

Mr. David Maxwell
Surrey County Council
County Planning Department
County Hall Penrhyn Road
Kingston upon Thames
Surrey
KT1 2DY

Date: 17th June 2020

Dear Mr. Maxwell,

SCC ref: 2019/0072 and WBC ref WA/2019/0796

SITE: Land South of Dunsfold Road and East of High Loxley Road, Dunsfold, Surrey.

PROPOSAL: The construction, operation and decommissioning of a well site for the exploration and appraisal of hydrocarbon minerals from one exploratory borehole (Loxley-1) and one sidetrack borehole (Loxley- 1z) for a temporary period of three years involving the siting of plant and equipment, the construction of a new access track, a new highway junction with High Loxley Road, Highway improvements at the junction of High Loxley Road and Dunsfold Road and the erection of a boundary fence and entrance gates with restoration to agriculture.

APPLICANT: UKOG (234) Ltd.

Further to my previous **strong objection** dated 11th May 2020 with reference to the lack of analysis by the applicant in their Transport Statement for the vertical alignment at the junction of High Loxley Road and Dunsfold Road, I have commissioned a further professional examination which demonstrates that an Abnormal Indivisible Load Vehicle (AILV) is predicted to ground when entering/exiting High Loxley Road.

Working from a detailed topographical survey of the area produced by Cadmap Ltd., and the data presented in the applicant's Transport Statement information regarding the specification of the AILV, a vertical plane swept path assessment has been produced using Autotrack by Paul Mew Associates (PMA) which demonstrates the predicted grounding of an unladen vehicle entering High Loxley Road from Dunsfold Road (see Figure 1.1). In performing this analysis, PMA have remarked that the vehicles used in the applicant's swept path assessment are entirely bespoke therefore PMA have made the closest possible match to the AILV as possible based on the data available.

Our investigations went further, measuring the physical carriageway widths along the length of High Loxley Road between the junction and the proposed site access, which was not part of the swept path analysis provided by the applicant; from table 1, you will see these vary between 2.6m and 3.1m , which compares with the large HGVs requiring access being between 2.75 and 3.4m wide (taken from the applicant's drawings). This means that the required vehicles cannot reach the site entrance without overriding the verges, with major damage to the road pavement inevitable. Existing surface water drainage is by ditch(es) which would also require survey and checking for capacity/functionality.

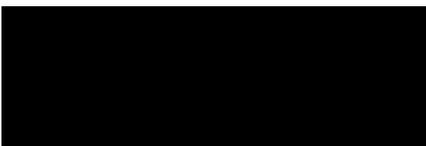
The applicant has provided no evidence that they either understand these constraints or have a workable solution to these physical barriers to access to the site by the required vehicles. As well as significant engineering works to reprofile the B2130 junction, widening of High Loxley Lane will be required, along with associated drainage and edge strengthening works. For such a scheme, the Applicant would be expected to give detailed consideration to the presence of buried utilities and services; for example, our survey identified water mains in the vicinity of the B2130/High Loxley Road junction, and it is my understanding that the water main serving my own property runs from there along High Loxley Road, likely to be at a shallow depth. This would also require detailed investigation as part of any improvement scheme.

On 17th June, I attended an online meeting with SCC Highways Officers, Richard Cooper and Frank Apicella, our County Councillor, Victoria Young, [REDACTED] and [REDACTED]. This was most helpful, in particular allowing us to explore the implications of our findings. Officers agreed that, in the event of the physical constraints of an access not proving adequate for the proposed vehicles to access the site, this would be materially significant not least on highway safety grounds. Furthermore, Richard Cooper said that the usual approach to solving such an issue would be by a s278 Agreement between the Applicant and the County Council, but any solution at this particular junction would necessarily be constrained by location factors including diversion of utilities, and land ownership.

In addition to requiring a s278 Agreement as a Pre-Commencement Condition, we noted the views of Officers that other Conditions may also need to be strengthened. This could include more robust monitoring of the site operator's compliance with the finally agreed Construction Traffic Management Plan, to which end the idea of continuous CCTV monitoring of traffic at key locations such as Pratts Corner was considered appropriate. An extension of draft Condition 8, linked to 9(i), should be considered to give a guarantee of restoring the road condition, although this might be included as part of the s278 Agreement. I would also support Officers suggestion that a penalty notice scheme for non-compliance could also be introduced, with stringent sanctions if thresholds are breached.

In conclusion, a decision to permit this application in the knowledge that vehicles required to access the site via High Loxley Road cannot physically do so would therefore be wholly unsound, and does not accord with the requirements of the NPPF not to cause significant harm in transport terms. Furthermore it is not in accordance with Surrey County Council Policy MC15(iii). Should a solution be sought via a s278 Agreement, this would require further investigation, design and legal negotiation between the parties.

