EN070005: Southampton to London Pipeline Project

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

## Summary



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Interested Party reference no: 20022545

## **Summary of the Written Representation**

This is a summary of the representation 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 flooding 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.
- 8. There is no justification given for why Esso are not offering the same narrow working width in the park as elsewhere. In some 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.

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. These concerns are listed in the full Written Representation.

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'. 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.