

# Southampton to London Pipeline: Preferred corridor announcement



# Preferred corridor announcement

In December 2017, Esso Petroleum Company, Limited (Esso) began to talk publicly about our intention to replace 90km of our 105km aviation fuel pipeline that runs from our Fawley Refinery near Southampton, to our West London Terminal storage facility in Hounslow.

Completed in 1972, the pipeline initially carried a type of oil used for large industrial sites and oil-fired power stations. Since the 1980s it has been used to supply aviation fuel to some of the UK's busiest airports. We are now looking to update this key piece of infrastructure to maintain the supply of aviation fuel for years to come.

- Through early conversations with relevant local authorities, parish councils, and environmental bodies and the work of our team of engineering and environmental experts, we identified a number of potential corridors within which the replacement pipeline could be located.
- We consulted on six of these corridors between 19 March and 30 April 2018.
- We were grateful to receive more than 1,000 responses.
- After the close of the consultation on 30 April, an independent consultation expert collated all consultation responses, which have now been analysed. Our technical data, engineering and environmental experts and the in-depth analysis of the consultation responses have helped us select a preferred pipeline corridor to progress.
- **We have identified corridor option G in the south and corridor option J in the north to progress as our preferred corridor. These corridors perform best when measured against the guiding principles we set for the project. The two options selected are those that most closely follow the existing pipeline. When the two selected options are combined they form the single preferred corridor.**



# The corridor options consultation

Since the existing pipeline was built in the late 1960s, Hampshire and Surrey have changed dramatically. The South Downs National Park and many other protected sites have been established alongside the existing pipeline. Communities, new homes and businesses have been created and roads such as the M25 have been opened. This means, that in some areas we can't simply install the replacement pipeline alongside the existing one.

We consulted on six corridors - three to the south of Esso's Alton Pumping Station and three to the north of the Alton Pumping Station.

## Public Engagement

As part of our initial consultation, we held 11 public exhibitions near the proposed pipeline corridors, where we met with more than 1,900 residents and interested members of the public. We also had just over 14,000 people visit our project website and over 1,000 consultation responses were received.

To publicise the consultation and the series of local exhibitions, we took out advertising in local publications, shared a press release with local editors to encourage news coverage, sent posters and materials to local deposit points and engaged with local authorities. The project was also featured on BBC TV and local radio news programmes.

Our selection considered which corridor option performed best against our objectives and the guiding principles:

## Objectives

- to replace the pipeline from Boorley Green to the West London Terminal storage facility via Alton, Hampshire, to connect to our existing pipeline infrastructure;
- to meet all the relevant planning requirements;
- to maintain fuel supply during replacement; and
- to develop and install a safe, buildable, operational and economically viable pipeline.

## Guiding Principles

- if possible, benefit from existing equipment (infrastructure) and relationships with landowners;
- are likely to have better environmental outcomes versus the other options considered, especially relating to internationally and nationally important features along the final route;
- will provide social and economic outcomes of greater benefit compared to the other corridors;
- if possible, pass through less complex or built-up areas;
- achieve compliance with National Policy Statements; and
- can be installed in a timely and realistic manner at reasonable cost.

Our technical data, engineering and environmental experts and the analysis of the consultation responses have helped us to select the preferred pipeline corridor to progress.



# Southern Corridors: Key engineering and environmental performance

## OPTION D (De-selected)

This was one of the shortest corridors within the South Downs National Park, but it performed less favourably due to the corridor's significantly longer length.

This corridor would have passed close to the community of Ropley, with the possibility of causing some short-term disruption.

This corridor would have passed through or very close to a Groundwater Source Protection Zone 1 south of Lasham, and included part of the Cuckoo Corner Roman site, which is a Scheduled Monument. It would have posed significant engineering challenges to avoid the chalk grasslands, and there was steeper landscape topography.

## OPTION F (De-selected)

This corridor diverged from the existing route southwest of Blackhouse Copse, then headed north to pass around Four Marks and Chawton Park Woods. This allowed the corridor to avoid re-entering the South Downs National Park.

However, this corridor would have passed close to the communities of Ropley, Four Marks and Alton, causing disruption to residents.

We were also aware of planned developments and specific installation challenges in Alton that made this corridor unsuitable to progress.

## OPTION G (Preferred)

This corridor was developed to follow the existing aviation fuel pipeline where possible to make best use of existing infrastructure and landowner and stakeholder relationships. The corridor avoids ancient woodland and sensitive features above the existing pipeline, although this corridor re-enters the South Downs National Park.

Its proximity to the existing pipeline means that land used for most of its length is already accustomed to the operation of the existing pipeline.

# Southern Corridors: Summary of themes from consultation responses

## OPTION D (De-selected)

51 per cent of respondents who expressed an opinion opposed or strongly opposed this option. 13 per cent of respondents who expressed an opinion favoured or strongly favoured this option\*. The main concerns were around the potential negative effects on wildlife and trees, closely followed by installation impact concerns. Biodiversity was a key concern for stakeholders responding to the consultation.

### Definitions

De-selected – This term is used to describe a corridor that did not perform as well against the project's objectives and guiding principles, and has now been removed for the second consultation.

Preferred – This term is used to describe a corridor that performed well against the project's objectives and guiding principles and will be progressed for the second consultation.

