farnborough Airshow, and will update in its discussion of the SoCG with the authority and in subsequent written submissions to the examination. The Applicant notes that the Airshow is no longer open to the public and this will therefore reduce the number of visitors</p>



Question TT.1.4: Cumulative Effects

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.

Interested Party	Interested Party Response to Written Question	Applicant comments
Rushmoor Borough Council REP2-080	<p>The local authority states that an assessment of any diversion, delays or prevention should be included in the Traffic and Transport assessment study area. It strongly questions the restriction to works within roads anticipated to exceed four weeks as this fails to assess the extent of impact rather than the length of impact. The local authority states that currently all roads in Farnborough are effectively excluded, including arterial routes such as the A325 and A311, and main routes within north Farnborough providing access to the town.</p> <p>The local authority cited example of Cove Road where, despite very careful planning, very substantial</p>	<p>The Transport Assessment Scoping Report has previously been provided to Hampshire County Council, Surrey County Council and Highways England, as the relevant highways authorities.</p> <p>They were invited to provide comments through either meetings, Statements of Common Ground or other forms of communication. All three highways authorities have either confirmed that they are satisfied with the work completed based on it, and/or have not raised issues with the content of the document, as documented within the relevant Statements of Common Ground submitted at Deadline 2. The Applicant will continue to have regular engagement with Hampshire Highways Authority to agree the traffic management diversion routes for the roads affected in Rushmoor Borough.</p>



	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.	
--	--	--

7 Comments on Responses to ExA's Written Questions - South Downs National Park Authority

Table 7.1: Applicants comments on responses to Written Questions

Question FR.1.2: Surface and Foul Drainage System 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].		
Interested Party	Interested Party Response to Written Question	Applicant comments
South Downs National Park REP2-086	Outline SFDS In response to FR.1.2, the SDNPA set out its concerns regarding the absence of an Outline SFDS.	At the Issue Specific Hearing on the draft DCO (dDCO) held on Wednesday 27 November 2019, the Applicant confirmed that an outline SFDS would be prepared and submitted to the examination by Deadline 4 in the examination timetable. This will be included in the list of certified documents in Schedule 11 of the dDCO (Document Reference 3.1 (4)).

8 Comments on Responses to ExA's Written Questions – Spelthorne Borough Council

Table 8.1: Applicants comments on responses to Written Questions

<p>Question BIO.1.2: Biodiversity and Habitats Regulations Assessments Landscape and Ecological Management Plan 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.</p>		
Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Spelthorne Borough Council REP2-088</p>	<p>Landscape and Ecological Management Plan (LEMP) The Council considers that there is a lack of detail in respect of the effects on the landscape and wildlife habitats, along with associated mitigation. The Council's Local Impact Report (LIR) identifies the specific landscape and ecology concerns. The Applicant relies on the LEMP to mitigate the impacts, which is to be secured by Requirement 13 of the draft Development Consent Order (dDCO). To ensure that there will be sufficient mitigation, the Council requests that the Applicant submits an Outline LEMP during the</p>	<p>Following the Issue Specific Hearing on Environmental Matters on Tuesday 3 December 2019, under Action 3 of the 'Hearing Action Points' (as published on The Planning Inspectorate website on 9 December 2019), an Outline Landscape and Environmental Management Plan (LEMP) will be submitted at Deadline 4.</p>



	Examination. The Outline LEMP should include surveys, consultations, licences, mitigation, site management, aftercare and net biodiversity gain in each local authority area.	
--	---	--

Question DCO.1.15: Draft Development Consent Order Part 3 Article 14 – Access to works Comment on the provision contained within Part 3 Article 14 of the draft DCO [AS-059].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	Development Consent Order – Article 14 Access to works The Applicant considers that Part 3 Article 14 of the dDCO should be deleted because of the potential impacts of creating new accesses upon, for example, vegetation. Or it should be amended to include approval provisions which will allow consideration of the effects of any additional site accesses.	As part of the Applicant's amended draft DCO submitted at Deadline 2 (REP2-003), it has amended article 14 to address these concerns.



Question DCO.1.30: Draft Development Consent Order

Schedule 2 Requirement 3 – Stages of the authorised development

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.

To the Host Local Authorities and National Park Authority:

i) Comment on the effectiveness of this Requirement.

Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Development Consent Order – Requirement 3</p> <p>The Council considers that Requirement 3 of the dDCO should provide for the submission of all the stages of construction work across the entire route to the local authorities and notes the absence of an approval provision.</p>	<p>Please refer to Appendix 1 of the Applicant's summary of the draft DCO Issue Specific Hearing which took place on Wednesday 27 November 2019, which contains the Applicant's responses to interested parties' comments on the draft DCO as contained in Local Impact Reports and in responses to the ExA's first round of written questions.</p>



Question DCO.1.33: Draft Development Consent Order

Schedule 2 Requirement 6(2) – Construction environmental management plan

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.

To All Relevant Planning Authorities:

ii) Comment on the above.

Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Development Consent Order – Requirement 6(2)</p> <p>The Council considers that there is a lack of detail in the Applicant's Outline CEMP.</p> <p>The Council also considers the same applies in respect of the impact upon trees where Requirement 6 of the dDCO requires the submission and approval of Arboricultural Management Plans, albeit at present the impact on trees are unquantified and not accurately assessed.</p>	<p>At the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019, the Applicant confirmed that an updated Outline CEMP would be prepared and submitted to the examination by Deadline 4 in the examination timetable.</p> <p>The Applicant will take the local authority's comments into consideration in preparing the revised Outline CEMP and Outline LEMP.</p>



Question DCO.1.33: Draft Development Consent Order

Schedule 2 Requirement 6(2) – Construction environmental management plan

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.

To All Relevant Planning Authorities:

ii) Comment on the above.

