

# Written Representation on Behalf of the Neighbours and Users of Queen Elizabeth Park



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Interested Party reference no: **20022545**

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# 1. Summary

This representation is on behalf of the neighbours and users of Queen Elizabeth Park in Farnborough. The group is seeking to retain the current use and feel of the park, and to minimise damage and tree loss from the pipeline installation and operation within the park.

The group are not opposed to the replacement of the pipeline. However the group believe that the replacement can and should be achieved in a way which is more sympathetic to the use and future of the park - an area which is an essential and valued open space in the local community.

We believe that Esso's current plans are too damaging to the park and that no effort is being made to reduce tree loss either during or after the installation of the pipeline. Ideally the pipeline would be installed and operated without losing any trees from within the park. We would like to achieve an outcome as close to this ideal solution as possible.

Esso's current plans also risk putting some or all of the park out of use for a significant period of time.

There is immense opposition amongst the local community to the proposed route through the park. A petition expressing this opposition has attracted 6,203 signatures in only six weeks.

The planned construction activities in the park are complex, extensive and will take a long time to complete. The park will become a busy, noisy construction site with limited or no access for local residents and the effects will be visible for many years afterwards. We have identified the following main activities:

- Removal of the existing playground
- Building the construction compound
- Tree felling and associated vegetation clearance (to which we strongly object)
- Installing fences along the edge of the site
- Directional drilling under allotments and associated stringing out of pipeline
- Auger boring beneath A325
- Access to the auger boring site for equipment and materials
- Trenched installation of the pipeline
- Reinstatement of subsoil and topsoil
- Replacement tree planting
- Removal of the construction compound
- Construction of a new playground

We have the following areas of concern on the current plan as documented by the application:

1. The plans as they currently stand mean that the community will be worse off after the pipeline has been installed. As a minimum, the effect of the pipeline after its installation should be neutral.
2. There is insufficient detail to support the statement that a suitable temporary play area will be provided as there is no suitable location for one in the local area.

3. There is concern that the replacement play area will not be satisfactory.
4. There has been no assessment of the impact of the work on flood risk in the area.
5. There has been no assessment of how noise levels might increase for residents following the completion of the work in and around the park and the removal of the tree screening.
6. The statements with regard to the area of the tree loss (working width, Order Limits, nearby trees) are contradictory and give no clear data with which we can assess damage.
7. We are very concerned about the possible extent of tree loss. Rushmoor Borough Council's assessment is that 25% of the park's area would be cleared of trees<sup>1</sup>.
8. There is no justification given for why Esso are not offering the same narrow working width in the park as elsewhere. In places this is as narrow as 5 metres.
9. The full working area needed to accommodate the stringing out activities and its impact on the trees has not been mentioned at all.
10. The space needed for stringing out seems not to be part of the narrow working commitment.
11. Esso have not produced a full detailed survey of trees within the park, documenting species and age.
12. There is insufficient detail on which trees will be removed, even those which are substantial specimens are not identified.
13. Esso seems to have the right to remove trees outside the Order Limits.
14. The commitment from Esso to replant lost trees and other vegetation is vague and does not even commit to replace with similar.
15. The Register of Notable Trees does not accurately identify tree group locations.
16. The work to drill underneath the A325 is highly destructive to the park, and there is insufficient justification provided for this choice.
17. The auger bore drive pit of 11 metres x 3 metres x 6 metres deep is a big environmental and safety risk in a public park.
18. The impact on the wildlife in the park during and after construction is not adequately analysed or documented.
19. Whilst the health and safety of Esso workers is documented, there is insufficient planning and detail for the health and safety of the local residents and park users.
20. The potential use of the park as a haul route for heavy machinery is undocumented.
21. Some details of the construction compound are unclear. The section of route that this compound serves is not documented and so the duration of its active service is unknown.
22. Alternative locations for the construction compound and risks associated with locating it in the park have not been properly evaluated.
23. The statements regarding the duration of the work within the park are contradictory and keep changing.
24. There is a high likelihood that the park will be closed for the full duration of the project, or at the very least that the Cabrol Road entrance will be closed.
25. Esso is only prepared to commit to minimal and inadequate mitigation efforts following construction.
26. Esso have not provided details about the reinstatement of vegetation, screening, the woodland path, lighting and car parks following the works.

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<sup>1</sup> Rushmoor Borough Council Local Impact Report, paragraph 8.12.2 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000725-Rushmoor%20Borough%20Council%20-%20Matters%20Relating%20to%20the%20Rule%208%20Letter%20.pdf>)

We also suggest some options which we believe to be viable alternatives to avoid tree removal in the park altogether:

1. Avoid the park with a different route, for which a viable alternative has been identified.
2. Drill under the park using trenchless techniques.

We have raised 158 distinct concerns and believe they should all be addressed by Esso.

We note that the Secretary of State for Business, Energy and Industrial Strategy's recent decision to put a moratorium on fracking was based on its 'unacceptable impacts on the local community'<sup>2</sup>. We believe that the same reasoning should apply to Esso's proposed route for the pipeline through Queen Elizabeth Park. Esso's application should not be recommended in its current form.

A final, but crucial question which needs to be raised. There are currently two pipes running through the park and only one is being replaced. Esso need to confirm what their plans are for the older pipe which is not being replaced in this project. Specifically they must confirm that a similar DCO will not be raised in the future which would necessitate implementing the same installation along the same route all over again.

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<sup>2</sup> BBC News website, 2nd November 2019: <https://www.bbc.co.uk/news/business-50267454>

## **2. Queen Elizabeth Park**

### **2.1. Community**

#### **2.1.1. Support in Farnborough's Local Community**

The proposed route through Queen Elizabeth Park is a highly unpopular choice. It does not have support of the local community.

The level of opposition is best quantified by the online petition<sup>3</sup> which was started on 1st October 2019. By 13th November it had amassed 6,203 signatures. This total also includes signatures which were gathered offline.

The number of signatures on the petition and the speed with which they were gathered shows the magnitude of local opposition to the route through the park.

The vast majority of people who have signed the petition acknowledge that the pipeline is an important piece of national infrastructure. They have no objection to the pipeline, but they do not think it is right to remove trees from the park to install it. Even those who have campaigned against broader environmental concerns have put these issues to one side when discussing the pipeline. The petition is about the pipeline's impact on the park and nothing else.

Comments received during the gathering of signatures show that a route and installation techniques which are more considerate of the local environment would provoke far fewer objections.

We hope Esso will agree to a route and installation techniques which have the support of the local community.

#### **2.1.2. Benefits to the Surrounding Community**

The community in Farnborough will derive no benefits from the installation and running of the pipeline.

There will be no increase in local employment. There will be no increase in amenity value of the areas through which the pipeline runs.

The plans as they currently stand mean that the community will be worse off after the pipeline has been installed. As a minimum, Esso should aim for the effect of the pipeline after its installation to be neutral. The current plans do not even achieve a neutral impact.

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<sup>3</sup> Petition at change.org: <https://www.change.org/p/rushmoor-borough-council-save-queen-elizabeth-park-in-farnborough>

## **2.2. Play Area**

### **2.2.1. Temporary Play Area**

Esso have offered to build a temporary play area which can be used while the current play area is removed to provide space for construction works.

No suitable site for the temporary play area has yet been identified. There is no scope to site it within Queen Elizabeth Park because doing so would require the removal of even more trees. Removal of trees is exactly what we want to avoid, so the temporary play area will have to be outside the park.

In fact, there are no suitable sites in the immediate vicinity. Even within a 400 metre radius of the existing play area, there are no suitable sites. The density of population in Farnborough and the extreme pressure which is already placed on every piece of land means that there is no guarantee that an alternative site will be found.

This also serves to illustrate how unique Queen Elizabeth Park is within Farnborough and how important it is to local residents.

Esso have taken the decision to remove the current play area, it is therefore Esso's responsibility to find a suitable new location for the temporary replacement. It is also Esso's responsibility to ensure that the temporary play area is available before the existing one is commissioned and is not removed until the replacement is opened.

#### Summary of our concerns:

1. Esso will not take full responsibility for finding a site for the temporary play area.
2. A suitable alternative site will not be found before the project starts.
3. The temporary play area will not be complete before the current play area is removed.
4. Esso will go ahead and remove the current play area even if an alternative has not been found.
5. The temporary play area will be substandard compared to the current facility.
6. The temporary play area will be too far away from the current one to be accessible by the current users.
7. The residents will lose the play area for the duration of the project.
8. The temporary play area will be decommissioned before the new play area is fully built and opened.

### **2.2.2. New Play Area**

Following negotiation with Rushmoor Borough Council, Esso have agreed to rebuild the play area after their works are finished.

This is currently a vague commitment, lacking many important details. For example, it is unclear whether the proposal is to re-use the existing equipment or provide new replacements. There is no mention of commitments to meet any relevant safety standards or design practices. It is also not stated which age ranges of children the replacement play area will cater for.

We note that Rushmoor Borough Council has estimated that the new play area will cost between £80,000 and £100,000. These figures are 2019 prices, but realistically the work will not take place until 2023 - 2025. Therefore any figure that is agreed must be adjusted to take account of inflation in the intervening years.

Furthermore, it is unknown whether the route of the new pipeline will place further restrictions on the size and positioning of the play area and the type of equipment which it may contain.

The local residents are concerned that the replacement play area will be substantially lower standard than the one which will be lost. There is also concern that if existing equipment is re-used its safety and appearance will be compromised by its removal and subsequent re-installation.

#### Summary of our concerns:

1. The route of the pipeline will impose restrictions on where the new playground can be sited and what it can contain.
2. The new play area will not be in the same location as the existing one.
3. The current equipment will be reused in the new play area.
4. The new play area will be smaller than the current one.
5. The equipment in the new play area will be inferior to that of the current one.
6. The design and layout of the new play area will be inferior to the current one.
7. The new play area will not be built to the highest level of safety standards.
8. The age range of children catered for in the new play area will not meet the needs of the community.
9. The new play area will not be available before the temporary play area is removed.
10. Inflation reduces the real value of the budget agreed for the replacement.

