

**Frack Free Balcombe Residents Association
(FFBRA) Objection to
Angus Energy's application to pump out water and
conduct an extended well test at Lower Stumble,
Balcombe WSCC/045/20**



28th September 2020

The Balcombe community has voted three times against the presence of the oil and gas industry in our village.

In responding to this consultation, we are obliged to object to specific aspects of the application that are material to planning. But our first, fundamental and overriding objection is to the presence of this company or any other oil company in our village. Whatever the conditions and whatever they claim to be doing, we do not want them here.

Previous Application

In 2019 the WSCC Planning Officer in his report to the WSCC Planning Committee recommended that they refuse Angus Energy's previous application to flow test at Lower Stumble. Angus Energy withdrew that application and have resubmitted one with minor changes but that is substantially the same.

Previous Grounds for Recommendation to Refuse

FFBRA agrees with the reasons given for refusal as:

- The proposed development would represent major development in the High Weald Area of Outstanding Natural Beauty, for which there are no exceptional circumstances, and which is not in the public interest.
- There are alternative sources of hydrocarbon supply, both indigeneous and imported, to meet the national need, there would be minimal benefit to the local economy from the development, and there is scope for meeting the need in other ways, outside of nationally designated landscapes.
- It would therefore be contrary to Policies M7a and M13 of the West Sussex Joint Local Mineral Plan (2018) and paragraph 170 and 172 of the National Planning Policy Framework (2019).
- The only significant change to the 2020 application from the 2019 one has been a shortening of the period from three years to 30 months. The procedures remain the same, with attendant risks to the water environment, and air quality, and disturbance to the village and heavy traffic.

Area of Outstanding Natural Beauty

The site is designated an AONB. This type of heavy industry should not be introduced here. Red kites have returned to breed close to the site. They are protected and listed as threatened. Angus's proposed activities could cause significant harm to wildlife, especially bats, given the night lighting of the site, the 24 hour flaring , and air pollution.

FFBRA believes that Angus Energy are trying to get planning permission for *production* in the guise of an extended well test.

Angus are applying for permission to flow test for one year. This is an extraordinary length of time for a test. If Angus Energy succeed in pumping out the water from the well, they should be able to see whether

oil will flow, or at least after a brief well test. They should then be required to re-apply for permission to produce.

If Angus Energy applied for *production*, they would need to apply to the Environment Agency (EA) for a groundwater permit, a development permit and a more detailed risk assessment, to the Oil and Gas Authority (OGA) for a field development plan and a production consent, plus other regulatory approvals from WSCC and the Health and Safety Executive. During production they would not be allowed to flare, because it would no longer be Best Available Technique (BAT) and they would have to transport the gas away from the site for use, which would be expensive.

Angus is trying to avoid these constraints which are designed to protect our environment by falsely describing their activities as “testing”.

Traffic nuisance and danger

The heavy traffic proposed would be dangerous and polluting. Their proposed route passes through our villages, pass our houses, and our primary school where outdoor classrooms and play areas are right by the roadway. High, long multi-axled articulated lorries pass under low-hanging trees and low-slung wires. These HGVs are so much bigger than the normal traffic on our roads. Between the village houses and the site, the road is fast and the turning into the site is tight.

Throughout the time Angus Energy last attempted to flow test in Balcombe, 30 community members organised a Traffic Watch Group, logging traffic movements and HGV types. Site traffic way exceeded the levels predicted. The Traffic Watch Group estimated the increase in traffic at 15 per cent (as opposed to the predicted 8 per cent), with a 30 per cent increase on the heaviest days. The traffic estimates were further misleading because small lorries were lumped in (by Angus’ consultants and WSCC) to the ‘HGV’ category along with massive six- and seven-axle lorries.

Lorries were seen swathed in branches wrenched down from the trees as they passed. Some vehicles were extremely high, making it difficult to

pass under the low-slung power cables that cross over the London Road – Balcombe’s electricity is supplied via overhead cables. This was dangerous, as was the fact that long vehicles had to swing out onto the opposing carriageway in order to turn into the oil site, on a road with a 60mph speed limit and a bend just after the site. The B2036 is not made for such vehicles.

We must also consider the contents of these vehicles passing our school and houses: oil, potentially gases, contaminated water, acids and other chemicals.

WSCC Highways Report

We disagree with the WSCC Highways Report which was prepared by Stephen Gee from WSCC Highways Authority on the 15 October 2019 in which he states that the proposed application will “not have a material impact” on the road network. It should be noted that WSCC have not prepared an updated report based on the increased traffic figures produced for this application. However, even using the lower figures from the previous application, we believe the calculation and conclusion is incorrect.

