

**TO:** PLANNING & REGULATORY COMMITTEE **DATE:** 2 AUGUST 2017

**BY:** PLANNING DEVELOPMENT TEAM MANAGER

**DISTRICT(S)** MOLE VALLEY DISTRICT COUNCIL **ELECTORAL DIVISION(S):**  
**Dorking Hills**  
**Mrs Watson**  
**Dorking & The Holmwoods**  
**Mr Cooksey**

**PURPOSE:** FOR DECISION

**GRID REF:** 515489 144822

---

**TITLE:** MINERALS/WASTE MO/2017/0911 - LAND AT BURY HILL WOOD, OFF COLDHARBOUR LANE, HOLMWOOD, SURREY RH5 6HN

---

## **SUMMARY REPORT**

**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.**

Planning permission was granted on appeal (ref: APP/B3600/A/11/2166561) for the construction of an exploratory well site, including plant, buildings and equipment with preliminary short-term drill stem test for one exploratory borehole, the erection of security fencing and associated works to an existing track on 7 August 2015. This was subject to 23 conditions. This application addresses Condition 19.

363 letters of representation have been received with regards to the Construction Traffic Management Plan (CTMP) all raising objection and concern to it. The most prevalent comments raised are: no Environmental Impact Assessment (EIA) has been carried out for the CTMP, emergency services require access to Coldharbour Lane, the roads in the locality are unsuitable for the existing traffic let alone the vehicles proposed, the lorries would have an impact on Dorking as a whole, the lorries would cause detrimental damage to the sunken lanes and the trees on the banks, the unfairness of the proposal on residents, that the proposal would endanger cyclists and pedestrians; and the holding bays in Knoll Road are unacceptable. These matters are covered in the report. The matters raised with regard to the site being in an Area of Outstanding Natural Beauty (which is raised in 99 letters of representation, has no bearing on this application.

Leith Hill Action Group (LHAG) and Capel Parish Council raise a number of concerns with regards to the CTMP including that they do not consider adequate mitigation measures have been provided, state that the CTMP should be subject to an EIA and that other impacts such as the socio-economic impacts of the proposal have not been addressed, do not consider the CTMP differs from that submitted as part of the Public Inquiry, that there is a level of uncertainty whether the aluminium trackway would be used. Mole Valley District Council have yet to comment as they will consider this application also on 2 August 2017.

### *Planning History*

A planning application (MO09/0110) for the drilling of an exploratory wellsite on land to the west of Coldharbour Lane (the D289) in Bury Hill Wood was submitted to Surrey County Council (SCC) as the County Planning Authority in 2008. That application was subject to an EIA and was reported to the May 2011 Planning and Regulatory Committee with an Officer recommendation to Permit subject to the imposition of conditions. The application was refused

by SCC on 30 June 2011. The applicant then made an appeal to the Secretary of State against the refusal. The appeal was subsequently dismissed by the Secretary of State's Inspector on 26 September 2012. However, the applicant Europa Oil and Gas Ltd then successfully challenged the Inspector's decision in the High Court, and on 25 July 2013 the judge quashed the earlier appeal decision. LHAG, which was a defendant to the proceedings in the High Court, then appealed against the judge's decision. This appeal was dismissed by the High Court on 19 June 2014 and the effect being to refer the application back to the Secretary of State to re-determine the appeal by Europa Oil and Gas Ltd against SCC's earlier refusal of planning permission ref: MO09/0110.

Another Public Inquiry took place following this commencing on 22 April 2015 and closing on 11 June 2015 (ref: APP/B3600/A/11/2156561). The Inspector's decision was to allow the appeal subject to 23 conditions, 13 of which were pre-commencement conditions. Of those 13 conditions, 10 have been approved (three of those have been reported to the Planning and Regulatory Committee for determination).

When the Planning Inspector granted planning permission on Appeal for exploratory drilling at this site, the principle of Coldharbour Lane to access the site was established, despite its very obvious short comings. Therefore the only consideration in respect of this submission is whether or not the traffic management scheme meets the requirements of Condition 19.

#### *The Traffic Management Plan Considered at Appeal*

A Traffic Management Plan (TMP) was submitted with the original planning application in 2009 to accompany the documents that were submitted and heard at the second Planning Inquiry in 2015. This TMP provided details of the proposed route that HGVs would travel to the application site which would be the A24, travelling northwards from the junction of the A2003 Flint Hill with the A24 before turning left (westwards) into Knoll Road (the D2841) and then left (southwards) into Coldharbour Lane. Access into the application site would be a right hand turn from Coldharbour Lane and then using an existing Forestry Commission entrance and track. The TMP included Controller Cards for the banksmen which would be positioned at Knoll Road, Logmore Lane and the application site. Given the nature of the road network in the vicinity of the application site, there is only one route HGVs can travel to the application site.

The Inspector considered the number of HGVs that would be associated with the proposal, alongside their size, stating at paragraph 53 of the appeal decision: "*there is no doubt that a relatively large volume of HGVs – some 1,100 movements – would use the Lane during the construction and dismantling of the drill-rig site and compound. However, this would be spread over a period of 12 weeks, with a predicted maximum of only some 30 movements in any single day*". Whilst concern has been raised within representations that this Construction Traffic Management Plan (CTMP) is 'no different to that submitted in 2014', Officers have to have regard to the requirements of Condition 19 and what the Inspector was seeking to have submitted as part of Condition 19. Whilst Officers recognise the concerns raised in representations, Officers note that there is no reference within the Inspectors report to the TMP being so deficient or unworkable that the planning application should be refused.

What is referenced in the Inspectors report at paragraph 51 are his three main concerns with the proposal with regards to traffic. These being the holding lay by point for HGVs prior to them travelling to Knoll Road; that the number of recreational cyclists using Coldharbour Lane on Saturdays has increased dramatically since the original application had been made in 2008; and that there had been a width restriction order placed on Coldharbour Lane in the period between the planning application being made in 2008 and the second Public Inquiry date of 2015.

With regards to the width restriction on Coldharbour Lane it was discussed at the Inquiry that this was not a difficulty as the width restriction does not preclude access to land and properties on Coldharbour Lane and just prevents through traffic. The application site complies with this regard. With regards to the increasing number of recreational cyclists on Saturdays the Inspector required by Condition 18 for surveys be carried out to ascertain figures and for the

CTMP to address this. As a consequence of the traffic surveys conducted for Condition 18, the CTMP has been modified so that no HGVs shall access the application site on Saturdays except in an emergency during the drilling phase. Finally with regards to the holding point before HGVs travel to Knoll Road, the applicant has confirmed in the CTMP this would be Ryka's Café on the A24.