## **2.3. Flooding**

### **2.3.1. Flooding in Cabrol Road**

The gardens of houses in Cabrol Road are regularly flooded during periods of heavy rain. The elevation of Queen Elizabeth Park is highest adjacent to Farnborough Road on the eastern side, and it slopes downwards to the western end at Cabrol Road.

Residents in Cabrol Road are extremely worried that flooding could occur more frequently and more severely during and after the installation of the pipeline. They report that their gardens are already quite wet and boggy for much of the time. Factors which could contribute to increased flooding are:

- i. Extensive removal of trees from the park, reducing the area's ability to absorb water and thereby making what is already a relatively wet area more waterlogged and even less able to deal with rainfall.
- ii. Decrease in drainage capacity on the site of the play area and its surroundings caused by any additional hardstanding installed as part of the proposed compound.

- iii. Ineffective management of waste water and effluent from the construction compound.
- iv. Disturbance of the ground caused by drilling and trenching.
- v. Changes to the ground structure caused by backfilling and reinstatement of the surface.

None of Esso's documents mention or address the flooding risk in this area. In fact Esso currently disputes the fact that trees can alleviate flood risks, at least in other areas along the route<sup>4</sup>. This is in direct contradiction to other studies<sup>5</sup> and projects which say that trees can reduce flooding<sup>6</sup>.

Consent should be withheld until this has been properly assessed and an appropriate mitigation plan has been agreed.

#### Summary of our concerns:

1. Esso have not performed full flood risk assessments on the park and surrounding houses.
2. Esso do not have a mitigation strategy for the flood risk during and after the project.
3. Removal of trees in the park will result in increased flooding in Cabrol Road.
4. The construction compound and the activities within it will contribute to an increased risk of flooding in Cabrol Road.
5. The lower end of the park and gardens in Cabrol Road will be generally wetter all year round due to decreased drainage capacity during and after the project.
6. Waste and pollutants within the construction compound could contaminate gardens in Cabrol Road if they are carried off by heavy rain, flooding, or general run off.

## **2.4. Tree Loss**

Tree loss within the park is a major topic and is the most contentious aspect of Esso's plans for Queen Elizabeth Park. The park is unique within Farnborough and Esso's plans will cause permanent, major damage to its character and amenity value.

The proposals will change the park from being a quiet shaded woodland walk to being an open area. It is likely that this will change its use away from the current dog walking, running and cycling to something more like an open playing pitch.

During the consultation Esso have always understated the extent of tree clearance their plans require, however the publication of the Environmental Statements give a more accurate picture of the damage which will be done. Rushmoor Borough Council's Local

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<sup>4</sup> Responses to Relevant Representations Application Document: 8.3, section 9.3.48 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000693-Esso%20Petroleum%20Company,%20Limited%208.3%20Responses%20to%20Relevant%20Representations.pdf>)

<sup>5</sup> Institute of Chartered Foresters: Trees can Reduce Floods, 29th June 2017 (<https://www.charteredforesters.org/2017/06/trees-can-reduce-floods/>)

<sup>6</sup> Environment Agency press release: Hundreds of trees planted in a pilot to help reduce flood risk, 27th August 2019 (<https://www.gov.uk/government/news/hundreds-of-trees-planted-in-a-pilot-to-help-reduce-flood-risk>)

Impact Report estimates that just over a quarter (25.1%) of the park's area will be cleared of trees<sup>7</sup>.

Proposed activities which endanger trees in the park are:

- i. Trenched pipeline installation
- ii. Auger boring at Farnborough Road
- iii. Stringing out of pipelines
- iv. Using the park as a haul route
- v. Operating large excavators in the park
- vi. Building the construction compound
- vii. Providing access for HGVs to the construction compound

The amount of tree loss caused by the proposed plans is entirely unreasonable. The size and age of the trees near the current pipelines shows that the activities for the installation of the previous pipeline were not as harmful as those which are proposed.

There is every reason to expect that modern practices and techniques should be used to install the new pipeline in a more sympathetic way than the previous ones.

#### **2.4.1. Tree Loss Due to Working Width**

Although Esso have committed to a working width of 15 metres within Queen Elizabeth Park<sup>8</sup>, the Order Limits are still at least 30 metres wide, and might even be as wide as 36 metres<sup>9</sup>. The exact width cannot be determined from the plans which are currently available because the scale is quite small.

We believe that even a 15 metre corridor is too wide because this still encompasses many substantial trees, no matter where it is placed within the 30 (or 36) metre Order Limits.

There is a non-binding statement that the new pipeline will be installed near to the existing ones<sup>10</sup>. This could reduce tree loss if part of that width were within the southern path, which is several metres wide. It would be helpful if this could be made into a

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<sup>7</sup> Rushmoor Borough Council Local Impact Report, paragraph 8.12.2 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000725-Rushmoor%20Borough%20Council%20-%20Matters%20Relating%20to%20the%20Rule%208%20Letter%20.pdf>)

<sup>8</sup> Environmental Statement (Volume B) Chapter 16: Environmental Management and Mitigation, NW17, page 18 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000174-6.2%20Chapter%2016%20Environmental%20Management%20and%20Mitigation.pdf>)

<sup>9</sup> Environmental Statement (Volume B) Chapter 3: Project Description, 3.2.5 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000161-6.2%20Chapter%203%20Project%20Description.pdf>)

<sup>10</sup> Responses to Relevant Representations Application Document: 8.3, section 10.3.4 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000693-Esso%20Petroleum%20Company,%20Limited%208.3%20Responses%20to%20Relevant%20Representations.pdf>)

specific commitment which used the path as the majority of the working width. The width of the Order Limits should then be reduced accordingly.

It should also be easy to see that a 15 metre wide strip positioned in the middle of the 30 metre Order Limits could create a narrow strip of trees between it and the path, or more likely result in a wider empty strip (15 metres plus the width of the path). This is based on the assumption that trees which encroach onto the strip (rather than being entirely contained within it) are also at risk of being felled.

The plans as they stand do not make a firm, binding commitment on the positioning of the pipe or even restricting tree loss to a 15 metre corridor in the park. This means that it is not an effective or sincere commitment to reduce tree loss to an absolute minimum.

The Order Limits cover more than half width of the park at its narrowest point. The trees in this area are large and widely spaced. Losing even one tree from this area could create a substantial open space, possibly even splitting the continuous tree cover of the park in two.

Esso have committed to working widths as narrow as 5 metres for sections of the pipeline outside the park, for example in St James School grounds in Ashford<sup>11</sup>. We see no reason why Esso cannot make the same 5 metre commitment for the installation through the park.

#### Summary of our concerns:

1. Esso are not willing to use a 5 metre working width when other areas of the route show this is possible.
2. A 15 metre working width is still too damaging.
3. The 15 metre working width includes trees up to 200 years old which will be removed.
4. A 15 metre working width could result in an area far wider than 15 metres being cleared if any trees which encroach (roots or canopy) into the working width are also removed.
5. All trees within the Order Limits but outside the working width are still at risk.
6. Esso know the route of the current pipeline and yet they will not commit to a precise route for the new pipeline in an area where it is critical to do so.
7. Lack of a precise route for the pipeline at this stage and the very wide Order Limits gives too much scope for excessive tree removal.
8. Trees which survived the installation of the previous pipelines are now at risk.
9. Trees within the Order Limits which are not felled could be pollarded, crown reduced or otherwise affected.
10. The commitment to a 15 metre working width only covers trenched installation and not other activities which could also require tree removal.
11. The narrow working width commitments do not apply to the area around the auger boring pit.

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<sup>11</sup> Responses to Relevant Representations, Application Document: 8.3, paragraph 13.3.3 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000693-Esso%20Petroleum%20Company,%20Limited%208.3%20Responses%20to%20Relevant%20Representations.pdf>)

## 2.4.2. Tree Loss Due to Stringing Out

A paragraph in the Environmental Statement casts further doubt on the commitment to keeping activities within a 15 metre width. It states that the working width “does not include any working compounds, laydown areas, stringing out areas”<sup>12</sup>.

Stringing out will take place within the park for the trenchless installation under the allotments. We must conclude that the area for this will be different from the area where the pipeline will be installed. We also assume that this area will be cleared of trees to make space for stringing out. Rushmoor Borough Council have come to the same conclusion<sup>13</sup>.

It should be noted that the Queen Elizabeth Park information sheet published by Esso in October 2019<sup>14</sup> does not mention any stringing out activity in the park. It is not documented in the Trenchless and Targeted Open Cut Assessment<sup>15</sup> either.

The fact that stringing out will take place in the park can only be inferred by reading Rushmoor Borough Council’s Local Impact Report and from conversations from local councillors who have been told by Esso that this activity will take place. The councillors were left with the impression that the pipes would be strung out ‘between the trees’. Whilst this is hearsay and therefore non-provable, it is currently the best information we have.

This aspect of the project is inadequately documented and there is not enough information to objectively assess the damage it will cause to the park.

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<sup>12</sup> Environmental Statement (Volume B) Chapter 3: Project Description, page 2 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000161-6.2%20Chapter%203%20Project%20Description.pdf>)

<sup>13</sup> Rushmoor Borough Council Local Impact Report, paragraphs 7.8.1, 8.12.2 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000725-Rushmoor%20Borough%20Council%20-%20Matters%20Relating%20to%20the%20Rule%208%20Letter%20.pdf>)

<sup>14</sup> Queen Elizabeth Park Information Sheet, Esso, October 2019 ([https://www.slpproject.co.uk/wp-content/uploads/2019/10/Project-Update-Information-sheets\\_Oct19-v2.1.pdf](https://www.slpproject.co.uk/wp-content/uploads/2019/10/Project-Update-Information-sheets_Oct19-v2.1.pdf))

<sup>15</sup> Environmental Statement (Volume D) Appendix 8.2: Detailed Trenchless and Targeted Open Cut Assessment (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000223-6.4%20Appendix%208.2%20Detailed%20Trenchless%20and%20Targeted%20Open%20Cut%20Assessment.pdf>)

#### Summary of our concerns:

1. The stringing out activities and their effects on the park are not documented.
2. Stringing out will require the clearance of trees.
3. The area cleared for the stringing out activities will be separate from and in addition to any area cleared for trenchless installation (if trenchless installation is used).
4. Narrow working width commitments do not apply to stringing out.
5. The exact area to be used for stringing out is not documented.
6. Stringing out could require the closure of additional areas of the park.
7. The environmental and visual impact statements do not take into account the damage caused by stringing out.
8. Mitigation commitments do not cover damage caused by stringing out.
9. Esso have not not considered reversing the direction of drilling to avoid stringing out within the park.

