

**WEST SUSSEX COUNTY COUNCIL
STRATEGIC PLANNING CONSULTATION**

DATE: 2nd July 2014

**FROM: Dominic Smith TO: County Planning
FAO: Jane Moseley**

SUBJECT: WSCC/083/13/KD

The installation of a well and associated infrastructure, including access road and soil bunds, for the drilling of a vertical borehole and contingent horizontal borehole from the same well for the exploration, testing and evaluation of hydrocarbons for a temporary period of three years.

Land south of Boxal Bridge, Northup Field, Kirdford Road, Wisborough Green, West Sussex, RH14 0DD

RECOMMENDATION:

Advice	<input type="checkbox"/>	Modification	<input type="checkbox"/>	More Information	<input type="checkbox"/>
Objection	<input checked="" type="checkbox"/>	No Objection	<input type="checkbox"/>	Refusal	<input type="checkbox"/>

The Local Highway Authority (LHA) has been consulted on the proposed installation of an exploratory well and associated infrastructure as a result of additional information that has been submitted to address matters in the initial consultation response of the LHA on the 21st November 2013.

An objection is raised on the following grounds;

- It has not been satisfactorily demonstrated that safe and suitable access to the site can be achieved, contrary to paragraph 32 of the National Planning Policy Framework (NPPF) and objective 4 of the WSCC Local Transport Plan 2011-2026 (LTP3). The Application has failed to:
 - Provide suitable visibility at the site access and its junction with Kirdford Road to satisfy the stopping sight distances of the recorded 85th percentile speed;
 - Submit an accurate assessment of the likely traffic impacts of the proposed development and establish an accurate and realistic baseline position;
 - Demonstrate that approach roads are suitable to accommodate the additional traffic generated by the development and, in particular, large vehicles at the junctions of the A272/Durbans Road, Durbans Road/Kirdford Road and along Kirdford Road given width constraints and two-way vehicular flow; and
 - Demonstrate that large vehicles are able to execute a right hand turn out of the site access and its junction with Kirdford Road.

Site Access

Speed surveys undertaken on the approach to the access indicate a recorded 85th percentile speed of 41.3mph eastbound and 40.2 mph westbound. Given the recorded speeds the application of Design Manual for Roads and Bridges (DMRB) standards would be appropriate. Visibility splays extending 136m to the west and 150m to the east have been identified and shown on drawing number '3582 P 18 Rev E'. The splays are shown drawn to the far side verge line. As a result, the visibility splay would preclude any vehicles travelling along the near side verge line or centre of the road. To the west this would include any vehicles that may be overtaking slower

moving users such as horse riders, cyclists, pedestrians or agricultural vehicles all of which have been observed using Kirdford Road. To the east this would include any vehicles travelling in the main westbound vehicular flow.

Given the recorded speed, the DMRB identifies in 'Figure 1' of 'Part 1 TD9/93' that the appropriate design speed for a recorded speed of 64kph is 70A. This equates to a visibility splay of 120m in order to provide sufficient stopping sight distance. To both the east and west of the access it appears that visibility splays in the region of 90-100m can be achieved, 20-25% less than the required splay, when measured to the nearside verge line of the carriageway.

Vehicle tracking of the access that accompanied the initial submission demonstrated that the point of access can only accommodate one-way vehicular flow when in use by a large vehicle. A passing place has been proposed on the approach road but intervisibility between vehicles approaching the site and the passing place is limited, restricted by the presence of vegetation along the site frontage. While it may be possible to control movements associated with the operation of the site through a Traffic Management Plan, the LHA understand that the access will continue to serve third party movements associated with the existing agricultural use and it is unclear whether the applicant would have any control over such movement. As a result, and even with the implementation of the TMP, the inability of the access to cater for two-way movement may result in congestion at the point of access and the introduction of an obstruction hazard on the highway.

The vehicle tracking does not demonstrate the right hand turn from the site access junction onto Kirdford Road and whether this can be executed within the confines of the highway or land in control of the Applicant.

Traffic Assessment

The LHA sought clarification regarding the justification behind setting the heavy vehicle threshold at 1.5t, whereas the Design Manual for Roads and Bridges identifies large vehicles to be in excess of 3.5t (p.1.19 of TD50/04). While revised traffic assessment figures have been submitted in light of the earlier response from the LHA the 1.5t threshold has been retained without sufficient justification. It is not possible to accurately assess the figures against counts undertaken on the surrounding network that use standard class definitions, or against WSCC count data that use detailed class definitions. By way of comparison, a 4x4 vehicle such as an Audi A7, Volkswagen Touareg or Range Rover weighs approximately 2.5t and would be classed as a heavy vehicle using the Applicants vehicle categorisation.

There is a significant disparity between the heavy vehicles (HV) set out in the baseline traffic flows (table 10.3) for Kirdford Road and the data recorded through the Axiom count submitted as part of the revised submission. Table 10.3 indicates that there is 183 movements in a 24 hour period, whereas the count data indicates that the daily average is 38 heavy goods vehicle movements (HGV). Basing the percentage increase in HV movements as a result of the development on these figures indicates a 23 week period during construction of access road and well site, main rig mobilisation, main rig demobilisation, lateral workover rig mobilisation, lateral workover rig demobilisation, workover rig mobilisation, restoration and workover rig demobilisation where the increase in HVs will be between 50-64% of the baseline level, rather than the 11 – 13% increase set out in Tables 10.3 to 10.5. No count data has been submitted to undertake a similar assessment of the impact on the A272.

The LHA do not consider the traffic assessment associated with the proposed development to be a realistic or accurate representation of the existing or anticipated impact of the proposed development. An accurate assessment is required to fully assess the impact of additional HGV movements and any mitigation required to facilitate their presence on the network, as well as informing other material planning considerations.

Access Route

Given safety concerns and the travel distances identified through the Applicants feasibility study for route 2 (Skiff Lane/B2133) and route 3 (Kirdford Road west – A283), route 1 was identified by the LHA as the preferred route for further analysis and additional information was requested by the LHA to determine the suitability of the route to accommodate the additional traffic, in particular the large vehicle movements, associated with the proposed exploratory well site.

The Applicant has undertaken a swept path assessment from the junction of Durbans Road and the A272. While a left turn from the A272 onto Durbans Road has been assessed the left turn from Durbans Road onto the A272 has not been demonstrated. It is unclear whether the Applicant intends to restrict all vehicular movements towards Petworth and whether this would form part of an extended routing agreement. In order to execute a left turn into Durbans Road the large vehicle is required to manoeuvre into the opposing lane of the carriageway and use the entire width of the junction in order to enter Durbans Road. In the event that there is an oncoming vehicle travelling along the A272, or a vehicle waiting to emerge from Durbans Road, the large vehicle would not be able to undertake the turn and would present an obstruction hazard. Alternatively, any oncoming vehicle who may not be expecting a vehicle to enter the opposing carriageway would be at an increased risk of vehicular conflict exacerbated by the alignment of the A272 on the westbound approach limiting forward visibility to the junction. Table 10.3 of the assessment indicates that the A272 carries approximately 7000 vehicles per day and a peak hour flow of approximately 600 vehicles. On average, this equates to 1 movement every 6 seconds.

A similar manoeuvre is required to execute a turn from Durbans Road into Kirdford Road. A large vehicle would enter the opposing lane of the carriageway and require the full width of the junction in order to complete the manoeuvre. This would present a similar hazard through obstruction or opposing flow conflict as identified at the Durbans Road/A272 junction.

The vehicle tracking assessment does not extend from Wisborough Green to the site access. The Applicant has failed to demonstrate whether the remainder of Kirdford Road is suitable to accommodate the traffic generated by the proposed development, with the exception of Boxal Bridge where mitigation has been proposed. A Road Safety Assessment has been undertaken but limited supporting information was available to the Auditors. No vehicle tracking or detailed baseline vehicular data was submitted for consideration alongside the audit.

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