WEST SUSSEX COUNTY COUNCIL STRATEGIC PLANNING CONSULTATION

FROM: Dominic Smith TO: County Planning

FAO: Jane Moseley

SUBJECT: WSCC/005/14/BA

Temporary permission for the exploration and appraisal comprising the flow testing and monitoring of the existing hydrocarbon lateral borehole along with site security fencing, the provision of an enclosed testing flare and site restoration.

DATE: 21st March 2014

Lower Stumble Hydrocarbon Exploration Site, London Road, Balcombe, Haywards Heath, West Sussex, RH17 6JH

RECOMMENDATION:

| Advice | X | Modification | | More Information | |
|-----------|---|--------------|---|------------------|--|
| Objection | | No Objection | X | Refusal | |

Summary

West Sussex County Council, in its capacity as the Local Highway Authority (LHA), has been consulted on the proposed temporary permission for exploration and appraisal of the existing hydrocarbon lateral borehole.

Having reviewed the technical documents submitted in support of the application, and in utilising documents relating to previous applications/permissions on the site, no objection is raised subject to conditions. The following is the detailed report of the LHA.

Transport Assessment

A Transport Assessment (TA) has not been submitted in support of the application as the applicant considers that the site will not generate a significant number of vehicular or HGV movements. Appendix (b) of the Department for Transport publication 'Guidance on Transport Assessments' indicates that a Transport Assessment should be submitted where there a development generates a 'significant number of HGV movements'. This document has been recently archived and replaced by guidance in paragraph 32 of the National Planning Policy Framework and paragraph 13 of the Planning Practice Guidance which requires a TA to be submitted where developments generate significant amounts of transport movements. In the absence of a clear definition from the National guidance, the LHA uses the definition set out in the WSCC Transport Assessment Methodology where significant is considered to be in excess of 20 HGV movements per day.

It is understood that a period of 6 months is required to undertake the operations that form the planning application and that this will be split into 3 stages – mobilisation/test/monitor, sealing well and demobilisation/dress site. Over a period of 122 days a total of 210 movements are anticipated at an average of approximately 2 movements per day. This will peak during the first week and last week with 10-12 HGV movements anticipated per day. Therefore, in accordance with both National and County TA guidance, the HGV generation of the site is not considered to be significant.

Notwithstanding the above, the application builds upon operations permitted through previous planning submissions including WSCC/027/10, from which information regarding transport matters

can be drawn, including a previous Transport Assessment and a Road Safety Audit of the site access.

Site Access

The site has previously been used in a gas and oil exploration capacity and benefits from an existing access onto the B2036 London Road. No alterations are proposed to the access which was subject to a Road Safety Audit: Stage 1 as part of the 2010 application. In accordance with 2.40 of Highway Directive 19/03, an audit is valid for up to a period of 5 years if there are no material changes to the design of the scheme. A recommendation that signage be erected in the vicinity of the access to alert drivers to the presence of emerging HGVs; this should be incorporated into a condition that requires a Traffic Management Plan to be submitted and approved prior to the commencement of any works associated with planning permission.

Existing Traffic/Trip Generation

Vehicular count data is available in various locations along the B2036, with data being obtained in November/December 2012. There are several locations that lie to the north of the site on the approach to the M23. To the south of Balcombe village (ref: 0005791) the data indicates that during weekday operation the road experiences in the region of 3600 car movements, 580 LGV movements and 120 HGV movements. In Balcombe village, in the vicinity of Haywards Heath Road (ref: 0004280), the data indicates HGV movements of up to 350 per day. North of the village (ref: 0002367) the data indicate HGV movements in the order of 230 per day.

Appendix (b) sets out the number of HGV movements associated with the proposed operation; the figures are as follows;

| Activity | Number of Days | Total HGV's | Average Per Day |
|---------------------|----------------|-------------|-----------------|
| Mobilisation | 7 | 54 | 8 |
| Flow Test | 14 | 69 | 5 |
| Pressure Monitoring | 62 | 10 | 1 |
| Sealing | 27 | 35 | 6 |
| Demobilisation | 4 | 42 | 11 |

It is unclear whether the total HGVs represent the number of HGVs visiting the site or whether they are two-way trips (i.e. the HGV arriving and then departing the site). To ensure a robust assessment, is the LHA has assumed that the total HGVs are one-way movements only and have been multiplied by two in the following analysis. The following table indicates the percentage increase in total HGV movements at each of the aforementioned locations based on the count data available.

| Activity | South (005791) | Village (004280) | North (002367) | Duration (days) |
|-------------------|----------------|------------------|----------------|------------------------|
| Mobilisation | 13% | 4.5% | 7% | 7 |
| Flow Test | 8% | 3% | 4% | 14 |
| Press. Monitoring | <1% | <1% | <1% | 62 |
| Sealing | 10% | 3% | 5% | 27 |
| Demobilisation | 18% | 6% | 9% | 4 |

It should be noted that the previous site permission was in operation while the counts were taken and that movements associated with the proposed use may replace those that have since ceased.

Given the temporary nature of the movement and the limited increase on existing HGV traffic it is not considered that the proposal will have a material impact on the operation of the network.

Routing

The applicant proposed utilising the routing that was identified in the previous permission, which provides the most direct route to junction 10a of the M23. Local concern regarding routing through Balcombe is acknowledged and the LHA would recommend that a Traffic Management Plan is sought via condition in order to restrict the timings of HGV movements; for example, outside of school drop off and pick up times. Further to this, there is concern over the routing of tankers containing hydrochloric acid past the school adjacent to the proposed route. It is recommended that the Traffic Management Plan restricts the arrival/departure of these vehicles outside of school hours.

Concerns over maintenance of both the road surface and highway structures have been raised. Whilst maintenance is not a material planning consideration the concerns have been brought to the attention of the relevant teams in the County Council. It should be noted that there are no weight or width restrictions along the proposed vehicle routing.

Conditions

Traffic Management Plan

Operation shall not first commence, including any works of mobilisation, until a Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,

- the anticipated number, frequency and types of vehicles used during construction,
- · the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- · the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- details of public engagement both prior to and during construction works.
- traffic management schemes such as restrictions on timings, associated signage etc

Reason: In the interests of highway safety and the amenities of the area.

Dominic Smith Strategic Planning