



**SDNPA Consultation Response**

**ESSO Pipeline**

**ESSO Non Statutory Consultation dated March 2018**

**Draft Response**

1. The South Downs National Park Authority (SDNPA) notes that ESSO are consulting on a replacement pipeline along the approximate line of the existing route.
2. The 200m – 300m wide corridor which has been identified by ESSO allows for deviations around significant environmental issues, whether ancient woodland or scheduled monuments, though this may not be wide enough to avoid registered historic parkland at Chawton House (GII), access land at Stephen Castle Down or unscheduled monuments through which the existing route passes.
3. The route crosses the Park in two main blocks, Lower Upham - Ropley (17km pipeline approx.) and Binsted – Spreakly (5km). Approximately 660 hectares of the South Downs National Park (SDNP) fall within the redline area of the proposals. (refer to Appendix 2). It is notable that the proposals pass through several landscape types which are identified in the South Downs Integrated Character Assessment, from the Hampshire Clay Plateau, to the Greensand Terrace to the north.
4. The SDNPA has broad concerns about the proposals in relation to impacts on the SDNP in terms of landscape, biodiversity, trees and woodland and cultural heritage.
5. ESSO are not consulting on options which avoid the SDNP and it is noted that this would be contrary to paragraph 116 of the National Planning Policy Framework (NPPF) on major development within National Parks.
6. Other routes which would have crossed the SDNP for less distance, and have been discounted, should also be brought forward and an explanation why these are more damaging to the SDNP than the longer proposed route should be given
7. Details of mitigation, and/ or compensated proposals have not been included as part of the consultation to date and SDNPA recommends that a scheme of mitigation and compensation should be consulted on to enable proper and full assessment of the impacts on the SDNP to be undertaken.
8. Although not part of the consultation exercise, further consideration should be given as to alternatives to the decommissioning of the existing pipeline so that large amounts of concrete are not needed to fill the old pipeline, with all of the associated environmental damage that producing and using concrete brings
9. The Government's publication of 'A Green Future: Our 25 Year Plan to Improve the Environment' includes the commitment to 'support development by embedding the principle that new development should result in net environmental gain....' The challenge and expectation is for ESSO to work up the details of mitigation and compensation to a sufficient standard to be enhancing for a National Park, in line with current guidelines.

**Assessment Stage**

10. The assessment of impacts to date by ESSO has been carried out in accordance with the National Infrastructure Commission process which does not require a full Environmental



Impact Assessment (EIA) until the Development Consent Order Application (ie preferred route announcement). The following assessment is therefore based on the information made available to the SDNPA prior to the consultation document being released by ESSO as part of their information gathering and non-statutory consultation and stage. Further detailed assessment of the preferred route option will be undertaken by SDNPA in order to refine this early impact assessment of likely impacts to identify indicative mitigation and compensation.

### **Summary of Impacts on Special Qualities of the SDNP**

11. The proposals at this stage are very high level and do not include detailed information about the route alignment and construction methodology. Further very detailed assessment of the preferred option will be necessary at the next consultation stage of the project in order to fully identify likely impacts, mitigation and potential compensation

### **Landscape and visual Impacts (Appendix 6)**

12. The pipeline would be buried after construction is complete and the land reinstated. As a result, in theory, the visual impact could be reduced to occasional infrastructure associated with maintenance/safety and operation of the line; principally on/off valves at regular lengths along the route and below ground inspection chambers. However this minimal visual impact does rely on important features in the landscape being avoided and unaffected during construction of the pipeline, and sensitive construction and reinstatement methods for the landscape being used.
13. The removal or alteration of existing features due to the proposed pipeline construction could affect the continuity of the existing landscape – e.g. woodland, hedgerows and field patterns, ancient tracks and lanes, hedge banks and sunken lanes, distinctive open topography, scheduled monuments and archaeological features, rivers, streams and historic parkland for example. Long distance views along a scar in the landscape for example would result in both visual and landscape impacts.
14. Where the route passes through existing arable land it is considered that residual landscape and visual impacts could be neutral, however again this would rely on hedgerows and other existing features being gapped up or retained following completion.
15. Pasture and woodland would be more affected by the construction process where the permanent land cover would be broken by the construction corridor which could result in permanent landscape and visual impacts for example on open and unenclosed slopes of chalk downland and through areas of woodland where a 6m wide easement would be needed for the pipeline. This approach will require further detailed assessment.

### **Biodiversity (Appendix 5)**

16. The SDNPA Landscape and Biodiversity Lead (water) commissioned a data search from the Hampshire Biodiversity Information Centre (HBIC) and carried out an ecological desk-based assessment for the proposed Junction changes and area of influence
17. The route cuts through many hedgerows and the species diversity and connectivity of these should be considered, in some cases they may be protected by the Hedgerow Regulations (1997). Where possible damage to hedgerows should be avoided, by utilising gateways or for important species rich hedgerows consider direct drilling. Hedgerows that need to be removed should be replaced with a similar species mix.
18. The route has been planned to avoid many designated and local wildlife sites. There are a number of local wildlife sites close to the pipeline which may be affected and measures to



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mitigate for these impacts will be required. Any chalk downland turf which is along the route should be carefully removed and preserved and then reinstated as soon as possible.