#### *The current Construction Traffic Management Plan*

The current proposal the subject of this report is for consideration of Condition 19, the submission of a Construction Traffic Management Plan. Condition 18 (the requirement to carry out surveys of Coldharbour Lane on Saturday mornings and to produce a safety audit) is elsewhere on this Agenda for consideration. The CTMP contains a number of different elements. Given the length of Coldharbour Lane involved, a traditional traffic management scheme such as unattended shuttle signals would not be appropriate. The scheme proposed in the CTMP is therefore bespoke, acknowledging the difficulties in providing traffic management in these circumstances and with different traffic management requirements for the different phases of the development. The CTMP would also involve the implementation of a number of Traffic Regulation Orders (TROs) including two periods of 3 day road closure for Coldharbour Lane. The stated aims of the traffic management scheme are to ensure the safety of road users, to minimise any delay to road users, to avoid attempts by vehicles to pass each other where the road width is not adequate, to avoid vehicles speeding in order to reduce the likelihood of collisions, and to avoid damage to the delicate banks of the sunken lane.

The phases of the exploratory well site development are: site construction (6 weeks); rig mobilisation (3 days); drilling the borehole (4-5 weeks); testing (4 days); rig de-mobilisation (3 days); decommissioning and restoration (6 weeks).

Access to the application site is to be gained via Coldharbour Lane travelling southwards from Knoll Road in Dorking. Coldharbour Lane is a rural road which has restricted width and is a sunken lane in places. The sunken lane nature of Coldharbour Lane can be seen in the attached photographs. Coldharbour Lane's width varies from greater than 5.5 metres (m) wide (suitable for two HGVs passing each other) to less than 4.8m width (not suitable for a HGV and car to pass). A number of rights of way networks join with Coldharbour Lane; and Logmore Lane connects to it approximately half way down. It is a challenging access route, particularly given the size and number of vehicles proposed (20 tonnes – 60 tonnes). Given the nature of the operation proposed and the size of the vehicles required to facilitate it, accessing the site presents significant and unique difficulties.

#### *Vehicles in Convoy*

During the site construction, drilling and decommissioning phases, a convoy system would operate whereby HGVs would travel to Knoll Road and then travel to the application site in convoys of three vehicles behind an escort vehicle. As the escort vehicle would travel in front of the HGVs it would be this vehicle that would be radioing ahead to the banksmen at the banksmen positions at Logmore Lane, near to Home Farm and the application site to ensure that any traffic travelling in the opposite direction to the HGVs are either held back at the banksmen positions should the HGVs be travelling along a narrow section of Coldharbour Lane; or to inform the escort vehicle that traffic is advancing towards them so that the HGVs can be aware of the need to take caution. The most extended narrow section of Coldharbour Lane is between Logmore Lane and the application site with a limited section of approximately 155m in length to the north of the application site which is slightly wider and suitable to allow a HGV and car to pass.

#### *Road Closure*

During the rig mobilisation and de-mobilisation phases Coldharbour Lane would be closed to all other traffic during the hours of 0930 – 1900 hours to allow for the delivery of the rig and the crane which would be brought to site on 50 tonne and 60 tonne vehicles respectively and would

be wider loads than the other deliveries. The applicant has provided plans showing the signage that would be placed around the local highway network to warn of the road closure and to show diverted routes. An additional sign has been proposed to warn drivers of the narrow nature of Anstie Lane.

### *Safety*

Concern has been raised within representations and LHAG with regards to the safety of users of Coldharbour Lane and Knoll Road including cyclists, pedestrians and equestrians. With regards to users of the rights of way network that connects with and/ or crosses Coldharbour Lane, the CTMP provides details of what signage would be in place for those rights of way. There would also be signage in place prior to bridleway 262 to forewarn HGV drivers that there could be equestrians in the road.

The Planning Inspector noted in his Report that the safety of other road users is the most crucial aspect of the access arrangements. However he went on to comment that with HGV banksmen in place, and in communication with the HGV drivers, potential hazards should be known and risks minimised. The Inspector recommended the imposition of signs at entry points to warn highway users of possible HGV movements and although it was acknowledged that there would be an increase during the period of exploration, the Inspector believed that the management protocols which would be set out in the details submitted for Condition 19, and including lowering of the speed limit, should offset this. The Inspectors only remaining outstanding concern with regards to the safety of other road users (as cited in para 67 of the Report) was HGV movements on Saturdays and the potential impact this could have on recreational cyclists. The CTMP has been revised to remove references to Saturday movements except in an emergency during the drilling phase.

The County Highway Authority, in consultation with the Safety Audit team and the Surrey Police, have reviewed the submitted CTMP and have commented that whilst this is a complex traffic management scheme, it is the only practical way of getting HGV vehicles to the site, given the constraints of the highway network. In consideration of whether the submission meets the requirements of Condition 19, the view of the County Highway Authority and Officers is that it does, with the exception of HGV movements on Saturday mornings, which the County Highway Authority considers should be only in case of emergencies that endanger the safety of life or the safety of the operation. The operator will need to plan in advance in order to ensure that they have sufficient supplies on site before the weekend for drilling and testing.

**The recommendation is to APPROVE subject to conditions**

---

### **APPLICATION DETAILS**

#### ***Applicant***

Europa Oil and Gas (UK) Ltd

#### ***Date application valid***

10 May 2017

#### ***Period for Determination***

5 July 2017

#### ***Amending Documents***

Construction Traffic Management Plan Rev 9 13 July 2017, plan 4100 CTMP 10 rev C, Knoll Road Controller card, HGV Control card.

---

## SUMMARY OF PLANNING ISSUES

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.

	<b>Is this aspect of the proposal in accordance with the development plan?</b>	<b>Paragraphs in the report where this has been discussed</b>
Construction Traffic Management Plan Environmental Impact Assessment		

---

## ILLUSTRATIVE MATERIAL

### Site Plan

Plan

### Aerial Photographs

Aerial 1: Bury Hill Wood

Aerial 2: Bury Hill Wood

Aerial 3: Bury Hill Wood

Aerial 4: Bury Hill Wood rights of way network and access to the site

Aerial 5: Bury Hill Wood: route to site

### Site Photographs

Figure 1: Knoll Road Looking Westwards towards Coldharbour Lane

Figure 2: Knoll Road Looking Eastwards

Figure 3: junction of Knoll Road and Ridgeway Road where the holding bays would be

Figure 4: upper part of Coldharbour Lane having just left Knoll Road

Figure 5: the sunken lane section of Coldharbour Lane

Figure 6: the sunken lane section of Coldharbour Lane

Figure 7: the sunken lane section of Coldharbour Lane

Figure 8: the sunken lane section of Coldharbour Lane

Figure 9: Coldharbour Lane

Figure 10: site entrance

---

## BACKGROUND

### *Site Description*

1. The permitted drill site is located in a rural area at Bury Hill Wood, part of Abinger Forest, within the Metropolitan Green Belt and in the Surrey Hills Area of Outstanding Natural Beauty (AONB) and Area of Great Landscape Value (AGLV). The site lies some 3.5 kilometres (km) to the south west of Dorking, west of South Holmwood and approximately 700 metres (m) to the north of the Village of Coldharbour. The Anstiebury Camp, a Scheduled Monument, is found some 800m south of the site between Abinger Road and Anstie Lane.
2. The 0.79 hectare (ha) site is located within an elevated part of the Greensand Hills, which divide the North Downs from the Low Weald and is some 2.4km north east of Leith Hill. The site is defined on the southern and western boundaries by well established

gravelled tracks. The proposed site contains uneven ground; it is situated at a height of 236m Above Ordnance Datum (AOD). The site is found within a plantation managed by the Forestry Commission, with rising land to the east and north. The western part of the site falls within the Abinger Forest Ancient Replanted Woodland. There are a number of 'dells', former quarries thought to date from the 18<sup>th</sup> or 19<sup>th</sup> century on, and in, the vicinity of the site. The land to the west drops to a valley that has Coldharbour Village at its southern end. The site would be situated at approximately the same elevation as Coldharbour Village. Although no public rights of way are directly affected by the proposal, the public has open access to the Forestry Commission land and the woods are used for informal recreational purposes.