	The Council requests that a detailed draft CEMP should be submitted during Examination in order to ensure that there are appropriate provisions to manage and mitigate the impacts of the development.	
--	--	--



Question DCO.1.34: Draft Development Consent Order Schedule 2 Requirement 6(2) – Construction environmental management plan 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.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Development Consent Order – Requirement 6(2)</p> <p>The Council considers that given the number of affected communities and individuals that a Community Engagement Plan be a standalone Requirement and not part of Requirement 6.</p>	<p>Following the Issue Specific Hearing on Environmental Matters on Wednesday 27 November 2019 (as published on The Planning Inspectorate website dated 29 November 2019), as set out in Action 13 of the 'Hearing Action Points', Requirement 6 (2)(d) will be amended to remove the Community Engagement Plan and this to be made a standalone requirement for the submission at Deadline 4.</p>



<p>Question DCO.1.35: Draft Development Consent Order Schedule 2 Requirement 8(3) – Hedgerows and trees 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.</p>		
Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Spelthorne Borough Council REP2-088</p>	<p>Development Consent Order – Requirement 8(3)</p> <p>The aftercare period for mitigation planning should be increased from three to five years.</p> <p>The Council's LIR offers further observations in respect of the tree protection and replacement.</p>	<p>The Applicant has considered the comments raised by interested parties regarding the timescales for replacement planting and can confirm that Requirement 8(3) in the draft DCO submitted at Deadline 3 (Document Reference 3.1 (4)) has now been amended to refer to a period of five years.</p> <p>The intention would be to replant as soon as possible which would be the next available planting season. The methodology and timing of replacement planting would be set out in detail in the LEMP to be approved by the relevant planning authorities for each stage of the authorised development under draft DCO Requirement 12.</p> <p>At the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019, the Applicant confirmed that an Outline LEMP would be prepared and submitted to the examination by Deadline 4 in the examination timetable.</p>



Question: DCO.1.37: Draft Development Consent Order
Schedule 2 Requirement 20 – Further information

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

Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Development Consent Order – Requirement 20</p> <p>The Council requests that the period for requesting further information in respect of an application to discharge a Requirement of the dDCO be increased from 2 business days to 15 business days and that 'business days' exclude days on which General or Local Elections take place.</p>	<p>The Applicant recognises that concerns have been raised by interested parties regarding the timing requirements in paragraph 20(2) of Schedule 2 and can confirm that the reference to 2 business days in paragraph 20(2) has now been amended to 5 business days in the revised draft DCO submitted at Deadline 2 (REP2-003).</p> <p>However, the Applicant does not consider it necessary to exclude election days given the number anticipated during the construction period.</p>



Question DCO.1.38: Draft Development Consent Order Schedule 2 Part 2 – Procedure for Discharge of Requirement 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.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Development Consent Order – Procedure for Discharge of Requirement</p> <p>The Council requests that Paragraph 19 (Schedule 2: Requirements, Part 2 Procedure for Discharge of Requirements) be amended so that when submitting Requirement(s) to multiple local authorities that this becomes a prior notification approach which would not be limited by the timeframes in Paragraph 19 of the dDCO (Schedule 2, Part 2).</p>	<p>Please refer to Appendix 1 of the Applicant's summary of the draft DCO Issue Specific Hearing which took place on Wednesday 27 November 2019, which contains the Applicant's responses to interested parties' comments on the draft DCO as contained in Local Impact Reports and in responses to the ExA's first round of written questions.</p> <p>There is no prior notification process for the discharge of planning conditions and there is no reason to depart from this principle.</p>



Question FR.1.2: Flood Risk, Water Resources and Geology Surface and Foul Drainage System 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].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Drainage</p> <p>The Council raised flooding and drainage considerations in its LIR. The Council understands why detailed site-specifications will not be available until after consent is granted. The Council considers it would assist the Examination if a SFDS method statement were to be submitted.</p>	<p>The Applicant has included a number of commitments within the CoCP in relation to surface water and drainage during construction. Further details will also be contained within the appendices to the outline CEMP. Following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday, 4 December 2019, the Applicant has committed that a more detailed Outline CEMP will be submitted at Deadline 4. The Applicant will take the local authority's comments into consideration in preparing the revised Outline CEMP.</p> <p>In addition, following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday 4 December 2019, under Action 26 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an outline strategy for surface and foul water will be submitted at Deadline 4.</p> <p>The Applicant has been fully engaged with the Environment Agency and the Lead Local Flood Authorities (Hampshire and Surrey County Councils) in respect of the findings of the Flood Risk Assessment.</p>



Question LV.1.2: Landscape and Ecological Management Plan 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].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	Outline LEMP Please refer to the Council's response to Written Question BIO.1.2 above.	Following the Issue Specific Hearing on Environmental Matters on Tuesday 3 December 2019, under Action 3 of the 'Hearing Action Points' (as published on The Planning Inspectorate website on 9 December 2019), an Outline Landscape and Environmental Management Plan (LEMP) will be submitted at Deadline 4.

Question LV.1.20: Landscape and Visual Planting Mitigation 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.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	Planting Mitigation The Council has requested that the LEMP should include provisions which specify the aftercare	Following the Issue Specific Hearing on Environmental Matters on Wednesday 27 November 2019, as set out in Action 18 of the 'Hearing Action Points' (as published on The Planning Inspectorate website dated 9 December 2019), Requirement 8(3) will be amended to increase the time period to five years and to allow for the use of alternative species; this will be submitted at Deadline 3.



	requirements for both trees and shrubs	
Question PC.1.8: People and Communities Working Hours The proposed hours of work are 4 hours longer than a standard working day and would operate 6 days a week [APP-128]. To All Relevant Planning Authorities: v) Comment on the working hours proposed.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	Working Hours <p>The Council requests that Requirement 5 (CoCP) of the dDCO is amended to require the CoCP to be submitted for approval to the Local Authorities.</p> <p>Given the wide range of environmental and amenity conditions along the pipeline, Requirement 4 (Construction Hours) should be amended to require the construction hours to be submitted for approval to the Local Authorities.</p>	<p>The Applicant does not consider it appropriate for local authorities to approve the CoCP (REP2-010), however they will have an opportunity to approve the CEMP and the LEMP which relate to environmental impacts that relate more closely to the local authority's remit.</p> <p>Following the Issue Specific Hearing on Environmental Matters (ISH1) on Wednesday 27 November 2019, as set out in Action 20 of the 'Hearing Action Points' (as published on The Planning Inspectorate website dated 9 December 2019), the Applicant will consider whether a more flexible/area specific approach to working hours would be appropriate.</p>