WSCC Traffic survey from January 2018 located at Kemps Farm near the site shows that the majority of HGV traffic is of the smallest classification, 2 axle (83%) and the next smallest, 3 axle (10%) over a 24 hour period. However, Angus Energy’s vehicle predictions are over much less than a 24 hour period.

WSCC Highways table showing the percentage increase in HGV flows is half of what it should be. They are comparing two-way movements with the average 96 one way movements and as a result 21%, 24%, 21% , 24%, 4% should in fact be 42%, 48%, 42%, 48%, 8%.

The WSCC Transport own Assessment Method states “Significant HGV movements per day” is defined as 20 or more one-way movements per day.

This is of grave concern as the traffic proposed would have a significant impact.

For a more detailed analysis, see the FFBRA Supplementary Traffic Objection.

Noise

Flares are extremely noisy. Flaring would be 24 hours per day 7 days a week during the one year period of flow testing. There would also be the noise from generators and traffic. Sound carries up from Lower Stumble towards the village on the prevailing wind.

Air Pollution

The Balcombe community faces air pollution from the flare, generators, tanks and site operations in general.

The village lies downwind from the site, at the height of the top of the flare, and the lie of the land carries pollution from the site into the village centre. The recreation ground in the centre of the village is a very popular leisure area, especially for young children. The B2036 country road runs alongside the site, and the London to Brighton railway line crosses an embankment to the rear. Ancient woodland adjoining the site is home to bats and other wildlife.

Two types of flares are described. It is not clear in the application which would be used when. However, any flaring is of particular concern in terms of air pollution, toxins, smoke and particulates, especially if the flare operates at sub-optimal efficiency. Sulphur- and chlorine-containing compounds, including dioxins, are very likely to be present. Sulphur compounds were noted at the site by Conoco in the 1980s. Angus energy intend to use hydrochloric acid in the well, potentially leading to chlorinated hydrocarbons in the waste gases. Experts in the village calculate that levels of polyaromatic hydrocarbons in the air at Kemp's Farm could be 24 times the National Air Quality Objective. There could be serious health implications for people in the village, including cancers.

We are also concerned about arrangements for dealing with associated gases in storage tanks. Schedule 3 of the 2018 EA permit (EPR/GB3609KQ) requires monitoring of the gas vented from the

storage tank vent. From the application we cannot see that there is a tank vapour recovery system. Are these dirty gases to be vented? The vapour recovery system that they have is to recover vapours displaced from the tanker when oil is loaded into it, in order to comply with the Sector Guidance requirement to ‘capture and recover all hydrocarbon vapours arising from the loading and unloading of liquid hydrocarbons into vehicles.’

Angus Energy’s consultants are wrong to downplay the significance of emissions as ‘negligible’ and to say that emissions do not need to be mitigated.

Based on the smells observed by members of the community during the 2018 flow test, FFBRA believes that odour should be addressed in this planning application. Angus declare that odour and dust are ‘typically minimal’ in this kind of operation, and that ‘given the closest residential receptor is approximately 350m from the site, emissions are considered to be insignificant and assessment of odour and dust has been scoped out of the air quality assessment.’ It should not be scoped out.

Community members were disturbed by ‘sulphidey’ smells during the 2018 flow test, both in the village and on the B2036 beside the site. As the wind blew unusually in the direction of Staplefield village during the well test, people there also reported unpleasant smells. We remember that ‘odour management’ last time was to consist of a worker periodically sniffing.

Potential Water Pollution

FFBRA commissioned a review of Angus’s hydrological report risk assessment by hydrologist Trevor Muten BSc, MSC, MPhil, FGS, CGeol, CSci, Cenv, C.Wem MECIWEM, EurGeol from Tapajos. A copy of his report is included with this objection. Mr Muten concluded that the risk to groundwater had not been accurately assessed by Angus. Their risk assessment made ‘misleading and subjective statements’, omitted vital information and over-simplified the hydrogeology. It failed to demonstrate how risks to groundwater could be resolved or mitigated.

Angus's Finances

Angus Energy have not made a profit in recent years and need to be funded by shareholders or outsiders whenever they need to do or buy or rent anything. Their share price has dropped from 30p to under 1p. We are concerned that they will cut corners and put our safety, health and environment at risk. If an accident should happen, we are concerned that they would not have the means to deal with the fallout. We are concerned that they will not have the means to decommission the site and will not be required to set sufficient funds aside.

Please refuse this application

Angus' application WSCC/071/19 was withdrawn after planning officers recommended refusal. Little has changed in their current application. Such industrial activities are inappropriate in an Area of Outstanding Natural Beauty. There are no mitigating factors and the development is on zero benefit to the local community. We ask you to reject this application.