### **2.4.3. Tree Identification**

Surrey Heath Borough Council have asked for a detailed assessment of trees which will be affected by the installation of the pipeline<sup>16</sup>. These are referred to as Tree Identification Records and the main requirements are:

- Assign a reference number to each tree and record the location, species, health, height and spread.
- Document whether the tree will be pruned or have any roots severed.
- Document whether the tree will be retained or felled.
- If the tree will be felled, explain why it cannot be retained.

We request that Esso is required to do the same for all trees within Queen Elizabeth Park, well in advance of Deadline 3. We also believe the estimated age of each tree should be recorded.

We realise that the Examining Authority has asked how many trees will be removed in Written Question QE.1.2<sup>17</sup>, but we would like more detailed and specific information to be provided now. This will enable all interested parties to objectively assess the extent of the tree loss and damage within the park.

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<sup>16</sup> Surrey Heath Borough Council Local Impact Report, section 2.17 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000721-Surrey%20Heath%20Borough%20Council%20Local%20Impact%20Report.pdf>)

<sup>17</sup> Examining Authority's Written Questions, QE.1.2, (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000674-Written%20Questions.pdf>)

Summary of our concerns:

1. Esso has not produced detailed tree identification records for Queen Elizabeth Park.
2. Lack of detailed tree records prevents the extent of the damage to the park being accurately and objectively assessed.
3. The accurate age and significance of individual trees will not be known when the route for the pipeline is chosen.
4. Decisions on individual tree felling will be based on arbitrary opinions rather than documented facts.
5. Older and more significant trees could be overlooked and therefore unnecessarily removed if the trees in the park are considered as a group.

#### **2.4.4. Risk of Tree Removal Outside Order Limits**

Although the Order Limits would seem to define the maximum extent of damage which might be caused to the park, there is a paragraph in the Statement of Reasons which asks for rights to fell or perform other work on trees near the proposed development<sup>18</sup>.

‘Near’ is not defined so we assume this means that any tree in the park is at risk of being felled without any prior warning or notice.

Summary of our concerns:

1. There is no precise definition of ‘near’.
2. There is no documented process for agreeing to the removal, or reduction, of trees outside the Order Limits.
3. Trees outside the Order Limits could be removed or reduced without any consultation.
4. There will be no opportunity to challenge the planned work on trees outside of the Order Limits.
5. There is no documentation explaining who can challenge decisions to fell or reduce trees outside the Order Limits.
6. Given that trees may be disrupted outside of the Order Limits, other work may take place outside of the Order Limits which is not identified at this time.

#### **2.4.5. Tree Loss in the Local Context**

Tree removal within Queen Elizabeth Park should not be considered in isolation. There has already been a considerable reduction in the number of trees in the immediate vicinity of the park.

Network Rail has cleared trees from the southern embankment of the Southwestern Railway line adjacent to Farnborough Abbey within the last 12 months (an area of about 1.25 acres). This area was covered with large trees of a similar age to those in the park.

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<sup>18</sup> Statement of Reasons, Application Document: 4.1, 5.3.16 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000148-4.1%20Statement%20of%20Reasons.pdf>)

We do not believe that the local area should have to sustain so much tree loss, with so many wooded areas being gradually nibbled away at the edges. The constant bit-by-bit reduction of woodlands will eventually leave us with nothing.

The loss of so many trees will reduce the area's ability to absorb air pollution. In June 2019 the speed limit on the nearby A331 was reduced to from 70 mph to 50 mph<sup>19</sup> to improve air quality. Removing trees from an area where such action is being taken to reduce pollution will be counter-productive.

Other local developments have produced an air quality assessment report<sup>20</sup>, and we believe that Esso should to do the same so that the impact of their proposed tree removal can be objectively measured.

Trees are also known to offer noise screening, so their permanent removal will mean a noisier environment for local residents and park users. A large area of the centre of the park is currently completely free from the traffic noise from surrounding roads. This tranquil area will be significantly reduced if tree felling happens on the scale which is proposed.

Woodlands provide cool areas in the summer and reduce the urban heat island effect<sup>21</sup>. Many residents come to the park with their families and dogs in the summer because it is noticeably cooler than the surrounding area. The ability for the park to absorb heat will be reduced by a greater proportion than the area of trees removed.

#### Summary of our concerns:

1. Recent reductions in tree cover in the local area mean that further reductions will have increasingly negative impacts.
2. An air quality assessment has not been performed to assess the impact of the proposed tree removal.
3. A noise level assessment has not been performed to assess the impact of the proposed tree removal.
4. Noise from the adjacent railway line and roads will be more audible within the park.
5. Reduction in the park's cooling capacity will give a smaller area for offsetting the heat of the nearby built-up town centre.

## **2.5. Wildlife**

The park provides a safe habitat for numerous species of wild animal. There is no similar habitat within the local area, and any animals displaced will suffer a large impact. The park is also thought to be part of the green corridor linking areas outside of Farnborough, and damaging this link will affect the movement of many more species.

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<sup>19</sup> Blackwater Valley Group, Speed reduction along the A331, (<https://www.a331airquality.co.uk/taking-action>)

<sup>20</sup> Thompson House Redevelopment Report (<http://kingsbury-consultants.co.uk/wp-content/uploads/2017/09/Air-quality-assessment.pdf>)

<sup>21</sup> Urban Heat Island, Wikipedia ([https://en.wikipedia.org/wiki/Urban\\_heat\\_island](https://en.wikipedia.org/wiki/Urban_heat_island))

Residents have reported sightings of the following wild animals (some of which may be protected or endangered) within the park and directly adjoining gardens:

#### Mammals

- Hedgehog
- Badger (and cubs)
- Bat (two species, thought to be Pipistrelle and Daubenton)

#### Birds

- Owl (species so far unidentified)
- Red kite
- Sparrow hawk
- Heron
- House sparrow
- Bullfinch
- Woodpecker

#### Reptiles

- Grass snake
- Slow worm

#### Amphibians

- Newt
- Frog

#### Insects

- Stag beetle

There are numerous other wild animals in the park and surrounding gardens which are not protected but which would be adversely affected by the proposed activities. Whilst most of these species are valued by local residents we will not list them individually in this document.

Esso do not mention how nesting birds will be protected during the project and the community are worried that netting will be used in trees and shrubs to restrict nesting before any work is undertaken. The park is visited and inhabited by numerous birds of many species and there is great concern that this distressing practice would be a danger to them, resulting in injury and mortality.

### Summary of our concerns:

1. The report detailing the scope and numbers of wildlife in the park is inadequate and failed to find the species which are known to live there.
2. Decisions which affect wildlife in the park will be based on inadequate evidence.
3. There is no commitment to avoid working during nesting and breeding seasons within the park.
4. There is no commitment to prevent disturbance of bird nests and eggs during the project.
5. There is no commitment to avoid the use of netting in trees and shrubs to restrict nesting.
6. The impact to the wildlife and biodiversity following completion of the work has not been fully assessed.
7. There is no detail on the planned range of replacement plants, so the impact on wildlife of any changes in planting cannot be known.

## **2.6. Drilling Within Queen Elizabeth Park**

### **2.6.1. Drilling Between the Play Area and Stake Lane**

The documentation for this is difficult to understand. It seems to be described in section 1.22 (TC018) of the Trenchless Assessment document<sup>22</sup> but the start and end points are not clearly identified. The drilling direction cannot be determined from this document either.

Esso's Queen Elizabeth Park information sheet says that 'the drill pit would be tucked in the corner of the park'<sup>23</sup>, which suggests the drilling direction would be from the park outwards. However, as noted elsewhere in this document, there is also the possibility that space in the park will be used for stringing out the pipes. This would suggest that drilling would be in the opposite direction.

Due to the lack of clarity about the drilling direction it is impossible to know with certainty what machinery will be used within the park or how much space will be needed for stringing out. The length of TC018 is approximately 443 metres, yet the clearance of trees anticipated by Rushmoor Borough Council is a much shorter length.

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<sup>22</sup> Environmental Statement (Volume D) Appendix 8.2: Detailed Trenchless and Targeted Open Cut Assessment: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000223-6.4%20Appendix%208.2%20Detailed%20Trenchless%20and%20Targeted%20Open%20Cut%20Assessment.pdf>

<sup>23</sup> Queen Elizabeth Park Information Sheet, page 2 ([https://www.slpproject.co.uk/wp-content/uploads/2019/10/Project-Update\\_Information-sheets\\_Oct19-v2.1.pdf](https://www.slpproject.co.uk/wp-content/uploads/2019/10/Project-Update_Information-sheets_Oct19-v2.1.pdf))

### Summary of our concerns:

1. Documentation of directional drilling in and around the park is inadequate.
2. It is not clear whether TC018 is the trenchless route which runs beneath the allotments and into the park.
3. Documentation about drilling under the allotments is incomplete or not up to date.
4. It is not possible to know which direction the trenchless route will be drilled in.
5. Whilst temporary loss of allotments is very undesirable, prioritising the allotments, which can be reinstated in a short time over trees, which take many years to replace, is the wrong decision.

## **2.6.2. Auger Boring Under Farnborough Road**

The Esso pipeline installation plans include a trenchless crossing under the A325. The specifications of the drilling works are in Esso's Detailed Trenchless and Targeted Open Cut Assessments document<sup>24</sup>.

This explains that the drive pit will be on the Queen Elizabeth Park side of the road, within the woodland. Dimensions of the pit will be 3 metres wide, 11 metres long and 6 metres deep. The edges of the pit will have to be reinforced to prevent collapse and the base will be lined with concrete.

The pit area itself will require substantial tree clearance - and Esso's plans show that the Order Limits are even larger than 30 metres wide at the site of the pit. The area shown is roughly 40 metres by 40 metres. This area is currently covered by woodland and includes a number of large, old trees. Unless there is a clear commitment to the contrary, we must assume that this entire area will be cleared to allow the drive pit to be constructed.

