



Balcombe CE (C) School

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County Planning
West Sussex County Council
County Hall Chichester
West Sussex
PO19 1RH

Dear Sirs,

Planning Application WSCC/045/20

In response to the above Planning Application ("the Application") from Angus Energy Weald Basin No.3 Limited ("Angus") at the Lower Stumble Hydrocarbon Exploration Site, this letter outlines the reservations and additional information that the Board of Governors of Balcombe CE (C) Primary School are requesting to ensure the safety of the children and staff at the School.

Background

Balcombe CE (C) Primary School is a Church of England Primary School located in the village of Balcombe, approximately 1 kilometre from the Lower Stumble site. The School is situated directly on the main road (the B2036) through the village.

We have approximately 125 pupils in attendance at the School daily, and employ over 25 staff.

A number of the classrooms face out onto the B2036, and in addition some classrooms have outside educational spaces directly adjacent to B2036, separated from the road by only a rail fence and a narrow pavement. These outside spaces are used by children and staff on a daily basis throughout the academic year, regardless of weather.

We are responding to the application as part of our safeguarding obligations to our children and staff.

Response

Time Period of Activities

We note that the Application is for permission to undertake activities for a two and half year period. This is an extended period of time. We request that the Council consider whether it is necessary for the activities to continue for this period given the concerns highlighted below.

Traffic Movements

We would like to focus on the issues of traffic safety arising from the increased traffic movements (both HGV and other traffic) along the B2036, which runs directly adjacent to the School as a result of this Application. In

addition, close to the School is the intersection for traffic joining the B2036 from Haywards Heath, which is a major commuter route for those travelling north to join the A23 and M23.

The Traffic & Transport Effects Technical Note (“Note”) appended to the Application sets out that the proposed route of access for HGVs and other traffic to the Site, both inbound and outbound, is from junction 10a of the M23 via the B2036 and as a result will pass directly by the School.

The table on page 5 of Appendix 1 (Traffic Management Plan) sets out the estimated frequency of traffic movements. We note that for an extended period between weeks 52 and 156 the maximum daily movement could be 23 two-way vehicle movements. We appreciate that this will not be every day during that period but there is no indication in the Application how frequently this will occur. We consider that this number of HGV movements within a single day represents a significant increase in traffic movements and an increased risk to the safety of our children and staff.

It is also not clear from the Application what the size of the HGVs will be, but during previous periods of activity at the Lower Stumble site, a high percentage of the HGVs were 6 and 7 axle vehicles which are large vehicles for travel along a B road through a village.

Point 1.10 (conclusion) on page 5 of the Note states that *“Utilising data provided by Angus it is considered that the proposed operations will have a negligible effect on the local road network...”* It is our understanding that the assessment of traffic passing through Balcombe is based on total traffic passing through the village, the majority of which is travelling to and from Haywards Heath from junction 10A of the M23 so turns off the B2036 onto London Road before the road enters the main village and passes the School i.e. the increase in traffic using the B2036 to travel through the village passed the School during the school day when children and staff are in attendance as a result of the movement of HGVs and other traffic will be significant. This opinion is based on the School’s experience of a significant increase in traffic during previous activities at the Lower Stumble site. It is our view that the increase in HGV and other traffic represents a significant increase in the risk to the safety of our children and staff. The level of concern is increased as a result of the three-year period of the Application. We request that the Council give careful considerations to what conditions should be attached to the Application in relation to traffic movements in line with the requirements set out in the Department for Transport’s *Guidance on Transport Assessment*.

Point 4.2.3 on page 6 of Appendix 1 states that *“Heavy good movements to and from the site will be timed so that none are undertaken during the morning and afternoon school start and finish periods avoiding school drop off/pick up times.”* We note the undertaking to restrict traffic movements to outside of school drop off/pick up times. The summary on page 3 of the Note indicates that these restrictions will apply 30 minutes before and 15 minutes after school start time and 15 minutes before and 30 minutes after school end time. We do not consider that these restrictions are adequate. We would point out that significant numbers of children arrive and leave the School outside of the standard drop off/pick up times. The School operates a breakfast club with children being dropped at the School from 7.20am. It is also the offers after school activities which finish between 4.15-4.30 every day of the week. School staff arrive and leave school outside of standard pick up/drop off times. Traffic movements as a result of this Application during all of these hours will impact the safety of our children and staff.

Point 4.8 on page 8 of Appendix 1 states that *“The proposed HGV traffic will have no direct impact upon pedestrians along the route from the M23 Motorway.”* When arriving and leaving the School, the majority of our children have to cross over the B2036 directly opposite the School. The sight lines when crossing the B2036 at this point are obscured when looking down the road towards the Lower Stumble site either by a hedge when crossing to the School or parked cars when crossing from the School. West Sussex County Council employs a part-time lolly pop person to assist in safe crossing of the road by our children. Despite continued efforts to recruit, it has not been possible to engage full-time cover for this role. A number of children in Years 5 and 6 walk to School on their own (as part of developing their independence and personal responsibility). There are no traffic controls at this section of the B2036. Unless appropriate conditions are placed around traffic movements during the extended drop off/pick up times highlighted above, it is our view that the significant

increase in traffic movements along the B2036 represents an increased risk to the safety of our children when crossing the B2035 opposite the School.