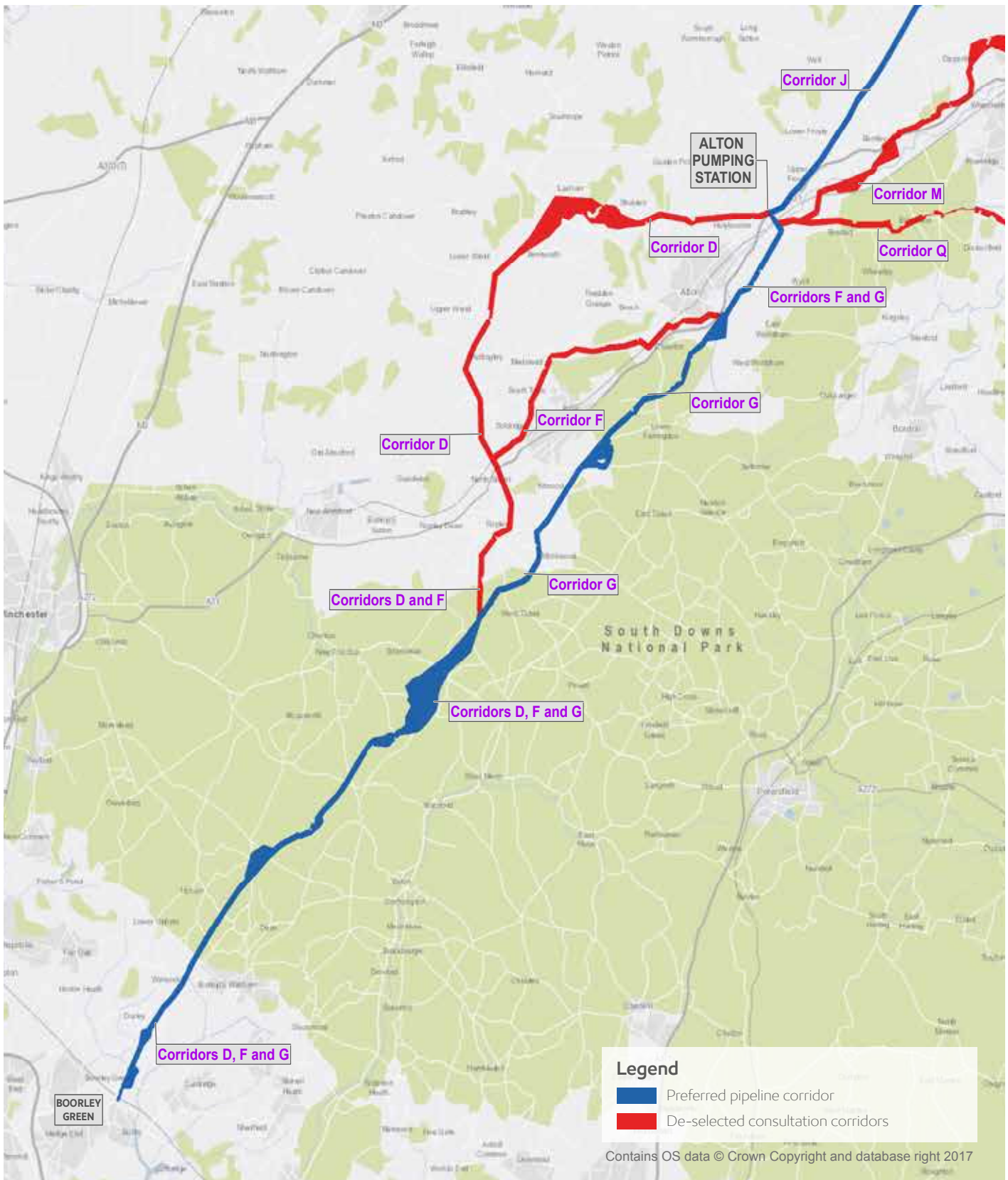
## OPTION F (De-selected)

56 per cent of respondents who expressed an opinion opposed or strongly opposed this option. 9 per cent of respondents who expressed an opinion favoured or strongly favoured this option\*. Similar to option D, there were key concerns around potential natural impacts and concerns around installation impacts – particularly given the planned development in this area. People also expressed concern about the landscape and visual impact of the project.

## OPTION G (Preferred)

26 per cent of respondents who expressed an opinion opposed or strongly opposed this option. 50 per cent of respondents who expressed an opinion favoured or strongly favoured this option\*. The key concern here was about installation impacts, similar to the other corridors, and concerns over noise, transport and access during installation. A high number of respondents said that the existing landowner relationships made this preferable to the alternative corridors consulted upon compared to the other options.

\*Percentage based on those who responded to questions 1a, 2a and 3a within the consultation response form.



# Northern Corridors: Key engineering and environmental performance

## OPTION J (Preferred)

This is the shortest northern corridor and makes best use of existing infrastructure and relationships with landowners. This corridor has the least streetworks compared to other corridors consulted upon. This corridor avoids the South Downs National Park, although it passes through national and European designated nature conservation sites.

This corridor passes through several residential areas including Farnborough, Frimley, Lightwater, Chertsey and Ashford, and communities lying within or near to the corridor may face short-term disruption during installation.

## OPTION M (De-selected)

This corridor was developed to avoid the South Downs National Park, that Option Q passed through.

This corridor avoided many of the residential areas crossed by Option J such as Farnborough, Frimley and Lightwater, but travelled through the north of Farnham. Farnham is a historic market town and presented significant engineering challenges due to the width of the roads and the volume of traffic.

This corridor did not follow the existing pipeline and there may have been a greater risk of disturbing buried archaeological remains.

## OPTION Q (De-selected)

This corridor was developed to avoid national and European designated nature conservation sites, as well as to avoid the community of Farnham that Option M passes through. It passed through the communities of Pryford and Byfleet, which would have caused short-term disruption to residents.

However, the corridor passed through both the South Downs National Park and Surrey Hills Area of Outstanding Natural Beauty. It also intersected with a large area of ancient woodland at Alice Holt Forest. This forest is a high value community and environmental asset.

# Northern Corridors: Summary of themes from consultation responses

## OPTION J (Preferred)

23 per cent of respondents who expressed an opinion opposed or strongly opposed this option. 70 per cent of respondents who expressed an opinion favoured or strongly favoured this option\*. The main concerns cited by respondents were around installation impacts and impacts such as land use, health and noise.

