

From: [helen.savage](#)
To: [PL Planning Applications](#)
Subject: Traffic Watch Objection to Angus energy 2020
Date: 28 September 2020 22:43:54
Attachments: [Increase in traffic 2020 application.xlsx](#)
[traffic objection 2020 with photos NoFiBS.docx](#)

Traffic Objection to application WSCC/045/20 Sep 2020

Location: Lower Stumble Exploration Site, off London Road, Balcombe, RH17 6JH

Proposal from Angus Energy: Remove drilling fluids and carry out an extended well test.

By The Traffic Monitoring group. Organised by the No Fracking in Balcombe Society. The group was composed of 30 individuals from the village who watched traffic in and out of the site in Sep 2018 and made a point of counting all the vehicles coming in and out of the site in the demobilisation period from Monday 1st – Friday 5th October 2018.

Submitted by Helen Savage

3 Troymede

Balcombe

RH176LU

On behalf of Traffic Monitoring Group NoFiBS.

Please see main word document attached.

Attached spread sheet analyses the phases of Angus' work and converts them into daily averages of single sightings of an HGV on the road to compare with the traffic count from the same road as quoted in the main report.

Helen Savage

MA BA PGCE

weeks in each phase of work	ave per week single HGV on road	Ave per week x number of weeks	ave per day single HGV on road	ave per day single HGV on road rounded to nearest whole vehicle	baseline HGV single movements	increase of daily average as % baseline daily averages
1	112	112	18.67	19	96	20%
2	40	80	6.67	7	96	7%
1	112	112	18.67	19	96	20%
1	68	68	11.33	11	96	11%
7	32	224	5.33	5	96	5%
1	68	68	11.33	11	96	11%
1	112	112	18.67	19	96	20%
53	16	848	2.67	3	96	3%
2	72	144	12.00	12	96	13%
2	68	136	11.33	11	96	11%
2	60	120	10.00	10	96	10%
1	112	112	18.67	19	96	20%
4	84	336	14.00	14	96	15%
8	88	704	14.67	15	96	16%
86		3176		12.50		
Total weeks		Total additional HGVS		13.23		6 %HGVs average increase per day on average across all weeks (529/ 86)
516		6				12 %HGVs average increase per day across 33 weeks of their weeks, which is excluding the 53 week low traffic period, i.e. 86 - 53
total days (6/wk)		average daily increase HGVS over 18 mnths				

96 Base line daily average taken across 6 days (Mon to Sat) of HGV's on B2036 Jan2018 as referenced by WSCC highways in 2019 application. HGV being bin 5 (2axle med weight HGV) and above up to 13 by FHWA classification:

12% daily increase in HGV's on road over 33 weeks of their work (which does not include 53 week mechanical well lift phase of max 4 HGV's per day which sits within it.)

4 weeks with 20% or over average daily increase of traffic on road

In 23 different weeks (6 months) in their application we can expect spikes on various days of 20 HGV's and above. On 3 weeks daily maximums of up to 32 on the road

No movements on Sundays or public holidays. We have divided weekly averages by 6 to reflect Angus Mon-Sat working (comparable with traffic count quoted).

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Summary

1. Numbers of HGV movements predicted by Angus/WSCC for the application in 2018 were grossly underestimated and misleading, particularly with reference to HGVs passing the village school. This led to approval for that application, subsequent applications use these mistakes as reasons to approve following applications.
2. The types of HGV seen in Sep 2018 were the largest multi-axle high pollution vehicles of a type never normally seen in the village, totally unsuited to the narrow, cluttered village road. The presence of Angus energy had a negative impact on village/school.
3. WSCC highways assessment make the impact on village look less. This application should be subject to a full Traffic Impact Assessment.
4. This application does not sit well with in the Joint Minerals Plan/NPPF and declared Climate emergency.
5. Our children will be adversely affected by this application

1) Mistakes in planning statistics last time helped allow last year's flow test application to be approved.

Historic situation.

The traffic watch team would like to make a complaint, which was flagged up to Mr Bartlett about the application made in 2017 and allowed in 2018 Mr Bartlett told Mrs Savage as the organiser that there was no point raising it again until another application arrived.

