

Weald Action Group

Objection to the Traffic and Transport Management Plan submitted on behalf of Horse Hill Developments Ltd to comply with Condition 8 of the planning permission for oil production at Horse Hill Ref 2019/0196

January 23rd 2020

The Weald Action Group is an umbrella organisation for local groups in the South East, including the Horse Hill Protection Group, concerned about the impacts of oil and gas exploration.

The Weald Action Group objects to the Traffic and Transport Management Plan (TTMP) for the Horse Hill oil site, as it is unable to be delivered as currently framed. It will have an impact on local road safety, require monitoring and enforcement to ensure the operator complies with the plan and will cause local impacts in terms of noise and disturbance over long hours of operation day and night. The operator has a poor track record of compliance with existing requirements and local residents have no confidence that this might improve and be maintained over such a length of time (25 years). The operator has not provided evidence that it has permission from the operators of motorway services, or lorry parks nor of the police to help it deliver the TTMP.

The TTMP document is problematic as it contains errors and a lack of information on some key points (detailed below).

Main issues

1. Swing out of HGVs

One of the fundamental flaws in the document is that it fails to demonstrate that HGVs entering the site can do so without crossing the centre of the road. Lorries currently entering the site are failing to do so safely. This is not a matter of drivers misjudging the situation but a reflection of how difficult the task is.

Large HGVs, for example cranes, or vehicles carrying drilling rigs are excluded from the assessment by the applicant, suggesting that these loads will not be required, but that appears to be contradictory to the nature of the planned operation.

The 'Swept Path Analysis' diagram at paragraph 5.2 is not drawn to scale and therefore misleading. This diagram should be rescaled to reflect reality so an accurate assessment can be made. The Notes to Appendix A say: 'Actual vehicle movements and track may vary.' What is meant by 'track' in this context? The Disclaimer says 'all dimensions are to be checked by the contractor prior to commencement of work'. This is not acceptable. A diagram must be produced with accurate dimensions.

Section 5.2 also says that any breaches will be reported to the Site Operator but it is unclear what action they will be able to take as a result.

We ask Surrey County Council to view and note the photographic and video evidence on this topic.



Photo of HGV entering the site, taken January 9th 2020

These videos show the approach of various lorries entering the site and the degree of swing out to the other carriageway:

Filmed last October: <https://youtu.be/9GXb8er8CT4>

This video was filmed since this issue was raised as a problem

<https://drillordrop.com/2020/01/07/horse-hill-lorries-to-be-ordered-to-stay-in-lane/>:

<https://www.youtube.com/watch?v=qbxVzjr13UY>

<https://youtu.be/oyLUP6tYPLU?t=285>

It should also be noted that fencing has been installed right up to the road edge on the other side of the road from the site entrance, which means cars suddenly caught up in a “swing out” incident have nowhere to go. Considering how fast vehicles travel down this road this could cause accidents.



2. Impact on other road users and road safety

Traffic serving the site will clearly have an impact on other road users and will reduce safety in Horse Hill. The “swing out” issue has already been mentioned. There is no consideration given in the document to walkers, horse riders and cyclists. HGVs should not be allowed to overtake walkers, horse riders and cyclists between the A217 and the site entrance. This would be dangerous for drivers on the other side of the road as well as the walkers/cyclists. The TTMP fails to have regard to the fact that Horse Hill is on

the [Surrey Cycleway](#), which Surrey County Council promotes to cyclists, describing it as follows: “The route uses quiet country roads and lanes and is well sign-posted. It is suitable for people who have some experience of cycling on roads.” There is a busy equestrian centre right next door to the oil site.

The transport practices are described as considerate, yet HGVs already pass very close to pedestrians because of the lack of a pavement and obstructed verges in Horse Hill.

The right turn exit from Horse Hill onto the A217 is already difficult. A three way traffic light would mitigate the risk and make this safer for all road users.

Video showing disruption to other road users caused by lorries entering the site:

<https://youtu.be/oyLUP6tYPLU?t=218>

3. Hours of operation linked to HGV disruption

The overall application is for production of oil – for many periods of time (adding up to 20 years) this will be for 24 hours a day. The TTMP proposal implies that the lorry movements will also be 24/7 over that period of time: "Although the site is expected to operate on a 24-hour basis during short-term drilling ... operations and **during the production of oil outside of these periods** (our emphasis) materials delivered to and collected from the site would take place between the following hours consistent with condition No. 6".