This area will have to accommodate machinery for digging the pit and removing the spoil in addition to the space required for the pit itself. If the spoil is not removed, part of the area will be used to accommodate it. We also expect that all works and machinery involved in lining the pit base will be in this area too. It is also likely that this machinery, and the auger boring machine itself, will access the pit area via the park, not the road, resulting in unnecessary damage to the park.

The depth of the drive pit (6 metres) means that it is a major safety hazard to both public and wildlife. Esso say the the park will remain open but there is no documentation explaining how this area will be safely operated. The boundary of this area will have to prevent access by all users of the park, including dogs which have been let off the lead and children who are exploring on their own. The depth of the pit and the possibility of standing water at the bottom present numerous risks of serious injury and drowning.

The plans seem to assume that the extensive tree loss in the park is justified by the need to keep both lanes of the A325 open for the duration of the work. The effects of this

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<sup>24</sup> Environmental Statement (Volume D) Appendix 8.2: Detailed Trenchless and Targeted Open Cut Assessment, section 1.23 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000223-6.4%20Appendix%208.2%20Detailed%20Trenchless%20and%20Targeted%20Open%20Cut%20Assessment.pdf>)

decision will be visible for decades in the form of a large gap in the park and along this tree-lined section of the road.

Digging a trench across the road, closing one lane at a time is a viable and much less destructive alternative. Utility companies regularly close lanes and dig trenches in roads with a manageable impact on traffic flow and minimal objection from road users.

Earlier in 2019 the A325 was reduced to a single lane for over a week while a water main leak was repaired. Even though this is a busy road the congestion was not excessive and traffic kept flowing throughout the area.

A less destructive alternative to auger boring might be directional drilling, which we understand would require a smaller pit at each side of the road. Better still, if directional drilling were used under the entire park, the road crossing could be achieved as part of this.

We do not believe that Esso is making the right trade-off. The amount of clearance and damage to the park is not justified by the decision to bore underneath the A325.

Summary of our concerns:

1. Esso have not properly evaluated the use of a trenched crossing on the A325.
2. Auger boring will result in major tree loss in and around the drive pit area.
3. The Order Limits around the drive pit are large - approximately 40 x 40 metres.
4. The entire 40x40 metre area around the drive pit will be cleared of trees.
5. The number, age and type of trees which will be removed for the drive pit area has not been documented.
6. Commitments to narrow working width do not apply to the working area around the drive pit.
7. The auger boring pit is positioned very close to residential properties.
8. Digging and lining the pit and subsequently operating the auger boring machinery will be very noisy, dusty and disruptive for the neighbouring houses.
9. Bringing machinery and materials to the auger boring site via the park will be noisy, messy and disruptive for residents of all houses neighbouring the route through the park.
10. Digging a very deep pit in a public park, so close to the road and footpath is extremely dangerous to the public and wildlife.
11. It will not be possible to prevent all public access to the drive pit area and therefore it cannot be guaranteed to be completely safe.
12. Positioning the drive pit in the park is more damaging overall than positioning it on the other side of the road in Farnborough Hill.
13. Short-term traffic management is being prioritised over long-term tree loss.
14. The decision to use auger boring is based on closing the whole road when the pipe could be installed by closing one lane at a time.
15. Directional drilling has not been considered.

## **2.7. Proposed Work Within Queen Elizabeth Park**

### **2.7.1. Health and Safety of Park Neighbours and Users**

Esso have not detailed any of the measures they will take during the installation within the park to ensure that there is no impact on the health and safety of the neighbouring houses or on the park users. Esso say that the public will be able to use the park while work is in progress.

During the consultation process, Esso have always attempted to play down the scale and extent of work in the park, giving the impression that there will be barely any impact on the day-to-day lives of anyone nearby. Documents such as the Visual Impact Schedules<sup>25</sup> contradict this message because they describe extensive tree felling and major earthworks. These contradictions mean that it is impossible to form an accurate impression of what type of disruption the work will cause.

The edges of the Order Limits almost touch the boundaries of two houses in Cabrol Road and two houses in Queen Victoria Court. The Order Limits are very close another seven houses in Queen Victoria Court. Such close proximity means that these residents are very likely to experience major disturbance and disruption.

The magnitude, hours and duration of disturbances such as noise, dust, vibration and lighting are all unknown at this stage. They cannot be determined from the documentation which has been provided up to this point but we believe that Esso should already have provided this information. They must do so with no further delay.

The local residents are concerned that the proposed working hours are not suitable for a residential area. Working hours of 7am to 7pm Monday - Saturday are unreasonably disruptive. Esso have declared that Sunday working will not be typical, however this does not rule out Sunday working altogether. It just means that fewer than half the Sundays available will be worked.

The residents need an assurance that there will be no weekend working in the park.

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<sup>25</sup> Environmental Statement Appendix 10.3: Visual Impact Schedules, items 41 and 41a (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000236-6.4%20Appendix%2010.3%20Visual%20Impact%20Schedules.pdf>)

### Summary of our concerns:

1. The levels of noise, vibration and dust pollution which the surrounding residents will be subjected to has not been assessed or documented.
2. Mitigation measures against noise, vibration and pollution have not been documented.
3. The working hours of 7am to 7pm are too long for a residential area.
4. Weekend working is not appropriate in a residential area.
5. There is no commitment to implement safety measures which will prevent the users of the remaining part of the park (both human and animal) from straying into the work area.
6. There is no documentation on whether there will be suitable screening to prevent accident or injury to members of the public and local residents caused by flying debris.
7. Removal of the vegetation in the Order Limits will leave neighbouring properties completely open and exposed to the work.
8. The disturbance caused by the work in the park could displace rats from the park into neighbouring gardens and houses.

## **2.7.2. Use of Heavy Machinery in the Park**

All documentation seen to date indicates that Esso plans to use large, heavy machinery within the park<sup>26</sup>. The 15 metre working width suggests the use of 8 wheel drive trucks and full-sized excavators.

The park is not a suitable place for such machinery (concerns about the tree loss to facilitate this are addressed elsewhere in this document), and a trench of the size which has been proposed can be dug with much smaller machinery (assuming that a trenched installation is used).

Even a Mini Excavator can dig a trench sufficiently wide and deep to install the 300mm pipeline. For example, the Kubota K008-3 is only 860mm wide and can dig a trench 1,720mm deep<sup>27</sup>. Such a machine is narrow and light and can easily be accommodated within the width of the existing path. It would also be quieter and less visible than full-sized machinery.

Lighter machinery will also reduce soil compaction and require a smaller height within which to work. Smaller working height will mean that branches do not need to be pruned to accommodate the machine's working area.

There is no reasonable argument not to use a Mini Excavator for digging the trench through the park (on the assumption that trenchless installation is not used). Similar-sized earth-moving equipment should also be used.

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<sup>26</sup> Esso's Southampton to London Pipeline Project website, Installation Techniques section (<https://www.slpproject.co.uk/installation-techniques/>)

<sup>27</sup> Kubota K008-3 technical specifications ([https://kuk.kubota-eu.com/constructionmachinery/wp-content/uploads/sites/4/2015/03/K008-3-EN\\_HD.pdf](https://kuk.kubota-eu.com/constructionmachinery/wp-content/uploads/sites/4/2015/03/K008-3-EN_HD.pdf))

#### Summary of our concerns:

1. The machinery which Esso plans to use is inappropriately sized for the park environment.
2. Speed of installation is being prioritised over limiting damage to the park.
3. Esso have not considered techniques which could be used to remove the need for heavy machinery in the park.
4. Esso are not willing to use smaller machinery, which would be much less damaging to the park.
5. The type of machinery which will be used in the park has not been specified, e.g. typical examples of make and model.

### **2.7.3. Use of the Park as a Haul Route**

The drive pit for the proposed auger boring work at the A325 is a large hole which cannot be dug and lined by using small machinery.

Despite its proximity to the A325, and without any statements from Esso to the contrary, we believe that the park will be used as a route to bring machinery and materials to and from the pit.

We believe that small machinery should be used within the park to minimise damage to the ground and to preserve as many trees as possible. A haul route which allows large machinery to be driven through the park will therefore cause unnecessary damage.

#### Summary of our concerns:

1. The park will be used as a haul route for vehicles accessing the drive pit area.
2. The construction compound in the park will be used as a base for all the machinery and materials used to bore under the A325.

### **2.7.4. Construction Compound**

There are no details on the temporary and permanent changes which will be caused by the construction, operation and removal of the construction compound.

For example, there are gates and fencing at the entrance to the Cabrol Road car park which are likely to impede the access of HGVs making deliveries to the compound. The entrance is also bordered by trees which might obstruct access for tall vehicles.

The implications of using Cabrol Road as an access route for the construction compound have not been documented. It is not stated whether any restrictions will be imposed to make HGV access to the compound easier. For example, there might be restrictions on parking or vehicular access to residents' driveways.

The capacity of the compound car park is not documented, so it is not possible to know whether workers and contractors will use Cabrol Road as an overflow.

The proposed site of the construction compound is currently a flat grassy area, bordered in places by trees. Although it is not stated in the documentation, we assume that some sort of paving will be necessary, along with some tree clearance.

We also note that the Order Limits extend beyond the north side of the existing car park - the opposite side to the compound but there is no obvious reason why this should be necessary.

Summary of our concerns:

1. The gates and fencing at the entrance to the Cabrol Road car park will be removed.
2. If the gates and fencing are removed, they will not be replaced and returned to the same or better condition than when they were removed.
3. Pedestrian access from Cabrol Road will be prevented by the need to allow safe entry and access to the site for construction vehicles.
4. Trees surrounding the car park entrance will be removed or reduced.
5. Trees within the area of the compound will be removed.
6. The number, type and age of trees to be removed from the compound area has not been documented.
7. The material to be used for surfacing the construction compound has not been specified.
8. There is no commitment to reinstate the site of the construction compound after it is removed.
9. Activities in the construction compound could cause noise, dust and vibration disturbances to residents in Cabrol Road.
10. Access to Cabrol Road and the houses along it could be restricted while the compound is in use.
11. Cabrol road will be used as an overflow car park for the compound.
12. HGV traffic will cause excessive disturbance to residents, particularly early and late in the day.
13. Activities in the construction compound will attract more rats to the area.

### **2.7.5. Alternative Construction Compound Site**

We understand that Farnborough Hill school offered to host a construction compound on their site, but that the offer was declined because the presence of the compound would mean that the school could not be operated safely.

Farnborough Hill school has plenty of open space (the grounds are 65 acres) and two paved access roads off the A325. The construction compound could be sited far away from any buildings and vehicles would have direct access to a wide road where no cars are parked.

We cannot understand why Esso consider that a construction compound would not be safe in this environment, and yet say that it is safe to site one at the end of Cabrol Road. The proposed site is directly adjacent to residential housing and in a public park nearly a third of the size of Farnborough Hill's grounds. Esso also claim that use of the park will be maintained while the compound is there.

If it is not safe to locate the construction compound in the large, private grounds of Farnborough Hill then it is surely not safe to place it in a public park at the end of a residential road.

Summary of our concerns:

1. The siting of the Cabrol Road compound compromises public safety.
2. Alternative locations for the compound have not been properly evaluated.
3. The promise to maintain access to the park will be withdrawn on safety grounds.
4. Even if the park stays open, access via Cabrol Road will be prohibited on safety grounds.

## **2.8. Duration of Work and Disruption**

### **2.8.1. Duration of Work**

In their Consultation Brochure<sup>28</sup> Esso say that work at any location along the pipeline route would take typically one to two months. This is later contradicted by the Queen Elizabeth Park information sheet, published by Esso in October 2019 which states that the work in the park would be done over a period of 12 months<sup>29</sup>.

Activities which we have identified are as follows:

- Removal of the existing playground
- Building the construction compound
- Tree felling and associated vegetation clearance (to which we strongly object)
- Installing fences along the edge of the site
- Directional drilling under allotments and associated stringing out of pipeline
- Auger boring beneath A325
- Access to the auger boring site for equipment and materials
- Trenched installation of the pipeline
- Reinstatement of subsoil and topsoil
- Replacement tree planting
- Removal of the construction compound
- Construction of a new playground

This shows that the park will be a busy, noisy, active construction site for a long period of time. However, Esso have not provided enough information to explain what the timetable will be and when the periods of greatest disruption will be.

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<sup>28</sup> Esso's Consultation Brochure, chapter 11, page 45 ([https://www.slpproject.co.uk/wp-content/uploads/2018/03/Consultation\\_Brochure.pdf](https://www.slpproject.co.uk/wp-content/uploads/2018/03/Consultation_Brochure.pdf))

<sup>29</sup> Esso's Queen Elizabeth Park information sheet ([https://www.slpproject.co.uk/wp-content/uploads/2019/10/Project-Update\\_Information-sheets\\_Oct19-v2.1.pdf](https://www.slpproject.co.uk/wp-content/uploads/2019/10/Project-Update_Information-sheets_Oct19-v2.1.pdf))

Esso also say that each construction compound will be active for the full duration of the construction of its related pipeline section<sup>30</sup>. However we do not know which section of pipeline the construction compound in the park will serve (i.e. how far beyond the limits of the park). Esso need provide this information and also state the length of time that this be required to be active.

It is essential to understand and assess the impact of the working period in the park on the people and the communities, to assess the negative impacts of the project.

Summary of our concerns:

1. The duration of work required from the initial reduction of park availability through to the complete restoration of the park is unknown.
2. The timescales quoted by Esso may be working time and not total elapsed time. For example, 12 months of working could be spread over 2 years.
3. Quoted timescales get longer with each iteration of documentation.
4. There do appear to be any penalties imposed for overrunning timescales, either for the whole project or at specific locations.
5. It is not known which section of the pipeline the construction compound will serve.
6. It is not known how long the construction compound will be active for.
7. Esso have not said how long it will take to construct and remove the construction compound.
8. It is not clear how long the consent for tree removal lasts. For example, there is a risk that trees could be removed during maintenance activities after the installation is complete.
9. It is unclear what scale and duration of maintenance activities are permitted after installation is complete.
10. It is unclear whether working width and all other restrictions which are in place for the installation activities also apply to all subsequent maintenance activities.

## **2.8.2. Access Restrictions While Work is in Progress**

The type and scale of the proposed work will result in significant restrictions on how the park can be used while the work is in progress. There are three entrances to the park and the work is likely to close or restrict access via two of them.

The Cabrol Road entrance to the park is narrow and unsuitable for construction compound traffic in its current form. Modifications to allow easy access for HGVs would mean that no space remains for a separate safe pedestrian entrance.

The southern entrance on Farnborough Road is within the Order Limits in the auger boring drive pit area, so it is likely to be completely closed while work is in progress.

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<sup>30</sup> Responses to Relevant Representations, Application Document: 8.3, paragraph 18.3.22 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000693-Esso%20Petroleum%20Company,%20Limited%208.3%20Responses%20to%20Relevant%20Representations.pdf>)

The path which links these two entrances is within the Order Limits. This means that two out of three entrances to the park will be closed and the main route across the park will be inaccessible for the duration of the project.

This path provides an important route through the park for pedestrians. It is particularly useful to commuters who live to the west of the park and use it as a convenient and direct route to Farnborough North station. Closure of the walking route across the park would result in more road traffic to Farnborough North station where there are only five dedicated parking spaces.

This is the only lit path in the park and if it is made unusable by the work, there will be no safe route across the park during hours of twilight and darkness.

Although Esso have promised to maintain access to the park while work is in progress we do not see how this can be adequately achieved via the single remaining entrance (the northern one on Farnborough Road).

Summary of our concerns:

1. The Cabrol Road entrance to the park will be closed to the public.
2. The local residents will lose the use of the park as a commuter route to the station.
3. Access to the park for residents who usually use the Cabrol Road entrance will require a significantly longer walk.
4. Closing the Cabrol Road car park will displace all cars to the Farnborough Road car park, which does not have a hard surface.
5. The surface of the Farnborough Road car park will deteriorate excessively due to increased use.
6. The reduced area of the park will become more crowded and damaged by heavier use.
7. The park will be completely shut during the work if adequate access cannot be maintained.
8. There will be no lit path in the park during the work.
9. Pedestrians who use the park as a route to Farnborough North station may switch to using cars.

### **2.8.3. Negative Effects on House Values and Saleability**

Various aspects of the project will reduce the value and saleability of neighbouring houses on all sides of the park.

- The existence of the DCO application and the current examination.
- The likely disturbance during the project.
- The threat of major changes to the park.
- The threat of major changes to views into and out of houses and gardens which adjoin the park.

These issues will affect all home owners who need to sell before, during and after the project.

Summary of our concerns:

1. Sellers are likely to have more difficulty finding a buyer.
2. Sellers are likely to receive a lower price for their property.

## **2.9. Mitigation Within Queen Elizabeth Park**

Esso have not published any detailed plans for mitigation following their removal of trees and vegetation from the park. We know from Rushmoor Borough Council's Local Impact Report that no mitigation has been agreed other than the reinstatement of the play area<sup>31</sup>.

Mitigation offered so far by Esso is inadequate. The current proposal changes and degrades the character of the park. Shrubs, grasses and wildflowers surrounding an open path are not a substitute for the shaded, tree-lined path which will be lost.

### **2.9.1. Trees**

Whilst Esso have offered to plant trees 'where possible' there is no commitment regarding the age and size of these replacements. Ideally there would be a like for like replacement such that the mature trees which are removed are replaced with mature trees.

Mature trees of a reasonable height and canopy are available to be purchased and could be used to restore the park to a more adequate level. It is very easy to source native trees of a height exceeding 6-7 metres, and we would expect Esso to commit to planting trees on at least this scale.

Summary of our concerns:

1. Esso have not committed to replace any trees which they remove.
2. Esso have not committed to how many trees will be planted.
3. There is no detail on the type or age of the replacement trees.
4. Restrictions on where replacement trees can be planted could change the character of the park.
5. The commitment to tree care following the project is inadequate.
6. The soil in the park is known to be of low quality and replacement trees may not establish well enough to grow vigorously.

### **2.9.2. Path**

A path which provides a route from Cabrol Road to Farnborough Road must be provided following completion of the work. This must provide a safe route with nighttime lighting.

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<sup>31</sup> Rushmoor Borough Council Local Impact Report, page 4 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000725-Rushmoor%20Borough%20Council%20-%20Matters%20Relating%20to%20the%20Rule%208%20Letter%20.pdf>)

Lighting must be carefully considered. It must not intrude into neighbouring houses and it must be resistant to vandalism.

The materials used for the path must be carefully chosen to ensure that they are appropriate for the woodland environment and provide a safe surface for users of all abilities in all weather conditions. Ideally consideration should be given to the ease of use of the path for disabled users.

The route of the path must be chosen to minimise tree loss. The route must also provide at least the same level of seclusion for neighbouring houses and gardens.

Summary of our concerns:

1. The existing footpath will not be reinstated.
2. The replacement path will have no lighting or the lighting provided will be unsuitable.
3. The path will either be un-surfaced or inappropriately surfaced.
4. The route of the path will be moved closer to neighbouring gardens.

### **2.9.3. Screening**

The majority of gardens adjacent to the park are well screened by vegetation. The majority of this vegetation is rhododendron. This also offers a moderate level of security by impeding direct access to the boundaries.

Although rhododendron is classified as an Invasive Non-Native Species, it is a very effective natural screen. For this reason, it is valued by the residents. Rushmoor Borough Council have stated that they favour the removal of all rhododendron from the park.

If the screening vegetation is removed during this project, the owners of the properties backing onto the park (9 houses in Queen Victoria Court) must be individually consulted to agree a suitable permanent replacement. Agreement must be reached on appropriate planting and replacement fencing which takes into account the reduced screening while the new planting establishes itself.

Replacement screening must retain the same height, density and security as the current natural screening provides, both during the work and following the installation. Native evergreen species could be used in preference to rhododendron.

