

Esso Petroleum Company Limited – Southampton to London pipeline

Application for a Development Consent Order under the Planning Act 2008

Proposed outline of a Landscape and Ecological Management Plan (LEMP) for locations of highest sensitivity on the pipeline route

INTRODUCTION

The Outline LEMP should be structured to be used alongside the CEMP/ CMS. The LEMP should either detail or reference measures proposed to avoid and/or minimise construction impacts to natural habitats, and other open spaces contained within the CEMP/ CMS. The LEMP should detail the mitigation and/or compensation required for any unavoidable impacts, how this is to be secured in the short, medium and long term and the management and funding required, to ensure mitigation is successful.

ECOLOGICAL AND RECREATIONAL HOTSPOTS

Assessments of the local impacts of Esso's pipeline proposal by local authorities in Surrey and Hampshire have identified a number of particularly sensitive ecological sites and open spaces for which mitigation and/or compensation is likely to be required. The sites are as follows.

- Natura 2000, SSSIs and locally designated SINCS throughout the route where direct habitat loss or impacts on the ecological functioning of the site are likely to occur
- Suitable Alternative Natural Open Spaces including Southwood Country Park, St Catherine's Road, Windlemere and Chertsey Meads
- Queen Elizabeth Park
- Ashford Road and Fordbridge Park in Spelthorne
- Old Ively Road, Ively Road and Ashford Road and on railway lines throughout the route where loss of trees could occur
- Cove Brook Greenways
- Frimley Bridge Blackwater Valley SINC and the River Blackwater
- Sites where species protection and/or mitigation is likely to be required such as internationally, nationally and locally designated sites, Southwood Country Park, St Catherine's Road, Windlemere, Chertsey Meads, Cove Greenways and Queen Elizabeth Park.
- Southwood and Farnborough Hill Football Fields
- *This list is not exhaustive and only contains the hotspots identified within the Spelthorne, Runnymede, Surrey Heath and Rushmoor Boroughs. Further sites could be present in other areas.*

TECHNICAL AND ECOLOGICAL SURVEYS

Ideally a LEMP should be based on reliable up to date data including technical surveys, to investigate hydrology and topography in particular, and habitat and species surveys to establish the ecology present and provide a baseline by which to assess the success of the mitigation provided.

The ESSO application does not provide the level of technical and ecological investigations to enable detailed, site specific LEMPs, with technical surveys being inadequate and some habitat and species surveys entirely absent. Due to seasonal limitations, reptile and bat surveys cannot be undertaken until April at the earliest and therefore an outline LEMP only can be provided at this stage. Before the implementation of the DCO the Local Authorities would request a requirement for further survey to be undertaken, with investigation informing the site specific chapters of the LEMP. All surveys should be agreed by the statutory agencies and Local Authorities before being undertaken.

SECURING OF LAND FOR SHORT, MEDIUM AND LONG TERM MITIGATION AND MANAGEMENT

Within the application there are few details regarding mitigation and compensation for significant impacts and no assurances that the land identified for mitigation has been secured and will be funded in the medium to long term.

Within the outline LEMP a full mitigation package based on biodiversity offsetting calculations should be detailed, with evidence provided that land agreements and long-term funding are in place to secure mitigation and compensation in perpetuity.

THE NATURA 2000 AND SSSI NETWORK

The Information submitted to inform the Habitat Regulations Assessment suggests that that there will be a direct impact on habitats within the SPA and SAC either designated as supporting qualifying species such as ground nesting birds, sand lizard or as habitats of value in their own right. Further impacts on the SSSI qualifying habitats and species are also likely although no information is provided in relation to these impacts within the application. The Outline LEMP will need to

- Provide as a separate document the full breeding bird survey used to assess impact on the SPA bird population within the application.
- Describe the habitats to be lost within each designated site.
- Calculate the amount of qualifying habitat or supporting habitat to be lost within each site and across the SPA complex. As the route will not be known until the contract is let the outline LEMP will need to use the precautionary principle, with the worst case being calculated and assessed.
- Assess the habitat's importance in their own right as qualifying SAC or SSSI habitats or as supporting habitats for SPA, SAC or SSSI qualifying species.
- Detail the avoidance measures to be used to minimise impacts as much as possible
- Describe the mitigation to be provided to ensure there is no significant impacts on the designated sites and species and how this is to be secured and funded in the short, medium and long term.
- If impacts are still present within the Natura 2000 network, after mitigation, it is Rushmoor Borough Council's view that Imperative Reasons of Overriding Interest (IROPI) will need to be considered and appropriate compensation provided offsite.