At the planning meeting stages of the 2018 application WSCC highways stated that 'at most there would be an 8% increase in HGV movements, which would occur during the seven-day mobilisation period'. WSCC did not use up to date traffic information to make that calculation, it was made from a 2012 survey of traffic to the North of the village which is a completely different story to the section of the London Road that Angus energy would be working on. The road splits and the B2036 that passes the school is a quieter section. BPC SID (Speed Indicator Device) Traffic stats indicate traffic on the Haywards Heath Road is approaching twice that on London Road.

A group of 30 residents observed traffic entering and exiting from the site across the whole period Angus were there in 2018, and particularly established a round-the clock traffic watch on the road during the demobilisation week in order to count vehicles and watch the impact on the road. When residents compared what came past with weekly averages for that road,

based on a recent count in the same place, (Balcombe 2018 London Road S.of Kemps Farm Site No.00004431 05/01/2018-15/01/2018) they found that the week that was watched represented an average 15% cent increase in HGVs on daily base-line average for that road. Indeed, if initial calculations of the increase on traffic on that road by WSCC had been made correctly they would have specified a much higher increase than they stated.

The statistics the highways agency provided WSCC were misleading and a completely different picture to what actually happened. This did have importance at the planning meeting in 2018 as one of the councillors on the panel said, 'As it's only an 8% increase, over a short period'. WSCC did not use up to date traffic information to make that calculation. The subsequent applications have used this previous consent as justification to let work occur again.

On some days we saw as many as 32 HGV's; which is a 30% increase on the daily average stated in the traffic count stats for the survey mentioned above. The daily average for HGV's across the 5 days we counted was 15, which is a 14% increase of HGV's on the traffic on that road.

Demobilisation traffic all appeared to move over one week last time as opposed to the 2 promised. Angus stated 34 vehicle movements would occur across a fortnight with a maximum of 12 in one day. In actual fact we saw 37 movements across one week with 16 in one day, which exceeded the original promise. **HGV movements must be accurate and stick to the time frame and plan suggested with the maximum daily levels not being exceeded. Angus did not stick to their traffic plans, we have no faith they will again.**

WSCC Transport assessment methodology 2007 states that more than 20 HGV's is significant and triggers the need for a full transport assessment. Therefore, the application shouldn't have been passed without at least a full Traffic Impact assessment. In 2017 '20 movements 2 ways' were quoted by West Sussex highways as the threshold to make HGV numbers 'significant'. In fact it is one way, see the quote from 2007 guidance below.

Thresholds for requiring a Transport Assessment 2.1 The Guidance on Transport Assessment (DfT/DCLG 03/2007) provides indicative thresholds for Transport Statements, Transport Assessments and Travel Plans at Appendix B. West Sussex County Council sees no reason to vary from these standards within West Sussex, with the exception of the following variations to the second table "Thresholds based on other considerations": • All transport assessments in West Sussex must be accompanied by a travel plan. See section 8 below for guidance. • **"Significant HGV movements per day" is defined as 20 or more one-way HGV movements per day**

Current application 2020

In 23 different weeks we can expect spikes of 20 HGV's and above from Angus. Combined with the sheer size of the vehicles as previously explained; the fact that they get caught in trees and only just shave under the low-slung power lines down London Road should be grounds for a full TA to be submitted and considered.

Again, given that the percentage increase of 6 axle vehicles on that road is going to be into triple and double figures during many weeks, a full Traffic Impact assessment should be submitted.

Even looking at the whole HGV category there will be numerous days where we will be looking at an average daily increase of over 20% in HGV's. From a baseline of 96, for the London Road, this would mean 19 HGV's from Angus would constitute a 20% increase in HGV's on that road. Therefore for 4 weeks of Angus' working time here we will be seeing a 20% increase of HGV's on that road on a daily basis (according to daily averages extrapolated from their weekly averages). We also know there will be many spikes across the 23 weeks exceeding this increase.

Permission should not have been allowed in 2017 without a full transport assessment. See below from the WSCC transport methodology:

10.6 Environmental Impact of Development Traffic 10.6.1 The TA must comment on environmental impacts of traffic including noise, vibration and emissions where increases in traffic flow of over 20% are predicted on any highway or where the development generates any additional HGV flows through a residential area or on a rural lane or where the development is within or adjacent to a designated Air Quality Management Area (AQMA).