19. There is a range of protected species found in the vicinity of the route for which appropriate mitigation measures will be required.
20. The protection of the varied geology and soil profiles along the route during the construction process will need to be set out in a soil management document in accordance with Defra Construction code of practice for the sustainable use of soils on construction sites<sup>1</sup>

#### **Archaeology/Cultural Heritage (Appendix 6)**

21. SDNPA commissioned a report by Hampshire County Council Heritage Services which has identified the significant number of heritage features along the proposed route.
22. There are significant issues identified with both designated and undesignated features which will require re-routing and consents from Historic England.
23. The Scheduled ancient monument at Ganderdown Farm (**32560**) (SIb). This presents an overriding consideration for the proposal if this route were to be selected. The pipeline would need to be re-routed at this point, or Scheduled Monument Consent acquired for the work to be carried out. Consent, if granted would certainly require extensive, intensive archaeological investigations in return.
24. If Route SIa\_II did need to pass through Chawton Park Grade II Registered Park and Garden, then Historic England would need to be consulted and the need for the route to cross the park be justified. Any impacts on the park would be likely to be temporary, unless of course works required the removal of landscape features such as tree lines.
25. Impacts on nearby scheduled monuments and listed buildings would be a material consideration at the planning stage.
26. The general archaeological potential along all of the routes within the Park is good to high. Having established this potential, with a large number of prehistoric field systems, funerary sites and possible settlements located along the routes, it is clear that the stripping of topsoil along the pipeline easement would expose many archaeological features and that where the pipe trench crosses these features, the impact upon them would be severe.
27. A draft programme for a series of archaeological assessments along the chosen route would be expected. This would include a geophysical survey of the route, the results of which could then be used to target a series of trial trenches to be excavated along the easement, (along with a general spread of trenches within areas deemed as 'blank' by the geophysics results). The results of this trial trenching could then be used to fully assess the archaeological potential of the route and the impact of the development. This potential could then be mitigated via a series of excavations at sites of particular value. This fieldwork

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<sup>1</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69308/pb13298-code-of-practice-090910.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69308/pb13298-code-of-practice-090910.pdf)



would then be followed up by a programme of post-excavation assessment and ultimately the publication of the results for public consumption.

28. Any archaeological work carried out within the Park would also require an element of public engagement.

#### **Impacts on Access and Recreation (Appendix 7)**

29. The proposed routes shown on the confidential map will impact on numerous rights of way including several long distance promoted routes and the South Downs Way where the route is not just crossed by the pipeline route but the route follows the line of these paths for some distance. Open Access land at Stephens Castle Down could be affected in combination with other biodiversity impacts.
30. During construction the timetable should take account of any major events planned for the National Trail or on other rights of way ensuring any diversions (where unavoidable) are able to accommodate event numbers and are well signed.
31. Paths will need to be reinstated following any disruption or damage by the works in accordance with the Rights of Way Authority (HCC) recommendations and the National Trail management team (NE/SDNPA)
32. A scheme of appropriate mitigation for the prolonged disturbance to the amenity and use of the PROW network will be needed together with a robust communications strategy for giving information about closures and diversions of route for the duration of the works.

#### **Woodland and existing trees (Appendix 8)**

33. In terms of trees and woodlands option **S1b & S1b\_1** is the least directly damaging. However this route option would pass through the River Itchen SSSI & SAC and is likely to be unacceptable as a result.
34. Modifications to route alternatives to S1b & S1b\_1 would therefore be required as several areas of Ancient Semi Natural Woodland are currently shown as being within the route corridor.
35. Further detail will be required on minimising the impact on trees through the construction phase – eg compliance with BS5837 (including an Arboricultural Impact Assessment and method statement).
36. Mitigation or compensation for the loss of woodland, existing trees and hedgerows would be required, together with a scheme of replacement planting (or other habitat restoration) with demonstrable long term management agreements in place.

#### **Tranquillity**

37. Tranquillity is a perceptual quality of the landscape, and is influenced by things that people can both see and hear in the landscape around them. It is considered to be a state of calm, quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence that it helps to promote health and well-being. As a special quality of the National Park, it is a characteristic of the landscape that visitors and residents greatly value. These are not characteristics that apply uniformly across the whole National Park, some areas are considered more tranquil than others based on a wide number of influences.
38. It is considered that Tranquillity would be detrimentally affected along the proposed route for the duration of both the construction and decommissioning phases due to the presence of vehicles, machinery and human activity in rural and undeveloped areas of the SDNP. This



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could affect users of the PROW network, residents and other visitors and their enjoyment of this special quality for the duration of the works.. However following completion it is anticipated (at this stage) that existing levels of tranquillity would be restored.

39. Tranquillity mapping for the route alignment is included in volume 2 of the Landscape report at Appendix 6.

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