Question EIA.1.7: Scope of Development and Environmental Impact Assessment Cumulative Effects 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.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Cumulative Effects</p> <p>The Council provided a list of major development projects along the route which was appended to the Council's LIR. The Council considers the list of developments in the LIR to be more reflective of developments that could give rise to cumulative effects. Given the limited list of cumulative projects assessed to date, the Council is unable to confirm that inter-projects have been fully assessed.</p> <p>The Council is concerned as to the level of scrutiny and detail that has been afforded to intra-project effects, particularly in relation to</p>	<p>Text from Response to the ExA's First Written Questions - Scope of Development and EIA (EIA), Written Question EIA.1.8 (REP2-051):</p> <p>The Applicant has undertaken an in-combination effects or inter-project cumulative effect assessment (referred to here as the Cumulative Effects Assessment) as required under the EU Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment (the EIA Directive) and Overarching National Policy Statement for Energy (EN1). The Cumulative Effects Assessment has been based on a proportionate approach given the scale of the potential effects from the project. This is in line with paragraph 3.4.5 from the Planning Inspectorate's Advice Note 17, which states: '<i>Whilst applicants should make a genuine attempt to assess the effects arising from multiple, individually non-significant effects, the CEA should be proportionate and should not be any longer than is necessary to identify and assess any likely significant cumulative effects</i>'.</p> <p>The Cumulative Effects Assessment has followed the four-stage approach as recommended in Planning Inspectorate's Advice Note 17. The scope of the Cumulative Effects Assessment was set out within the Scoping Report (AS-019).</p>



	<p>effects on community receptors. 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.</p>	<p>The proposed methodology and the long and short lists of proposed developments were issued to the relevant Local Planning Authorities for comment on 18 January 2019 and their comments were reflected in the Cumulative Effects Assessment presented within Chapter 15 (Application Document APP-055) of the Environmental Statement (ES) and within Appendix E of the Habitats Regulations Assessment (HRA) Report (Application Document APP-131).</p> <p>The Applicant considers the Cumulative Effects Assessment in both the ES and the HRA Report to be both adequate and proportionate to the scale of the works. The Applicant consulted the council, prior to the assessment, regarding both the long list and short list of sites identified for this assessment. The council did not comment on the identified sites.</p>
--	---	---

Question EIA.1.8: Scope of Development and Environmental Impact Assessment Cumulative Effects
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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	Please see the response to question EIA.1.7 above.	Please see the Applicant's response to Written Question EIA.1.7 above.



Question TT.1.2: Traffic and Transport Construction Traffic Management Plan 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].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Construction Traffic Management Plan</p> <p>The Council requests that the Examining Authority invites the submission of a substantial draft CTMP.</p> <p>The Council also requests that Requirement 7 (Construction Traffic Management Plan) be amended to specify the details that need to be addressed within the CTMP.</p>	<p>Following the Issue Specific Hearing on Environmental Matters on Wednesday 4 December 2019, under Action 12 of the 'Hearing Action Points' (as published on The Planning Inspectorate website on 9 December 2019), an Outline Construction Traffic Management Plan will be submitted at Deadline 4.</p>



Question TT.1.15: Traffic and Transport
Construction Traffic Routing

- 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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Spelthorne Borough Council REP2-088	<p>Construction Traffic Routing</p> <p>The Borough Council defers to Surrey County Council in its capacity as the Local Highway Authority.</p> <p>The Borough Council highlights the following points:</p> <ol style="list-style-type: none"> 1. the concern with respect to the community and residential amenity – with specific concerns raised Ashford Road, Fordbridge Park and Celia Crescent, Central Ashford and Clarendon Primary School. 2. The traffic assessment has inadequately assessed the sensitivity of receptors, the 	<p>In response to (1), the Applicant has responded to the Local Authority's concerns regarding construction traffic and community and residential amenity. See Comments on Local Impact Reports (REP2-053) and the Applicant's Response to the Examining Authority's Written Questions, TT.1.1, TT.1.13 (REP2-052).</p> <p>The Applicant is working with the Highway Authority to agree the use of the South East Permit Scheme, subject to agreement of exclusions to reflect the nationally significant nature of the project.</p> <p>Following the Issue Specific Hearings on the 3 and 4 of December, the Applicant agreed to produce a construction method statement for Fordbridge Park (including access, such as Celia Crescent and Ashford Road.)</p> <p>In response to (2), the Applicant has agreed the scope and details of the traffic assessment with the Local Highway Authority, taking into account the local sensitive locations, and this assessment has been agreed as recorded in the Statement of Common Ground with Surrey County Council (REP2-034).</p>



Question TT.1.15: Traffic and Transport
Construction Traffic Routing

- i) Comment on the extent to which the local community (including local businesses, schools and farms) might be affected by the construction traffic routing, 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.

	status of Ashford Road and Celia Crescent, which in turn has led to the magnitude and significance of effects being undervalued.	
--	--	--

9 Comments on Responses to ExA's Written Questions -Surrey County Council

Table 9.1: Applicants comments on responses to Written Questions

Question ALT.1.4: Trenchless Techniques at Fordbridge Park i) Explain whether trenchless techniques were considered for construction of the Proposed Development at Fordbridge Park. ii) If they were considered explain why they were discounted. iii) Consider trenchless techniques for the said areas given the effect on tree loss.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	The Authority query whether Trenchless Techniques could be used at Abbey Rangers. Comments received from Fisher German on 24 October state that partial Trenchless Techniques are being considered.	The Applicant has continued discussions with Abbey Rangers since the ISH to discuss this and other matters and the Applicant believes they are close to agreement.