## OPTION M (De-selected)

89 per cent of respondents who expressed an opinion opposed or strongly opposed it. 8 per cent of respondents who expressed an opinion favoured or strongly favoured this option\*. The main concerns were around installation and the social and economic impacts.

## OPTION Q (De-selected)

83 per cent of respondents who expressed an opinion opposed or strongly opposed it. 10 per cent of respondents who expressed an opinion favoured or strongly favoured this option\*. Respondents also expressed the same concerns here over installation and social and economic impacts, but also considered that nature and landscape in the area could be damaged.

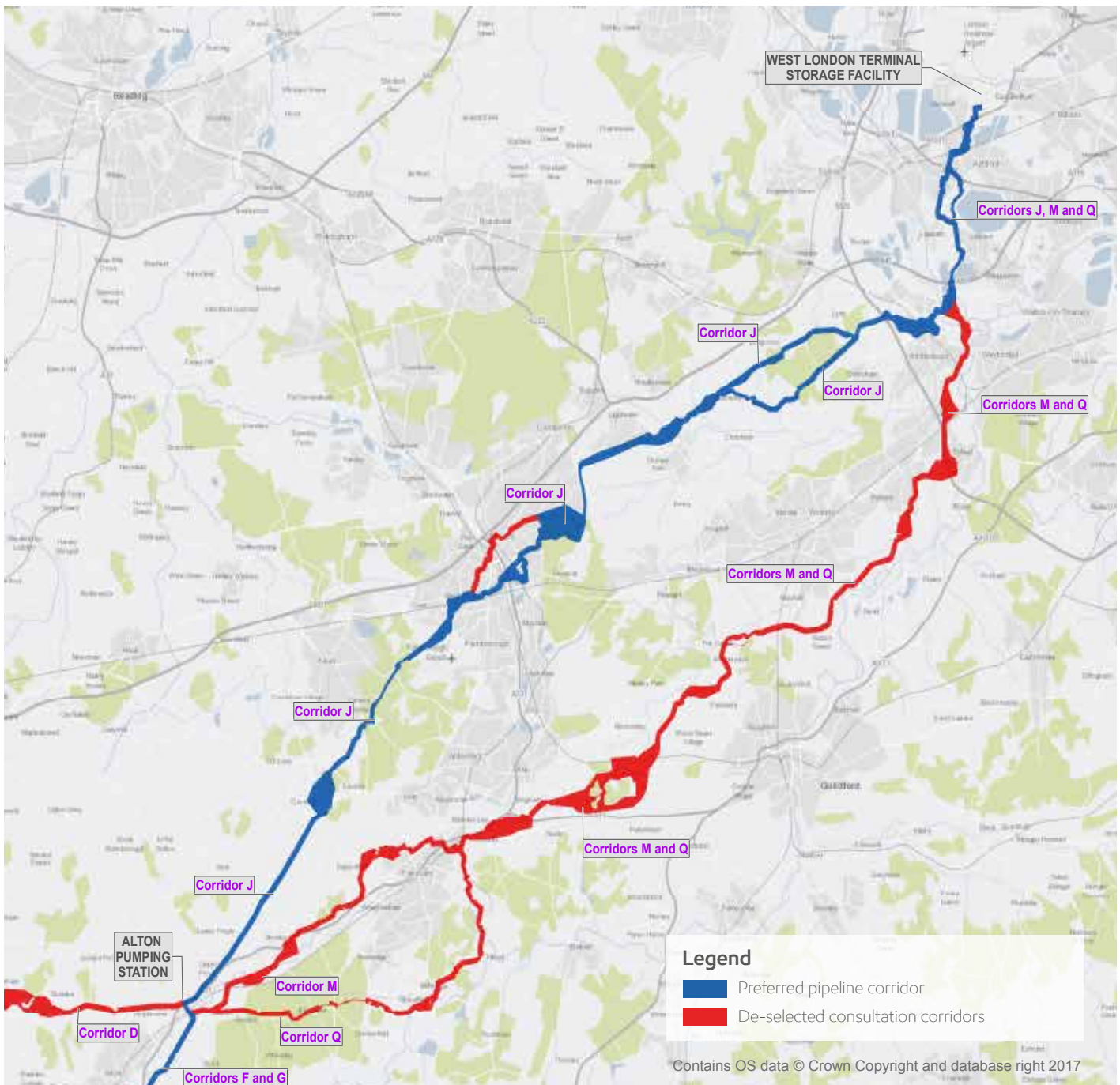
### Definitions

De-selected – This term is used to describe a corridor that did not perform as well against the project's objectives and guiding principles, and has now been removed for the second consultation.

Preferred – This term is used to describe a corridor that performed well against the project's objectives and guiding principles and will be progressed for the second consultation.

\*Percentage based on those who responded to questions 4a, 5a and 6a within the consultation response form.





# How the preferred corridor was selected

The preferred corridor was selected following a detailed and thorough review by the project's senior management team. The team included expert support from our environmental, engineering and planning teams. The team was presented with the independent report on the consultation findings which included comments relating to the selection of a corridor.

## **Southern Section: Selection of Option G as the preferred corridor between Boorley Green and Alton**

All southern corridors within the corridor consultation had different positive and negative points when judged against the project objectives and guiding principles. The first 20km for Options D, F and G, between Boorley Green and West Tisted, are the same. From West Tisted, the three options diverge until they meet again at the Esso Alton Pumping Station. The responses received during the consultation provided helpful insights into the local communities' views, both positive and negative. Corridor G was favoured by a large proportion of respondents, although, the individuals and organisations who took part in the consultation prioritised different elements. We have considered this consultation feedback, along with our technical data and the views of our engineering and environmental experts, to arrive at our decision of Option G as the preferred corridor.