The last 2 applications have used previous consents as a justification for permission. As discussed, consents should not have been given on the basis they were. For previous applications the baseline traffic statistics given were for north of the village which has a much higher traffic count than the London Road to the south and so gives a falsely low figure on the impact of traffic on the road. Even when the 2018 traffic counts have been used, the increase in HGV's is often more than 20 one-way journeys and should trigger a full Transport Impact Assessment. Quote below from Angus application:

As discussed above, these figures were examined to identify the maximum volume of HGVs on any given day with consideration for the duration of such an effect. They have also been compared with the previous consent to determine the scale of impact with what has already been considered acceptable. In all stages of work these vehicle movements are the same as or less than previously consented and therefore it is considered that the existing site access and route could accommodate the proposed development without any further improvements. It is also expected that the level of traffic generated by the proposed development would be likely to have a negligible impact on the local highway network.

Using previous consent as an excuse not to scrutinise this is unacceptable. Previous consents were not given based on the real facts. 'Negligible impact on the local highway network is simply wrong'.

2) These are the largest kinds of HGV's

In 2018, traffic watch found that many of the vehicles coming into the site were among the biggest you'll see on any roads - six or seven axle vehicles which spanned the whole length of the school. The average count for *that* size of vehicle coming down that road past the school is not even one a day. To consider all HGV's under the same classification is

disingenuous, as a normal small delivery lorry is considered within the same category as a 6 axle vehicle multi-unit lorry. Daily average for 6 axle vehicles is 0 (average across 7 days). We saw an average of 10 per day and as many as 25 in one day. The percentage increase of these sort of vehicles will be in the thousands because they are just not usually there! This drastically changes the nature of traffic passing the school as they are not your average HGV. We were using FWHA diagrams and classifications, and were confirmed to be correct from one of a team who has previously been a police inspector with the traffic department. Angus energy at the CLG pointed out that they thought the tankers they are talking about would fall into 'BIN 9' by FHWA vehicle classifications. The average for these 5 axle vehicles with draw bars is 1 per day on that road.

Besides, it makes little difference as they are both big enough to cover the length of the school; not the size usually found on that road and both almost equally rare statistically. It is also worth noting that many of the vehicles are extremely high. One of them had to stop so that the driver could get out and climb on the roof to remove it from catching on the low slung electricity cables that weave their way all the way down the residential parked up section of the London road. It was confirmed that they were power cables by the power cabling company that were also working on the road at the same time. One of the men working on the cable described it as 'madness'. Other lorries arrived with bits of tree stuck in them because they are simply too big for our parked up London Road. **Allowing lorries of this height to travel within inches of these power lines is a great danger to both drivers and residents.** Please see photos. **This kind of HGV traffic DID change the nature of this quiet village road and will do so again if permission is granted.**

Disruption caused by traffic in village 2018

Last time traffic organisation was farcical; considering that at planning stage traffic was considered such a major issue, more care should have been taken. Signage to the site did not appear for the first weeks when heavy traffic was going in, even after members of the Community Liaison Group highlighted the problem. It then took another 11 days for works signage to go up. This indicates the kind of cavalier attitude Angus energy have for their neighbours in the village and is one of the many reasons not to inflict this on us again by accepting this application.

In the time they were working many HGVs overshot the site and had to go to Whitemans Green in Cuckfield to turn round. They were frequently sent through Balcombe village again, only to turn around at the roundabout to the M23. Many HGVs went through the village four times, and one went through six times. Apart from drivers getting lost, this problem arose either because traffic was obliged to enter from the north to comply with planning conditions, or because at the moment a lorry arrived there was no space on the site for it to enter.

The site itself is not big enough for the vehicles that need to enter it so they sometimes wait on the road or in the layby until enough vehicles have moved out so they can get in, or they are told to drive back to the roundabout to turn round and come in again later.



Photo of equipment entering site, so tall that tree branches have got caught in it.

Photo below shows traffic backing up towards blind bend behind slow turning/waiting lorries

These huge HGVs took up both sides of the road in their attempt to turn in to the site. This was dangerous, with traffic backing up on the fast B2036 or overtaking the protruding tails of the vehicles as they waited to go in. Vehicles that could not fit into the site were seen reversing back into the road, with no officially organised assistance, or parking in risky places such as blind bends.



Managing director of Angus Energy Paul Vonk informed the Community Liaison Group (CLG) that:

‘Our core objective, other than doing a well test, was not to have any protest, so the last thing we wanted to do was to put up signage... we wanted to stay out of the radar - so we know we are going to be in breach of the traffic management plan.’