Question BIO1.2: Landscape and Ecological Management Plan

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 for both questions.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	<p>The Authority favours the option of providing an Outline LEMP, listing the measures that would be secured, drawings to be prepared, detailing consultation that would be undertaken and with whom, and the inter-relationship of ecology and landscape.</p>	<p>Following the Issue Specific Hearing on Environmental Matters (ISH2) on Tuesday 3 December 2019, under Action 3 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an outline LEMP will be submitted at Deadline 4.</p>



<p>Question DCO.1.11: Draft Development Consent Order 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 insufficient justification for such wide powers conveyed within the Article. <u>To All Relevant Local Highway Authorities:</u> ii) Provide a response as to the appropriateness of the powers sought by these Articles.</p>		
Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Surrey County Council REP2-090</p>	<p>ii) From discussions thus far, the Authority does not anticipate that the Applicant will need to utilise powers in Article 9 for any permanent changes.</p> <p>However the Authority believes that any temporary measures under article 9 and any measures listed under article 10 should be ultimately governed by adherence to Authority's South East Permit Scheme Council Order.. The Authority believe the powers sought in Article 10 – without requiring our consent, could prevent us from fulfilling our 'Network Management Duty' Under the Traffic Management Act 2004.</p>	<p>The Applicant is working with the Highway Authority to agree the use of the South East Permit Scheme, subject to agreement of exclusions to reflect the nationally significant nature of the project.</p>



Question DCO.1.12: Draft Development Consent Order Part 3 Article 11 – Application of the 1991 Act Justify the need to modify the 1991 Act other than for reasons of precedent as set out in the EM [AS061].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	<p>The Authority would prefer that the provisions of the 1991 Act listed in para 11 (3) were not disapplied and that our South East Permit Scheme Order was followed, which provides the means to consider such issues and act 'reasonably' recognising the nature and timescales of the applicant's project. We are unclear on why the applicant wishes the works in question to be treated as 'Major Highway Works'.</p>	<p>The Applicant is working with the Highway Authority to agree the use of the South East Permit Scheme, subject to agreement of exclusions to reflect the nationally significant nature of the project.</p>



Question DCO.1.13: Draft Development Consent Order Part 3 Article 13 - Use of private roads The ExA is concerned that the Article as worded would allow for unprecedented and unrestricted access to private roads. Justify the need for such wide powers and explain whether this Article ought to be tied into a phasing plan such that the powers in the Article would not be used for any longer than necessary.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	<p>Whilst private streets are not the responsibility of the Highway Authority, the Authority would suggest that reference should be added to restrict access through such streets to a designated timeframe in some way as suggested here by the ExA.</p>	<p>As part of the Applicant's amended dDCO submitted at Deadline 2 (REP2-003) the Applicant has amended article 13 to address these concerns</p>



The Applicant notes that the Authority has submitted comments on the draft DCO in response to the following responses to FWQs:

Question DCO.1.14: Part 3 Article 14 – Access to works, Question DCO.1.16: Part 4 Article 17 – Discharge of water, Question: DCO.1.38: Schedule 2 Part 2 – Procedure for Discharge of Requirement and Question: DCO.1.39: Schedule 9 – Protective provisions

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	Various	The Applicant's comments on the Authority's suggestions in relation to the draft DCO are contained in Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019 (Document Reference 8.17).

Question DCO.1.15: Draft Development Consent Order
Part 3 Article 14 – Access to works
Comment on the provision contained within Part 3 Article 14 of the draft DCO [AS-059].

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	The Authority requires this to be conditional upon form, layout and details first being agreed and permitted through the Authority's Street Works permit process.	As part of our amended dDCO submitted at Deadline 2 (REP2-003) the Applicant has amended article 14 to address these concerns. The Applicant is working with the Highway Authority to agree the use of the South East Permit Scheme, subject to agreement of exclusions to reflect the nationally significant nature of the project.



<p>Question DCO.1.35: Schedule 2 Requirement 8(3) – Hedgerows and trees 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.</p> <p>Comment on the adequacy of the Requirement and on the time period allowed for reinstatement and management.</p>		
Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Surrey County Council REP2-090</p>	<p>The Authority recommends a five year period.</p>	<p>The Applicant has considered the comments raised by interested parties regarding the timescales for replacement planting and can confirm that Requirement 8(3) in the draft DCO submitted at Deadline 3 (Document Reference 3.1 (4)) has now been amended to refer to a period of 5 years.</p> <p>The intention would be to replant as soon as possible which would be the next planting season. The methodology and timing of replacement planting would be set out in detail in the LEMP to be approved by the relevant planning authorities for each stage of the authorised development under draft DCO Requirement 12.</p> <p>At the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019, the Applicant confirmed that an outline LEMP would be prepared and submitted to the examination by Deadline 4 in the examination timetable.</p>

Question: DCO.1.37: Draft Development Consent Order
Schedule 2 Requirement 20 – Further information
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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	The Authority agrees that 2 days is too short. Suggest 14 days.	The Applicant recognises that concerns have been raised by interested parties regarding the timing requirements in paragraph 20(2) of Schedule 2 and can confirm that the reference to two business days in paragraph 20(2) has now been amended to five business days in the revised draft DCO submitted at Deadline 2 (REP2-003).

Question FR.1.2: Surface and Foul Drainage System
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].

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	The Authority do not feel that an outline SFDS is required before submission of documents for ordinary watercourse consent application as these sites will all need to be assessed individually	The Applicant notes this response. A conference call between the Applicant and Hampshire and Surrey County Councils as Lead Local Flood Authorities (LLFA) took place on 11 December 2019. The Applicant is preparing additional information for the LLFA and the Applicant will



Question FR.1.2: Surface and Foul Drainage System 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].		
Interested Party	Interest Party Response to Written Question	Applicant comments
	and we will need all of the required information within Authority's draft provisions to be able to complete these assessments.	continue to engage directly with the Authority in relation to its comments and update the examination through the SoCG or in written submissions.

