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Treales, Roseacre & Wharles Parish Council
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Development Management Group,
Lancashire County Council,
PO Box 100, Preston

Dear Sir or Madam,

Appeal Reference: (APP/Q2371/W/15/3134385).

Re: PLANNING APPLICATION REF LCC/2014/0101 – HYDROCARBONS EXPLORATION SITE ON AGRICULTURAL LAND THAT FORMS PART OF ROSEACRE HALL TO THE WEST, NORTH AND EAST OF ROSEACRE WOOD AND LAND THAT FORMS PART OF THE DEFENCE HIGH FREQUENCY COMMUNICATIONS SITE BETWEEN ROSEACRE ROAD AND INSKIP ROAD, ROSEACRE AND WHARLES, LANCASHIRE.

1. The Treales, Roseacre & Wharles Parish Council presented substantial evidence to the previous Inquiry into the proposed transport plan for the fracking site, in a joint submission with Roseacre Awareness Group. We intend to present further evidence at the reopened Inquiry.
2. In our view the proposals should be refused on a number of grounds, but we understand that a key question at the reopened inquiry will relate to the highways related impacts.
3. This response to the consultation by Cuadrilla on its new transport proposals, therefore, sets out the broad reasons we consider our objections on those grounds still hold, that is to say:
 4. a The applicant cannot identify a safe and suitable access route to the site (in line with NPPF Para 32).
 5. b The mitigation proposed by the applicant on the suggested routes (particularly the B-road sections) does not ensure they are safe and suitable. It fails to address any safety issues on particular sections of the A-road network.
 6. c The activity being undertaken is not in accord with the characteristic of this designated countryside rural and residential environment as required by NPPF 17, FBC policy SP2 and emergent policy GD4 and thus does not support safe and suitable heavy industrial traffic.
7. The Fylde, Wyre, Preston, Blackpool and Lancashire Local Plans all make extensive provision of highways & utilities infrastructure for locations to support heavy industrial activity, such as shale gas exploration. This enables that shale gas surface activity can take place where provision is already provided with safe & suitable highways access to support the associated HGV traffic.
8. It is particularly timely to note that on 31st December 2017 (reported in the Times newspaper) another shale gas operator, INEOS, confirmed that they can access target geology of interest under Areas of Outstanding Natural Beauty (AONB) from outside those areas. There is no need to conduct surface activity directly above the target geology. The objective of the interest of Central Government civil servants is to access target particular sub-surface geologies, not any particular surface location. Central Government's (now BEIS') "Onshore oil and gas exploration in the UK: regulation and best practice" and testimony given by industry to the All Party Parliamentary Group (APPG) highlight that, as a result of the use of Horizontal Directional Drilling (HDD) technologies required for shale gas exploration, this provides significant flexibility in the location of surface works to avoid adverse community and environmental issues. Offsets of over 10km between target geology and surface works, have been demonstrated in the UK. This was first demonstrated over two decades ago at Wytch Farm, Dorset. This is, therefore, a demonstrably mature capability in the UK.

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9. The applicant has failed to demonstrate that it has considered the alternative routes available through the use of the infrastructure made available by local councils and the drilling industry to conduct activities and traffic operations. This is where safe, suitable and sustainable, day & night highways access has already been provided, in accord with the requirements of the NPPF to protect the health, well-being and amenity of communities, economies and environments. It is logically and evidently unacceptable to conduct such highways related activities in rural and residential areas. Such activity is provisioned for safely & suitability in other routes and there is no evidence that they have been considered.
10. d The impact on local residents and users of those roads is, therefore, unacceptable and the proposal should be refused because the traffic impacts are severe.
11. The new transport proposals, reflected in the updated EIA, Transport Plan and Traffic Management Plan, has five substantive alterations:
12. a The removal of the Broughton Route.
13. b The insertion of two alternative (previously rejected) routes with passing places.
14. c A commitment to avoid two HGVs travelling in the opposite direction at the same time (on uncontrolled public highways).
15. d The addition of traffic lights on the Dagger Road section operated by the contractor's HGVs.
16. e The introduction of contingency planning in 'exceptional circumstances' to deal with protests, including out of hours convoy operations (including at night).
17. Despite the assertion that these address the issues raised at the previous inquiry sessions, in our view, none of these changes affect our fundamental objection or provide mitigation to address the concerns that led to its refusal.
18. Instead their main practical result is to provide the applicant with additional flexibility of routing which impacts on communities previously not affected and creates substantial uncertainty about where and when HGVs will be routed during the busiest periods of operation.
19. As presented, the text suggests that the same, or similar, conditions would apply as at the previous inquiry, with up to 50 HGV vehicle movements along any single route, just as before, however over extended periods and now at all times of the day and night, with additional adverse impacts on safety and health & well-being and amenity,
20. In conclusion we do not believe the fundamental transport issues raised by this proposal have changed. There is not a safe and suitable route to the site and the Appellant cannot demonstrate that he can mitigate these problems, even by causing substantial harm to the rural nature of the area and disruption to local residents and visitors.
21. The changes to the proposal provide additional flexibility to the applicant, but add substantial adverse additional impacts, including night time HGV operation.
22. We would, therefore, urge that the refusal of this application is upheld on the grounds that they do not meet the criteria of NPPF 17, nor Fylde Borough Policy policy SP2 and GD4, nor NPPF 32 .

Yours faithfully,

P. Hill
Clerk, Treales Roseacre & Wharles, Parish Council