It would seem, therefore, that the whole operation was deliberately set up without signs – ignoring the traffic management plan that had been submitted to WSCC, and without telling residents exact start times of work for this reason. At the CLG meeting, employees admitted the signs weren’t ordered until after complaints had been made by residents. Gary Marsh spoke for Mid Sussex District Council:

‘I’ve been talking to the officers doing the risk assessment. We feel that was wrong – everyone is entitled to legitimate peaceful protest, so in the future that doesn’t happen, the signs go in as per the traffic management plan, because you are potentially compromising public safety, we’re not very happy about this.’

This flow-test should not be allowed again because it causes great disruption within the village. Angus energy did not show due care and attention to our needs, we don’t have faith they will again.



Picture shows vehicles stopped waiting to go in over hanging the road, causing local traffic to back up to pass on the wrong side of the road.

Those watching the site from the village observed a number of public order offences involving workers leaving the site who swore or used offensive gestures towards the watchers at the side of the road. Some workers also compromised safety by filming those on the roadside while making a right hand turn onto the B2036.

Security guards breached several laws by refusing to display name badges or tell us who they were. At one point a protestor was threatened by dogs outside the boundary.

Angus should not be allowed back again because they were NOT considerate neighbours. Their work will disrupt the village again.

An ex-police officer involved in the traffic watch has listed the offences he observed. 'It is important that having gained permission to carry out commercial enterprise in our village, companies display appropriate standards of integrity and professionalism. Unfortunately, Angus Energy have failed to do this and we have recorded numerous breaches of both civil and criminal law. This is unacceptable in light of the type of operation they are entrusted to carry out and only serves to highlight the mistake in granting permission to them in the first place.' These offences were followed up with the police.

Parents have raised concerns about the size of the HGVs passing the school.

The considerable length and height of the lorries, is a great problem for such a small village. Traffic watch members pointed out that there are always numerous cars parked along this residential road, so that both large and small vehicles stand and idle - emitting toxic diesel fumes - as they wait to pass through. Worst still they have a tendency to idle in front of the school because of the bottle neck caused by parking further down the road. They take up the whole length of the school and the fumes go straight into the children's outdoor learning areas just 2.1m away from the road edge. Many of the watchers commented that the village and the site itself are clearly too small for an operation such as this.

This application should not be allowed because the industry is too large for the nature of the village roads.



Photo of a 6 axle vehicle obscuring the entire length of the school.

Residents never saw an emergency action plan and were concerned about the vehicles with hazardous chemical symbols leaving the site. Mr Vonk of Angus Energy told the CLG that once the lorries leave it would be out of their hands, any incident would be up to the haulage company to deal with. Councillors had to press to get any explanation of what might be

appropriate action should there be an accident near the school; Mr Vonk initially suggested to his colleagues they didn't need to answer that question.

In this application there is still no emergency action plan for school or village in evidence, despite us asking to see one.



The power cable on the left is actually touching the lorry (with trees caught as well).



3) WSCC assessments:

WSCC made considerable mistakes in their assessments of the traffic in the last application put in in 2019. They made mistakes in calculations of daily averages and in the average increase on the road this represented. They also got confused with one-way and two-way movements when calculating these increases. In this application, they don't even try to make traffic assessments. See this about last year's 2019 application put forward in our response last year:

*Looking at the response that has come in from WSCC highways, we are very concerned about its contents. For instance 65 vehicle movements over a week, equate to 9 or so average per day. BUT 9 per day (for 2 weeks) is an average daily increase of **19%** (because each movement will equate to 2 vehicles passing through the village (there and back) which is not stated in the documents. For the other week it will be 14 per day, which will equate to 28 vehicles on the road which is a **29% increase** in traffic flow on that road.*

Angus say there could be a maximum of 20 movements per day. In terms of effect on the road WSCC say this would equate to a 21% increase. However, it should actually be double this. They talk about the traffic count on that road and say 'Of the average 3122 vehicles, 96 daily movements are by HGVs'. But these are not movements in the way that the term 'movement' is used in the rest of the application, but a single vehicle passing through the village and recorded on the traffic count.