Question HE.1.2 Historic Environment Written Scheme of Investigation 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 [AS059].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	<p>Detailed comments on the approach to archaeological mitigation, specifically in respect of Annex A of the AMS.</p> <p>It is suggested that requirement 11 point 5 be amended to say suitably qualified and Registered person or body.</p>	<p>Please see the Applicant's response to the Written Representation from SCC in respect of archaeological evaluation and mitigation.</p> <p>Please refer to Appendix 1 of the Applicant's summary of the draft DCO Issue Specific Hearing which took place on Wednesday 27 November 2019 for comments on the suggested requirements.</p>



Question: HE.1.4: Historic Environment
World War Crash Sites

The Applicant

Respond to Historic England's concerns as raised in its RR [RR-243] that crash site remains should be classified as high significance and not as a low priority risk as set out in Chapter 9 of the ES [APP049].

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	<p>The Authority supports the views of Historic England that aircraft crash sites should be classified as high significance.</p>	<p>Paragraph 2.3.16 of the updated version of the AMS submitted at Deadline 2 (REP2-007) contains an updated approach in respect of military remains. This includes a commitment for an additional assessment of potential World War II crash sites, in the form of metal detecting, in order to provide a further level of understanding of the impact.</p> <p>Historic England has signed a Statement of Common Ground with the Applicant (REP2-024) which states that they are happy with the AMS provided the additional text referred to above is added, no change to the classification is therefore required.</p>



Question: HE.1.5: Mitigation In the absence of an Outline WSI, update the ExA on discussions within the relevant planning authorities on mitigation for archaeology, as highlighted by Surrey County Council in its RR [RR-281].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	The Authority provided a list of meetings that have been held with the Applicant.	The Applicant agrees with the list of meetings provided.

Question: LV.1.20: Planting Mitigation 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 measures and time length proposed.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	The Authority recommends a five-year aftercare period.	See the response above from the Applicant with respect to Question DCO.1.35.

**Question: EIA.1.7: Scope of Development and Environmental Impact Assessment
Cumulative Effects**

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	The Long List refers only to Planning Permission SP/12/01132/SCC which relates to the development of a quarry on land at Manor Farm, from which the extracted mineral would be transported by conveyor to the nearby Queen Mary Quarry for processing. No reference is made to the permitted Homers Farm quarry at West Bedfont (Planning Permission SP/14/00141/SCC and Planning Application SP19/01476/SCC), for which the current application seeks an extension of time for mineral working and restoration to 30 September 2024 (it is assumed in Chapter 11 of the ES that the mineral working would be completed before the pipeline installation commences).	<p>Homers Farm Quarry was considered within the cumulative effects assessment (CEA). Paragraph 15.2.34 of Chapter 15 of the Planning Statement (Application Document APP-055) states '<i>Homers Farm: Planning permission has been granted and mineral extraction is currently taking place with processing at Hengrove Farm.</i>' 15.2.35 goes on to explain that '<i>as these mineral extractions are already taking place, they have been assessed as part of the project baseline and are therefore scoped out of the CEA.</i>'</p> <p>The application to extend the mineral working at Homers Farm was received on 15 October 2019, and is therefore a change after the date when the Environmental Statement was submitted.</p> <p>The project has made a representation on this application making no objection and recommending the imposition of an informative on any consent that may be granted regarding liaison with the project in respect of the timing of work.</p>



**Question: EIA.1.7: Scope of Development and Environmental Impact Assessment
Cumulative Effects**

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
	<p>For the Manor Farm Quarry Appendix 15.2 to the ES includes an assessment of the potential for inter-project cumulative effects. No such assessment is provided in respect of the Homers Farm quarry site, and it is recommended that such an assessment be provided in light of the proposed extension of time for the quarry (Planning Application SP19/01476/SCC).</p>	



Question: EIA.1.8: Scope of Development and Environmental Impact Assessment Cumulative Effects 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.		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	<p>See comments for question EIA 1.7 in respect of minerals sites and inter-project cumulative effects as covered in the ES.</p> <p>For the HRA, review of Appendix E (In Combination Assessment) indicates that account has been taken of the proposed Garden Village at Longcross and the associated provision of a SANG on land at Chertsey Common.</p>	<p>The Applicant accepts that it mis-read the planning register and assumed that record RU.17/0793 in respect of Longcross Studio was a planning application, when in fact it is a scoping opinion. The error is not continued into the draft Statement of Common Ground with Runnymede Borough Council (REP2-030) where the reference number is correctly referred to as a scoping opinion. This error does not undermine the findings of the HRA.</p>



Question: TT.1.1: Traffic and Transport
Construction Traffic Management Plan

The Applicant

Requirement 7 of the draft DCO [AS-059] requires the submission and approval of a Construction Traffic Management Plan (CTMP) in accordance with the REAC which is contained within Chapter 16 of the ES [APP-056]. Although the Applicant relies on the measures contained within the CTMP to mitigate transport effects, no outline document is before the Examination.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	It is usual practice for Heads of Terms of CTMPs to be submitted and agreed prior to the determination of a development proposal, whether that be the subject of a planning application or a DCO.	Following the Issue Specific Hearing on Environmental Matters on Wednesday 4 December 2019, under Action 12 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an outline Construction Traffic Management Plan will be submitted at Deadline 4.

Question: TT.1.2: Construction Traffic Management Plan

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]

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey County Council REP2-090	The Authority would expect a CTMP.	Following the Issue Specific Hearing on Environmental Matters on Wednesday 4 December 2019, under Action 12 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an outline Construction Traffic Management Plan will be submitted at Deadline 4.