Yours sincerely,

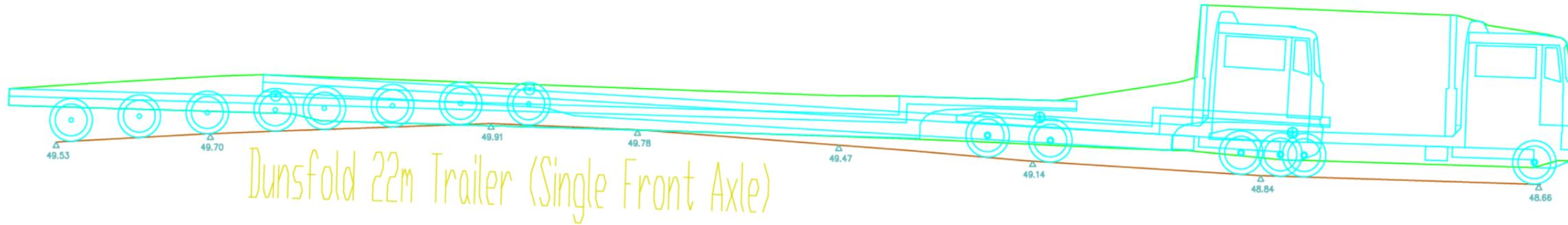
A large black rectangular redaction box covering the signature area.

Tom Gordon

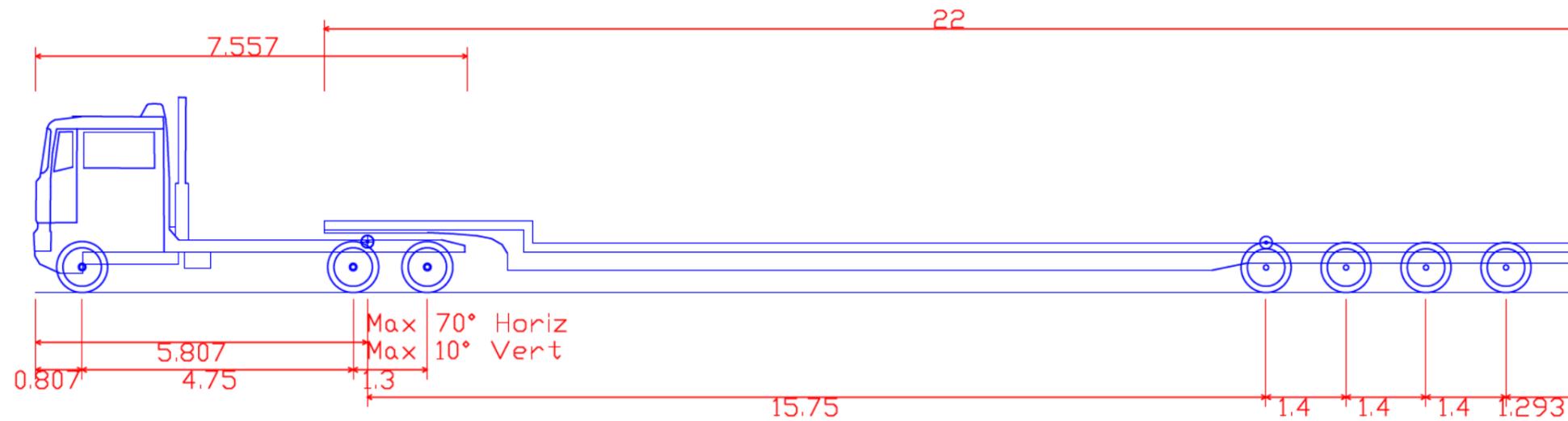
Table 1 – High Loxley Road - Measured Road Widths

Centreline distance along High Loxley Road (cumulative)	Width of metalled road surface	Notes
0m (65m)	3.1m	First measurement at approx. 65m from Give Way line at junction with B2130
20m (85m)	2.8m	
20m (105m)	3.1m	
10m (115m)	2.7m	Adjacent to agricultural field entrance
20m (135m)	3.0m	
50m (185m)	2.6m	
15m (200m)	2.7m	Approx. location of start of proposed new site access

NOTE: Refer to Cadmap Topographical Survey (drawing reference CM/20302/T) and Sections (drawing reference 20302/S) for source data



Section B-B
Datum 47.00m



Dunsfold 22m Trailer (Single Front Axle)	
Overall Length	27.050m
Overall Width	3.400m
Overall Body Height	3.417m
Min Body Ground Clearance	0.341m
Max Track Width	2.550m
Lock to Lock Time	6.00s
Max Steering Angle (Virtual)	40.00°

