

**MINUTES** of the meeting of the **PLANNING AND REGULATORY COMMITTEE** held at 10.30 am on 2 August 2017 at Ashcombe Suite, County Hall, Kingston upon Thames, Surrey KT1 2DN.

These minutes are subject to confirmation by the Committee at its meeting.

**Members Present:**

Mr Tim Hall (Chairman)  
Mr Keith Taylor (Vice-Chairman)  
Mr Stephen Cooksey  
Mr Matt Furniss  
Dr Andrew Povey  
Mrs Penny Rivers  
Mrs Rose Thorn  
Mr Jeffrey Harris  
Mrs Bernie Muir

**Apologies:**

Mr Ernest Mallett MBE  
Mr Edward Hawkins  
Mrs Natalie Bramhall

**215/17 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]**

Apologies for absence were received from Mr Ernest Mallett MBE, Mr Edward Hawkins and Natalie Bramhall. Mrs Mary Angell attended as substitute.

**216/17 MINUTES OF THE LAST MEETING [Item 2]**

The Minutes were approved as an accurate record of the previous meeting and signed by the Chairman.

**217/17 PETITIONS [Item 3]**

There were none.

**218/17 PUBLIC QUESTION TIME [Item 4]**

There were none.

**219/17 MEMBERS' QUESTION TIME [Item 5]**

There were none.

**220/17 DECLARATIONS OF INTERESTS [Item 6]**

Dr Andrew Povey declared a non-pecuniary interest in that he was a Trustee of the Surrey Hills Society. He took part in the meeting.

*With agreement of the Committee item 8 was considered before item 7.*

**221/17 MINERALS/WASTE MO/2017/0740 - LAND AT BURY HILL WOOD,  
COLDHARBOUR LANE, HOLMWOOD, SURREY RH5 6HN [Item 8]**

**Officers:**

Alan Stones, Planning Development Team Manager  
Samantha Murphy, Principal Planning Officer  
Caroline Smith, Transport Development Planning Manager  
Nancy El-Shatoury, Principal Solicitor

**Speakers:**

Alan Hustings, a local resident, made the following points:

1. The Independent Safety Audit in the traffic survey was based on the October 2014 Traffic Management Plan (TMP). Therefore, considering the outdated 1100 Heavy Goods Vehicle (HGV) movements and not the 1500-1600 currently considered he raised concerns about potential further inaccuracies in the outdated traffic survey.
2. He stated that Coldharbour Lane was a very popular recreational cycle route all through the year and therefore would benefit from the recommendations outlined by the Safety Audit. He also raised a concern about the TMP making no provision for pedestrians using Coldharbour Lane due to inconclusive surveying of pedestrians in the Lane.

Pam Pulling Smith, a Local resident, made the following points:

1. Residents of Coldharbour Lane felt they had not been properly consulted.
2. Concern was raised about restricted access to local businesses that would be caused by the road closures and HGV use of the Lane. Elderly and unwell residents would also be restricted to attend hospital appointments and recreational activities in the area.
3. The Committee were asked to consider the residents that would be directly affected by the TMP and were asked to drive on Coldharbour Lane to allow for proper consideration.

Pat Smith, a Local resident, made the following points:

1. That no Traffic Survey had been completed in Dorking or Flint Hill. Concern was raised as traffic issues were already severe in the area and further HGV movements would only add additional traffic problems.
2. She had conducted her own survey which showed a large variety of road users using Flint Hill at sometimes dangerous speeds which highlighted the need for a formal traffic survey to be completed and considered. The current traffic survey was said to be insufficient due to it covering a limited area. She requested that a traffic survey be completed in Flint Hill and other affected Dorking roads.

Charlotte Nolan, a Local resident, made the following points:

1. That there were inaccuracies in the Environmental Impact Assessment (EIA) due to it being based on an outdated version of the TMP. It was further stated that the socio-economic impacts of the TMP had not been considered within the Traffic Survey. Many local businesses had expressed concern about impacts and had forwarded these to Surrey County Council. Members were informed of further impacts that had not been considered in the traffic survey which would have a negative affect on local businesses.
2. She had noted that Europa conducted a survey in the area and discovered that a large number of cyclists used the road on a Saturday and therefore decided that it would not be appropriate to continue operations on this day. It was then stressed that cyclists were extremely active all through the week but this had not been considered due to the surveys being very outdated.