<p>Question: TT.1.15: Construction Traffic Routing 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. i) 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>		
Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Surrey County Council REP2-090</p>	<p>In response to point i) the Applicant states that there will be affects upon the local community from construction traffic, diversions and related arrangements but provided these can be properly managed through the Permitting system, these will be minimised. If they are not managed through the permitting system there is potential for greater than necessary impact upon local business, schools and farms.</p> <p>In response to point ii) the Authority does not have any particular concerns, provided the Applicant's works are co-ordinated around other known network impacts.</p>	<p>The Applicant notes the response.</p> <p>The Applicant is working with the Highway Authority to agree the use of the South East Permit Scheme, subject to agreement of exclusions to reflect the nationally significant nature of the project.</p>

10 Comments on Responses to ExA's Written Questions - Surrey Heath Borough Council

Table 10.1: Applicants comments on responses to Written Questions

Question BIO.1.2: Landscape and Ecological Management Plan 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]		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-079	<p>Landscape and Ecological Management Plan (LEMP)</p> <p>The Authority considers that there is a lack of detail in respect of the effects on the landscape and wildlife habitats, along with associated mitigation. The Authority's Local Impact Report (LIR) identifies the specific landscape and ecology concerns.</p> <p>The Applicant relies on the LEMP to mitigate the impacts, which is to be secured by Requirement 13 of the draft Development Consent Order (dDCO).</p> <p>To ensure that there will be sufficient mitigation, the Council requests that the Applicant submits an Outline LEMP during the Examination.</p>	<p>Following the Issue Specific Hearing on Environmental Matters (ISH2) on Tuesday 3 December 2019, under Action 3 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an outline LEMP will be submitted at Deadline 4.</p>



	The Outline LEMP should include surveys, consultations, licences, mitigation, site management, aftercare and net biodiversity gain in each local authority area.	
--	--	--

Question BIO.1.43 Thames Basin Heaths SPA

Respond to the points raised in Surrey Heath Borough Council's RR [RR-093] with regards to the potential adverse effects on the integrity of the Thames Basin Heaths SPA that would result from the Proposed Development's effect on the town SANGs (St. Catherine's Road and Windlemere) within the borough.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-091	The Authority's Local Impact Report and Written Representation sets out the Council's position on the Thames Basin Heaths SPA and SANGs.	<p>In response to SHBC's Relevant Representation (Document Reference REP1-003) the Applicant stated at paragraph 26.3.13:</p> <p><i>'...it is anticipated that visitors would typically continue to make use of the respective SANGs during the construction period and any displacement of recreational activity to the SPA is expected to be very low (see paragraph 5.8.28 of the HRA Application Document APP-130)...the project would not lead to adverse effects on the integrity of the SPA or its ecological functions as defined by Conservation Objectives (see paragraph 5.8.29 of the HRA Application Document APP-130).'</i></p> <p>As such, it is considered that the Requirements would not meet the tests set out in Planning Practice Guidance of being 'necessary' and 'relevant to the development permitted'.</p>



Question DCO.1.15: Draft Development Consent Order Part 3 Article 14 – Access to works Comment on the provision contained within Part 3 Article 14 of the draft DCO [AS-059].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-091	Development Consent Order – Access to Works <p>The Applicant considers that Part 3 Article 14 of the dDCO should be deleted because of the potential impacts of creating new accesses upon, for example, vegetation. Or it should be amended to include approval provisions which will allow consideration of the effects of any additional site accesses.</p>	<p>As part of the amended draft DCO submitted at Deadline 2 (REP2-003), the Applicant has amended article 14 to address these concerns. The Applicant is working with the Highway Authority to agree the use of the South East Permit Scheme, subject to agreement of exclusions to reflect the nationally significant nature of the project.</p>



The Applicant notes that the Authority has submitted comments on the draft DCO in response to the following responses to FWQs:

Question DCO.1.30: Schedule 2 Requirement 3 – Stages of the authorised development, Question DCO.1.38: Schedule 2 Part 2 – Procedure for Discharge of Requirement, Question PC.1.8: Working Hours

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-091	Various	The Applicant's comments on the Authority's suggestions in relation to the draft DCO are contained in Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019 (Document Reference 8.17).



Question DCO.1.33: Draft Development Consent Order

Schedule 2 Requirement 6(2) – Construction environmental management plan

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.

To All Relevant Planning Authorities:

ii) Comment on the above.

Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Surrey Heath Borough Council REP2-091</p>	<p>Development Consent Order – Requirement 6(2)</p> <p>The Council considers that there is a lack of detail in the Applicant's Outline CEMP.</p> <p>The Council also considers the same applies in respect of the impact upon trees where Requirement 6 of the dDCO requires the submission and approval of Arboricultural Management Plans, albeit at present the impact on trees are unquantified and not accurately assessed.</p>	<p>Following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday, 4 December 2019 (as published on The Planning Inspectorate Website on 9 December 2019), a more detailed CEMP will be submitted at Deadline 4. The Applicant will take the local authority's comments into consideration in preparing the revised outline CEMP and outline LEMP.</p>



Question DCO.1.33: Draft Development Consent Order

Schedule 2 Requirement 6(2) – Construction environmental management plan

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.

To All Relevant Planning Authorities:

ii) Comment on the above.

	The Council requests that a detailed draft CEMP should be submitted during Examination in order to ensure that there are appropriate provisions to manage and mitigate the impacts of the development.	
--	--	--



<p>Question DCO.1.34: Draft Development Consent Order Schedule 2 Requirement 6(2) – Construction environmental management plan 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.</p>		
Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Surrey Heath Borough Council REP2-091</p>	<p>Development Consent Order – Requirement 6(2) The Council considers that given the number of affected communities and individuals that a Community Engagement Plan be a standalone Requirement and not part of Requirement 6.</p>	<p>The Applicant would adopt a Community Engagement Plan (see commitment G31 in the CoCP (REP2-010)) which would manage the process to inform residents of the proposed works and impacts locally.</p> <p>At the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019, the Applicant confirmed that the Community Engagement Plan would be a separate DCO Requirement.</p>