Summary of our concerns:

1. Removal of screening will leave gardens exposed, reducing privacy during and after the project.
2. Loss of screening will decrease the security of neighbouring gardens and houses.
3. Replacement planting will be inadequate in terms of size and density.
4. Screening will not be immediately replaced.
5. Residents will not be consulted about the type, size and effectiveness of any replacement screening.

#### **2.9.4. Car Parks**

Both of the Queen Elizabeth Park car parks will be adversely affected by the proposed work.

The Cabrol Road car park will be used to provide access to the construction compound. It will sustain greater volumes of traffic and those vehicles will be heavier than it was designed to serve.

The Farnborough Road car park will have to absorb all the traffic displaced from the Cabrol Road car park. There is no hard surface in this car park and it is likely to become very muddy and unusable with the level of increased traffic.

The surfaces of both car parks will suffer as a result of the various additional demands placed on them. When the project is completed Esso must resurface both car parks to a high standard.

##### Summary of our concerns:

1. The Farnborough Road car park does not have any additional capacity and will rapidly become unusable.
2. Car parks will be damaged during the project and not reinstated.
3. Any reinstatement will not be to a sufficient standard.

### **3. Alternatives which Avoid Damaging Queen Elizabeth Park**

We believe that an ideal solution to the issues associated with installing the pipeline through Queen Elizabeth Park is to avoid the park altogether and use an alternative route.

If the route cannot be changed, we would be supportive of a scheme which drilled underneath the park in order to avoid damage to the trees and surface, and which kept as much machinery as possible out of the park during construction.

#### **3.1. Avoid the Park Altogether**

During Esso's consultation, they proposed an alternative corridor in which the pipeline could be placed which avoided Queen Elizabeth Park altogether<sup>32</sup>. This followed Prospect Road northwards from the railway line and continued north-eastwards through Frimley. This corridor was de-selected<sup>33</sup> due to Surrey Heath Borough Council's concerns about reduced access to Frimley Park Hospital<sup>34</sup>.

Whilst concerns about access to the hospital are entirely valid, it is unfortunate that this led to the dismissal of the portion of the route which would avoid the park.

Queen Elizabeth Park is about 1.5 miles south of Frimley Park Hospital, so routing the pipeline along Prospect Road does not commit it to passing the hospital. In fact, at the top of Prospect Road, the pipeline could turn right along Prospect Avenue, which would take it up to the A325 and within a few metres of the proposed route at Ship Lane.

Installing the pipeline across the A325 (and possibly along it for a short stretch) would need careful traffic management but there are at least 4 and at most 6 lanes (including filter and bus lane) to use here. There is also a central reservation which gives plenty of space in which to work.

As mentioned elsewhere in this document, one lane of the A325 was closed for about 1 week during the summer of 2019 due to a water main leak. During this time, the traffic was managed with no major disruption.

The pipeline will be installed under roads in other areas (e.g Cove Road, Balmoral Drive and St.Catherines Road in the local vicinity) so we see no reason why the same can't be done in this area of Farnborough.

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<sup>32</sup> We note that the Examining Authority has asked whether alternative routes were considered in Written Question QE.1.3 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000674-Written%20Questions.pdf>)

<sup>33</sup> Preferred Corridor Announcement leaflet, page 7 ([http://www.slpproject.co.uk/wp-content/uploads/2018/05/Preferred\\_corridor\\_announcement\\_leaflet.pdf](http://www.slpproject.co.uk/wp-content/uploads/2018/05/Preferred_corridor_announcement_leaflet.pdf))

<sup>34</sup> Preferred route consultation – summary report of consultations responses, section 6.3.1 (<https://www.slpproject.co.uk/wp-content/uploads/2019/04/Preferred-route-consultation-report.pdf>)

Summary of our concerns:

1. Esso has not properly evaluated alternatives to routing the pipeline through Queen Elizabeth Park.
2. A route which avoids the park was dismissed because of issues which have no relevance to the area surrounding the park.
3. Esso have not fully evaluated a viable alternative route along Prospect Road and Prospect Avenue.
4. Esso have not engaged with the community or Rushmoor Borough Council to find out whether a road-based route for the pipeline would be preferable to going through Queen Elizabeth Park.

### **3.2. Drill Under the Park**

Use of directional drilling under the whole of Queen Elizabeth Park and across the A325 would allow a large amount of damage to be avoided<sup>35</sup>. This is based on the assumption that the pipeline could be installed deep enough to avoid tree roots and that a suitable stringing out area is available.

An untrained observer might wonder why it's not possible to use directional drilling from the Cabrol Road play area, right under the park and emerge in the grounds of Farnborough Hill. This would be a length of about 500 metres, which we understand is perfectly feasible. There is also 500 metres of mainly clear space within Farnborough Hill, giving enough length in which to string out the new pipe.

This would confine any disruption within the park to the area immediately surrounding the construction compound.

Summary of our concerns:

1. Esso have not provided any justification for why they are unable to use directional drilling beneath Queen Elizabeth Park.

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<sup>35</sup> We note that the Examining Authority has asked why trenchless techniques are not being proposed in the park and the they ask for these to be considered - Written Question QE.1.5 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000674-Written%20Questions.pdf>)

## **4. The Project as a Whole**

### **4.1. Reasons for Replacing the Existing Pipeline**

There are two Esso pipelines running through Queen Elizabeth Park and we assume this is the case along the entire route. Esso are only asking to replace one of these. During a telephone call with one of their representatives, the author was told that it is the newer of the two pipelines which will be replaced.

The older pipeline, which will be retained, has a diameter of 12" and the newer one, which will be replaced, is 10" in diameter. The replacement pipe will be 300mm in diameter (roughly 12"). Appendix B shows some of the pipeline markers in the park.

There is a risk that at a superficial level, the purpose of the project could be seen as enlargement, rather than replacement. Even if it truly is a replacement project then it is reasonable to expect that the older pipeline will also have to be replaced in the near future.

No-one affected by the current plans wants to duplicate the upheaval and destruction caused by replacing the second pipeline a few years after the first one, not to mention the years of processes associated with obtaining consent for the project.

Currently we have no reason to believe that this is a one-off project and every reason to fear that we will be faced with exactly the same situation in a few years time.

We believe that Esso should give details of the condition and service life of both pipelines. They should also explain how much longer the older pipeline will be in service for and what will happen at the end of its service life. We should know whether it will be replaced or whether it will cease to be used.

We do not believe consent should be granted to replace one pipeline if both are near the end of their service lives and will need to be replaced within a few years of each other. Replacing both at the same time would significantly reduce the amount of inconvenience and damage which will be caused.

#### Summary of our concerns:

1. The remaining service life of both existing pipelines has not been disclosed.
2. Differences in materials and construction of the two existing pipelines has not been disclosed.
3. The reason why the older pipeline can outlast the newer one has not been disclosed.
4. The other existing pipeline which runs through the park will have to be replaced soon.
5. Replacement of the other existing pipeline will be undertaken as a separate project.
6. The new pipeline will be made of materials of an inferior quality to the one which it replaces.
7. The new pipeline will have a shorter service life than the one it replaces.
8. The new pipeline will need more maintenance and repairs than the current pipeline.

## 4.2. Mapping of Notable Trees and Tree Groups

There are two issues with Esso's Schedule of Notable Trees<sup>36</sup>.

1. Some trees listed in Table 1.2 are well outside the Order Limits. Examples are T46 and T47 in the grounds of Farnborough Hill.
2. The co-ordinates for the majority of the tree groups and woodlands in Table 1.3 are not even close to the route of the pipeline. Most seem to have been transposed some distance to the north, whilst G125-G137 are in a line running northwards from Pulborough to Weybridge.

These statements are based on a map produced directly from the tables<sup>37</sup> in the Schedule of Notable Trees. The map is included in Appendix D. Co-ordinates were taken from the document and programatically transformed into a format suitable for plotting in Google Maps.

We believe that the Schedule of Notable Trees should be urgently reviewed and corrected. The erroneous positions seem to be a result of inadequate checking and reviewing during the preparation of the Schedule of Notable Trees rather than the methods which were used to prepare the map.

Documents containing errors of this magnitude are not a suitable basis on which to grant the Development Consent Order.

### Summary of our concerns:

1. There are serious errors in the Schedule of Notable Trees.
2. The preparation and review of the Schedule of Notable Trees was inadequate.
3. Errors of this sort cast doubt on the accuracy of all other documents so far submitted by Esso.
4. The Schedule of Notable Trees lists trees which are well outside the Order Limits (e.g. T46 and T47).
5. The proper co-ordinates of all tree groups and woodlands in Table 1.3 is not known.

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<sup>36</sup> Environmental Statement Appendix 10.2, Document 6.4: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000235-6.4%20Appendix%2010.2%20Schedule%20of%20Notable%20Trees.pdf>

<sup>37</sup> Google Map produced from the Schedule of Notable Trees: [https://www.queenelizabethpark.net/notable\\_tree\\_map](https://www.queenelizabethpark.net/notable_tree_map)

## A. Old and Significant Trees Within the Park

This appendix lists trees within the park which were catalogued by local residents in the week of 4th November 2019.

Trees which were selected for inclusion were those that stood out as being larger and older than the others. Most are located within the Order Limits. They were chosen as trees which might be relevant for the Woodland Trust tree register. It was not a complete survey of all notable trees as it was raining and slippery underfoot.

No.	Grid ref.	Species	Girth...	...at height	Comments
1A	SU86945630	Sweet Chestnut	2.97m	1.5m	Joined with 1B
1B	SU86945630	Beech	2.71m	1.5m	Joined with 1A
2	SU86895624	Sweet Chestnut	4.05m	1.5m	
3	SU86875619	Sweet Chestnut	5.33m	0.5m	
4	SU86815617	Beech	5.91m	1.5m	T42
5	SU86765612	Sweet Chestnut	2.65m	1.5m	
6	SU86765608	Beech	2.62m	1.5m	
7	SU86745608	Beech	4.00m	1.5m	Recently pollarded
8	SU86735607	Sweet Chestnut	3.97m	1.5m	
9	SU86725603	Oak	3.97m	1.5m	
10	SU86495602	Willow	4.10m	1.0m	
11	SU86475605	Oak	3.55m	1.5m	

The Woodland Trust requires girth measurements to be taken at a height of 1.5 metres. For trees where the trunk divides near ground level, this measurement was taken lower down, but as high as practical (trees 3 and 10).