SUITABLE ALTERNATIVE NATURAL GREENSPACES

A separate site specific assessment will be required for each SANG including

- A description of the habitats present within the SANGS. These habitats are likely to need to be resurveyed to inform the detailed LEMPs
- A clear assessment of the project impact on the SANG including details of
 - the quantum of habitat to be lost or disturbed,
 - the maturity of the habitats
 - the disturbance of species likely to be present on site (*due to the lack of survey data the species to be considered on each site will need to be agreed with the Local Authority for which the SANG provides mitigation*) Within the detailed LEMP all SANGS should be fully surveyed for protected species with appropriate avoidance and mitigation provided. In the case of Southwood Country Park, Rushmoor Borough Council is happy to share the detailed data held on this site providing it is still in date when the LEMPs are prepared.
 - An avoidance strategy to evidence that natural habitats including mature trees have been conserved wherever possible
 - A Biodiversity Offsetting calculation to assess the quantum of habitat that will need to be delivered to ensure no net loss of habitats
 - the loss of amenity value within the SANG including an assessment of capacity lost using the formula of 8ha/ 1000 people
- Avoidance mitigation and compensation measures for short, medium and long term impacts on the site in relation to habitat loss or disturbance and the impacts of construction on the function of the SANGs to provide Alternative Natural Greenspace comparable with habitats within the SPA.
- Funding for alternative SANG creation and management during the lifetime of the project
- A 5 year management plan for mitigation and compensation habitats and translocation sites with funding for four 5 year reviews.
- Full funding of any on and offsite mitigation and compensation required for 25 years
- A monitoring schedule with review of translocation sites once every 2 years for 10 years and review of habitats every 5 years for 25 years

QUEEN ELIZABETH PARK

A separate site specific assessment will be required for QEP with a section detailing the loss of woodland within QEP if relevant and further assessment of the woodland to be lost within the railway corridors. The assessment should include

- A description of the woodland present including a full assessment of all trees within the order limits. RBC will expect the following investigations to be included in the site appraisal.
 - Identification of all mature, notable and veteran trees within the area
 - Identification of all trees with high medium and low bat potential to inform the detailed LEMP
 - An assessment of habitat likely to contain reptiles and amphibians a full survey will be required for the detailed LEMP

- An assessment of the impact of the work to badger setts within the area
- An assessment of the use of HDD to preserve the woodland. If HDD is not used clear reasons should be required as to why this solution has been discounted.
- If it is agreed HDD will not be used. An assessment of the impacts of the works on QEP from both an ecological and amenity viewpoint. This should include a biodiversity offsetting calculation to establish the quantum of impact and the mitigation and compensation required for tree and grassland loss within the park.
- An explanation of the working practices to ensure that all veteran and notable trees will be preserved and the root zones safeguarded within the construction process. Reference can be made to the CEMP/ CMS
- A full mitigation, compensation and enhancement project including a commitment to fund:
 - a redesign of the park with full community consultation
 - Establishment of alternative habitat such as a woodland edge or glade within the 6m corridor.
 - Other offsetting works such as clearance of non-native species
 - the setup and running of a friends of Queen Elizabeth Park community group
 - habitat creation and enhancement of the park for the community and management of the site for a specified period

ASHFORD ROAD AND FORDBRIDGE PARK, SPELTHORNE

In its Local Impact Report Spelthorne BC has proposed an additional DCO Requirement on tree surveys and protection (see paras. 4.13-4.14 the Spelthorne BC Local Impact Report (LIR, ref. REP1-021), with a Tree Survey and Protection Strategy requested from the Applicant during the current DCO examination. Site-specific safeguards could be provided by means of s.106 agreements and/or the production of site-specific Construction Method Statements for the most sensitive locations along the pipeline route (referred to as 'hotspots' in the hearings). If undertaken satisfactorily these measures would satisfy the Council in respect of tree protection at Ashford Road and Fordbridge Park.