*Their assumption that it would lead to a 21% increase in the road is based on a miscalculation because they have divided the number of daily movements (20) by the number of the average traffic count on the road (96) (which they have **WRONGLY** called a movement) to get to their stat of 21% increase. In actual fact you need to divide 96 by 40 to get the proper stat on increase because a movement is double. And 20 HGV movements to and from the Angus site will equate to 40 HGV's passing our school. Therefore, the percentage increase in daily HGV flows (represented by the 20 movement daily maximum) should read **42% increase, 48% increase** etc.*

*Even when it settles to flow-testing proper when they say only 6 movements per day, we should still be looking at a **12.5% increase** in HGV traffic on that road. And 2 movements per day would be a **4.1% increase**.*

These mistakes in coming to these judgements have fed into their reasons to 'pass' it, which have then been given as a reason to blindly accept this application with no scrutiny Despite this being mentioned last year, there seems to have been no review of the past traffic decisions.

WSCC has not factored into their traffic calculations the guidance from Angus that any vehicles coming from the south will go up to the roundabout to u-turn before entering the site. Possibly causing that vehicle to come through again if they exit to the north. This could add on half as much again for many vehicles. Angus should specify the numbers that will do this so an accurate calculation can be made. In 2018, even some large HGV's vehicles came from the South

WSCC and Angus energy have not made clear the number of HGV's that will be 6 axle and therefore subject to thousand fold increase because the daily average for them is 0.... 25 of these passing your school in one day is no small amount.

'WSCC stated in 2019: *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.*'

But calculations on previous applications were wrong and calculations on the 2019 application were wrong, and don't make clear the whole picture by the way that HGV's are defined.

In 2020 WSCC simply state:

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. A transport note has been submitted with the application which details the trip generation, this would largely be the same as accepted and approved with regard to a previous application at the site ref WSCC/040/17/BA. Stephen Gee 2020.

They haven't even bothered to reassess the data.

These vehicle movements present a much bigger increase on the road than that which was previously given consent, because previous calculations were not accurate

This will have a very large impact on the school and traffic on that road, as it did last time.

We request that the mistakes be acknowledged, the calculations be re-made to reflect the true picture and the consultees made aware so that they can review their responses. More time must also be given to allow people to review the corrected traffic plans written by Angus and consultation response written correctly by WSCC Highways. This request was made with the last application, yet there appears to be no attempt to review the previous traffic assessments in detail. We are simply not being listened to.

Current Application

WSCC highways 2020 state:

'The estimated HGV movements are detailed within Table 1 of the Transport Note. The maximum daily HGV two-way movements per day are 16 during 3 weeks of the 86week timescale, during 62 weeks of the timescale HGV flows would be at or below 4 HGV two-way movements.'

WSCC over simplify the case here and focus on the low traffic period weeks.

Over 33 weeks (6 months-not solid) of their testing period we will be looking at an average daily increase of HGV's on the London Road of 12%. As previously discussed, for 4 weeks we will see a 20% average daily increase. We know from the past that the traffic often goes in spikes on various days. **In 23 different weeks in their application we can expect spikes on various days of 20 HGV's and above.** This is a very significant amount. All traffic numbers here are single vehicle on road either direction to be comparable to traffic count and WSCC specified ONE way movement.

Over 3 weeks of the period Angus's daily maximums would see an extra 32 HGV's on the London road. As WSCC state, a 33% increase. This is very significant when you consider that the majority of their traffic in these heavy phases are 6 axle HGV's on a kind of scale that is very rarely seen in rural villages. This well exceeds both the '20 HGV' and the 20%

increase figure which should trigger the need for a full Traffic Impact Assessment, yet WSCC don't mention that.

On the week we counted last time, on average 70% of their vehicles were 6 axle plus. The current average on the London Road for those kinds of vehicles is less than one, therefore the percentage increase over a thousand, so this development changes the nature of the road significantly. Angus energy at the CLG pointed out that the they thought the tankers they are talking about would fall into 'BIN 9' by FHWA vehicle classifications. The average for these 5 axle vehicles with draw bars is 1 per day on that road.

On one day in September 2018 there were 25, 6 axle vehicles which is an increase of over 200%....nothing gives us faith this won't happen again.

Therefore, this development changes the nature and composition of the road providing new point sources of air pollution. Particularly close to the school, where vehicles have a tendency to idle as they wait to get down the London road bottle neck, polluting the school inside and out. See PPG below.

4) Link To WSCC Joint Minerals Plan/NPPF

The Planning Practice Guidance is a material consideration in the determination of planning applications.

The PPG for Minerals sets out the Government's approach for mineral extraction in the decision making and planning application process.