We would request that the Council consider whether the proposed route is the most appropriate. It would reduce the impact of the increased traffic movements on the School if the inbound route was from junction 10a of the M23 and the outbound route accessed the A23 at Warninglid via Cuckfield/Whitemans Green and the B2115. This route avoids significantly built up areas and populated buildings such as schools and was the approved route for a previous application to undertake activities at the site.

We would request that the School be granted a right of access to the traffic logs to be maintained by Angus to allow the School to monitor compliance with any conditions attached to the granting of the Application in relation to traffic movements.

Hazardous Waste

We understand from the Application that waste materials (requiring handling by approved facilities) will be transported away from the Lower Stumble site and that various materials (e.g. nitrogen and/or acid wash) will be utilised as part of the activities. It is our understanding that these materials could adversely impact the safety of our children and staff if there are any issues in transportation.

The School has not been consulted on what measures or safety plan may be implemented in the event of a leak of such materials, either at the Lower Stumble site or while HGVs are in transit. The Application does not appear to take into consideration the close proximity of the Lower Stumble site to the School, or that the proposed route to the Lower Stumble site is directly adjacent to the School. The School has a duty of care to our children, staff and visitors to assess any risks that may be imposed on them when attending School premises.

When previous activities were being undertaken at the Lower Stumble site, the headteacher of the School contacted the representatives at the Site to request information on what plans were in place for managing a hazardous spillage affecting the School. She was told "call 999". The Application imposes potential high risks on the School and those attending its premises. It is the opinion of the School that a full assessment of these risks should be undertaken by Angus in consultation with the School and other appropriate authorities.

Pollution Issues

The Application does not provide adequate information on the environmental and pollution impacts of the activities proposed to be carried out at the Lower Stumble site.

The number of HGVs and other vehicles travelling passed the School will increase significantly if this Application is granted, and this will result in an increase in traffic related air pollution on the School premises. The proposed route of the HGV traffic in and out of the Lower Stumble site is along the B2036 directly passed a number of classrooms with their attached outside educational spaces and the playing fields of the School. The outside educational spaces, which are used on a daily basis during the academic year by children and staff, are a pavement width away from the B2036. The classrooms and the attached outside educational spaces are below the road level which means that any particulate matter that is discharged through the exhaust fumes is at head height of those using these classrooms and spaces, and is unlikely to fully disperse before being inhaled. This issue is most serious in the outside educational spaces which are contained spaces largely surrounded by walls so that any particulate matter will not easily disperse and will become concentrated in these areas.

Numerous studies have demonstrated that children are particularly susceptible to the health issues such as respiratory problems arising from air pollution. The School has a number of pupils for whom this risk is exacerbated as a result of existing health conditions.

The School is concerned about the impact on the health of our pupils from an increase in air pollution if this Application is granted without adequate restrictions to minimise the potential risks.

In all that we do we are guided by God.

Request for Additional Information

The Governors of Balcombe CE (C) School have the following questions:

- (i) We would request further information on the frequency of HGVs transporting hazardous materials, and any restrictions that will be in place connected to such transportation. e.g. will the HGVs transporting potential hazardous materials be escorted by vehicles equipped to deal with any emergencies resulting from the transportation of material by HGVs? What are the emergency procedures that are in place should an incident such as a spill of materials occur in a heavily populated area such as the School?
- (ii) We would request full details of the management and monitoring controls over transport of materials to the site and from the site to the external processing facility?
- (iii) Who will cover the costs (including legal costs) that may result from pollution emanating from the Lower Stumble site, or a spill of hazardous material while in transit which may affect the children and staff of the School?

Conclusion

We would request that assurance be provided in respect of the issues raised above before this Application is granted.

If the Application is to be granted, we propose that there are adequate restrictions in place to ensure:

- (i) that HGVs do not travel passed the School during the periods when children and staff are in attendance at the School (including during the time period when children and staff are arriving and leaving the School premises), either by placing constraints on the timing of movements or by restricting movements to routes that do not pass the School;
- (ii) that the School be granted a right of access to the traffic logs to be maintained by Angus to allow the School to monitor compliance with the Application and conditions attached to it in relation to traffic movements;
- (iii) that Angus be required to appoint a responsible employee for the School to contact should it have any concerns around traffic movements, or any other issues connected to the site;
- (iv) that Angus be required to put in place and maintain an adequate response plan for any spillage of hazardous waste or other pollution emanating from the site;
- (v) that Angus be required to put in place and maintain sufficient insurances to cover in full the costs incurred by the School arising out of any air pollution arising as a result of activities at the Lower Stumble site (including but not limited to HGV movements), or from any emergency events that may occur as a result of the movement of HGV's carrying toxic materials.

Thank you for your consideration of these matters.

Yours sincerely,

Ian Tremble
Chair of Governors
Balcombe CE (C) Primary School