- Option D performed less strongly due to its significantly longer length – 22.5km from the point the corridors diverge (Option F being around 19.9km and Option G being around 17.8km). Compared to Options G and F, this corridor had greater engineering and installation challenges, such as the hilly landscape and groundwater Source Protection Zones near Lasham. It also had additional crossings over the Watercress railway line and A31 road. Respondents highlighted these issues, as well as impacts on wildlife and the potential issues of installing in an area where many roads are narrow country lanes.

When compared to Option G, there was less potential to benefit from existing infrastructure and landowner relationships, as once it diverged from the other two corridors it did not follow any existing pipelines. Option D also included part of the Cuckoo Corner Roman site, a scheduled monument.

For these reasons, Option D was de-selected.



- Option F performed less strongly due to the possibility of greater disruption to communities such as Alton and needing additional crossings over the Watercress railway line and A31 road. This option also performed less strongly when compared to Options D and G due to its proximity to areas of woodland, such as Chawton Wood. In addition, during the consultation, we also received new information that identified a priority habitat for hydrology in this area. Concerns were also raised by respondents about maintaining easy access to Alton Community Hospital and the impact on growing local communities during installation of the pipeline.

For these reasons, Option F was de-selected.

- Option G performed more strongly than Options D and F. There was a strong representation from the consultation responses that the replacement pipeline should be located near to the existing pipeline. Key reasons given were the positive existing relationships with landowners and the opportunity to use land and land access routes along the existing pipeline.

Option G is significantly shorter from the point the corridor options diverge and there are fewer engineering challenges in this corridor. It also has a lower risk of disruption to residential areas such as Alton and Ropley, less potential to affect cultural heritage assets and above and below groundwater systems.

Unlike Options D and F, Corridor G does re-enter approximately 5km of the South Downs National Park to the south of Alton. When installation is complete and the land has been reinstated, where possible, to its previous state, we believe there would be no permanent effect on the special qualities of the park, such as the natural

beauty of the landscape and countryside.

We are committed to continue working closely with the South Downs National Park Authority to develop the route. This will include exploring mitigation techniques and looking for opportunities for enhancing the local environment. This will support us in ensuring that short or medium term effects on the special qualities of the park are avoided or reduced.

Option G is preferable to the community-related impacts and engineering challenges associated with Options D and F.

For these reasons, Option G was selected as the preferred corridor.

# How the preferred corridor was selected (continued)

## **Northern Section: Selection of Option J as the preferred corridor between Alton and the West London Terminal storage facility in Hounslow**

All northern corridors within the corridor consultation had different positive and negative points when judged against the project objectives and guiding principles. Corridor J was favoured by most respondents. However, the individuals and organisations who took part in the consultation prioritised different elements. We have considered the consultation feedback along with our technical data and the views of our engineering and environmental experts, to arrive at our selection of Option J as the preferred corridor.

- Options M and Q both passed through Pyrford and Byfleet and these areas presented significant engineering and installation challenges. These include crossing the River Wey and the high water table in this area that results in frequent flooding. Consultation responses strongly highlighted the rich cultural and historical heritage in these areas. There was a lower potential for benefiting from existing infrastructure and landowner relationships. Consultation responses showed that many respondents who opposed Options M and Q felt the replacement should, where possible, follow the existing pipeline.
- Option M performed less strongly due to its path through the historic town of Farnham. Many consultation responses highlighted the community, heritage and business impacts of the route passing through Farnham. These themes included the engineering challenges of the narrow roads, archaeology around Farnham Park, the number of listed buildings and the planned redevelopment of the town centre (starting in August 2018). The traffic impact of installation was likely to be greater in Farnham, when compared to other areas, due to the relatively narrow roads and the volume of traffic.

- Option Q performed less strongly due to the potential impact on Alice Holt Forest (part of the South Downs National Park). The forest was highlighted by many in the consultation responses as being an important community and environmental asset. It also crossed about 5.2km of the Surrey Hills Area of Outstanding Natural Beauty.

For these reasons, Options M and Q were de-selected.

- Option J performed more strongly overall than Options M and Q when considered in the round. There was a strong representation from respondents that the replacement pipeline should be located near to the existing pipeline, due to existing positive relationships with landowners and the opportunity to use land and land access routes along the existing pipeline. Option J was favoured due to its avoidance of Farnham, Alice Holt Forest, the River Wey and high water table in that area. Option J passes through or near more designated nature conservation sites, but the team concluded that careful route development and appropriate design and mitigation measures would reduce the risk of adverse effects on these sites. There was a common theme raised about the impact on communities and traffic during installation, especially around the Farnborough and Frimley areas, but we are working to reduce these potential impacts through careful route design and planning of the installation of the pipeline.

For these reasons, Option J was selected as the preferred corridor.





# How the preferred corridor was selected (continued)

## Corridor J sub-options

Following the selection of Corridor Option J, we further considered the strong and reasoned feedback from consultees relating to the sub-options in Frimley, Chobham Common and Queen Mary Reservoir.

The corridor consultation gave a clear steer that the sub-options that deviate away from the existing pipeline are all unfavourable to consultees.

In response, our favoured sub-options are those closest to the existing pipeline, and we will prioritise the technical development of route options in these areas.