3. Access to the site would be gained via Coldharbour Lane and utilise an existing Forestry Commission entrance and 250m of existing access track. The access with Coldharbour Lane (D289) is approximately 600m north of the junction with Anstie Lane (D297)/Abinger Road (D289) and 1.5km south of Logmore Lane (D288). Coldharbour Lane links to the A24 via Knoll Road (D2841) and Flint Hill (A2003) to the south of Dorking.
4. There is a residential property known as Lower Meriden some 520m north west of the site and about 35m lower in elevation. The properties known as White Cottage, Ranmore Cottage and Ivy Cottage at the eastern end of Coldharbour Village and within its Conservation Area are some 512m from the southernmost end of the site. The Coldharbour Village Conservation Area extends from the junction of Coldharbour Lane, Abinger Road and Anstie Lane in a band that includes the majority of the village properties and ends just short of The Landslip to the west of Coldharbour.
5. There are two important aquifers present in the Dorking area, the Chalk and the Lower Greensand. The primary aquifer, the Chalk, is not present in the proposed borehole location. The secondary aquifer, the Lower Greensand, is exposed at surface and would be penetrated by the upper part of the proposed exploratory borehole.

## PLANNING HISTORY

6. Planning permission was granted on Appeal (ref: APP/B3600/A/11/216561) in August 2015 subject to 23 conditions. The decision was preceded by two Public Inquiries which is set out below in the following paragraphs. Planning application ref: MO09/0110 was refused by Surrey County Council (SCC) on 30 June 2011 for the following development: "Construction of an exploratory drillsite to include plant, buildings and equipment; the use of the drillsite for the drilling of one exploratory borehole and the subsequent short term testing for hydrocarbons; the erection of security fencing and the carrying out of associated works to an existing access and track all on 0.79 ha, for a temporary period of up to 3 years, with restoration to forestry." At the Planning and Regulatory Committee on 25 May 2011, Members had resolved to refuse the application for the following reasons:
  - (1) *The proposed exploratory drilling development will have a significant adverse impact on the Area of Outstanding Natural Beauty (AONB) in the setting of Leith Hill which cannot be mitigated and where exceptional circumstances including the public interest have not been demonstrated to justify the grant of planning permission. The proposal is therefore contrary to Government Planning Policy as set out in Minerals Policy Statement 1 (Planning and Minerals) November 2006 and Planning Policy Statement 7 (Sustainable Development in Rural Areas) August 2004, The South East Plan May 2009 Policy C3 (Areas of Outstanding Natural Beauty); the Surrey Minerals Plan 1993 Policy 1 (Environmental and Amenity Protection) and the Mole Valley Local Development Framework Core Strategy 2009 Policy CS13 (Area of Outstanding Natural Beauty and Area of Great Landscape Value).*

- (2) *There is insufficient evidence to demonstrate why the proposed exploratory drilling development cannot be located beyond the boundary of the Area of Outstanding Natural Beauty (AONB) designation. The proposal is therefore contrary to Government Planning Policy as set out in Minerals Policy Statement 1 (Planning and Minerals) November 2006 and Planning Policy Statement 7 (Sustainable Development in Rural Areas) August 2004 and Surrey Minerals Local Plan 1993 Policy 15 (Environmental & Ecological Impact of Hydrocarbon Development).*
- (3) *It has not been demonstrated to the satisfaction of the County Planning Authority that the proposed traffic management measures are adequate to protect the character of Coldharbour Lane; where the nature of the traffic activity would have the potential to irreversibly damage the historic banks and trees and lead to the industrialisation of the character of a quiet rural road; or adequate to protect the amenity of highway users and residents in Knoll Road, Coldharbour Lane and the broader vicinity; contrary to the Mole Valley Local Plan 2000 Policy MOV2 (The Movement Implications of Development) and Surrey Minerals Local Plan 1993 Policy 1 (Environmental and Amenity Protection).'*
7. The applicant then made an appeal to the Secretary of State against the refusal. The above reasons for refusal were subsequently amended by Surrey County Council in the run up to the first appeal Public Inquiry, with the second reason for refusal withdrawn and the third amended to read as follows: *'It has not been demonstrated to the satisfaction of the County Planning Authority that the proposed traffic management measures are adequate to protect the character of Coldharbour Lane; where the nature of the traffic activity would lead to the industrialisation of the character of a quiet rural road; or adequate to protect the amenity of highway users and residents in Knoll Road, Coldharbour Lane and the broader vicinity; contrary to the Mole Valley Local Plan 2000 Policy MOV2 (The Movement Implications of Development) and Surrey Minerals local Plan 1993 Policy 1 (Environmental and Amenity Protection).'*
8. The appeal was subsequently dismissed by the Secretary of State's Inspector on 26 September 2012. However, Europa Oil and Gas Ltd then successfully challenged the Inspector's decision in the High Court, and on 25 July 2013 the judge quashed the earlier appeal decision. LHAG, which was a defendant to the proceedings in the High Court, then appealed against the judge's decision. This appeal was dismissed by the High Court on 19 June 2014 and a new Public Inquiry was held in the spring of 2015. The Inspector issued his decision (ref: APP/B3600/A/11/2166561) on 7 August 2015 and allowed the appeal with the following formal decision reason: *'Having regard to the evidence presented to the inquiry, the written representations and visits to the appeal site and surroundings, I am convinced that the short-term harm to the identified interests of acknowledged importance would be clearly and demonstrably outweighed by the fully reversible nature and the benefits of the scheme in national and local terms...Accordingly, and having taken into account all other matters raised, this appeal succeeds'*. This Appeal Decision has 23 Conditions which are required to be complied with, some of which require the submission of detail for approval by the County Planning Authority.
9. In addition to the above, the applicant submitted a planning application for an underground drilling corridor of an exploratory hydrocarbon borehole (ref: MO/2014/1006) which was permitted, subject to four conditions, on 25 September 2015. This application will include the drilling of an underground drilling corridor from land at Bury Hill Wood (the land which is the subject of this planning application) to land under Coldharbour Village. The borehole would be drilled to an anticipated total depth of 1,450m true vertical measured depth in order to target the Downdip Portland Target, with a 'deviation tolerance zone' of 8.5 hectares. The underground route of the drilling operation was not included within the earlier planning application refused by SCC (see above, ref: MO09/0110 – allowed at appeal), which sought planning permission for the over ground exploratory drill-site operations.