<p>Question DCO.1.35: Draft Development Consent Order Schedule 2 Requirement 8(3) – Hedgerows and trees 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.</p>		
Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Surrey Heath Borough Council REP2-091</p>	<p>Development Consent Order – Requirement 8(3)</p> <p>The aftercare period for mitigation planning should be increased from three to five years.</p> <p>The Council's LIR offers further observations in respect of the tree protection and replacement.</p>	<p>The Applicant has considered the comments raised by interested parties regarding the timescales for replacement planting and can confirm that Requirement 8(3) in the draft DCO submitted at Deadline 3 (Document Reference 3.1 (4)) has now been amended to refer to a period of 5 years.</p> <p>The intention would be to replant as soon as possible which would be the next planting season. The methodology and timing of replacement planting would be set out in detail in the LEMP to be approved by the relevant planning authorities for each stage of the authorised development under draft DCO Requirement 12.</p> <p>At the Issue Specific Hearing on the draft DCO held on Wednesday 27 November 2019, the Applicant confirmed that an outline LEMP would be prepared and submitted to the examination by Deadline 4 in the examination timetable.</p>

Question DCO.1.37: Draft Development Consent Order
Schedule 2 Requirement 20 – Further information

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-091	Development Consent Order The Council requests that the period for requesting further information in respect of an application to discharge a Requirement of the dDCO be increased from 2 business days to 15 business days and that 'business day's' exclude days on which General or Local Elections take place.	The Applicant recognises that concerns have been raised by interested parties regarding the timing requirements in paragraph 20(2) of Schedule 2 and can confirm that the reference to 2 business days in paragraph 20(2) has now been amended to 5 business days in the revised draft DCO submitted at Deadline 2 (REP2-003).



Question FR1.2: Flood Risk, Water Resources and Geology Surface and Foul Drainage System 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].		
Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-091	Drainage <p>The Council raised flooding and drainage considerations in it's LIR. The Council understands why detailed site-specifications will not be available until after consent is granted. The Council considers it would assist the Examination if a SFDS method statement were to be submitted.</p>	<p>The Applicant has included a number of commitments within the CoCP in relation to surface water and drainage during construction. Further details will also be contained within the appendices to the outline CEMP. Following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday, 4 December 2019, the Applicant has committed that a more detailed Outline CEMP will be submitted at Deadline 4. The Applicant will take the local authority's comments into consideration in preparing the revised Outline CEMP.</p> <p>In addition, following the Issue Specific Hearing on Environmental Matters (ISH3) on Wednesday 4 December 2019, under Action 26 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an outline strategy for surface and foul water will be submitted at Deadline 4.</p> <p>The Applicant has been fully engaged with the Environment Agency and the Lead Local Flood Authorities (Hampshire and Surrey County Councils) in respect of the findings of the Flood Risk Assessment.</p>

Question LV.1.20 Planning Mitigation

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-091	Outline LEMP The Council has requested that the LEMP should include provisions which specify the aftercare requirements for both trees and shrubs.	Following the Issue Specific Hearing on Environmental Matters on Wednesday 27 November 2019, as set out in Action 18 of the 'Hearing Action Points' (as published on The Planning Inspectorate website dated 9 December 2019) Requirement 8(3) will be amended to increase the time period to 5 years and to allow for the use of alternative species; this will be submitted at Deadline 3. Aftercare requirements will be set out in the LEMP.

Question LV.1.2 Landscape and Ecological Management Plan

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].

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.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-091	Outline LEMP Please refer to the Council's response to Written Question BIO.1.2 above.	Please refer to the Applicant's response above to Written Question BIO.1.2.



Question TT.1.2: Construction Traffic Management Plan

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].

Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Surrey Heath Borough Council REP2-091</p>	<p>Outline Construction Traffic Management Plan</p> <p>The Council requests that the Examining Authority invites the submission of a substantial draft CTMP.</p> <p>The Council also requests that Requirement 7 (Construction Traffic Management Plan) be amended to specify the details that need to be addressed within the CTMP.</p>	<p>Following the Issue Specific Hearing on Environmental Matters on Wednesday 4 December 2019, under Action 12 of the 'Hearing Action Points' (as published on The Planning Inspectorate Website on 9 December 2019), an outline Construction Traffic Management Plan will be submitted at Deadline 4.</p> <p>Please refer to Appendix 1 of the Applicant's summary of the draft DCO Issue Specific Hearing which took place on Wednesday 27 November 2019 for comments on the suggested requirement change.</p>



Question TT.1.15: Traffic and Transport
Construction Traffic Routing

- i) Comment on the extent to which the local community (including local businesses, schools and farms) might be affected by the construction traffic routing, 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.

Interested Party Interest Party Response to Written Question Applicant comments

Interested Party	Interest Party Response to Written Question	Applicant comments
<p>Surrey Heath Borough Council REP2-091</p>	<p>Construction Traffic Routing</p> <p>i) There will be affects upon the local community arising from construction traffic, diversions and related arrangements. In Surrey Heath, the impacts will likely be significant for:</p> <ul style="list-style-type: none"> • The Balmoral Drive area due to the proposed road closure (as noted in the Council's response to TT.1.18). • St Catherines Road due to the planned road closure and potential for unsuitable construction related vehicles using the road to access the 	<p>The Applicant is working with the Highway Authority to agree the use of the South East Permit Scheme, subject to agreement of exclusions to reflect the nationally significant nature of the project.</p> <p>The Applicant has responded to the Local Authority's Written Representations which included concerns regarding construction traffic, diversions and related arrangements.</p> <p>In response to the points:</p> <ul style="list-style-type: none"> • The project does not propose to close Balmoral Drive. • The Applicant has provided a more detailed explanation of this in responses to response to action point 15 (Document reference 8.22) • The Applicant can confirm that construction materials and access to the compound on St Catherine's Road would be from the south, prior to the closure of St Catherine's Road. This will be confirmed in the revised CoCP at Deadline 4 (Document Reference 6.4 Appendix 16.1 (3)).