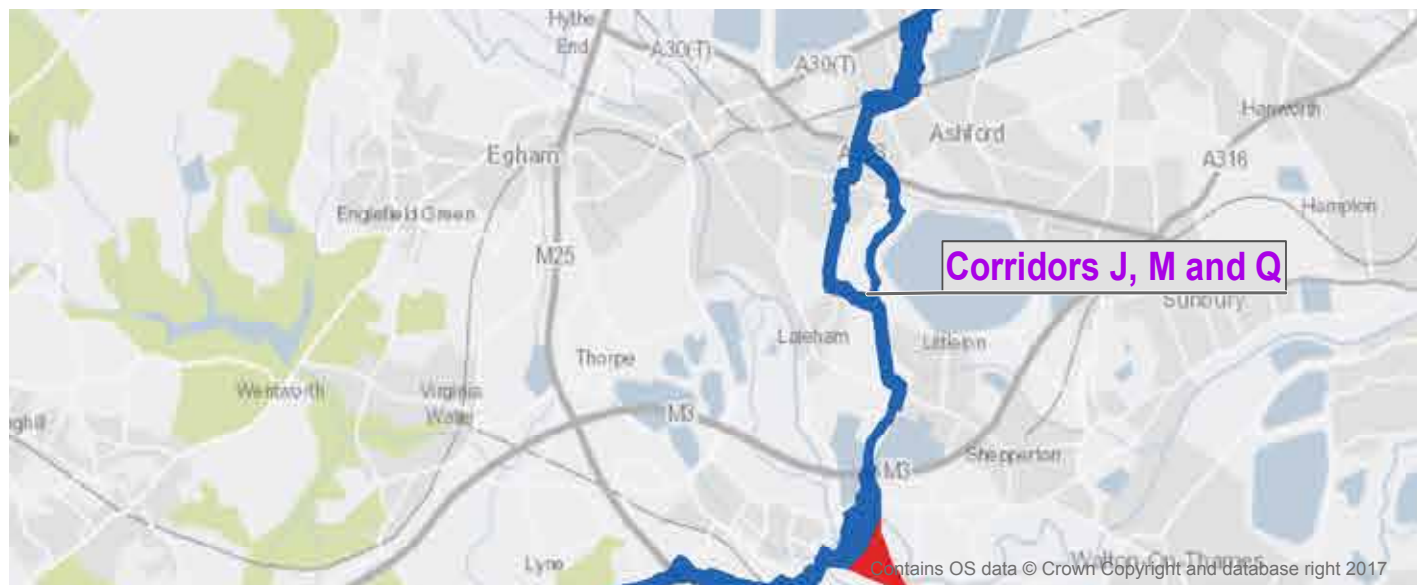
The Frimley Park Hospital sub-option has been de-selected due to the potential impact on the hospital, schools and local roads during installation. Following recent studies, we are confident that the technical challenges of a route passing through, or near to, the Frimley Hatches and Farnborough Station can be managed appropriately.

At this stage, we know there are potential technical challenges in Chobham Common and Queen Mary Reservoir that require further work, such as surveys and conversations with landowners, which we need more time to complete. Summaries of the issues for each are set out below.:

- Chobham Common. Extra care is needed in assessing the underground water system in this area, which supplies several sensitive habitats. We wish to carry out further investigation to gain greater confidence that an acceptable route exists through the Common before de-selecting the sub-option that passes around the Common.
- Queen Mary Reservoir. The pipeline currently passes between the reservoir and the Queen Mary Quarry. Now that we have selected a preferred corridor, we can undertake more detailed work to understand the technical challenges of installing a pipeline near the reservoir's walls and an active quarry. We also need to speak with a local gas company who maintain a high-pressure gas main in this area. Once we are able to confirm that there is an acceptable route in this area, we hope to de-select the Laleham sub-option that passes through residential communities.

We will continue to prioritise the technical work on these two sub-options and will be providing an update this summer, via our website and newsletter, when we release an initial working route for the pipeline.

## Queen Mary Reservoir sub-options





# Key themes raised in the consultation responses

The aim of the initial consultation was to receive views from communities and stakeholders on which corridor to progress. However, we also received information relevant to routes within the potential corridors. Now we have a preferred corridor, we wanted to incorporate some of the early route feedback now.

What you said	What we did
Frimley Park Hospital sub-option	We will be removing this sub-option that passes the hospital at this stage due to concerns around traffic management in this busy area and obstructing access to emergency services.
Chobham Common sub-option	We have noted the feedback from the corridor options consultation about this sub-option. Respondents were concerned about the potential effect on Chobham residents and properties. More technical work needs to be completed before we can remove this sub-option.
Reservoir sub-option	We have noted the feedback from the corridor options consultation about this sub-option. Respondents were concerned about traffic management in Laleham and a limited number of feasible routes in this area. More technical work needs to be completed before we can remove this sub-option.
Working within designated areas and South Downs National Park	We are working with statutory and expert environmental organisations to develop our assessment and potential mitigation in these areas. Our aim is to carefully design the pipeline to avoid or reduce environmental impacts.
Noise and air quality in residential areas	Once we have developed an initial working route we will start assessing the potential impacts of noise and on air quality during installation. This work is just starting and the results will be made available to everyone during the second consultation in autumn 2018.
The impact on communities due to installation causing traffic disruption	Traffic management will be put in place during installation, and we will be consulting with local communities in autumn 2018 to understand local impacts.
Archaeological sites may be disturbed where the route does not follow the existing alignment	We will be undertaking archaeological investigations before and during installation. More information on our approach to protecting archaeological remains will be available in autumn 2018.
The reinstatement of land following installation	Once the pipeline installation is complete, the land will, where possible, be reinstated to its former state.