T42 is the identification number used in Esso's Schedule of Notable Trees<sup>38</sup>.

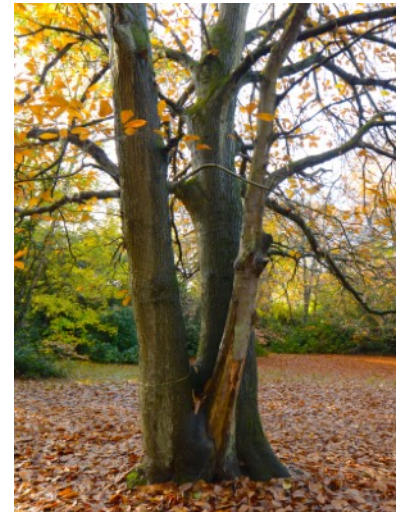
There are many other large trees within the Order Limits which have not yet been catalogued.

The following pages contain photographs of some of the trees listed in the table above.

<sup>38</sup> Environmental Statement Appendix 10.2, Document 6.4: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000235-6.4%20Appendix%2010.2%20Schedule%20of%20Notable%20Trees.pdf>

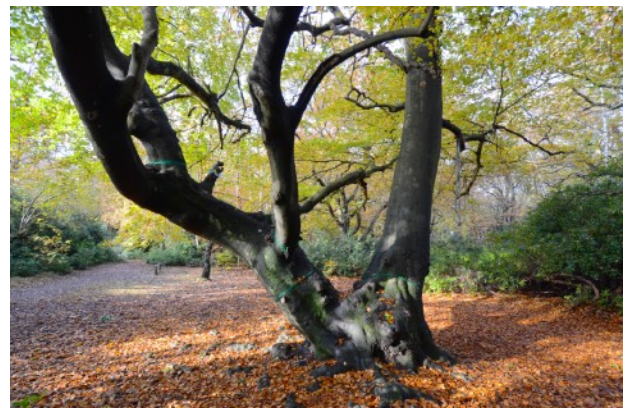
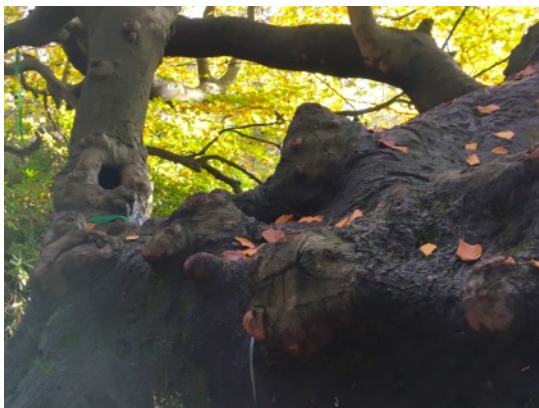
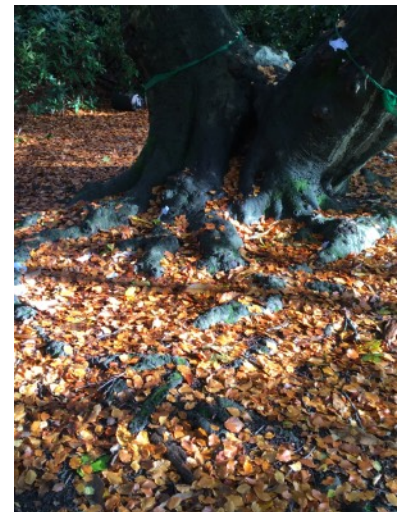
### A.1. Tree 2: Sweet Chestnut

This tree is located near the site of the auger boring drive pit.



### A.2. Tree 4: Beech (T42)

This is T42 in Esso's Register of Notable Trees. This one of the most distinctive trees in the park, with its shallow roots, hollows and a trunk which divides in several directions near the ground.



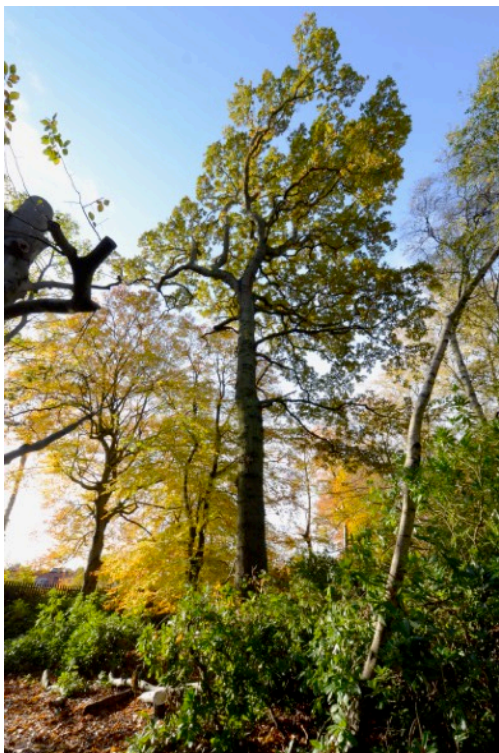
### **A.3. Tree 6: Beech**

One of the larger beech trees in the park.



### **A.4. Tree 9: Oak**

An adjacent beech tree was recently crown reduced. The effect of the beech tree's crown can be seen in the shape of the oak.



### **A.5. Tree 10: Willow**

This tree is adjacent to the Cabrol Road car park and is likely to be removed to make way for the temporary construction compound.



### **A.6. Tree 11: Oak**

This tree is by the Cabrol Road entrance to the park and is potentially endangered by the construction and operation of the construction compound.



## B. Pipeline Markers Within the Park

These photographs show some of the pipeline markers in the park. They are located at KM 70.2, 70.4 and 70.5. This shows that there are two pipes running through the park, one with a diameter of 10" and the other with a diameter of 12".



## C. Comparison of Original and Proposed Working Areas

This map was produced by a local resident in 1972 for a University Special Study. It shows the location of major trees in the park and the type of ground cover beneath them shortly after the installation of the previous pipelines. Note that this colouring does not allow the spread of the tree canopies to be shown.



The path under which the current pipelines are installed can be seen as an empty green area running down the right-hand side of the park (the southern side).

The same map is shown below with the currently proposed Order Limits superimposed to the same scale. This illustrates how excessively large the requested Order Limits are compared with the space which was used for the previous installation activities.



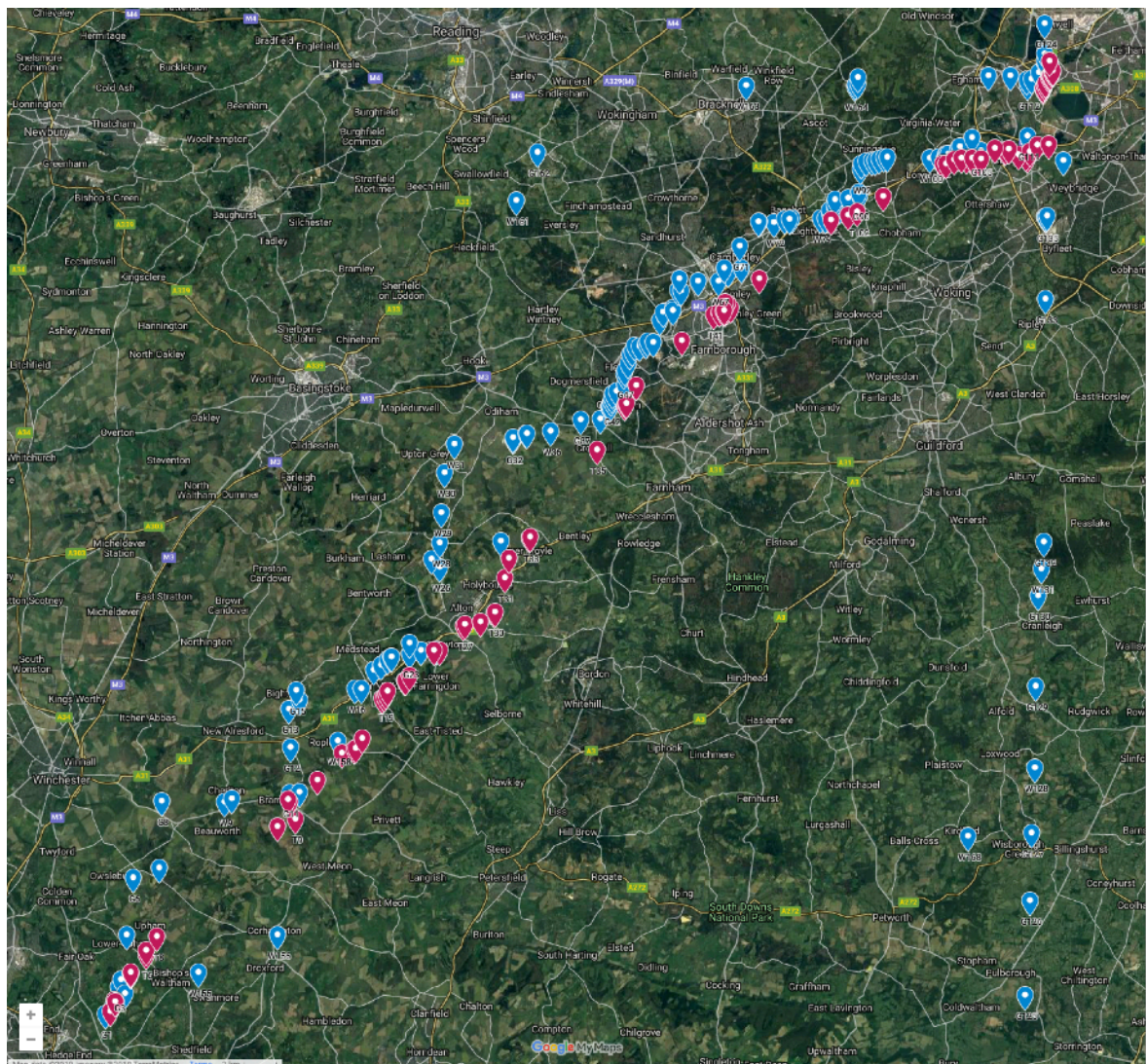
The Order Limits contain many trees which survived the previous installation but which are now at risk.