Against Planning Practice Guidance 9.3.28

Planning PPG: Air Quality notes that when deciding whether air quality is relevant to a planning application, considerations could include whether the development would (in summary): significantly affect traffic (through congestion, volumes, speed, or traffic composition on local roads); introducing new point sources of air pollution; give rise to potentially unacceptable impact (such as dust) during construction; or affect biodiversity (paragraph 5).

In addition: This traffic will have an adverse impact on human health with regards to the school:

National planning policy framework: Feb 2019 Section 17 Paragraph 205

• *Ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality; and..*

Impacts to consider from traffic on human health:

Noise in classrooms is disruptive to teaching and learning and children and staff have reported being able to smell and hear the lorries in the school classrooms (not just outdoors). Lorries can be smelled going past even on the school field.

Given the proximity of our outdoors classroom, (2.1m) only a pavement's width away and the fact that it is below the level of the road. Our outdoor classrooms present a prime area for pollutants to sink and collect particularly on a windless day. Benzene related chemicals in the air from traffic (BTEX) known to be harmful, cancer causing. Particulate Matter (PM) in the air well documented as harmful, lodges in the lungs and blood increasing likely hood of lung cancer among others. Oxides of nitrogen (NOx) are heavier than air so will roll down into this area. Carbon monoxide is the same weight as air, so floats about (combines with haemoglobin in the blood stream and prevents oxygen being prevented to vital organs, effects are cumulative. High doses of carbon monoxide can kill in under 5 minutes.) So, the traffic past the school is a clear concern particularly for children whose systems are so much more vulnerable.

The significant increase in traffic going past the school will have an adverse impact on human health.

Effects of polyaromatic hydrocarbons/sulphur dioxide and VOC's from the flare will reach people to varying degrees depending on where they live in the village. The synergy of various pollutants involved in this operation, when combined with flights from Gatwick (low at the moment but normally high) will contribute to a general lowering of air quality more likely to effect vulnerable children and the unborn in their various stages of development. Again, where people live relative to the development the road and wind direction would determine whether, or to what extent they are affected by this. The development risks human health.

This development will introduce the road at lower stumple itself as a new **point source of pollution**. Many traffic watchers complained of feeling nauseous or headachy as a result of the diesel generators on site. This activity will inspire protest, those protesting or traffic watching will also be adversely affected by the pollution at the road site as will local horse riders. Night time flow testing also produced heavy oily/acrid/bitumen/kreosote-like smells. This smell was so strong that traffic watch members rolled up windows. If this flaring is to be longer term, people will be very concerned about the poisons in these smells drifting over towards us.

WSCC Joint Minerals Plan Policy M7a (Hydrocarbon development not involving hydraulic fracturing) states that proposals for exploration and appraisal for oil and gas, not involving hydraulic fracturing including extensions to existing sites will be permitted provided that:

- 1. With regard to development proposals deemed to be major, the site is located outside the South Downs National Park, High Weald AONB or Chichester Harbour AONB unless it has been demonstrated that there are exceptional circumstances and that it is in the public interest, and in accordance with Policy M13;*

- II. the site selected represents an acceptable environmental option in comparison to other deliverable alternative sites from which the target reservoir can be accessed, **taking into account impacts from on-site activities and off-site activities including HGV movements;**
- III. Any unacceptable impacts including (but not limited to) noise, dust, visual intrusion, transport, and lighting, on both the natural, historic and built environment and local community, **including air quality and the water environment, can be minimised, and/or mitigated, to an acceptable level;**

Traffic problems in the village made this very unpopular last time, air quality will be compromised. Work should be refused. The village simply cannot support this kind of industry.

Link to National Planning Policy Framework

National Planning Policy Framework Feb 2019

Section 17 Paragraph 205

Paragraph 205 states that when determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. In considering proposals for mineral extraction, minerals planning authorities should:

Again no benefit to locals and economy whatsoever – oil amount too insignificant.

- Ensure that there are no unacceptable adverse impacts on the natural and historic environment, **human health** or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality; and....'

There will be unacceptable and adverse impacts, particularly human health Particularly if you look at cumulative effect of site pollution and traffic as mentioned above. See also 'Effect on Children'



Flare stack (that burns off unwanted gases – and produces NOX) leaves.