# Next steps

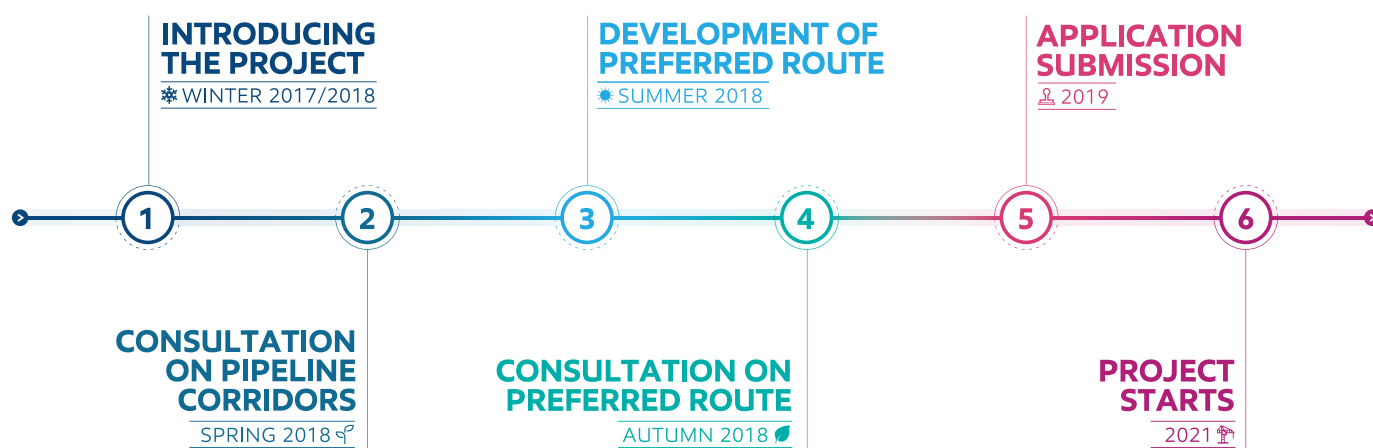
We recognise the importance of individuals, communities, representatives and organisations contributing to the development of our proposals. This is why we committed to undertaking two consultations and we are grateful for all the responses we have received during the first consultation to select a preferred corridor.

Now that we have selected a preferred corridor, we will develop the route for the pipeline and aim to release an initial working route in summer 2018.

Over the summer of 2018, we will further refine the initial working route into the preferred route.

In autumn 2018, we will publish and consult on the preferred route. This will provide an opportunity for anyone who wishes to take part to comment on the project.

Following this second consultation, we will then submit our formal application for permission to install the replacement pipeline. The permission is called a Development Consent Order (often referred to as a 'DCO').



## Contact us

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Southampton to London  
Pipeline Project

## **SDNPA Consultation Response**

### **ESSO Pipeline**

#### **ESSO Non Statutory Consultation April 2018**



#### **Response to Northern and Southern Proposals**

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, the consultation being split into two parts – i) the northern option (from Alton to the London Terminal, Hounslow and ii) the southern options from Alton down towards Fawley. The South Downs National Park Authority (SDNPA) makes one response to cover the two consultations.
2. The potential route crosses the Park in three main blocks, Lower Upham - Ropley (part of Option G 17km pipeline approx.), Four Marks to Chawton (Option G, 5km) and Binsted – towards Spreckley (Option Q, 5km). Approximately 66 hectares of the South Downs National Park (SDNP) fall within the redline area of the proposals. (refer to Appendix 2a). 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.
3. 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.
4. The SDNPA has broad concerns about the proposals in relation to impacts on the SDNP in terms of landscape, access, biodiversity, trees and woodland and cultural heritage.
5. ESSO have identified a route outside the SDNP (option A) which ESSO has considered and discounted prior to the consultation. The SDNPA agree with the reasons given by ESSO in their consultation document not to bring this option forward for consultation.
6. The SDNPA consider that there is potential for permanent damage to the national park from a route (option G) through the SDNP. Woodland, hedgerows, sunken lane banks and undiscovered archaeological features could be at risk and full mitigation and where this is not possible compensatory measures should be brought forward.
7. It is also noted that shorter options through the SDNP, to the west of the existing alignment were considered, but not brought for consultation. This is due to the potential for this alignment to have significant impacts on the River Itchen SAC. The SDNPA agree that having considered these alternative routes the impacts on the Special Qualities of the NP over an albeit shorter distance would be likely to be unacceptable due to the potential for harm to the SAC.
8. ESSO have included alternative route options (D and F) north of West Tisted in the consultation which avoid the SDNP altogether. The SDNPA considers these options to be preferable due to the potential for impacts on the Registered parkscape at Chawton House (GII\*) (Ropley to Chawton section) and also the Ancient woodland at Alice Holt (Binsted to Spreckley section). In addition both are significant tourism destinations within the SDNP where the pipeline construction impacts would be highly disruptive to the enjoyment of the SDNP in these locations for high numbers of visitors.





9. The sections at Chawton and Alice Holt through the SDNP were not part of the former East Hampshire Downs AONB (see Landscape Report map para 7.2) therefore decision making about the route alignment for the existing pipeline would not have considered impacts on designated landscapes at that time. The subsequent inclusion of these areas within the SDNP changes the planning context for these proposals, and given the impacts identified above are considered to be unacceptable by SDNPA.
10. Therefore, the SDNPA concludes that were any scheme to be given approval then the SDNPA recommends that option G, entering the SDNP to the west of Bishops Waltham from the south running northwards to West Tisted followed by either route D or F to take the pipeline out of the SDNP would be the least damaging option to the SDNPA. North from Alton options J or M would be preferable to returning into the SDNP through option Q as this would unnecessarily impact on the ancient woodland and special qualities of the SDNP in that area.
11. 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
12. 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, where this is not possible, compensation should be consulted on to enable proper and full assessment of the impacts on the SDNP to be undertaken
13. 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 or compensation to a sufficient standard to be enhancing for a National Park, in line with current guidelines.

### **Assessment Stage**

14. 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.

### **Planning process**

15. It is understood that permission for the pipeline will go through the National Infrastructure Planning process which is undertaken by the Planning Inspectorate (PINS) on behalf of the Secretary of State for Business, Energy and Industrial Strategy. ESSO will apply for a Development Consent Order (DCO). The National Park Authority would be considered to



be a 'relevant' Local Authority and will be invited to produce a Local Impact Report on the proposals within the DCO to submit to PINS for their consideration during the application process.

#### Planning policy

Overarching National Policy Statement for Energy (EN-1)(ONPSE)

16. The proposals would be considered by the Secretary of State for Business, Energy and Industrial Strategy against the policy criteria set out in the Overarching National Policy Statement for Energy (EN-1) <sup>1</sup> and The National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) <sup>2</sup>, (NPSGSI) some consideration will also be given to the Local Development Plan and the relevant policies in the NPPF.

17. The ONPSE sets out several policy criteria in relation to Energy infrastructure development within or close to National Parks;

- Paragraph 5.9.8 - 9 : Reference to the need for the Infrastructure Planning Commission to have regard to the statutory purposes for which national parks and AONBs were designated and refers to the NE publication which sets out the 'Duty of Regard'<sup>3</sup>
- Paragraph 5.9.10 sets out the approach to Energy infrastructure development proposed within nationally designated areas and broadly follows the tests for major development in Nationally designated landscapes which is set out in the NPPF;
- Paragraph 5.9.10 sets out the need for the IPC to ensure that infrastructure projects in these areas are carried out to high environmental standards.
- Paragraphs 5.9.12 & 13 sets out the considerations for infrastructure projects which might affect the statutory purposes of designated areas from beyond their boundaries – ie in the setting of the designated area.
- Paragraphs 5.9.18 – 5.9.20 covers visual impact
- Paragraphs 5.9.21 – 5.9.23 covers mitigation of landscape and visual impact.

National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) (NPSGSI)<sup>4</sup>

18. This NPS provides the primary basis for decisions by the IPC on applications it receives for gas supply infrastructure and gas and oil pipelines. This proposed pipeline meets the criteria for IPC decision making in paragraph 1.8 point (iv) being over 10 miles in length.

- Section 2.21 provides guidance for decision makers on Biodiversity, landscape and visual matters.
- Section 2.22 provides guidance on impacts on water quality and resources
- Section 2.23 provides guidance on soil and geology.

National Planning Policy Framework

<sup>1</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47854/1938-overarching-nps-for-energy-en1.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf)

<sup>2</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/37049/1941-nps-gas-supply-oil-en4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37049/1941-nps-gas-supply-oil-en4.pdf)

<sup>3</sup><http://webarchive.nationalarchives.gov.uk/20130402204840/http://archive.defra.gov.uk/rural/documents/protected/npaonb-duties-guide.pdf>

<sup>4</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/37049/1941-nps-gas-supply-oil-en4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37049/1941-nps-gas-supply-oil-en4.pdf)



19. Paragraph 115 of this document states that great weight should be given to conserving landscape and scenic beauty, wildlife and cultural heritage in National Parks, the Broads and Areas of Outstanding National Beauty;
20. Paragraph 116 then goes on to say that planning permission should be refused for major development in these areas except in exceptional circumstances and where it can be demonstrated to be in the public interest and meets the following tests;
- The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
  - The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
  - Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Local Plan documents may also be considered relevant by PINS;

The East Hants/SDNPA Joint Core Strategy 2014

21. The Joint Core strategy 2014 contains the following overriding policy which is relevant to the proposal

Policy CP2 Spatial Strategy

- *New development must fully acknowledge the constraints and opportunities of the South Downs National Park and the form, scale and location of development must ensure that the duty and purposes of the National Park are delivered. In particular, major new development will only be considered if it supports National Park purposes*

Winchester/ SDNPA Joint Core strategy 2013

22. Contains the following overriding policy which is relevant to the proposal.

*Policy CPI 9 - South Downs National Park.*

- *New development should be in keeping with the context and the setting of the landscape and settlements of the South Downs National Park. The emphasis should be on small-scale proposals that are in a sustainable location and well designed. Proposals which support the economic and social wellbeing of the National Park and its communities will be encouraged, provided that they do not conflict with the National Park's purposes.*
- *Development within and adjoining the South Downs National Park which would have a significant detrimental impact to the rural character and setting of settlements and the landscape should not be permitted unless it can be demonstrated that the proposal is of overriding national importance, or its impact can be mitigated.*

a. The emerging South Downs Local Plan (Submission Version, September 2017).

b. Partnership Management Plan – Shaping the future of your South Downs National Park 2014-2019 This proposal impacts and could contribute to the following policies of the PMP;

Policy 1, 3, 4, 5, 9, 10, 19, 24, 26, 28, 30, 31, 34, 37, 38, 47

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



23. 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

#### **Biodiversity (see Appendix 4)**

24. 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
25. 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.
26. 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 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.
27. There is a range of protected species found in the vicinity of the route for which appropriate mitigation measures will be required.
28. 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>5</sup>

#### **Archaeology/Cultural Heritage (see Appendix 5)**

29. SDNPA commissioned a report by Hampshire County Council Heritage Services which has identified the significant number of heritage features along the proposed route.
30. There are significant issues identified with both designated and undesignated features which will require re-routing and consents from Historic England
31. Route corridor G passes through Chawton Park Grade II Registered Park and Garden. 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.
32. Impacts on nearby scheduled monuments and listed buildings would be a material consideration at the planning stage.

<sup>5</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)





33. 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.
34. 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 would then be followed up by a programme of post-excavation assessment and ultimately the publication of the results for public consumption.
35. Any archaeological work carried out within the Park would also require an element of public engagement.

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

36. 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.
37. The removal or alteration of existing features due to the proposed pipeline construction could affect the continuity of the existing landscape – eg 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. In these cases it is recommended that the working width of the construction corridor is reduced to the minimum (likely 12m) or horizontal direct drilling is used as an alternative to preserve existing features such as hedgerows, banks to sunken lanes, walls and other linear features which the proposed route may cross.
38. 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.
39. 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.



40. A scheme of reinstatement of the landscape and replacement planting where necessary following completion of the works will be required together with the agreements in place for establishment maintenance and long term management of the restored land.