This seems to be saying that for 20 years when production is taking place the lorries can move to and from the site unconstrained by the operating hours in the planning permission. The worst-case scenario falls into the first four months of production with 32 lorry movements around the clock, bringing disruption and potential additional hazards to the local community.

The HGV movements should not follow the planning permission for the oil production but should be limited to the hours of daylight for reasons of safety and disturbance to neighbours throughout the permission period. The planning permission is long in terms of overall duration and in terms of daily impact. The HGV movements should not add to this burden and should be managed within restricted hours. The hours of daylight are easy to manage and enforce. We support the proposal that peak hours should be avoided - to minimise risk and inconvenience to other road users.

4. Reliance on holding areas and police facilitation of operations

We know from the Traffic Management Plan for the proposed Leith Hill drill site that the operator there also proposed holding areas and police co-operation for their operations, when no such commitments had been provided.

Surrey County Council will want to be clear – as it was with the Leith Hill proposals – where any proposed holding areas are and what route would be taken from them (6.8). If the holding area is being provided to prevent queues building up near the site, it must be of a considerable size to accommodate several HGVs. In the case of the Leith Hill plan no agreement was secured from any potential provider of a holding area for oil related HGVs, despite more than one being approached. In this case too, the applicant should provide details and an assurance that this commitment can be delivered or there can be no confidence in this proposal. HHDL’s Traffic Management Plan for a previous planning permission on the site (SCC 2017/0204 – response from Zetland consultants dated 12th February 2018) identified

Clacket Lane services on the M25 and Pease Pottage services on the M23 as suitable holding areas. The applicant should therefore be able to provide evidence that using these locations as holding areas is agreeable to the managers of those facilities (the manager of Cobham Services did not agree to this for Leith Hill), rather than just that they are suitable in principle.

Also, SCC will want to check that the police have agreed to providing escorts (6.1). The Plan cannot rely on this being forthcoming in the future when needed; SCC can only approve the Plan in the present and this appears to be an intrinsic part of the Plan.

5. Track record of poor compliance

As HGVs currently access the site, much can be learned from current practice.

A previous condition (paragraph 18 of the 2018 Officers' paper to Surrey County Council RE18/00012/CON) to erect signage has not been complied with – now more signage is being proposed in this TTMP. This is not temporary signage and needs to be acceptable in terms of its impacts on a rural area given the duration of this permission.

Another previous condition (same paper – paragraph 15) to limit HGV access to the site to 08.00 to 18.30 Monday to Friday and 08.00 to 13.00 Saturdays, has not been complied with.

Vehicles of all kinds (eg carrying cranes and tankers carrying waste) have been recorded blocking pavements, the public highway (including being parked on a roundabout) and local Tesco car park for durations of around an hour.

Other road users are having to take evasive action already at the site – including flashing lights and sounding horns and otherwise causing disruption and a distraction for other road users – because of the HGV issues at the site.

6. Commitments without detail

3.2 'car share and shuttle bus will be promoted and used where reasonable and practical'. The applicant should give evidence of how this will be organised and provided. For example:

- where will the shuttle bus pick up from?
- what route will it take?
- how will car shares be organised, given that workers might come from many different directions?

There is no public transport to the site so no opportunity for mitigating the environmental impacts of workers' travel over the long duration of this permission.

E-charging points should also be required at the site as part of the TTMP, given that new diesel and petrol vehicles will have been phased out by the time this permission ends.

6.2 What penalties are Surrey County Council proposing for when conditions are not met by this TTMP? Enforcement is meaningless without penalties.

6.3 How frequently will Surrey County Council conduct these surveys?

6.4 It would appear that felling more trees and damaging woodland would be needed to not only create more parking spaces but widen the entrance. Have HHDL applied for this?

6.6 The plan gives assurances that deliveries will be managed to avoid disruption, however, this is already a problem, with multiple HGV arrivals backing up on the public highway and some deliveries being off loaded outside the gates. It is likely that this will happen, even without the protestor disruption the TTMP discusses, and reinforces the need for an adequate plan for a holding area and suitable route from there to the site.

This video shows deliveries being dropped off outside the gate onto the carriageway in Horse Hill:

(from start to 2 mins 10"): <https://www.youtube.com/watch?v=oyLUP6tYPLU>

6.9 What provisions are made in case of liquid spills and spills of hazardous materials?

Conditions

We support the conditions put forward by Charlwood Parish Council.