TREE AND HEDGEROW LOSS THROUGHOUT THE SCHEME

OLD IVELY ROAD, IVELY ROAD, ASHFORD ROAD AND RAILWAY CORRIDORS THROUGHOUT THE ROUTE

A number of important tree lines, hedgerows that are important under the Hedgerow Regulations and wooded areas have been identified as at risk within the boundaries of the four councils. Of particular note are mature and ancient trees along Old Ively Road, Ively Road and Ashford Road and along the railway corridors throughout the boroughs and the large number of important hedgerows throughout the site that are to be fragmented by the proposals. The Outline LEMP should:

- Revisit the plans to assess where tree and hedgerow loss can be minimised across the route. All changes should be noted.
- Provide a Biodiversity Offsetting calculation for tree loss and hedgerow fragmentation within each borough.

- Detail the compensation to be provided both within and outside the order limits to ensure no net tree and hedgerow loss and if possible provide a net gain.
- Detail the safeguards or reference the CEMP/ CMS to ensure no disturbance of the root zones of significant trees especially along linear routes.
- Provide an assessment of the impact to the landscape views in areas of significant tree loss such as QEP, Turf Hill and tree lined streets.

COVE BROOK GREENWAYS

The ecology of Cove Brook Greenways could be impacted due to the space required to string out and to locate the HDD pits in relation to the HDD planned under the railway and along the railway to Stakes Lane. Bank management has been undertaken within this area recently by the Cove Brook Greenways Group with a richer flora being noted in 2019 than previously. Further along the river corridor a compound is proposed. The outline LEMP should include:

- An otter camera survey within the area where otter spraints were noted to assess the use of the corridor and whether a lying up area is present.
- Appropriate mitigation will be required within the construction stages to ensure otter are not disturbed, with enhancement of the river corridor detailed within the LEMP to ensure compensation for any habitat lost or disturbance.
- A biodiversity Offsetting calculation to establish the quantum of habitat to be lost. An additional assessment should be required for the detailed LEMP, informed by a detailed flora survey of the river corridor and adjacent areas and appropriate species specific investigations such as reptile, amphibian and bat surveys.
- A comprehensive mitigation package. to ensure habitats lost are recreated in the medium term and if possible there is a net gain for biodiversity. This is likely to include moneys to manage any bankside vegetation lost until it reaches it maturity at the time of impact.
- Commitments to provision of a fish pass under the railway to in part alleviate the impacts on the riparian habitats within the Country Park and along the Cove Brook Greenways.

BLACKWATER VALLEY, FRIMLEY BRIDGE SINC

The Outline LEMP should provide a full assessment of the impact of the proposals on the ecological features of the SINC and the pollution risks associated with the disturbance of the landfill. **To ensure no impact on either the SINC or the Blackwater river the Local Authorities feel that investigations regarding the nature of the landfill and a full appraisal of the risks from open trenching versus HDD should be required before the application ends with safeguards either within the outline CEMP or LEMP.**

The outline LEMP should also include:-

- A biodiversity offsetting calculation to establish the habitat loss as a result of the open trenching and/ or the HDD within the SINC
- A mitigation strategy to ensure restoration of any habitats disturbed and management of the habitats until they reach the maturity before construction.
- Within the detailed LEMP mitigation and management proposals should be

supported by comprehensive habitat and species surveys.

SOUTHWOOD AND FARNBOROUGH HILL FOOTBALL GROUNDS

The outline LEMP should include a long-term management plan for all the sporting facilities within the order limits. This should be agreed with the owners of the sites and the relevant Local Authority. The management plan should include a list of management practices that can be undertaken without reference to the applicant.

CONCLUSION

As stated previously Runnymede, Rushmoor, Spelthorne and Surrey Heath Borough Councils only have the knowledge to provide comments for impacts within their administrative boundaries and further ecological and landscape impacts may be present in other areas of the route. If the calculations, investigations safeguards and mitigation are incorporated into the outline LEMP as detailed above we feel that many of the ecological and amenity impacts could be mitigated in the medium to long term. The exception to this is where significant tree loss is envisaged.