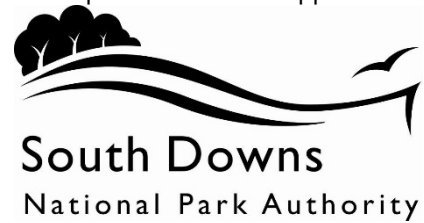
### **Tranquillity (included in Appendix 6 vol 2)**

41. 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.
42. 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 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.
43. Tranquillity mapping for the route alignment is included in volume 2 of the Landscape report at Appendix 6.

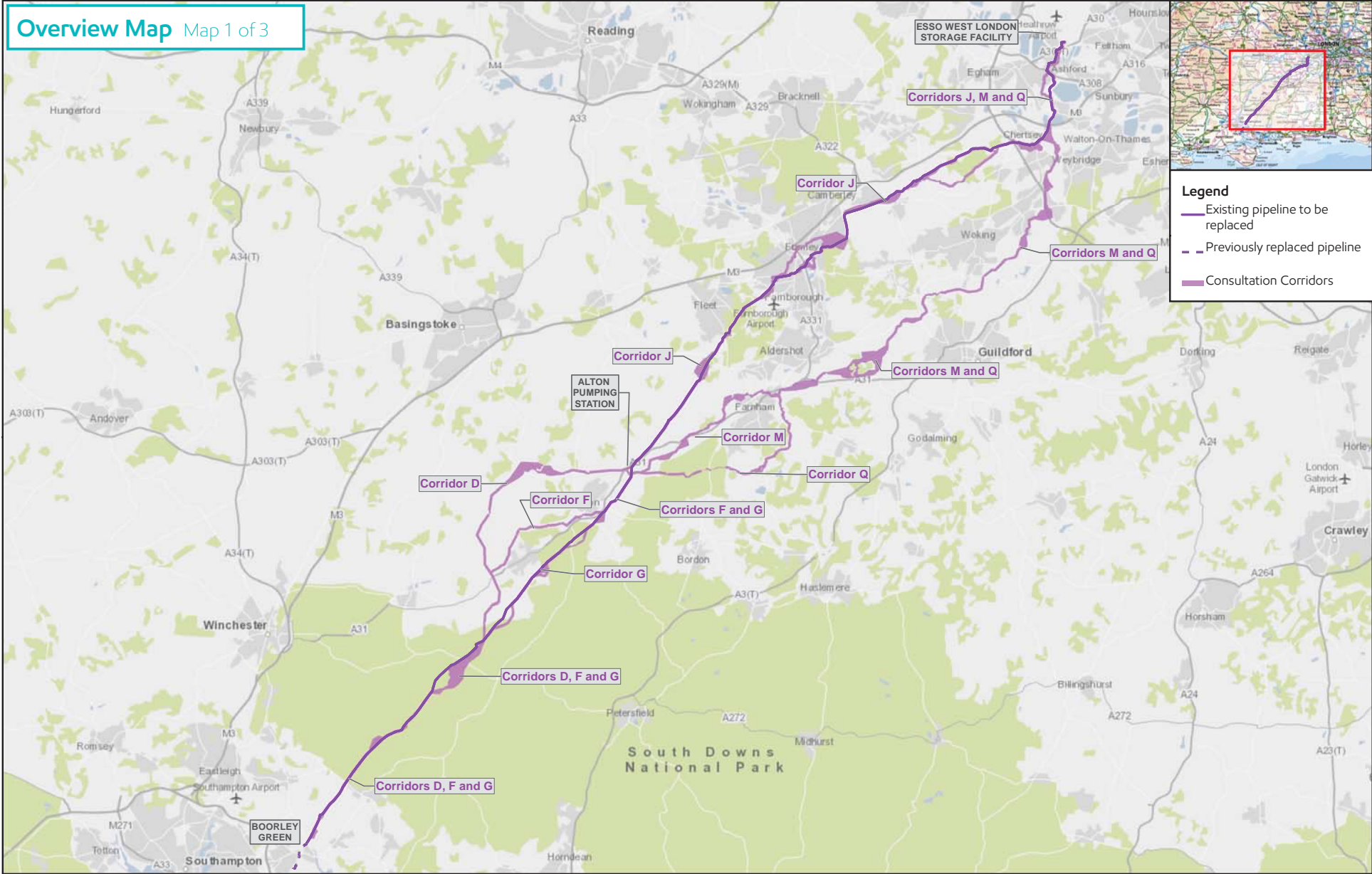
### **Impacts on Access and Recreation (see Appendix 7)**

44. 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.
45. 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.
46. 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)
47. 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.

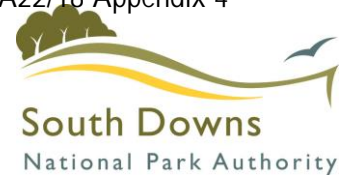
### **Woodland and existing trees (see Appendix 8)**



48. Modifications to the southern section of route options D,F, & G would be required as several areas of Ancient Semi Natural Woodland are currently shown as being within the route corridor.
49. 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).
50. 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. Horizontal direct drilling could be considered beneath hedgerows and woodland where feasible and where there is no suitable alternative route.







30 April 2018

Mr T Sunderland  
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### 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*<sup>1</sup> 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 a 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.

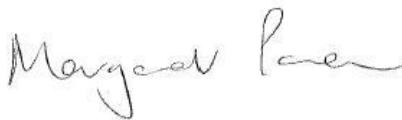
#### Northern Route Options

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 sincerely,



**Margaret Paren**

Chair

South Downs National park Authority

Encs

Appendix 1 SDNPA Response

Appendix 2b Sifted Routes

Appendix 2c Routes for Consultation

Appendix 2d Routes not brought forward

Appendix 3 Position Statement (for guidance re Special Qualities)

Appendix 4 Biodiversity Impact Report

Appendix 5 Cultural Heritage Impact Report

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Appendix 6 Landscape Impact Report and Volume 2 Figures

Appendix 7 Access Impact Report

Appendix 8 Trees and woodlands Impact Report