Richard Elliott, the applicant's agent, made the following points in response:

1. He emphasised that this item was for the consideration of the traffic survey and not the TMP. He also highlighted that the recommendation was to agree that the surveys carried out by the applicant met the requirements of Condition 18.
2. He referred to a local residents comments stating that a survey was needed to be completed on Flint Hill. It was said that a continuous traffic flow monitoring point had been present in Knoll Road in order to record the vehicle flows in the area. In response to the resident stating that a EIA was needed in Knoll Road, he stated that the number of vehicles using the site was below the threshold for the road to be taken into consideration which the Planning Inspector had recognised.
3. The committee were informed that a fourth survey had been carried out on a Saturday to ensure accurate and complete data was produced. It was said that pedestrians and equestrians would not be disregarded and logical safety measures and the Highway Code would continue to be followed.

**Key points raised during the discussion:**

1. Officers reiterated the wording of Condition 18 to make clear the Planning Inspectors requirements outlined in the Inspectors report. It was said that the Planning Inspector showed concern over the high number of cyclists on Coldharbour Lane and the safety impacts of HGV movements on Saturday mornings. It was further confirmed that the applicant had removed Saturday as an operational day due to the increased cyclist activity. Officers advised Members that they believed the applicant had completed the requirements outlined by the Planning Inspector. Officers provided further information on the details around the Safety Audit and confirmed that the submitted Safety Audit was satisfactory. An update sheet was tabled at the meeting and is attached as Appendix A to these minutes.
2. Members of the Committee raised concern that officers had put forward a recommendation to not accept all of the recommendations of the Safety Audit.
3. Some Members questioned the accuracy of the Traffic Survey due to the results showing that there were no equestrians and very few

- pedestrians on the road. A Member said that they had vast local knowledge of the area and that this would be very unlikely.
4. Officers stated that not all recommendations of safety audits were accepted and in the event of this, an internal process was carried out and an exceptions report produced. In this instance officers had considered the two recommendations in the Safety Audit and deemed them inappropriate for a number of reasons. It was also reported that the two recommendations not accepted were dealt with under Condition 19. With regard to the four surveys, officers stated that they reflected similar results of road users and therefore officers considered them as fit for purpose.
  5. A Member proposed that the Committee should accept all four of the Safety Audit recommendations due to there being good reason for doing so. The Committee debated this proposal.
  6. The enforcement powers of the County Planning Authority were queried and officers confirmed that approved schemes may be liable to enforcement if found to be in breach of conditions. This would include a series of warnings and, if necessary, a Breach of Conditions Notice.

A Motion was put forward by Mr Cooksey, and seconded by Mr Furniss, that the Safety Audit and its recommendations be accepted in its entirety. The Motion was put to the vote with five Members voting for and four against. Therefore the motion was carried.

**Resolved:**

1. That the details of the traffic survey and Safety Audit submitted pursuant to Condition 18 of Appeal Decision APP/B3600/A/11/2166561 dated 7 August 2015 contained in application ref: MO/2017/0740 be approved.
2. That all recommendations given in the Safety Audit be accepted.

**Actions/further information to be provided:**

None.

*Mrs Penny Rivers arrived at 11.06 am during the debate on this item and as she was not present from the whole of this item, refrained from the vote.*

**222/17 MINERALS/WASTE MO/2017/0911 - LAND AT BURY HILL WOOD, OFF COLDHARBOUR LANE, HOLMWOOD, SURREY RH5 6HN [Item 7]**

**Officers:**

Alan Stones, Planning Development Team Manager  
Samantha Murphy, Principal Planning Officer  
Caroline Smith, Transport Development Planning Manager  
Nancy El-Shatoury, Principal Solicitor

**Speakers:**

Pat Smith, a Local resident, made the following points:

1. The TMP was deficient as it failed to mention the impacts on Flint Hill, the designated route to Knoll Road. It was said that this route would be unworkable due to the road being extremely narrow with a single footpath. She stated that Flint Hill was a major access point to Dorking as well as the single access point for the residents of Goodwin estate which was not considered in the TMP.
2. That concerns raised by residents around impacts had not been addressed in the TMP and that made it unworkable.

Janet Housden, a Local resident, made the following points:

1. That the west end of Knoll Road would be used as a parking bay for HGVs waiting to be dispatched. She stated that previously, a three minute time limit had been set for the HGVs but in the latest TMP this time limit had been classified as unworkable and instead HGVs should instead move as soon as practicable. This was said to have an impact on the quality of life for Knoll Road residents as well as causing dangerous traffic conditions for cars, cyclists and pedestrians.
2. She also raised a concern that the banksmen would not have a sufficient view of Knoll Road to properly control the flow of traffic which could result in a severe casualty.
3. Concerns were raised regarding efficiency of radio contact with drivers.

Vicky Elcoate, a Local resident, made the following points:

1. A petition of over 2000 signatories was to be presented at Mole Valley Local Committee which sought to protect the historic trees found on Coldharbour Lane. It was explained that residents were concerned by the damage that could be caused by HGVs to the tree and banks on the Lane.
2. Members noted a tree report previously submitted to the Committee by tMrs Elcoate which stated that any damage to the overhanging and intertwined root systems of the historic trees would be irreversible. It was stressed that the TMP did not consider these issues nor provide mitigation measures to the environmental impacts.
3. She stated that Leith Hill Action Group had shown a 3D analysis that showed HGVs could not clear humps in the road without causing damage to tree canopies.
4. Further concerns of the environmental impacts of the TMP were raised and she asked the Committee to reject the TMP.

Max Rosenberg, a Local resident, made the following points:

1. That the TMP did not provide sufficient risk management and mitigation as well as not including vital information of road users. The Committee should not ignore equestrians because they did not show up in the survey. He also asked how pedestrians, which did show up in the survey, were put as a nil risk.
2. There was no mention of the radioactive material being transported.
3. It was stressed that no proper analysis had been provided to measure the delay to emergency vehicles trying to reach Coldharbour Lane and surrounding areas.

4. He informed Members that residents of Coldharbour Lane would need to contact the banksmen by mobile phone to request to leave their property via the Lane. This was said to be impossible due to a lack of mobile phone signal in the area.

Patrick Nolan, a Local resident, made the following points:

1. That the Planning inspector viewed the previous TMP to be unworkable. It was said that because of this the current TMP should not be accepted until it was up to standard.
2. He stated that Europa had not held any public meetings with residents, after stating that they would during the public enquiry, to ensure a satisfactory TMP.
3. He asked the Committee to consider the possible casualties that could be caused as a result of the TMP and asked for it to be rejected.
4. He also questioned the length and timings of the consultation on the TMP as the consultation ended after the officer's report was written and was concerned that the Committee may not have had all the information necessary.

Richard Elliott, the applicant's agent, made the following points in response:

1. Members were informed of various consultations that had taken place in preparation of the TMP. He stressed that it had been a long process with additional safety audits and surveys carried out and that it had not been rushed. Consultations were with a range of parties including Leith Hill Action Group (LHAG) which had led to very few amendments of the Plan.
2. He clarified the working hours proposed in the TMP was as a result of assessing the potential risk in the area. Although the number of pedestrians and equestrians recorded in the survey was low, with the exception of a Saturday, all road users were taking into consideration during the creation of the TMP.
3. It was confirmed that in the event of an emergency vehicle being obstructed by a moving HGV then it would take up to 30 seconds to reach the next passing point to allow the emergency vehicle to pass.
4. In regards to resident's comments on the lack of mobile phone signal in the area, he stated that it had been confirmed that there was a single provider that did have adequate mobile signal to be able to communicate.
5. He stated that the use of aluminium tracks would greatly reduce the number of lorries and that the holding bays in Knoll Road would not be needed very often.
6. He also reiterated that the road closure would only be in place when the rig was being delivered and removed from the site. At all other times there would be traffic management in place.

Hazel Watson, the Local Member, made the following points:

1. The local Member commented on a number of issues relating to the absence of risk management in the TMP. It was said that the number

of accidents would increase if these factors were not addressed due to increased traffic and hazardous environmental conditions.

2. She said it would be unacceptable that residents of Coldharbour Lane would need to phone the banksmen to get permission to leave their homes via the Lane. In order to contact the banksmen a mobile phone signal would be needed but this would not be possible as the signal was very poor in the area.
3. The local Member listed a number of other issues with the TMP, including access to Dorking and that there was no analysis undertaken of its workability, and asked the Committee to reject the proposal.

#### **Key points raised during the discussion:**

1. Officers introduced the report and tabled an update sheet at the meeting and is attached as Appendix B to these minutes. Members were provided with a details of the Inspectors report in order to outline the requirements of condition 19. Officers agreed that the current TMP addressed the outlined requirements adequately. Members noted that the Fire and Emergency Service had not issued any objections to the proposal.
2. Clarification was sought on timings for HGV movements within Coldharbour Lane which led to a discussion where it was confirmed that the Inspector's report outlined that in the event of delay during the HGV movements it would still continue to be manageable.
3. Members referred to details outlined in the report and stated that 30mph would be a dangerous speed limit to travel through Coldharbour Lane due to the hazardous layout of the road. Members showed concern that although the report stated otherwise, the road would also be too narrow to transport a drilling rig. Officers assured the Committee that the identified route for HGVs should be accepted due to the Planning Inspector being satisfied that HGVs could travel through the sunken lane without causing damage.
4. Committee Members raised many other concerns including:
  - the difference between using stone or aluminium tracks
  - that number and timings of movements didn't seem to add up
  - what would happen if Ryka's Café car park was full
  - there was no 3D analysis of the route
  - they were not convinced that mobile signals work in this area
  - enforcement would be mainly self-enforcement
  - it was not clear where width measurements had been taken, for example, did they include the kerb
  - it seemed rather unusual to be consulting the local committee after a decision was to be made at this meeting
  - that seasonal implications had not been considered
  - the impact on the route to Dorking was not sufficiently considered
5. A Member stated that there had been enough change in the TMP for the Committee to consider it as a whole rather than just look at the three points raised by the Inspector. That Member also stated that the TMP did not comply with safety requirements of the Local Plan.

6. It was also reported that a petition requesting a Tree Preservation Order (TPO) for Coldharbour had been received and not responded to in this report.
7. A Motion was put forward by Mr Stephen Cooksey, seconded by Mrs Penny River that:

The TMP should be refused for the following three reasons;

- i. The TMP does not adequately address the issues surrounding the route to Knoll Road
- ii. The TMP does not address the impact to Dorking Town centre
- iii. The TMP does not adequately deal with the access and safety issues on Coldharbour Lane and Knoll Road.

Three Members spoke on the motion and made following points:

- Members were reminded that Officers had confirmed that the TMP as presented adequately addressed the requirements set out in the Planning Inspector's report.
- There was concern that the motion could not be supported for a number of reasons. Members suggested that the item be deferred to allow for more information to be obtained, specifically if aluminium tracking or stone tracking would be used.
- Refusing the TMP on the grounds previously stated would open the Plan to examination far greater than the Inspector recommended.
- More information was required to make the decision including a 3D analysis of the route, further details of the mobile signal in the area and the view of Mole Valley Local Committee.

8. The Planning Development Team Manager explained that the communications and café issues raised were operational matters for the operational plan and if it couldn't be made to work then the plan could not be run. He also stated that it would be reasonable for Committee to make a decision now and take into account what the Local Committee had to say at a later date.
9. The motion to refuse was put to a vote in which two voted for and seven against. Therefore the motion was lost.
10. Mr Jeff Harris moved a motion, seconded by Mr Matt Furniss to defer the application in order to receive further information on concerns raised by members and specifically information regarding the nature of the agreement with Ryka's Café and alternatives if parking is not available, confirmation of whether aluminium tracks were to be available and used or whether the stone would be used, and the availability and range of mobile communications in the area.
11. The motion was put to a vote in which six voted for, and four voted against. The motion was carried.

**Resolved:**



That application MO/2017/0911 - Land at Bury Hill Wood, off Coldharbour Lane, Holmwood, Surrey RH5 6HN be deferred in order to receive further information on concerns raised by members including 3D analysis but specifically, information regarding the nature of the agreement with Ryka's Café and alternatives if parking was not available, confirmation of whether aluminium tracks were to be available and used or whether the stone would be used, and the availability and range of mobile communications in the area.

**Actions/further information to be provided:**

None.

**223/17      DATE OF NEXT MEETING [Item 9]**

The date of the next meeting was noted.

Meeting closed at 1.00 pm

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**Chairman**

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Planning & Regulatory Committee 2 August 2017

## UPDATE SHEET

**MINERALS/WASTE MO/2017/0740**

**DISTRICT(S)** MOLE VALLEY DISTRICT COUNCIL

**Land at Bury Hill Wood, Coldharbour Lane, Holmwood, Surrey RH5 6HN**

**Details of a traffic survey and a safety audit pursuant to Condition 18 of appeal ref: APP/B3600/A/11/2166561 dated 15 August 2015.**

## CONSULTATIONS AND PUBLICITY

### *Additional key issues raised by public*

Five further letters of representation has been received on this application raising concerns. These are as follows:

#### Rep 1:

- It is unclear if the surveys were monitoring people walking/equestrians along parts of Coldharbour Lane or the whole length.
- There is a risk to pedestrians and equestrians on Saturday morning
- Danger to cyclists – mud on the road, speed of cyclists reaching 40mph on northward stretch and their stopping distances all likely to cause accidents
- HGV access on Saturdays is unsafe and dangerous
- Damage has been caused to Coldharbour Lane when a lorry left the application site after trying to pass a car.
- There is a presumption that cyclists, pedestrians and equestrians enter Coldharbour Lane in the same manner as a car. This is not true, they will enter from footpaths and tracks and there is no plan in place to manage that.

Rep 2: object to the survey because it fails to take account of cyclists moving in the same direction as HGVs. Endorse all of LHAG's commented on this planning application.

Rep 3: the traffic survey dismisses dangers to equestrians; despite the fact that even a single horserider per day (i.e. infrequent enough to not be picked up in the survey) still represents a danger. As a whole, the survey's attempt to move into risk measurement is not justified, relying purely on supposition. Endorse all of LHAG's commented on this planning application.

#### Rep 4:

- Disappointed that the traffic survey was restricted to Saturdays only. Given the number of pedestrians, cyclists and equestrians on weekdays the survey should have covered weekdays.
- How was the conclusion that the risk presented to pedestrians at the junction of Knoll Road/ Coldharbour Lane and Ridgeway Road is negligible given pedestrians cross over this junction.
- The parking area at the western end of Knoll Road would present an impediment to clear vision for pedestrians, cyclists and vehicular traffic intending to negotiate this junction. The report makes no reference to this.
- The claim that a traffic controller at this junction would 'provide additional safety for a pedestrian' is unrealistic as the traffic controller would be extremely exercised in trying to keep in phone contact with his colleagues at control sites further to the south, whilst also trying to keep control of vehicular and cyclist traffic approaching this busy junction from 4 directions.

Rep 5:

- The matter of traffic congestion has been ignored. Section 96 of the Officers report [Officers report for MO/2017/0911 **not** MO/2017/0740] states there will be no traffic problems and ignored the implications of moving the rig around the Dorking bypass to Knoll Road.
- The question of where the rig will come from has been ignored. If from the south it will come along the dangerous A24 from Horsham to Capel.
- Worried that Flint Hill has been omitted. The assumption that is an A grade road so can cope easily with the extra traffic. There has been no survey to show this can cope.

Officer comment:

Condition 18 requires a traffic survey to be undertaken of all vehicles and pedestrians using Knoll Road and Coldharbour Lane on Saturdays between the hours of 0800 and 1400.

The traffic survey is a statement of fact with regards to what cyclists, pedestrians, equestrians and cars were seen on Coldharbour Lane and Knoll Road on the four surveys that took place.

The traffic survey is not required to cover weekdays as Condition 18 is explicit it is only for Saturdays. The traffic survey is not required to cover Flint Hill or Ridgeway Road as it is explicit it need only cover Knoll Road and Coldharbour Lane.

The surveys take into account and have recorded the direction cyclists, pedestrians and equestrians were travelling on the survey day including travelling towards Dorking and travelling towards Coldharbour village. Therefore this would cover cyclists travelling towards a HGV or travelling in the same direction as a HGV.

The surveys were carried out by people standing in positions at points along Knoll Road and Coldharbour Lane and recording if a vehicle (including motorbike)/ pedestrian/ cyclist or equestrian was seen and which direction they were travelling. This includes whether the pedestrian or equestrian was travelling along Coldharbour Lane for its full length or towards a right of way.

The CTMP has been amended to remove HGV access/ egress on Saturdays. The CTMP includes information about the signage that would be placed where rights of way enter onto Coldharbour Lane. This would be for all rights of way including: footpaths 135, 247, 250, 252, 257; and bridleway 260.

Condition 18 does not require a risk assessment to be carried out but just a survey and then a Safety Audit.

Planning & Regulatory Committee 2 August 2017

## UPDATE SHEET

### MINERALS/WASTE MO/2017/0911

DISTRICT(S) MOLE VALLEY DISTRICT COUNCIL

**Land at Bury Hill Wood, off Coldharbour Lane, Holmwood, Surrey RH5 6HN**

**Details of a Traffic Management Scheme pursuant to Condition 19 of appeal ref: APP/B3600/A/11/2166561 dated 7 August 2015.**

## CONSULTATIONS AND PUBLICITY

### *District Council*

Mole Valley District Council are due to report this application to their committee in the evening of 2 August 2017. Their report recommends No Objection be raised.

### *Consultees (Statutory and Non-Statutory)*

Surrey Fire and Rescue have commented that the issues that arise from HGV traffic access the application site during the proposal were considered and dealt with as part of planning application MO09/0110. Surrey Fire and Rescue have commented that access for both Emergency Services and Critical Services (health and social community care) will need to be considered as part of the operational planning stage which follows on from the planning process. The operational planning stage can only be completed once the dates and timings for both the road closure and vehicle movements have been confirmed by Europa. The establishment of an operational plan is a formal process and a parallel regime that is used for any road events/ road closures.

### *Parish/Town Council and Amenity Groups*

Leith Hill Action Group (LHAG) have written in raising the following concerns:

- It is contestable that the TMP must be workable. The TMP provides no more insight into that than the 2008 or the 2015 versions.
- There is uncertainty as to the basic facts i.e.:
  - How many HGV movements are required – table 2 of the Officers report attempts to interpret Table 5.1 of the TMP and gives subtotals summing to 1402 and 1546 (this number is using the aluminium trackway and is irrelevant as this option is proposed entirely at the Applicant's option). We believe the true number is slightly higher than the last of these. The information is not there.
- No attempt has been made to model or calculate typical transit times of HGVs up and down the steep, narrow and winding Coldharbour Lane whilst negotiating four sets of traffic controls and other traffic. The workability of the scheme cannot be assessed. Our assessment is that the required number of daily movements could not be achieved.
- If the TMP's workability cannot be assessed, its impacts cannot be assessed.
- No attempt has been made to explain how users or residents of Logmore Lane or the residents of Coldharbour Lane would integrate into the scheme – how will they communicate with the traffic controllers when there is no mobile reception on large parts of Coldharbour Lane
- No assessment has been made of the ability of alternative routes to handle Coldharbour Lane traffic.

- Coldharbour Lane is steep, narrow and winding sunken lane. For much of its 3 mile length it is too narrow for a single car safely to pass a single cyclists. It is classified as “Not suitable for HGVs”. The vehicles to be used are not cars but mostly 30 to 50 tonne vehicles 8 to 9 feet wide and 40 – 50 feet long.
- The Safety Audit includes Recommendation 3: “*Advise escort vehicle drivers that they should stop if they encounter cyclists coming towards them to allow them to safely pass*”. This recommendation is NOT accepted in the TMP on the advice of SCC Officers and Officers propose a card to be issued to every HGV driver
- The Safety Audit and TMP is silent on what HGV drivers should do if they encounter a cyclist going in the same direction [as the HGV] – surely a much more frequent likely occurrence under the proposed scheme
- The Safety Audit included Recommendation 2: “*provide signing specifically advising cyclists to wait for the signal to go*”. Officers refusal to accept this specific recommendation is irresponsible and dangerous. It constitutes a failure to meet the requirement of Condition 19 that “Any mitigation measures should be subject to the road safety audit process”, the measures now proposed have not been.
- At a meeting held in September 2016 with SCC, LHAG and representatives of the applicant, undertakings were given about early sight of drafts. These undertakings have not been honoured.
- The stated aims of the TMP include “ensuring the safety of road users”. With respect to cyclists and equestrians this is demonstrably not achieved.
- The stated aims of the TMP including “minimis[ing] any delay to road users”. This has not been achieved.
- The impacts of businesses and residents on Coldharbour Lane and Coldharbour have not been considered.
- The requirement of Condition 19 that any mitigating measures should be subject to the road safety audit process have not been met
- The deficiencies of the material presented and public interest are too great and this scheme should be rejected in its present form

CPRE have commented saying the CTMP provides little additional information on how the scheme will operate and it should not be accepted. Additional information should be provided on:

- The likely vehicle numbers going through the system at peak times and the impact this will have on existing traffic movements. The vehicles will be very slow moving and could close Coldharbour Lane for considerable periods for time.
- There is no explanation of the implications of no Saturday working
- Although much is made of replacing hardcore with aluminium trackway it is not clear if this is achievable. It needs to be clarified and possibly conditioned if it is the only way the CTMP can be made to work.
- There is no information on delays to emergency vehicles. It is not adequate to state that mineral vehicles can be held up to allow emergency vehicles. How will this be achieved if enroute. How will operators contact emergency vehicles as mobile phone connections can be weak.
- There is no evaluation of the impact on existing parking on Knoll Road or increased congestion in Dorking or the wider area.
- It is unsatisfactory to propose the Ryka Carpark as a holding area. This is already well used by HGVs.
- It is clear there is little room for error for the movement paths of the HGVs and it is likely the historic banks with their tree roots and ecology will be damaged
- The infrastructure is inadequate to cope with the additional HGV traffic.

#### ***Additional key issues raised by public***

97 further letters of representation have been received since the Officer report was published. Some of these letters are from residents who have previously made representations. Some are

from residents who have not. The following comments are issues raised within these representations in addition to comments made and documented within the Officer report:

*General*

- 1) The whole application is driven by greed
- 2) The drilling will cause serious impact/ damage aquifers/ rig damaging the skyline/ should be undertaken elsewhere

*Consultation time period*

- 3) Concern how consideration can be given to further comments when the meeting date is so close to the consultation closing date
- 4) Object/ protest to rush the scheme through without adequate time for consultation
- 5) The 14 day consultation period is woefully short
- 6) Urge to extend the consultation period until the September meeting
- 7) Proposal should not be rushed through in weeks

*Officer report*

- 8) The report flies in the face of considerations and valid points which are raised and have not been answered

*Risk*

- 9) Cannot see how this scheme is safe

*Access to the site*

- 10) Coldharbour Lane will effectively be closed to non-site traffic for the duration of the development
- 11) The knock on effect on alternative routes will be chaotic and expensive
- 12) Coldharbour Lane is a vital link to our village
- 13) How will other small lanes (i.e. Anstie Lane) cope with extra traffic?
- 14) The sunken lanes are a challenge for car drivers let alone HGVs
- 15) Coldharbour Lane is narrow for 4km in length

*Lorries and Traffic*

- 16) There will be hundreds of lorries
- 17) The lorries bringing in equipment have shown damage to the lane. Dread to think what 1000+ lorries will do/ is unimaginable
- 18) There is already horrific traffic on Vincent Lane - the knock on effect has not been assessed
- 19) The existing levels of traffic in Dorking are too high for this proposal

*CTMP itself*

- 20) The CTMP does not take into account Recommendation 3 of the Safety Audit
- 21) The CTMP does not take into account Recommendation 2 of the Safety Audit
- 22) Are SCC going to provide adequate Police time & funding for incidents that are inevitable with the CTMP
- 23) Concern the CTMP would allow HGV movements through Dorking during rush hour and school arrival/ leaving times
- 24) The marshalling of HGVs at 4 separate points along Coldharbour Lane was deemed unworkable by the Inspector & this CTMP is the same
- 25) More analysis/ an independent analysis/modelling of the traffic management plan needs to be done
- 26) Having movements on Saturday morning is unacceptable
- 27) The CTMP says that there will be no traffic movements on Saturday but this will concentrate movements during the week
- 28) There should be a 20mph speed restriction along Coldharbour Lane for the HGVs
- 29) There is no evidence that the radios would work between the banksmen
- 30) What happens in the event of a vehicular failure along Coldharbour Lane

- 31) The CTMP does little to allay concerns to both level of disruption and also environmental damage
- 32) What time of day will these movements occur
- 33) Outraged at the lack of information in the revised CTMP
- 34) If 10 cars are travelling down Coldharbour Lane & meet a HGV, who reverses?
- 35) Do you have an analysis of HGV movements per phase?
- 36) The CTMP does not provide for the safety of other road users especially cyclists
- 37) Aluminium trackway must be used
- 38) There will be massive consequences of the CTMP
- 39) Has an assessment of the average length of time for HGV to travel to site been carried out?
- 40) You cannot approve this CTMP or in fact any CTMP for this site
- 41) The bus service will cease between Dorking and Coldharbour
- 42) Is it confirmed that a BDF28 Rig is planned as the CTMP is based on this
- 43) Appalled by decisions being made in light of overwhelming evidence that the drilling and traffic management is unworkable
- 44) Any major project must include the identification of all potential risks and hazards with appropriate actions to mitigate these risks and a contingency. This CTMP is woefully short on all of these areas. Some risks are dismissed outright and it only takes one to potentially result in a death.

#### *Residents*

- 45) The impact of those living on the route will be unacceptable
- 46) People won't have access or will have delayed or reduced access to emergency services/ it would take double the time for an EV to get to Coldharbour
- 47) There is no provision for planning in case of an accident between a HGV and a cyclist
- 48) It will totally inconvenience those of use who work and live in the area/ people will be trapped in their homes/ the CTMP shows no consideration to residents who will effectively be imprisoned in their homes
- 49) There is no mobile signal so how will residents communicate with the applicant
- 50) There will be a risk to pedestrians/ cyclists/ equestrians
- 51) If a HGV travelling to the site at 30mph meets a cyclist doing 20/30mph then there is a high safety risk of an accident
- 52) The report does not take into account the number of cyclists on weekdays

#### *Businesses*

- 53) Is the Plough pub to be closed for 18 weeks?
- 54) Businesses will be affected
- 55) Our local dog walking business will be affected by road closures and not being able to get to woods to walk the dogs

#### *Knoll Road*

- 56) How are you going to get lorries along a residential road which already has traffic problems/ it is inappropriate to use Knoll Road and it will become unusable
- 57) The junction of Coldharbour Lane & Knoll Road is a hazard with difficulties of crossing junctions
- 58) The 3 minute waiting time for HGVs in Knoll Road has been withdrawn. It should be reinstated
- 59) Parking on Knoll Road is difficult enough with the HGVs
- 60) The HGVs waiting with engines idling will be a huge burden
- 61) Knoll Road will experience heavy traffic, noise, air pollution and damage from the proposal

#### *Flint Hill*

- 62) Flint Hill is a key route into Dorking - has an assessment been done of the HGVs on this road?
- 63) There is a lack of attention paid to Flint Hill (the A2003). The road is narrow with a single footpath for much of its length. The photographs in Appendix 1 show this.



Three types of Proforma letter have been received from members of the public. These raise issues all covered above in other representations received.

#### Officer response to new issues raised within representation letters

One key area of concern is with regards to access by Emergency Service vehicles in particular ambulances. As outlined above under the Surrey Fire & Rescue response, Europa will be required to establish an Operational Plan which would have to be put in place before work commences on site. The Operational Plan would cover all emergency services and critical care services to allow them to continue to operate unimpeded during the exploratory work. The Operational Plan will require Europa to inform all the emergency services and critical care services of their operational and its commencement. The Operational Plan follows on from the planning stage and cannot be established until dates for commencement of development are known and mobile telephone numbers are known. The establishment of an Operational Plan is a formal process and a parallel regime that is used for any road events/ road closures such as the recent Prudential Cycle Ride event. This falls beyond the remit of the planning system.

With regards to mobile phone signal, the applicant has stated that there is a mobile phone provider that gives coverage on the Site, which will enable contact with the emergency dispatch centres and local residents. Contact between the security cabin on the application site, the HGV drivers, the escort vehicles and the banksmen would be via radio.

#### Type of rig

The applicant has confirmed that the rig cited in the CTMP is the worst case scenario.

#### Lack of consultation

Of the further comments received, 29 of those have stated that the consultation on the amendments is inadequate/ too short. The following provides information on this:

- The planning application was validated on 10 May 2017 and went out on consultation and notification of the public on 25 May. This had a deadline for public responses of 21 June (this is a period of 27 days). This consultation was carried out in accordance with the requirements of the Development Management Procedure Order 2015.
- An amended CTMP was submitted with a revised plan on 17 July and this went out for re-consultation and re-notification of the public on 17 July with a deadline for responses on the re-consultation and re-notification on 31 July. This is a period of 14 days.
- There is no date set out within the Development Management Procedure Order 2015 or the NPPG as to how long a further consultation should take place. The best practice approach adopted by the County Planning Authority for all planning applications is to re-consult and re-notify for a period of 14 days.

#### Safety Audit Findings

LHAG have commented that neither Recommendation 2 or Recommendation 3 of the Safety Audit form part of the CTMP and therefore the CTMP is "*irresponsible and dangerous. It also constitutes a failure to meet the requirement of Condition 19*". Paragraphs 34 and 35 of the Officer report cover this point.

LHAG have also commented that the CTMP does not say what HGV drivers should do if they encounter a cyclist travelling in the same direction as the HGV. As the HGV convoys would have an escort vehicle in front of them the escort vehicle would see the cyclist first. The escort vehicle driver height would be the same as a car or van. The escort vehicle would then manage the HGV convoy to travel behind the cyclist in the same manner as any vehicle travelling behind a cyclist on the public highway.

#### Bus Service

**MO/2017/0911**

The bus service that goes through Coldharbour is:

- Monday and Thursday leaving the Plough at 9:47am and 13:02pm (returning 12:32pm)
- Tuesday and Friday leaving the Plough at 2:02pm (returning 5:07pm)

A total of 10 buses to Coldharbour all week. The CTMP would not impact on Wednesdays. There would be no impact on the evening service on Tuesdays and Fridays. The bus service would be diverted through Surrey County Council passenger service. The service has been diverted in the past due to other circumstances historically.



Car turning right out of Knoll Road into Flint Hill



The junction of Knoll Road with Flint Hill facing south.

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Looking south away from Knoll Road/ Flint Hill junction



Pedestrians walking along footpath on Flint Hill

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Photo 1: Lorry travelling along aluminium trackway



Photo 2: HGV unloading aluminium trackway



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