10. The applicant has submitted eight other planning applications seeking approval of details pursuant to conditions on appeal decision ref: APP/B3600/A/11/2166561. These are:
- Application ref: MO/2016/1009 - details of a Dust Suppression Scheme pursuant to Condition 7, details of a Method Statement for the geochemical baseline soil testing pursuant to Condition 12, details of a Method of Construction / Reinstatement Statement pursuant to Condition 21, details of measures necessary to keep the public highway clean pursuant to Condition 22, and details of in-cab cameras / CCTV pursuant to Condition 23. This application was approved in December 2016.
  - Application ref: MO/2016/0981 - details of Light Management Plan pursuant to Condition 11. This application was approved in December 2016.
  - Application ref: MO/2016/1194 - details of an Ecological Monitoring and Management Plan pursuant to Condition 9. This application has yet to be approved.
  - Application ref: MO/2016/1752 – details of a landscape and restoration plan pursuant to Condition 14. This application was approved in March 2017.
  - Application ref: MO/2016/1292 – details of Groundwater Monitoring pursuant to Condition 15. This application was approved in October 2016.
  - Application ref: MO/2016/1848 – details of a pre and post development condition survey method statement pursuant to Condition 20(ii). This application was approved in February 2017.
  - Application ref: MO/2017/0344 – details of a Noise Monitoring Plan pursuant to Condition 8. This application was approved in June 2017.
  - Application ref: MO/2017/0740 – details of a traffic survey and a safety audit pursuant to Condition 18. This application has yet to be approved and is another item on this Planning and Regulatory Committee agenda.
11. The applicant has also submitted three further planning applications relating to fencing which await determination and are matters separate to the consideration of the current scheme subject of this report:
- a) Ref: MO/2016/1563 for the installation of perimeter security fencing including 2m high heras fencing and 3m high deer proof fencing around the appeal site alongside an office and WC at the site entrance; and office, welfare accommodation, water, fuel and a generator for a period of 18 weeks. This application has yet to be determined.
  - b) Ref: MO/2017/0222 for the installation of perimeter security fencing including 2m high heras fencing and 3m high deer proof fencing around the appeal site alongside an office and WC at the site entrance; and office, welfare accommodation, water, fuel and a generator for a period of 52 weeks. This application has yet to be determined.
  - c) Ref: MO/2017/0255 for the installation of a 1.1 metre high reptile fence at the application site. This application has yet to be determined.
12. With regards to application MO/2017/0222, this application was screened under Regulation 7 of the Town and Country Planning Environmental Impact Assessment Regulations 2011 (the 2011 'EIA' Regulations) by the County Planning Authority (CPA) in January 2017 which concluded that the proposal would require an EIA of the development proposal. The applicant sought a Screening Direction from the Secretary of State (SoS) on this decision and in February 2017 the SoS issued a Screening Direction concluding that *“the environmental effects of this, albeit temporary and reversible, development on the character and appearance of the Surrey Hills AONB have not been subject to formal assessment through the EIA process to cover all components of the whole project. The Secretary of State concludes that the proposed security fencing and welfare facilities are inextricably linked to the main exploratory well-site works and the need to examine the potential impacts justify the need to update the existing environmental statement”*.
13. Following this, the SoS then chose to re-screen planning application MO/2016/1563 (which had been previously screened in November 2016) and in combination with

planning application MO/2017/0222 also resolved that planning application MO/2016/1563 should be subject to an EIA.

14. Consequently the applicant has chosen to submit an overarching Environmental Statement for planning applications MO/2016/1563, MO/2017/0222 and MO/2017/0255. This Environmental Statement was submitted to the CPA on 11 May 2017 and underwent consultation in accordance with Regulation 17 “Publicity where an environmental statement is submitted after the planning application” of the 2011 EIA Regulations (this falls to the applicant to carry out the publicity rather than the CPA). This included notifying residents.
15. Following this, the CPA has written to the applicant under Regulation 22 “Further information and evidence respecting environmental statements” of the 2011 EIA Regulations requesting further information and clarification on a number of matters in terms of the Environmental Statement. The further information requested has yet to be submitted.
16. For the avoidance of doubt the detailed scheme submission subject of this report is not subject to any further information requirements with regard to the previously submitted EIA in support of the 2015 Appeal decision or the subsequent EIA for the fencing applications.

## THE PROPOSAL

17. The applicant has submitted details to satisfy Condition 19 of Appeal Ref: APP/B3600/A/11/2166561 which is with regards to a traffic management scheme. Condition 19 states:

*Condition 19 No development (save for anything done pursuant to Condition 15 (Ground and surface water monitoring) shall take place until a Traffic Management Scheme has been submitted to and approved in writing by the County Planning Authority.*

*The Traffic Management Scheme shall include:*

- i. the provision, implementation and monitoring of traffic management measures (including details of the HGV holding area) to regulate the passage of relevant vehicles (as defined in Condition 16) travelling to and from the site and these measures shall take account of the road safety audit. Any mitigation measures should be subject to the road safety audit process;*
- ii. details of the temporary road closures, the management of traffic, including emergency vehicles, during the road closures;*
- iii. details of temporary warning signs for rights of way users at the point at which the rights of way meet Coldharbour Lane;*
- iv. details of temporary signs and any appropriate road marking prohibiting all relevant vehicles from parking or waiting in Knoll Road other than in three temporary marked parking places;*
- v. details of the publicity and prior notification signs to be provided to Capel, Holmwood and Wotton Parish Councils and to residents in Coldharbour Lane, Knoll Road, Abinger Road, Leith Hill Road, Lake Road, Broome Hall Road and Hen Hurst Cross Road in advance of and during the works;*
- vi. banksmen and escort details, including management of the progress of HGVs along Coldharbour Lane to protect trees and banks.*

*The Traffic Management Scheme shall be implemented as approved and continue for the duration of the contract.*

18. The applicant has submitted a Construction Traffic Management Plan (CTMP) to satisfy the requirements of Condition 19. The CTMP has been borne from the results of the

Traffic Survey carried out for Condition 18 and also the 2014 Traffic Count Data. The CTMP outlines that HGV movements to/ from the site for each of the different phases would take place between the hours set out in Table 1 below.

**Table 1.**

Construction/ decommissioning and reinstatement	0930 – 1500 Monday – Friday
Rig mobilisation and de-mobilisation	0930 – 1500 Monday – Friday
Borehole drilling	0930 – 1500 Monday – Friday
Testing	0930 – 1500 Monday – Friday

19. The timing of 0930 – 1500 hours Monday- Friday are set to avoid the network peaks and school pick up and drop off times when there may be high numbers of school children walking along Knoll Road. It should be noted these are hours for HGVs to travel to and from the application site. The hours of operation on the application site are longer and are controlled by Condition 5<sup>1</sup>. The CTMP outlines that the hours for HGVs to access and leave the site are the outer limits and deliveries would not necessarily be made first thing in the morning or late into the working day. Although the drilling and testing operations would be continuous in terms of their hours of operation, deliveries to the site associated with those phases would only be made during the working day as outlined in Table 1 above, except (as the applicant states) in the case of emergencies that endanger life or the safety of the operation. The applicant defines this as an out-of hours delivery of barites or materials to increase the density of the drilling mud to counter any uplift from a higher than expected surge of pressure during the drilling phase.
20. It should also be noted that Condition 19 requires the submission of a CTMP to regulate the passage of relevant vehicles as defined in Condition 16<sup>2</sup> of the Appeal Decision i.e. HGVs and not cars or vans. Cars and vans would be subject to the same traffic management as all other vehicles using the lane so will be managed that way and are able to traverse Coldharbour Lane and Knoll Road in the same manner as other cars and vans using that network.
21. HGVs travelling to the site would do so from the A24, travelling northwards from the junction of the A2003 Flint Hill with the A24 before turning left (westwards) into Knoll Road and then left (southwards) into Coldharbour Lane. Access into the application site would be a right hand turn from Coldharbour Lane and then using an existing Forestry Commission entrance and track. The Forestry Commission track near the entrance is structurally adequate and the visibility splays on to Coldharbour Lane are considered adequate with some trimming of the verges. The access track will require a protective membrane to be laid along part of its length and crushed stone or aluminium trackway laid on top. No top soil or subsoil is to be removed from site but once stripped would be placed within soil bunds around the perimeter of the operational area. The use of aluminium trackway would generate fewer movements as demonstrated in Table 2 below. Nevertheless, the assessment has been based on the worst case scenario of stone placement which was the situation considered by the Planning Inspector at the Public Inquiry.

<sup>1</sup> Condition 5 – *With the exception of emergencies, drilling, gas flaring and ingress and egress by relevant HGVs as specified in Condition 17, no lights shall be illuminated nor shall any operations or activities authorised or required by this permission, take place other than during the hours of: 0700 to 1800 hours on Monday to Friday; 0700 to 1300 hours on Saturday. Apart from the exceptions referred to above, there shall be no working at any time on Sundays, Bank or National Holidays.*

<sup>2</sup> Condition 16 – *No relevant vehicle (i.e. any HGV connected with the development hereby permitted and including any vehicle carrying parts of the drill-rig, but excluding any vehicle used for the purposes of the ground and surface water monitoring) shall enter or leave the application site unless accompanied by an escort vehicle to ensure correct routing in accordance with the approved Traffic Management Scheme (agreed in accordance with Condition 19 below).*

22. HGVs travelling to/ from the site would wait in Knoll Road until northbound traffic on Coldharbour Lane had passed through, and then travel in a convoy of three HGVs. For the return journey, HGVs would wait for a convoy of three on the site access track which is off Coldharbour Lane, before leaving and advancing up Coldharbour Lane. The number of HGVs proposed over the life of the development and per phase of the development is set out in Table 2 below:

**Table 2.**

Phase	Activity	Working hours	Delivery times	Size of vehicles	Number of two way vehicle movements
1 6 weeks	Site construction	0700-1800 Mon – Fri 0700-1300 Sat	0930-1500 Mon-Fri No HGVs Sat	32 tonne (t) <sup>3</sup>	a) Stone option = 376 b) Aluminium track option = 76
				49.5t	12
				Total a)	388 (13 movements per day)
				Total b)	88 (3 movements per day)
2 3 days	Rig mobilisation*	0700-1800 Mon-Sat	0930-1500 Mon-Fri No HGVs Sat	60t	2
				32t	58
				50t <sup>4</sup>	1
				Total	61 (20 movements per day)
3 4-5 weeks	Drilling the borehole	24/7	0930-1500 Mon-Fri No HGVs Sat	20t	232
				32t	192
				Total	464 (23 movements per day)
4 4 days	Testing	24/7	0930-1500 Mon-Fri No HGVs Sat	32t	40
				Total	40 (10 movements per day)
5 3 days	Rig de-mobilisation*	0700-1800 Mon-Sat	0930-1500 Mon-Fri No HGVs Sat	60t	2
				32t	58
				50t	1
				Total	61 (20 movements per day)
6 6 weeks	Reinstatement	0700-1800 Mon-Sat	0930-1500 Mon-Fri No HGVs Sat	32t	a) Stone option = 376 b) Aluminium track option = 76
				49.5t	12
				Total a)	388 (13 movements per day)
				Total b)	88 (3 movements per day)
Total movements			Stone	1546	
			Aluminium sheeting	1246	

\*- road closure

23. Details of each element of Condition 19 is as follows:

<sup>3</sup> This includes the vehicles bringing in fencing and security cabins which are subject to separate planning applications MO/2016/1563 and MO/2017/0222. This therefore represents the worst case scenario in terms of maximum HGVs coming to site.

<sup>4</sup> This represents a BDF 28 rig which is representing the worst case scenario in terms of size and manoeuvrability

*i. the provision, implementation and monitoring of traffic management measures (including details of the HGV holding area) to regulate the passage of relevant vehicles (as defined in Condition 16) travelling to and from the site and these measures shall take account of the road safety audit. Any mitigation measures should be subject to the road safety audit process;*

24. The provision of traffic management measures include the way HGVs will be directed to the application site from the A24, along Flint Hill and then Knoll Road to then travel down Coldharbour Lane.
25. This would be implemented by the placement of signs along the route to be used by HGVs warning other drivers using these roads that such activities would be taking place; and also on roads that lead up to Coldharbour Lane such as Logmore Lane, Anstie Lane and Abinger Road. In the case of the two 3 day road closures there would also be signs placed along the route to be used by the HGVs and also in the wider locality including the roads mentioned above and also Broomhill Road and Henhurst Cross Lane.
26. The applicant has outlined in the CTMP that they wish to use aluminium trackway sheeting in lieu of using crushed stone on site. The aluminium sheeting would be interlocking strips of hollow core box sections of sheeting with hardened steel nosing's to resist damage at connecting points. The trackway can be laid down directly from the lorry through the use of a hoist and would cover 4m by 3.5m per sheet. This would have the result of reducing the number of lorry movements by 90% for the construction and decommissioning phases. The applicant has stated that such aluminium trackway has been used on other drill sites and has been used by the military including runway sections for aircraft. The sheeting can be seen on the attached photo. The applicant has stated in the CTMP that should the aluminium trackway not be available that the CTMP also includes the provision for bringing in and using crushed stone. Therefore this CTMP considers both options.
27. Aluminium trackway would be delivered to the application site on flat bed rigid-body lorries also towing short trailers loaded with additional sheeting. The lorries are based on a standard three-axle chassis format with the hoist at the rear of the vehicle, with a cab of similar size to normal lorries. The trailers are short, twin axle units which have a deck the same height as the main lorry. The applicant states that although the overall length of the HGV would be long, because its hinge point is near the centre between the lorry and the towed trailer, manoeuvrability is better than a normal articulated lorry.
28. Prior to the commencement of operations, the CTMP outlines that Coldharbour Lane would be checked for the potential need for the management of foliage above and to the sides of the carriageway and pruned as necessary. The CTMP states that all appropriate consents would be obtained before this took place. A check would also take place on overhead power and telephone lines and actioned accordingly.
29. With regards to signage to be positioned along and in the vicinity of the route to warn other drivers and cyclists of the traffic management scheme and also HGV drivers of users of the rights of way network (pedestrians and equestrians), the CTMP states that signage would be erected at 0915 hours every day that deliveries were scheduled and removed when the last HGV has left the area.
30. The CTMP outlines how traffic travelling to the site would be managed for each phase which can be summarised as follows:

Construction, drilling, testing and decommissioning phases

- a) Following all signage being in position, deliveries of earth moving machinery would take place to the site. These vehicles would be escorted and would come directly from the plant hire location and proceed directly to the Knoll Road holding bays.

- b) Deliveries of hardcore or aluminium trackway would come to the site next. If using hardcore, this would come directly from railhead locations to the Knoll Road holding bays or from an assembly point identified as Ryka's Café on the A24 to the north of Dorking. Ryka's Café has HGV parking bays marked out for their use.
- c) To minimise the time HGVs travel down Coldharbour Lane, the HGVs would meet at Knoll Road and travel in a convoy of three lorries. To minimise waiting time of HGVs at Knoll Road, HGVs would drive together from Ryka's Café or from the railhead location. The CTMP states that as the contract for the stone has not yet been let, at this stage it is an unknown where the railhead yard would be.
- d) Once HGVs are gathered at Ryka's Café or are ready to come from the railhead yard location, they would inform the application site they would be travelling to Knoll Road. An escort vehicle would be waiting for the HGVs and as soon as possible escort the HGVs along Coldharbour Lane. To manage vehicles leaving Knoll Road there would be a traffic controller present at the junction of Knoll Road and Coldharbour Lane.
- e) For aluminium trackway HGVs these would be in single loads forming a truck and a trailer as one unit and would drive straight to Knoll Road to be escorted to the application site. As there would be one vehicle there would be no issues of the aluminium trackway vehicles extending beyond the holding bay area in Knoll Road. The CTMP says the access track would be 1 delivery (2 movements) then a pause whilst the site undergoes soil movements after which the remaining aluminium track would be brought to site in 4-6 movements per day. The holding bays in Knoll Road would only be used for HGVs bringing aluminium trackway if they were waiting for northbound traffic on Coldharbour Lane to clear.
- f) All vehicles waiting in Knoll Road to go down Coldharbour Lane would have to turn off their engines.
- g) Once ready to leave Knoll Road, the traffic controller at the Knoll Road/ Coldharbour Lane junction would inform the application site and the next set of banksmen, i.e. at Home Farm, that HGVs would be mobilised. As there would be no road closures along Coldharbour Lane for these phases, Coldharbour Lane would be open to usage by residents. Therefore as HGVs travel along Coldharbour Lane, the public will be held at each of the four banksmen points using stop/ go boards until the HGVs have reached the application site. This would be repeated in reverse for HGVs travelling from the application site to Knoll Road; and repeated each working day for each phase outlined above.

#### Rig mobilisation and demobilisation

- h) Coldharbour Lane would be subject to a three day road closure order during each of these two phases. The days when road closures occur, this would commence at 0930 hours when barriers will be placed across Coldharbour Lane to the north and south and also on Logmore Lane. Residents would be informed of this 14 days in advance and the highway authority 28 days in advance. As the drill rig components are in a planned sequence, they would be ordered forwards from the holding area at Ryka's Café to Knoll Road.
  - i) For residents who live along Coldharbour Lane, they would still have access to their properties. For them to gain access or to leave their residences they would need to liaise with the banksmen on the four listed positions to ascertain a time at which they would be able to pass the rig vehicle at the wider parts in the road.
  - j) On arriving at Knoll Road HGVs would then travel down Coldharbour Lane to the application site unimpeded due to the road closure and subject to any residents who live on Coldharbour Lane wishing to travel to their properties.
31. The CTMP outlines how the processes that form the CTMP would be monitored which would include assessing reports made to the central control located in the security cabin on site, by unannounced spot checks along the route throughout the day, the site construction engineer would attend Knoll Road prior to the permitted delivery times to ensure that no HGVs arrive at Knoll Road before 09:30 and that all HGVs were clear of the area by 15:00 hours, the site construction engineer would ensure that road traffic signs were erected as specified and liaise with the signing company to correct any errors

or omissions; that traffic control personnel should liaise and cooperate with residents as much as possible to minimise inconvenience.

### Safety Audit

32. In terms of measures following from the road safety audit, the CTMP originally stated that there would be no HGV movements on Saturdays to/ from the application site during the construction/ decommissioning phases. This is a change from the Appeal Decision as Condition 17 allows HGV movements on Saturdays. This modification was brought forward by the applicant due to the findings of the cycle surveys carried out as part of Condition 18 and the safety audit which found that due to a high level of cyclists on Saturdays there would be a corresponding higher level of risk to cyclists from HGVs traversing along Coldharbour Lane. Following consultation with the County Highway Authority (CHA), the CHA requested that the CTMP be revised further to exclude all HGV movements to/ from the application site on Saturdays for *all* phases of the development based on the findings of the safety audit. The applicant has subsequently modified the CTMP which now states: "It should be noted that deliveries have been ruled out on Saturdays during all phases and this is as a result of a re-appraisal of CPE (cyclist, pedestrian, equestrian) recreational use of the area on Saturdays. Whilst vehicular traffic generated by contractors driving to work on the site is acceptable, deliveries will be scheduled to ensure that they are not delivered on Saturdays. The exception to this would be in the case of emergencies that endanger life or the safety of the operation". With regards to the recommendations of the Safety Audit this is as follows:

Recommendation 1: provide advance signage on Flint Hill north and south of its junction with Knoll Road warning drivers that there are restrictions on movements along Coldharbour Lane

33. The applicant has provided details of the sign to be provided.

Recommendation 2: provide signing specifically advising cyclists to wait for the signal to go

34. No specific signage is to be provided for cyclists waiting for the signal to go as it is considered that the proposal already involves a large number of signs and adding further signs that are specifically for cyclists may add confusion to motorists as the signs would be similar to the other signs provided. Furthermore as a road user, cyclists should adhere to the highway code in the same manner as motorists and this would include adhering to any signs placed along the highway route warning and advising motorists of the traffic management scheme.

Recommendation 3: Advise escort vehicle drivers that they should stop if they encounter cyclists coming towards them to allow them to safely pass

35. This concern relates to the matter that on some sections of Coldharbour Lane there is insufficient width to comfortably allow a HGV to pass a cyclist travelling in the opposite direction therefore it is a matter for the HGV driver. Officers are concerned that should a HGV be made to stop every time it encountered a cyclist on Coldharbour Lane, including when the width of the road is not so narrow that a cyclist and HGV cannot pass, that this could cause delay and also confusion to not only the HGV convoy but also any traffic behind the HGV convoy. As such the HGV driver card which is to be issued to every HGV driver travelling to/ from the application site and is to be adhered to includes the information that HGV drivers should be aware and alert to cyclists travelling on Coldharbour Lane.

Recommendation 4: Provide signs at the start and end of the shuttle working sections with the text 'AT TRAFFIC CONTROL FOLLOW CONVOY VEHICLE'.

36. This requirement has been added into the HGV driver card but with the words “DO NOT PROCEED ALONG COLDHARBOUR LANE IN EITHER DIRECTION UNTIL INSTRUCTED TO DO SO.” The HGV driver card also outlines that HGVs should wait in the demarcated area at the western end of Knoll Road whilst waiting to leave Knoll Road.

*ii. details of the temporary road closures, the management of traffic, including emergency vehicles, during the road closures;*

37. The applicant has provided a series of plans which show the temporary road closures during the three day periods when Coldharbour Lane would be closed for access to allow the rig to be brought to site and then to be removed. The plan (4100 CTMP 10 (A)) shows that signs would be placed along the A24, Flint Hill, Knoll Road, Logmore Lane, Anstie Lane and Abinger Road providing warnings that the road ahead is closed. The plan shows the type of signs that would be put in place and where.
38. The CTMP outlines that the following Statutory Notices will be submitted to the County Highway Authority for road closures and the management of traffic for the duration of the proposal:
- Imposition of a 30MPH speed restriction on Coldharbour Lane throughout the project period;
  - Imposition of a traffic management scheme as necessary during the project period;
  - Suspension of parking along the south kerb at the west end of Knoll Road for the duration of the project to allow for parking of three HGVs;
  - Suspension of parking on both sides of Knoll Road for the first 20m at the east end, during drilling rig mobilisation and demobilisation;
  - Provision of three parking bays in Knoll Road for use by HGVs waiting to access the site;
  - Temporary closure of the part of Coldharbour Lane between Knoll Road and Coldharbour for through traffic during the drilling rig mobilisation and subsequent demobilisation, each period being for a minimum of three days: commencing at 0930hrs and finishing at 1900hrs on each day.
39. Traffic would be managed from Knoll Road along Coldharbour Lane to the application site by a series of traffic controllers and banksmen who would all work together to ensure safe passage of the HGVs.
40. All road signs would be put in place each morning and removed at the end of the working day to avoid confusion. A sign at the Coldharbour Lane/Anstie Lane junction will be included to notify road users that Anstie Lane is a narrow road.
41. With regards to emergency vehicles, the CTMP states that access for emergency vehicles during the road closure would be unimpeded with a communication link between the office on the application site and the emergency dispatch centre so that there is as much prior warning as possible and so that rig vehicles can be held to allow easy passage of emergency vehicles. Banksmen at either end of the road closure would move the barriers to let the vehicles past. The CTMP goes on to state that should an emergency vehicle approach either end of the closed road unannounced, the banksman at the closure will check briefly with security cabin control centre and if there is not a vehicle already passing through a restricted width section, the emergency vehicle will be allowed to proceed through the road closure. Any rig vehicle about to travel along Coldharbour Lane will be held at either the site or Knoll Road until the emergency vehicle has passed through. If the rig vehicle is travelling along Coldharbour Lane and an emergency vehicle needs to get through the rig vehicle would be moved to a point where the emergency vehicle could pass. The CTMP states that in an extreme emergency with the deployment of all three emergency services, it may be necessary to suspend the road closure.

*iii. details of temporary warning signs for rights of way users at the point at which the rights of way meet Coldharbour Lane;*

42. Plans show the rights of way network which connect with Coldharbour Lane along its entire length. The plans show an example of a warning sign that would be placed at a right of way saying "Traffic Management Scheme in force. Please accept our apologies for any delay". The CTMP also confirms that these signs will be duplicated where other rights of way meet Coldharbour Lane including FP 257, 252, 135, 247, 262 and 265.

*iv. details of temporary signs and any appropriate road marking prohibiting all relevant vehicles from parking or waiting in Knoll Road other than in three temporary marked parking places;*

43. Plan 4100 CTMP 03 rev A shows the three holding bays that would be identified for use by HGVs waiting to travel from Knoll Road to the application site. These three bays would be suspended from public use for the entire 18 week period and would be subject to a Traffic Regulation Order (TRO) for this. The applicant is not proposing to place any further signs or road markings to inform HGV drivers that they cannot park anywhere else on Knoll Road but has chosen to place that information in the HGV driver information card.

*v. details of the publicity and prior notification signs to be provided to Capel, Holmwood and Wotton Parish Councils and to residents in Coldharbour Lane, Knoll Road, Abinger Road, Leith Hill Road, Lake Road, Broome Hall Road and Hen Hurst Cross Road in advance of and during the works;*

44. The CTMP states that liaison meetings would be held with Capel, Holmwood and Wotton Parish Councils, LHAG and Surrey County Council to ensure that the public are kept informed of the intended programme. The CTMP sets information for how residents and the public would be informed of the proposed works to the public highway including the road closure and the suspension of parking bays. The CTMP outlines that the Surrey County Council Works Communication Team (WCT) promotes a 'Customer Stakeholder Engagement Plan' to set out the extent of engagement with local residents prior to road works being carried out. The CTMP says that the WCT recommended level of communication for this project is Level 2 where the scheme affects residential urban areas, large rural areas; and road closures. The CTMP outlines that the actions that would be undertaken would include contacting the councillor, a letter drop to households along and adjacent to the access route; and signs. The CTMP also says a telephone number (most likely a mobile number) would be made available for members of the public to contact during the works.
45. For the letter drop, the CTMP outlines that a letter drop would take place for individual households along and adjacent to the access route. The CTMP also outlines that the residents in Coldharbour Lane, Knoll Road, Abinger Road, Leith Hill Road, Lake Road, Broome Hall Road, Anstie Lane and Henhurst Cross Road shall be kept informed prior to, and during the works. It should be noted that Anstie Lane has been added to the list of roads listed in Condition 19(v) at the request of LHAG and residents.

*vi. banksmen and escort details, including management of the progress of HGVs along Coldharbour Lane to protect trees and banks.*

46. The CTMP outlines that banksmen would be positioned in four positions during the periods when deliveries of any sort are expected. The CTMP defines banksmen as personnel specifically allocated to direct traffic as necessary and not limited to guiding reversing vehicles or directing crane operations. The four positions the banksmen would be located would be:
- At the junction of Knoll Road with Coldharbour Lane
  - Near to Home Farm (approximately 285m south of the junction of Knoll Road and Coldharbour Lane)

- At the junction of Logmore Lane with Coldharbour Lane; and
- At the site entrance off Coldharbour Lane

47. The CTMP outlines that an escort vehicle, either a small van or quad bike, shall be positioned to escort site vehicles along Coldharbour Lane with the intention of ensuring compliance with the speed restriction and to stop the escorted vehicle(s) at an appropriate place to allow an oncoming vehicle to pass. Communication between the banksmen, the escort vehicle and the site security staff will be via radio. The banksmen will be equipped with radios and stop/go boards to control the traffic at their individual positions, liaising with the banksmen on adjacent sections as well as with the main control centre.

48. The CTMP outlines that following the surveys that were carried out in accordance with Condition 18 that no construction traffic would travel to / from the application site on Saturdays.

