



XX April 2018

Mr T Sunderland
XXXXX
XXXXXXX
XXXXXX

Ref SDNPA Response to ESSO Multifuel Pipeline Replacement Consultation

Dear Mr Sunderland,

Thank you for engaging with officers from the SDNPA earlier than required and providing information and responses to help shape the proposals coming forward for consultation. The SDNPA response (enclosed) covers both your northern and southern consultations running simultaneously.

For your information, Parliament lays down two statutory purposes for National Parks in England. ESSO, along with all public bodies and utility companies, when undertaking any activity which may have an impact on the designated area, has a duty to have regard to these purposes:

- **Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- **Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities National Park by the public.

There is corresponding social and economic duty upon National Park Authorities – to be considered when delivering the two purposes: to seek to foster the social and economic wellbeing of the local communities within the National Park.

This reciprocal arrangement is designed to ensure a high degree of mutual cooperation, avoiding the risk either that the needs of National Park residents and businesses will be ignored, or that others will ignore its designation when undertaking activities.

The SDNPA response (appendix 1) is therefore based on its remit to consider the impacts on the National Park in accordance with the purposes and duty.

It is understood that the application for the ESSO scheme will be made through the National Infrastructure Planning process which is undertaken by the Planning Inspectorate (PINS) on behalf of the Secretary of State. The National Park Authority would be considered to be a 'relevant' Local Authority in this process and will be invited to produce a *Local Impact Report*¹ to submit to PINS for their consideration during the application process.

Based on the route option brought forward for public consultation, and the level of evidence provided and the SDNPA's own assessments in appendices 2-8, a summary of the SDNPA response is as follows. The SDNPA agrees that:

- Option A, a route exclusively outside of the SDNP is not viable for the reasons given in your consultation document and ESSO is correct not to consult on this route

- Shorter routes (Options B,C and E) across the SDNP are also more damaging to the Special Qualities of the SDNP and agrees that ESSO is correct not to consult on them
- Option G is the correct route to consult on, though this also has the potential to cause permanent damage to woodland, hedgerows, sunken lane banks and undiscovered archaeological features and full mitigation and where this is not possible compensatory measures should be brought forward for implementation to accompany the preferred route announcement to enable an full response to be given.
- As the area through Chawton and further north through Alice Holt were not included in the East Hampshire Area of Outstanding Natural Beauty when the original pipeline was put in, there would have been no planning context or consideration for the protection afforded to nationally designated landscapes then. As both sites are now within the SDNP and alternatives exist for routes around these areas (options D, F, J) then the SDNPA consider that routes that leave the SDNP should be taken forward as the preferred option, due to the unnecessary damage caused to the registered park and gardens around Chawton and the ancient woodland and recreational opportunities around Alice Holt

Southern Route Options

Therefore the SDNPA supports Route option G running northwards from west of Bishops Waltham towards West Tisted, where the SDNPA then supports options D or F which leave the SDNP and merge again still outside the SDNP at Alton, and would oppose option G continuing northwards back through the SDNP around Chawton.

Northern Route Options

From Alton, northwards, the SDNPA would not support the pipeline re-entering the SDNPA for the reasons given, and has no preference on which of the alternative routes proposed that avoid the SDNP and consulted on (options J or M) should be taken forward

Concluding Remarks

To properly understand the impacts of the route, a fully costed mitigation, and where this is not possible, compensatory scheme should accompany the Preferred Route Announcement. The SDNPA remains willing to work with ESSO to achieve this.

Yours etc

Margaret Paren

Position

Email address

Phone number (if different from letterhead)

Encs

Appendix 1 SDNPA Response ~~Position Statement~~

Appendix 2a Existing Pipeline Route

Appendix 2b Sifted Routes

Appendix 2c Routes for Consultation

Appendix 2d Routes not brought forward

Appendix 3 Position Statement ~~Draft Response~~

Appendix 4 Biodiversity Impact Report

Appendix 5 Cultural Heritage Impact Report

Appendix 6 Landscape Impact Report and Volume 2 Figures

Appendix 7 Access Impact Report

Appendix 8 Trees and woodlands Impact Report

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie

