



Wisborough Green Parish
Council

21/11/2013 17:15

To 'Jane Moseley' [REDACTED]

cc [REDACTED]

bcc [REDACTED]

Subject Planning Application: WSCC/083/13/KD - Celtique Energie

Please find attached the response to Planning Application: WSCC/083/13/KD - Celtique Energie
From Wisborough Green Parish Council.

Yours sincerely

Louise Davies
Clerk, Wisborough Green Parish Council
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WGPC Oil response 21 11 13 confirmed (2).pdf

Wisborough Green Parish Council

Clerk: Mrs Louise Davies

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Ms Jane Moseley
Chief Planning Officer
West Sussex County Council
County Hall
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CHICHESTER
West Sussex
PO19 1RQ

21st November 2013

Dear Ms Moseley

Planning Application No: WSCC/083/13/KD

Proposal: 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.

Location: Land south of Boxal Bridge, Northup Field, Wisborough Green, West Sussex, RH14 0DD.

Applicant: Celtique Energie Weald Ltd

Wisborough Green Parish Council (WGPC) **OBJECTS** to this proposal. It considers the site location to be wholly inappropriate due to the impact it would have on many aspects of the local community and rural environment.

The WGPC decision was unanimous and reflects the clear overall views of the local community. WGPC held two public meetings, each packing the village hall, where residents could state their views, enabling us to gain a clear understanding of local feeling and opinion.

Whilst the Parish Council acknowledges that the numbers of representations received is not, in itself, a determining factor, it is of note that **over seven hundred** public objections have already been received by WSCC. The Parish Council has been impressed by the quality of and the factual content included in these public responses. The Parish Council considers that our residents have been restrained and objective in their responses to the application, but please be aware of the very strong level of concern felt within this community.

Please also note that WGPC has for the last two years been progressing the development of a Neighbourhood Plan which has involved consulting widely with our community on a range of matters related to this application.

- The key issue that our residents see as detrimental to their quality of life and sense of wellbeing is the impact of traffic on the village; congestion, safety, parking, speeding and noise.
- Conversely the key quality that local people value about living in Wisborough Green is its 'traditional village setting'.

Both these aspects relate directly to the application and, in our view, strengthen the need for this objection.

In summary:

- The additional HGV/OGV2 (largest size of HGV) traffic intends using unsuitable roads through our community and will have an unacceptable impact for local residents and road user safety.
- Noise impacts will affect quality of life for residents.
- Wildlife will be disturbed, as well as nearby farm and equine animals. This will particularly affect internationally important protected rare bat species.
- The proposed activity brings a high level of risk across a spectrum of aspects. The management of those risks and responsibilities for monitoring and potential remediation are not satisfactorily addressed in either the planning application itself or the Environmental Statement (ES). The WGPC supports the comments made by Kirdford Parish Council in relation to the inadequacies and shortcomings of the submitted ES.
- There is insufficient evidence to support the site selection process.

The Parish Council will explain its objection under these headings:

1. Transport
2. Environment
3. Community Life
4. Site Selection Process

1. TRANSPORT

In developing its Neighbourhood Plan the WPGC consulted with residents and a key message from the November 2011 Survey Report identified:

"Living in Wisborough Green.

You feel the best things about our village are the traditional village setting, the Green and other open spaces and low levels of crime. The things to improve are traffic issues such as speeding, and parking, public transport and the availability of affordable housing."

In consultation events on housing locations, the speed of traffic and pedestrian safety were key concerns. The issues are very pertinent to Kirdford Road which has no pavement, leaving pedestrians exposed and in very close proximity to vehicles. Our emerging Neighbourhood Plan would seek to improve these issues not exacerbate the problems, which the application will do.

Chichester DC also consulted WG residents in their 2011 Ward Profile and it found that traffic congestion was a top factor impacting enjoyment of the local environment. This concern is a consistent theme which has been raised prior to this submission; it is not a recent 'invention' as a reason for our opposition to this proposal.

The consultations have provided **evidence** supporting WGPC in its response to this application.

The application identifies three potential routes for lorries to reach major roads. These are:-

- Through Kirdford village
- Through Wisborough Green village
- Skiff Lane to B2133

WGPC conclude that none of the potential routes considered are suitable and the site location is therefore not appropriate or acceptable.

- All use miles of minor roads before reaching the A/B road network
- Two routes through the village residential areas would introduce issues for local congestion, public safety and quality of life.
- The proposed traffic will inevitably result in major damage to these roads which were not designed for any volume of HGV traffic.
- WSCC Minerals Policy directs HGV traffic towards the main lorry routes, the logical solution being to have direct access to A/B roads suitable for such traffic. This option either has not been considered or is unlikely to be practicable, which leads to the logical conclusion that the proposed site is simply the wrong location for the proposed activity.

The application documentation appears to underplay the significant increase in the numbers of large and heavy goods lorries that will be involved in the site construction, operation, and teardown/remediation phases. Figures quoted appear to spread the numbers over a 24 hour period which is inconsistent with the proposed operating plans for the site.

Given that the impact of additional traffic would be a primary effect to the village and community safety, WGPC along with Kirdford Parish Council have facilitated an investigation of Skiff Lane as an alternative to the applicant's proposal to route lorries through Wisborough Green village.

The Skiff Lane route has potential issues at the junctions at both ends, which could be improved with minor road works funded by the applicant. Both these junctions have a greater potential for visibility than the junction of Kirdford Road and Durbans Road in the centre of Wisborough Green village.

WGPC is not satisfied that alternative routes have been properly considered.

Evidence of damaged roads in Foxbridge Lane (in a neighbouring village) is a clear example of what will happen if unsuitable roads are used by very heavy goods vehicles. Photographs attached (Appendix A) clearly show damage occurring over a few weeks, rendering roads unsafe. The application does not address monitoring of road conditions and the likely remediation required.

1.1 Relevant Policies: WSCC Transport Plan

The WSCC Transport Plan makes a promise to all customers that WSCC will work in partnership with them in order to make the most of where they live and work, and promises to stand up for them and represent their interests. If WSCC were to permit the proposed application then the decision would not be representing resident interests and would contravene the policy of the WSCC Transport Plan.

In the WSCC Transport Plan there are four main objectives.

- Reduce congestion and pollution
- Improve accessibility for our residents to key services
- Improve road and personal safety
- Improve overall quality of life in West Sussex

WGPC believes this application is clearly in direct contravention of all these objectives.

1.1.1 WSCC Transport Plan: Reduce congestion and pollution

Congestion around the Village Green

At peak times there are already problems associated with congestion on the roads through the centre of the village causing delay and potential road safety issues. The proposed lorry route passes down two sides of the village green, along these congested routes; both roads are used for on-road parking. The Kirdford Road side is particularly narrow and the proposed lorry traffic will significantly increase congestion and exacerbate the parking problem. The applicant proposes to stop any parking on the Kirdford Road which is in direct contravention to Improving “accessibility for our residents” – see section below 1.1.2.

There is a wealth of evidence, from our Neighbourhood Plan consultations as well as past WGPC meeting records, to demonstrate the lack of parking within Wisborough Green village centre, and that the spaces available around the village green make an important contribution. It would not be acceptable to the village for the application’s activities to restrict the availability of parking in any way.

Congestion caused by deliveries to site

Access to the proposed site is via a narrow country lane and the ancient Boxal Bridge that is an even narrower point on the road. WGPC is concerned that there will be additional congestion on this important local route for Kirdford residents to reach key services.

WGPC points out the simple facts that if the bridge is not suitable for HGV traffic in the development stage of this proposal both width wise, structurally or safety wise this application should be rejected and we suggest no action can take place on this application until the feasibility of using this Ancient structure has been ascertained.

Congestion travelling to Strategic Lorry Routes

The applicant’s agent Royal Haskoning have advised us that that, as yet, they have little or no idea of which way the contractors will be coming from or indeed going to once they have gained access to the A272 Local Lorry Route in Wisborough Green. Given they could be going onto any of the main Strategic Lorry Routes, the A3, A27, A24 or the M23 we do not believe this proposal has given sufficient thought or detail to any resulting congestion at key

local points of contact in Wisborough Green or the surrounding area nor to the full environmental and/or ecological footprint for the entire scheme.

1.1.2 WSCC Transport Plan: Improve accessibility for our residents to key services

WGPC is concerned that the proposed significant increase in HGV traffic will effectively render Kirdford Road unusable for pedestrians. The road is narrow and has no pavement. When two lorries are passing each other, it may be genuinely unsafe. Pedestrians may be denied safe passage to the village centre and its amenities. This flies the face of stated intentions to improve sustainability in the rural areas.

WGPC have long been concerned about the limited parking available in the village centre. We rely on the spaces around the green as a major part of this provision. The applicant has written to local residents stating its intention to restrict parking around the village green. Such a proposal would significantly reduce accessibility to key facilities for some of our residents, and will, therefore, be contrary to existing WSCC policy.

The application would present significant threats and damage to the local rural transport links. It has failed to take local pedestrians, cyclists and horse riders into account. The numbers cited do not present the dimensions and weights of the HGVs nor OGV2s (heaviest/largest type of HGV) which will be required.

Our village suffers, as many do, with limited access to key services and those that are in place are heavily subscribed to; it is a delicate balance that will be disrupted by both the development and the day to day running of the proposed site if permitted.

The danger to local school transport of all kinds, bus routes and the disruption to current local businesses should not be underestimated by decision takers. It is of note that over a third of the village school children have to cross the path of the proposed lorry route and that the children's playground is situated behind the Cricket pavilion on the Green and to one side of Kirdford Road.

1.1.3 WSCC Transport Plan: Improve road and personal safety

WGPC does not believe that sufficient notice has been taken of residents' feelings on the choice of the proposed route that takes site traffic through the heart of our village and little direct consultation or advice has been taken note of in contact with us in this choice.

The community has been worried by the road safety implications at the junction of Durbans Road and Kirdford Road. In recent years there have been a significant number of accidents, the worst of which resulted in the death of one young person and serious injuries to three others. WGPC has been looking at ways of looking at the safety issues at this junction, including the installation of a mini roundabout. This application would, in our opinion, increase the road safety risk and delay efforts to reduce the danger.

Within the 40mph buffer zone along Kirdford Road there are many houses, but no pavement into the village. WGPC has evidence gained from Neighbourhood Plan consultations that traffic speed management and pedestrian safety have featured amongst the highest concerns of residents living along the route. We are aware that a number of young families that use this route to get to school and are very concerned about their personal safety on an already busy route without a footpath.

Published accident data clearly shows that the section of road immediately adjacent to the proposed site has had a number of slight and serious collisions since 2005. This is significant as there appears to be a cluster in comparison to the remainder of Kirdford Road. This would indicate that this location may have the possibility of being problematic in road safety terms especially for any increase of turning movements coming out of the proposed entrance. This is onto a road that has reduced visibility, even with an actual typical speed currently of approximately 40 mph.

This road and the bridge itself are not designed for use by such vehicles, particularly ones of up to fifty tonnes and major structural damage to the road surface and the bridge are a major risk that has not been considered by the applicant. Intensified road use at this point, particularly by large vehicles, will pose a serious and significant hazard to other road users, cyclists, horse-riders and pedestrians.

The application provides **no** evidence to manage or mitigate the safety of pedestrian traffic.

In WGPC's opinion it is highly likely that the development will result in a material change in the character of the traffic safety in the vicinity of the site, as well as within the village, and this is a material transport consideration in the determination of the planning application.

WGPC has a genuine concern that the proposed application will increase the risk of road and personal safety, and hence is contrary to WSCC Transport Plan policy.

1.1.4 WSCC Transport Plan: Improve overall quality of life in West Sussex

WGPC considers that several transport related impacts will have a detrimental effect on the quality of life in Wisborough Green. This would be at variance to WSCC policy. The Council will explain its views in Section 3.

1.1.5 Management of Transport Risks

The proposed application will involve a large increase in very heavy lorries using minor country roads not designed for such a load. It is inevitable that serious damage will likely occur to the road surface, making it unstable and unsafe for some users – such as pedestrians and cyclists. Who will manage the issue and who will be responsible for repairs? This should not be an imposition on the local tax payers.

Given the high increase of HGV and site traffic proposed it is our opinion that due to the concerns stated above regarding road safety, a Road Safety Audit (RSA) is warranted. Any actions or recommendations should be carried out and meet the approval of the Highways Authority before this application is determined..

1.2 Relevant Policies: WSCC Structure Plan

Policy DEV3 of the WSCC Structure Plan addresses the responsibility of developments to provide for infrastructure:

“(a) New development should not be permitted unless the on-site and off-site infrastructure needs it creates (including facilities and services) are met, and it does not impose costs on the existing residents or businesses of West Sussex.”

WGPC is concerned that the proposed heavy goods traffic will damage roads, leaving an imposed cost of repair on the local ratepayers.

1.3 Relevant Policies: CDC Policies

Chichester DC Draft Local Plan Key Policies 8.2 reaffirms the WSCC Transport Plan: *“ensure that all new development supports and contributes to the following:..... increasing improving safety for all road users; discouraging HGVs from using unsuitable roads;”*

A recent planning application for static caravans in Kirdford Road was refused by Chichester DC being:

“considered detrimental to highway safety. Issues of highway safety are also exacerbated by the lack of a public footpath to serve the additional pedestrian movement from the site. As such the development is considered contrary to policy TR6 of the Chichester District Local Plan First Review 1999.”

The impact to highway safety of a caravan site would clearly be exceeded by the impact of the significant HGV and other traffic for the proposed application.

1.4 Transport Conclusions

It is quite clear to WGPC that the transport needs of the proposed development:

- Would impose an unnecessary risk to the safety and the quality of life of Wisborough Greed residents.
- Would damage the road surface at potential cost to local tax payers.
- Would be contrary to core policies of both WSCC and Chichester DC.
- Would conflict with the emerging Wisborough Green’s Neighbourhood Plan.
- Has not adequately considered alternatives.
- Would be damaging to life in the village and to the quintessential nature of rural life and
- Is, therefore, proposed in an unsuitable and unacceptable location.

2. ENVIRONMENTAL

2.1 Noise

WGPC is concerned that the application underplays the potential impact of noise and the harmful impact that this could have on the amenity of our residents.

The application details an expectation of noise impact from the drilling operation itself; this will certainly affect a significant portion of the village, particularly to the North and Western side and residents along Kirdford Road. Noise will potentially impact Kirdford residents as well. The prevailing wind is from the southwest and the village lies directly west of the proposed site so noise **will be** an issue. The residents at the Balcombe site were assured by Cuadrilla that the noise would not be excessive and had to appeal to WSCC which then increased the permitted noise levels.

The proposed activity is in a naturally very quiet area, so the noise increase will be prominent. Noise travels far against this background; residents in WG can hear the bells rung at Kirdford Church at a distance which is double that to the application site.

The application does not address noise from the accompanying construction and supplies traffic.

It is noted that at Balcombe the noise impact of a drilling site was higher than claimed, and remedial action was required. This increases our concern that residents and local businesses will be adversely affected – in addition to agricultural animals there are several equine businesses within the north and western sides of the village. Residents' businesses are potentially at stake here and they make up a significant sector of local employment. The proposed activity will impact on the availability of employment and not just on hobbies.

The proposed application fails to identify how noise will be managed, independently monitored, and how it will be controlled if excessive.

2.2 Lighting

WGPC is concerned that lighting is likely to be a significant impact to wildlife, particularly the internationally important rare bat species which are known to use the vicinity of the site and for which this is one of the few sites in the UK. The danger of the proposed activity is that it will present a barrier to wildlife and interfere with these rare populations.

The site is recognised as a dark sky area, quite rare in highly populated southern England. The CPRE also record the area as one of the most tranquil in southern England.

Whilst the lower level lighting may be of limited impact, the tower and its lighting will be visible from several locations of the village as well as from the public highway (even on the A272).

It should be noted that in 2007 an application to install 4 floodlights to a sand school just 1000m south of the proposed oil site was refused by Chichester DC:

“The proposed floodlighting, when in operation, would cause serious light pollution which would adversely affect the visual amenity and remote and tranquil nature of the surrounding rural area. The development would therefore conflict with policies LOC2, CH1, DEV1 of the West Sussex Structure Plan 2001-2016 and policies RE1, RE5, BE11, R6 of the Chichester District Local Plan 1999 First Review.”

2.3 Water

WGPC is concerned that the proposed activity introduces many risks relating to both surface and underground water. The application claims that few wells exist locally but we believe that there are many more that may not have been recorded. Many parts of the locality relied on wells until relatively late in the past century. This level of uncertainty increases risk, and should be thoroughly researched and evidenced before the application is determined.

2.4 Management of Environmental Risks

WGPC is concerned that there is no evidence of how environmental impacts are to be monitored and resolved if they arise.

The WSCC Minerals Plan (4.55) states

“Given the importance of reclamation however, applicants should demonstrate that they are financially and technically capable to undertake the proposed restoration and aftercare”

The application does not provide any reassurance on such responsibilities and how they will be resourced. The issue of long term liability was a significant concern raised at our public meetings. The applicant has limited assets and has not provided evidence to give reassurance to cover the potential long term risks.

3. COMMUNITY LIFE

The Localism Act sets out a legislative framework for achieving the goals of involving people in planning.

“Government thinks that local communities should have a genuine opportunity to influence the future of the places where they live.”

This development is bound to have a serious negative economic and social effect not only to key services which need to be reached by transport through Wisborough Green but within the local individual business community itself.

Our community have demonstrated that they are against this application because of its likely negative impact on community life. This is not a ‘NIMBY’ response but part of an ongoing discussion in the community as to how our village should develop in a manner consistent with sustainable development. We do not believe that the application is consistent with sustainable development as expressed in the Localism Act and as articulated by our residents.

3.1 Impact on Community Life - Activity on the Village Green

WGPC believe that it is inappropriate to route the significant HGV traffic around the Village Green and to do so would have a significant impact to community life.

Wisborough Green enjoys the relatively rare asset of a village green located in the heart of the village. Almost all residents will travel past the village on a daily basis. The Green is used all year round for recreation of many kinds. Several sports are practiced according to season, and matches are played on most weekends and on some weekdays. In summer months a regular sight is of well over a hundred children using the Green, and with cars parked all around along Kirdford Road and Durbans Road. The Green is regularly used for organised events, such Village Fetes, Balloon Festivals etc all of which are a vital part of community life. The Green and the parking areas around it are also regularly used by tourists. (See attached photograph – Appendix B).

Kirdford Road runs directly past the Village Green and playground, where there are significant numbers of children playing throughout the day. Even during school hours this area is much used by parents with young children and toddlers, so any proposed restrictions on large vehicle traffic movements during school start/finish times would still mean that many other children would remain exposed to the dangers. Whilst the apparatus playground itself is fenced, the area directly adjacent is very regularly in use by children playing ball games and cycling, this area is completely exposed to the road and passing traffic.

The applicant has written to local residents stating an intention to restrict parking around the Village Green. WGPC will not accept such a proposal as it would reduce our already limited parking resources and have a detrimental effect on residents’ ability to enjoy recreation on their own Village Green and thus adversely impact on village life.

The significant increase in large and heavy lorries through the village centre poses a significant threat to the way the Green is used and its role at the centre of village life.

3.2 Impact on Community Life - Potential Employment

The application intimates that a potential benefit would be an increase in local employment. We note that there is no evidence for this inference and we are not aware of any significant local employment that has arisen from other oil/gas well sites in the region, whether exploratory or production.

3.3 Management of Risks to Community Life

We have observed, with considerable disquiet, the public reaction action that has accompanied the drilling of an exploration well at Balcombe in West Sussex. We are concerned that a repeat of such a situation in respect to the proposed site would have a profound negative impact on our community and that of our neighbours at Kirdford. We believe that there would be considerable disruption to both the economic and cultural life of the village with potential damage to property and people. Although the Council has participated in contingency planning meetings with the relevant authorities it is still not satisfied that a significant and sustained protest will not take place and question why our community should be put at risk in such a way.

4. SITE SELECTION

4.1 Site Selection and Assessment of Alternative Sites

The application provides no specific evidence to support why a small part of the Kirdford and WG Parish areas were selected for exploration within the applicant's License area PEDL234 located in the Central Weald Basin. This point is covered in detail by Kirdford Parish Council in its representations to the Environmental Statement. We do not, therefore, think it necessary to repeat the points already well made but wish to explicitly state that we support the comments already made.

The application clearly indicates that drilling technology exists to drill in all directions; and clearly has used distance from individual dwellings as well as distance by road to nearest 'A' road as criteria.

The Parish Council considers that alternative sites have not properly been considered and hence objects to the application and its conclusions on site location. It is clear from other drilling applications already approved in the region that it is possible to find locations that are well away from communities and have direct access to A/B roads suitable for the heavy goods traffic.

CONCLUSIONS

Wisborough Green Parish Council **OBJECTS** to this application on the strong evidence that the location is unsuitable, inappropriate and unacceptable.

- Our key to our objection is the impact of a significant increase in traffic, particularly HGV on the roads through our community. We believe that community safety will be compromised.

- The proposed location does not have direct access to the appropriate calibre road network and intends using unsuitable rural roads not designed or safe to carry the proposed traffic.
- The proposals are not in line with established WSCC and Chichester DC policies, as well as the emerging Kirdford and WG Neighbourhood Plans.
- The proposed development will impact on safety, noise and lighting levels, and will cause considerable disruption to the local community.
- Alternative locations and transport solutions have not been properly considered.

Yours sincerely



L Davies (Mrs)
Clerk to the Council

Appendix A:

Photographs of Foxbridge Lane damage by excessive HGV traffic

July 2013



September 2013



Appendix B:

Photograph of Kirdford Road during activities on the Green