## D. Errors in Esso's Schedule of Notable Trees

The image below illustrates the errors in the positions of tree groups in Esso's Schedule of Notable Trees<sup>39</sup>.

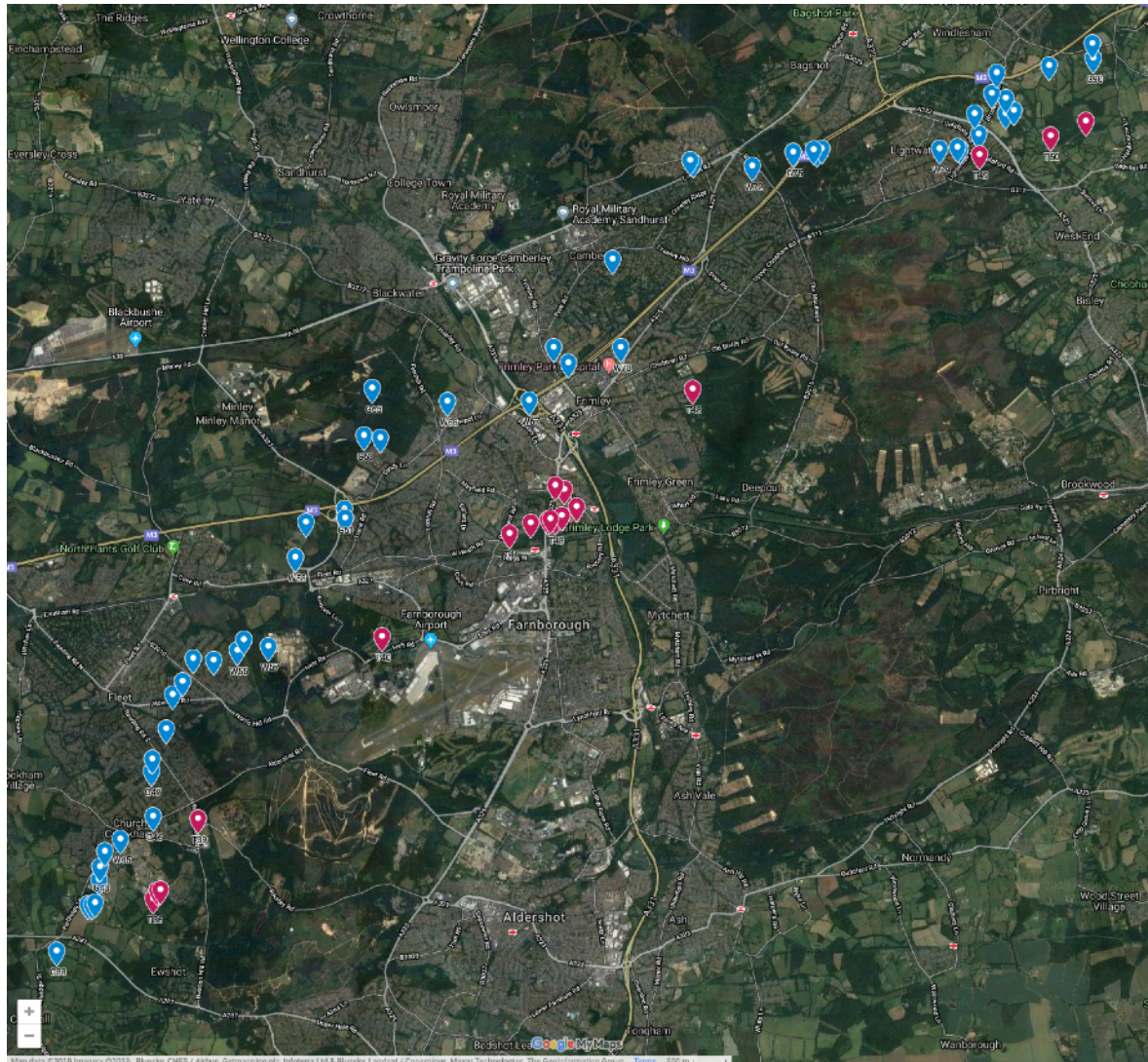
Red markers show individual trees listed in Table 1.2 of the schedule and we believe that these are accurate. The trial of red markers roughly follows the proposed route of the pipeline.

Blue markers show the tree groups listed in Table 1.3 of the schedule, most of which are inaccurate. Many are offset to the north whilst some inexplicably form a north-south line through Surrey and Sussex.



<sup>39</sup> Environmental Statement Appendix 10.2, Document 6.4: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN070005/EN070005-000235-6.4%20Appendix%2010.2%20Schedule%20of%20Notable%20Trees.pdf>

This enlargement shows the Farnborough area and illustrates more clearly how far away from the proposed route the co-ordinates of the tree groups are. The red markers are roughly aligned with the proposed route of the pipeline.



An interactive version of the map is available here: [https://www.queenelizabethpark.net/notable\\_tree\\_map](https://www.queenelizabethpark.net/notable_tree_map)

## **E. What Does Queen Elizabeth Park Mean to You?**

Park users were asked to provide additional comments while they were signing the petition to answer the question, "What does Queen Elizabeth Park mean to you?" The same question was also asked on Facebook. Here are some responses from local residents.

### **E.1. Multi-Generational Use**

"I played there as a child. We had family picnics and adventures through the trees. We would spend hours up there as a family. Best memories of growing up. I then did the same with my children and now with my grandson. It's the heart of Farnborough."

*Sonia, Rother Road*

"Clean safe park for my grandchildren."

*Sue, Ratcliffe Road*

"My love of the park started when my Mum brought me here as a child. Mum walked her dogs until well into her 80s and now I come and sit on her memorial bench that we put in the park. These woods are very special to my family."

*Diane, Victoria Road*

"As a child growing up in North Camp, a trip to Queen Elizabeth Park was an extra special treat for us, it was so different to our local parks and so special."

*Grace, Bennett Close*

"My name is James I'm six years old and have played in the park since I could walk. Please save my woods."

*James, Rectory Road*

"I have walked these historic woods since being a child, the trees have no voice, we do."

*Tracey, Hawley Lane*

### **E.2. Improving Mental Health**

"This wood has helped me such a lot through good and bad times – I can come and walk here and breath in deeply. It really improves my mental health."

*Maggie, Revelstoke Avenue*

"I never tire of the birdsong which can drown out the road noise and walking in it is a treat for our dog as she meets so many two and four legged friends... it's simply integral to my home life."

*Alexandra, Pierrefondes Avenue*

"Valuable green spaces must be preserved."

*Laurence, Caswell Close*

"Queen Elizabeth Park is a breath of fresh air in a very congested and over developed town. Entering it, you enter a beautiful woodland full of mature trees and feel a million miles away from the traffic and urban sprawl."

*Donna, Victoria Road*

"This wood is a piece of tranquillity in our home town. Its pathways are a favourite for us from winter walks to summer bike rides and we should do everything we can to limit the impact on it from Esso."

*Nicola, Revelstoke Avenue*

### **E.3. Local GP**

"One of my main pieces of advice I give to patients is to stay active and brisk walk when they can. Queen Elizabeth Park is a wonderful place to walk. This park is within easy reach of some of our most deprived wards enabling a lot of local people to experience the peaceful effect of beautiful trees and nature."

*Dr Ian Stuart, Giffard Drive Surgery*

### **E.4. The Friends of QEP**

"Opposite the playground there is a temporary pond (wet and dry depending on weather), which provides a habitat for very specific species adapted to such conditions. These ponds are valuable in their own right and need to be protected. Children in the 'Friends of QEP' all loved looking after this area."

*Penny (former group co-ordinator), Pierrefondes Avenue*

"When my children were young, they helped to build bat boxes for the park with the Friends of QEP. The children are now adults, when they come home to visit we often walk the park and enjoy the wildlife. Please don't take away this pleasure, we love this green space and it should be protected for the next generation."

*Maggie, Revelstoke Avenue*

### **E.5. Scouting and Guides**

"We use this space regularly for Scouts for forest activities. In the heart of town these spaces are invaluable. Older woodland must be protected there are so few spaces with mature trees for our children to be inspired by."

*Wendy, Rectory Road*

### **E.6. Commuter Route to Farnborough Stations**

"We bought our house in Cabrol Road and got a dog because of this beautiful park. I not only have fun there with my dog - but use it daily to get to Farnborough North station."

*Eva, Cabrol Road*

## **E.7. Local School: Nature Trails and Walks**

"I know what an amazing resource the park is for the children in our school. Every year, the children in Year R (aged 4 and 5) walk to the park which we can do because it is so close to the school.

"On the way there we can talk about the local environment. At the park the children climb on tree trunks, make dens, listen to the birds and spot signs of Spring.

"Last year, Years 1 and 2 also visited the park to make bark rubbings, collect leaves and explore nature. All children enjoyed using the playground.

We are so lucky to have this park in close proximity to our school and we make use of it regularly."

*Class Teacher at St. Bernadette's Catholic Primary School*

## **E.8. Dog Walkers: The Only Cool Place for Dogs in Summer**

"Last summer when the weather was so hot the park was the only place we could take our dog to cool down in the day – the house was hot, but the woods were cool thanks to the trees."

*Ben, Cabrol Road*

"The woodland provides much needed shade for warmer months to enjoy nature and walks with my dog. There is no-where else to go for some shade in the area."

*Natalia, Marston Drive*

"Queen Elizabeth Park is my favourite route walking my dog between my house and Farnborough town centre, because of all the lovely trees and green things she sniffs on route."

*Paul, Ringwood Road*

## **E.9. Large Beech (T42)**

"I have known Queen Elizabeth Park since the 1960s, I played in the woods with my brothers and remember climbing that tree, it always looked like a hand. I used to take my children there when they were young and say 'one day you will climb this' and they did. My daughter and granddaughter now come and visit the park with me and Beth calls it 'the fairy tree'; the triangle between the main branches in the middle is the fairy swimming pool. Beth wrote a postcard to tie on the tree – 'If you cut down this tree the fairies will be homeless'."

*Jane, Farnborough Road*



**Queen Elizabeth Park**  
Farnborough