
From: helen savage <[REDACTED]>
Sent: 26 February 2021 23:25
To: Richard Burrett <richard.burrett@westsussex.gov.uk>
Subject: Angus Energy at lower stumble Balcombe

Dear Councillor Burrett,

I am a teacher at Balcombe school and am writing to you about the Angus Energy Planning Application that will be heard by you on March 2nd 2021.

Not enough has changed from the last application which concluded that this was 'not in the public interest' and that the 'need for oil can be met elsewhere'. This is not a significant development enough for it to be allowed to happen in an AONB according to the joint minerals plan, as the amount of oil is so small. The amount of oil Angus expect the site to produce is just 0.005% of the amount of Wytch farm, so this is 'not a game changer' as Lord Lucan said at the CLG to us, because it is just not significant in supply volume. Angus stated in the same community liaison meeting this October 2019 that the production at Balcombe would be comparable with Lidsey and Brockham: Brockham produces only 0.00064997 mb/d, which is a tiny amount compared to the UK's main onshore site at Wytch farm that pumps out 13.748 md/d. As Angus energy stated at the CLG this is a 'cottage industry'. Will make little money for the area and it is simply not worth the risks of industrializing this area for.

According to planning 'great weight' should be afforded to protecting an AONB. It is certainly not in the public interest in democratic terms, as has been demonstrated by the very large numbers of objections and the petition of over 6500 which was submitted. We hope you will redress this balance.

The National Planning Policy Framework directs authorities to place 'great weight' on preserving the scenic beauty of 'Areas of Outstanding Natural Beauty' and to 'Ensure there are no unacceptable adverse impacts on...human health' (*NPPF Section 17 para 205*).

Tapajos independent hydrology report (2019) found Angus Energy's 'understanding of the

ground water systems' they are working in 'wholly inadequate' and found that there was an increased risk to groundwater systems because the well was not sound in all sections. Given the proximity of the site to the Ardingly Reservoir to which, as we were informed by the EA, it is hydraulically linked - this seems to be an unacceptable level of risk. When you also consider the significant rise in traffic levels and flaring so close to residents I can't see that the impacts are 'acceptable'. There are two houses and several businesses only 350m away, downwind, and when I went to the site during the flaring in 2018 (because the noise was keeping me awake) the acrid smell in the air was very strong – it's simply not acceptable that people should have to live with that so close, when the risks of living near flares are well documented and the planner admits 'adverse health risks'.

At the school our 'outdoor classroom' areas are only a pavement's width from the road and below it. So, when traffic passes the children playing out the front get the full force of the exhaust gases. The noise and smell from passing vehicles often intrudes on lessons in our two narrow outdoor classrooms, even when the classes are inside. So, when traffic passes the children playing out the front get the full force of the exhaust; dangerous oxides of Nitrogen (NOx) are heavier than air so will roll down into this area and be trapped by the school building, particularly on a windless day. There are also high levels of particulate matter (PM), carbon monoxide and benzene which is a well-known cancer causer. The teachers who work in those two outdoor classrooms have told me the noise and smell from passing vehicles often intrudes on their lessons making concentration hard. – When I am on the field, shielded by the hedge from the road, the sound and smell of HGV's drifts right across a large playing area for the children. Even when trying to talk on the phone in the outdoor areas to a parent during lock down, I have had to give up because of the traffic noise. You can imagine the difficulties of adults teaching in this outside area. This is how close the traffic is to us and how it affects us on a daily basis already, so to see the large increase in vehicle size and frequency for such a long period is soul destroying.

From the beginning, traffic assessments made by the Highways Agency have been disingenuous. Original traffic statistics were compared with the much busier statistics from the road north of the village, making it appear that the increase in traffic represented by the oil companies was less significant. The Highways Agency have never conducted a full Traffic Assessment, because they have judged that the increase in traffic is not 'significant'. Yet they have often confused the term 'movement' (a movement indicates a 2 way journey, thus a large vehicle on the road twice) in a way that favours the applicant by making the increase appear half as much as it really would be. These mistakes were highlighted in a previous application yet have never been rectified, and have been allowed to influence the decision to let the next application go through. *'Thresholds for requiring a Transport Assessment 2.1 The Guidance on Transport Assessment (DfT/DCLG 03/2007)* . • *Significant HGV movements per day" is defined as 20 or more one-way HGV movements per day'* yet we find that the HGV traffic increase on that road represented by Angus will exceed the daily norm by more than 20 across 23 different weeks. We are talking about over 3100 additional HGV's over Angus's next phase in Balcombe. On one day in 2018, 32 lorries passed, of which 25 were 6 axle plus, on 3 separate weeks in this application we can expect these kind of very high spikes.

The critical point that the traffic statistics don't take into account is the sheer size of the HGVs that Angus Energy are using. We have had the misfortune to see them come into our village on 2 separate operations now and the size of them defies belief. These lorries are often 6 axle or more and literally are the length of the whole front of our school (comprising 2 classrooms, a lobby, corridor and reception area). These vehicles are often extremely tall, taking in tree branches with them as they go down our narrow, parked up rural London road. Worse, they idle outside the school as they wait to go down. One lorry driver even had to climb on the roof of his vehicle to safely move the low-slung power cables that weave across the residential road, over the top of it.

We are looking at 4 weeks with 20% or over average daily increase of HGV's on that road.

Bear in mind that the daily average for 6 axle vehicles (commonly used by Angus) on that road is 0 so this substantially changes the 'composition of the road', 'creating new point sources of pollution', (Planning practice guidance air quality notes: 9.3.28). When you factor in the risks from flaring blowing into the village on the prevailing wind you can see how the air quality for the children is gradually down-grading.

This industry is far too big and disruptive for a small village. A lady wrote to me only today worried that the Victorian houses built into the slope along the residential route to the well site will not withstand all the additional traffic.

Enough traffic passes the children daily at close quarters to present a risk to their health without inviting more, and of such magnitude. Once a child has inhaled the huge amounts of PM generated by a 6 axle lorry waiting to pass the school, that PM will reside in their lungs indefinitely. Fine PM does not leave, but becomes lodged into the lungs and distributed into the blood stream potentially causing both serious heart and lung problems and contributing to stroke and alzheimers later in life. As medical experts agree, there is no 'safe-level' of PM.

At previous planning meetings the company has tried to convince councillors that sending traffic through avoiding pick up and set down times of children will make it acceptable. On the contrary, Angus have never satisfactorily managed this because they don't take into account the hour and 20 minutes or so after school which is affected by children coming and going to clubs. Even if they work round these times, the lorries are still going through during the middle of the day, when the children are likely to be playing outside the front of the school in their aforementioned 'outside classrooms'.

There is a human side here about what politicians and planners choose to expose our children and communities to. If the statements WSCC and the government make around sustainability and climate change are to be more than just empty rhetoric, this application must be refused. The tiny benefits of a small oil company trying to increase its share price are by far outstripped by the negative impact on the lives of both the people in the village and the risks that go with it for environment and climate. As the lawyer working on the case of the tragic death of Ella Kissi Debrah due to pollution stated:

"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."

I hope you will stand for this principle.

Yours Faithfully,

Helen Savage

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