Part (c) of Policy M13 sets out that proposals for major mineral development within protected landscapes will not be permitted unless there are exceptional circumstances and where it is in the public interest as informed by an assessment of:

- 1. the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

Traffic watched observed traffic, both HGV's and cars, driving into site and straight out of the village. No-one had the sense that or saw. anyone walking or driving up from the site to use our public amenities, this is a village where that would have been noticed, not least by traffic watch. There is no benefit to local economy either in Angus employees use of services or in local employment.

5) Effect on children and learning.

I have already outlined the considerable risk to children's health presented by this work. There are also plenty of children at the school who suffer from asthma.

Remember in the case of Ella Kissi-Debrah a report by Professor Stephen Holgate an expert on asthma and air pollution found there to be a "striking association" between Ella's emergency hospital admissions and recorded spikes in nitrogen dioxide (NO₂) and PM10s, the most noxious pollutants.

The fumes smell, they can come through the windows and get trapped in the classroom/outdoor area.

If this application is allowed to go through we will adversely be affected the health of our most sensitive inhabitants as well as effecting the quality of their educational experience.

Even on the playing field behind the hedge, diesel from lorries can be smelled. The field where children are often to be found doing cross country running practice.

When the effects of this traffic are combined with the emissions and toxic releases from the site, we will be looking at a significant reduction in air quality for our children.

Spillage Risk

We still have yet to see a comprehensive emergency action plan, and there is still great concern about vehicles passing the school.

Many of these movements will be of vehicles carrying hazardous loads: drilling fluids/ process water from the 'acid wash' and flammable crude oil during the EWT.

US regulators issued a safety alert in 2014 after a train carrying oil crashed and caught fire in North Dakota. The US Transportation Department said in the alert that the type of oil pumped from the shale formations of North Dakota may be more flammable and therefore more dangerous to ship than crude from other areas. Angus expects the oil at Lower Stumble to be 38-40 API (2 October 2018 statement), similar to the North Dakota shale oil and so also lighter and more flammable than typical crude oil. This is not the kind of thing we want to see passing our school on a daily basis. Should a vehicle roll or spill, the school is down hill from the road and will therefore take the full force of any spillage.

<https://www.cnbc.com/2014/01/02/bakken-oil-safety-warning-issued-by-federal-government.html>

One and a half years is not temporary in the lives of children and families.

It spans half a child will be considered to be an 'infant'. The children currently in year 1 will spend a year and a half years on the road side of the school with extra daily doses of toxic diesel fumes. It is likely Angus will follow this with a further production application, likely to be at least another year and a half. So in reality allowing this will be opening the gate for Angus to be here for much longer

Avoiding pick-up and drop-off

It is not adequate to say lorries can pass outside of school pick-up and drop-off times. This was set by Angus but not correctly adhered to last time. Some vehicles came through the village around 9 but waited up the road on a blind bend because they were too early to be allowed on site, (causing other issues with traffic safety). The children have school clubs most days so there will be a reasonable number also going home at 4.15-4.40 and a significant amount of fluid movement between 3.15 and 4.30. Therefore, no traffic should go through between 2.45 and 4.45 during afternoon pick-up times. However, Angus did not show willing to expand their 'no-pass' window.

But no traffic should pass during the school day anyway because the children will be in their outdoor classrooms and thus subject to toxic pollution. Also spillage risk.

Pollution death link

WSPCC should bear in mind that we have recently seen the first time that air pollution was recorded as the cause of a child's death. In the case of Ella Kissi-Debrah, human rights lawyer Jocelyn Cockburn stated "A wider inquest would look not just at what happened to Ella and the circumstances into her death, but what steps were taken and what lessons can be learned. To look at the wider implications for children's health'

"For me, this case gives an opportunity for those people in public office for protecting our health, to be asked questions and to be held to account and to come up with solutions so we can move towards cleaning up the air as quickly as possible."

WSPCC need to play their part in helping limit pollution on its roads and in its villages. There is **NO need** for this pollution to take place. NPPF Section 17 Para 209 has been **removed on climate change grounds**. Planning authorities are **not** obliged to: ***'recognise the benefits of on-shore oil...development.... for the security of energy supplies.'***

See photo below showing proximity of school to road.



Children and adults in this photo were aware that it was being taken to be presented to WSCC to try and prevent the presence of Angus in Balcombe. This is a typical scene at the end of the school day while children are being released and picked up. If more permissions are needed for this photo to be presented at the public hearing please let me know.



Lorries lining up, having dropped their loads - about to pass the school.