	<p>construction compound on St Catherines Road SANG.</p> <ul style="list-style-type: none"> • Red Road due to the pipeline being routed under a section of the road. <p>ii) The Authority has concerns regarding the suitability of St Catherines Road to accommodate site traffic, especially associated with the proposed construction compound on St Catherines Road SANG.</p>	<ul style="list-style-type: none"> • The Applicant has responded to the Local Authority's concerns regarding St Catherines Road and the construction compound in Section 8 of Comments on the Local Impact Reports (REP2-053). • The Applicant has responded to the Local Authority's concerns regarding Red Road in Section 9 of Responses to Relevant Representations (REP1-003) and Responses to the ExA's First Written Questions – Turf Hill (REP2-049).
--	--	---



Question TT.1.18: Traffic and Transport
Question to Surrey County Council
Balmoral Drive Diversion

In paragraph 3.1.7 of the Transport Assessment [APP-135] and other places in the assessment it is stated by the Applicant that the closure of Balmoral Drive to traffic while works are undertaken and the requirement for a diversion is at the request of the Highway Authority.

Explain the reasoning for this closure.

Interested Party	Interest Party Response to Written Question	Applicant comments
Surrey Heath Borough Council REP2-091	<p>Balmoral Drive, Frimley</p> <p>The Council understands that it is Surrey County Council's view that it not possible to achieve the minimum distance to allow traffic to access the road and keeping the road open to traffic would result in 4 way lights being required.</p> <p>Whilst the Council recognises the points raised by Surrey County Council, Surrey Heath raises significant concerns in respect of the proposed road closure. SHBC was, until recently, of the understanding that traffic control measures would be in place to allow for one-way traffic along Balmoral Drive. This is the main access point for a significant number of residential properties</p>	<p>The Applicant is not intending to close Balmoral Drive at the current time, as it considers the road to be wide enough to construct the project under traffic management. The Applicant also does not believe it is necessary to close the road crossing at Frimley Green Road.</p> <p>Nonetheless, a potential road closure has been discussed with the relevant Highways Authorities - Balmoral Drive falls within Surrey. During discussions, Surrey Highways indicated a preference for Balmoral Drive to be closed, to avoid the need for four-way traffic lights. Therefore, as a precautionary approach, Balmoral Drive was included within the schedule of potential road closures in the dDCO.</p> <p>The TA and ES also took a precautionary approach to consider the impacts of the road being closed, even if this was ultimately not required.</p> <p>The Applicant has provided a more detailed explanation of this in its response to action point 15 (Document reference 8.22).</p>



Question TT.1.18: Traffic and Transport
Question to Surrey County Council
Balmoral Drive Diversion

In paragraph 3.1.7 of the Transport Assessment [APP-135] and other places in the assessment it is stated by the Applicant that the closure of Balmoral Drive to traffic while works are undertaken and the requirement for a diversion is at the request of the Highway Authority.

Explain the reasoning for this closure.

	(over 1000 homes) and for service vehicles accessing businesses on Balmoral Parade. The alternative roads which would be used for access to residential properties and business are all residential in nature, many with cars parked on either side of the road, and not suitable a high level of traffic or access for service vehicles. Moreover, the proposed road closure would sever access to Frimley Community Centre, which the Council considers to be unacceptable.	
--	---	--

11 Comments on Responses to ExA's Written Questions - Winchester City Council

Table 11.1: Applicants comments on responses to Written Questions

Question GQ.1.4: Update on Development		
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 affect the proposed route or would be affected by the Proposed Development.		
Interested Party	Interested Party Response to Written Question	Applicant comments
Winchester City Council REP2-097	The authority provided an update on recent planning applications submitted or consents granted since May 2019.	<p>The Applicant is aware of the applications highlighted by the authority in its response, and comments as follows:</p> <p>19/01870/FUL (not yet determined); 19/01069/FUL (approved); and 19/01524/FUL (approved) – The access track to these properties are crossed by the Order Limits, but any proposed built development lies outside of the Order Limits. The Applicant will liaise with the landowners prior to construction over the timing of works across the across track, and would maintain access to the property during the construction period in accordance with the commitments in the Code of Construction Practice (CoCP) (REP2-010)</p> <p>19/02102/LDC (Lawful Development Certificate – not yet determined) – The Order Limits do not pass through this site.</p> <p>19/01354/FUL (approved) – the proposed built development lies outside of the Order Limits, but landscape planting is proposed within the Order Limits. The Applicant submitted a safeguarding response to the authority on this application, and a condition was imposed on the planning permission which provides for the planting within the Order Limits to be timed so as to be <i>'in the first planting season once work on the Pipeline project within the site have been completed, or other time to be agreed in writing by the local planning authority'</i>.</p>



Question GQ.1.4: Update on Development

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 affect the proposed route or would be affected by the Proposed Development.

Interested Party	Interested Party Response to Written Question	Applicant comments
		<p>19/00717/APN (prior notification) – the proposed barn extension lies outside of the Order Limits.</p> <p>18/02928/FUL (approved) – the Order Limits pass through the proposed development site. The Applicant engaged with the landowner and local planning authority through the safeguarding process and the layout of the planning application was amended as a result, such that built development was not approved within the Order Limits.</p>

Question BIO.1.2: Landscape and Ecological Management Plan

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.

Interested Party	Interested Party Response to Written Question	Applicant comments
<p>Winchester City Council</p> <p>REP2-097</p>	<p>The authority provided comments on various aspects of the draft DCO in its written question responses.</p>	<p>The Applicant notes the authority's comments.</p> <p>Where relevant to the drafting of the DCO, the Applicant's comments on the local authority's response to written questions of the Examining Authority's first round of written questions can be found in Appendix 1 of the Applicant's written summary of case at the Issue Specific Hearing on the draft DCO on Wednesday 27 November 2019 (Document Reference 8.17).</p>



Question BIO.1.2: Landscape and Ecological Management Plan

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.

Interested Party	Interested Party Response to Written Question	Applicant comments
<i>(Also relates to DCO.1.15 DCO.1.16 DCO.1.30 DCO.1.33 DCO.1.34 DCO.1.35 DCO.1.37 DCO.1.38 HE.1.2 LV.1.20 PC.1.8 TT.1.2)</i>		<p>At the Examination Hearings on Wednesday 27 November and 3and 4 December 2019, the Applicant committed to submit an outline LEMP, an outline CTMP, and a revised outline CEMP at Deadline 4. These documents will include information in response to a number of the authority's comments.</p>