**CONSULTATIONS AND PUBLICITY**

***District Council***

49. Mole Valley District Council : This application is to be heard at Mole Valley District Planning Committee on 2 August in the evening. An update will be provided on the details of the Officers report when it is published.

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

County Highway Authority

50. Transportation Development Planning : Considers the CTMPO meets the requirements of Condition 19.
- a) Surrey Police : Given the less than ideal location of the proposed works, the current traffic plan is the best solution
  - b) Surrey Safety Audit : Accept the plan is the best in the circumstances
  - c) Parking and Streetworks : No objection
51. British Horse Society : No comments received
52. Forestry Commission : No comments received
53. National Trust : No comments received
54. AONB : No comments to make
55. Ecologist : No comments received
56. Rights of Way : No comments received
57. Surrey Fire and Rescue : No comments received

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

58. Capel Parish Council : That all the Environmental Regulation procedures be followed. There is too short a timescale for receiving the revised CTMP and the committee date, it is unlikely members will have had the opportunity of appraising what is likely to be significant. Consideration should be given to:
- The existing public transport network
  - Increased activity within the revised work period
  - Notification procedures to residents
  - Coldharbour Lane and alternative routes (narrow roads)
  - Tourist activities during the summer months
  - Cyclist activities all year round
59. Holmwood Parish Council : No comments received
60. Frack Free Surrey : No comments received

61. Cycling UK : No comments received
62. Ramblers Association : No comments to make
63. CPRE : No comments received
64. Westcott Village Association : No comments received
65. Wotton Parish Council : No comments received
66. Leith Hill Action Group (LHAG) : Make the following comments –
- The CTMP states in a number of places (e.g. paragraph 1.12) that the developer proposes to use the Aluminium Trackway option, but then stresses repeatedly (e.g. paragraph 1.8: if it's "not available"; paragraph 1.12 – if it's not available "for any reason"; paragraph 17.2: "except where considerations of operational safety are concerned") that they may not use it. Much of the CTMP is written assuming that use of the Aluminium Trackway will apply. Consideration of the CTMP should be in light of the fact that use of Aluminium Trackway may not happen. If the Aluminium Trackway option were pursued, there is no special provision made anywhere in the CTMP for navigation of the huge transporter required (18.3m in length) to deliver and remove this trackway. This is only marginally shorter than the vehicle required for mobilisation of the rig, which requires two 3-day periods of road closures.
  - Furthermore, contrary to what paragraph 9.1 explicitly says, the highest traffic volumes are not during site construction and reinstatement but during the drilling phase. The use of Aluminium Trackway will make no difference to that.
  - The Environmental Impact of this TMP has not been assessed. Other impacts have not been addressed anywhere in the TMP or in the Environmental Statement. Examples include: socio-economic impacts, e.g. the impact on the lunchtime trade of The Plough Inn, and its shop Coldharbour and other businesses in Coldharbour and surrounding areas; amenity impacts, e.g. time delays to local residents, additional fuel expenses and time for local residents having to take alternative routes, congestion on those alternative routes.
  - The Secretary of State in his screening direction on the security fencing said traffic impacts had to be assessed in the Environmental Statement. This has not been done.
  - The CTMP is almost identical to that put forward for the Public Inquiry in 2015, of which the Planning Inspector said during the Inquiry, "I can't see how this can possibly work". (That is why he included Condition 19 in his decision letter.) The only things that seem to have changed are the addition of a further traffic control at either Home Farm (see paragraph 7.3) or Stable House (see paragraph 12.2) and the decision to not undertake stone deliveries on Saturday mornings. The purpose of this additional traffic control is not explained anywhere and, unlike the other controls, there is no sheet of traffic controller's instructions.
  - The proposed arrangements do not address the issue of how to manage a very large number of HGVs (and other site-associated traffic) via Knoll Road and Coldharbour Lane without very serious and unacceptable impact on local residents, and the knock-on effect to the existing very substantial traffic gridlock in Dorking, which has been the subject of much public controversy of late.
  - What analysis of the logic of the CTMP has been undertaken? For example, how does it take account of the fact that a cyclist takes, at a guess, around 15 minutes to get from Chadhurst Farm to the Bury Hill Wood site? what are the estimated waiting times for non-site traffic and how are these calculated? what modelling has been undertaken to validate the logistical workings of the CTMP? The numbers suggest to us that the TMP will not work; that the effect will be total closure of Coldharbour Lane (9.30 am – 2.30pm) throughout the period of the development. SCC has a duty to satisfy itself that will not happen, and if they too can't explain it then they should take independent advice.
  - Anstie Lane is a winding single track lane classified as "Road generally less than 4 metres wide" and is an unsuitable alternative to Coldharbour Lane. There is no evidence in the CTMP of road signs warning drivers of the narrowness of Anstie Lane.

- Nowhere does the CTMP give the duration of each of the phases it describes, so the reader can't see the density of the HGV traffic.
- We appreciate that the intention is for the Aluminium Trackway transporters to proceed up Knoll Road without waiting in the road, but should they have to wait in Knoll Road due to a blockage in Coldharbour Lane for any reason, one of the transporters will take up 2/3rds of the proposed parking bays in Knoll Road. This will leave little room for any other HGVs to park.
- The figures presented implies one movement every 20 minutes. Can there be more than one movement between Knoll Road and the application site at the same time. How many water tankers do they plan to have on site at any one time? How long does it take to discharge each one?
- It is not acceptable simply for "best endeavours" to "be used to ensure that the site works are carried out in a timely fashion." The Inspector granted planning permission for 18 weeks by which time the site should have been restored.
- An imposition of a 30mph speed limit on what is currently a national speed limit road will impose even longer journey times over and above the extended journey times imposed due to the stop/go boards.
- The road closure should also only run up until 5pm in order that commuters can navigate up the road after the end of their working day without having to take an enormous detour.
- It appears different residents will receive different communication depending on where they live. They should all receive the same.
- Providing residents with a mobile phone contact number will no work where there is no mobile phone reception.
- All references to movements on Saturdays should be removed.
- It is not acceptable for there to be deliveries outside of hours for the security of operations.
- It is incorrect to say there are no pedestrians on Coldharbour Lane.
- It is unacceptable to say that the figures have been based on one form of rig and this may change. It should be based on the worst case scenario.
- Request a full 3D model to show the aluminium trackway can negotiate Coldharbour Lane.
- There are no banksmen on the corner of Flint Hill and Knoll Road and there is a big gap between the banksmen positions.
- Hope the pruning of trees does not include the removal of trees.
- Suggest other ROW on other nearby roads should warn of the possible increase of traffic.
- It seems unnecessarily restrictive to rope off a large area of Knoll Road for the entire 18 week period and the 3 minute restriction time for HGVs to wait in Knoll Road should be enforced.
- Can the developer use Ryka's Café? And what evidence is there that the vehicles can be accommodated there.
- Suggestion that there will be no impeding of emergency vehicles is laughable. What happens if a vehicle is moving up Coldharbour Lane when the HGVs are moving through?
- Cyclists do not just use Coldharbour Lane on Saturdays but weekdays too.

67. Dorking & District Preservation Society : No comments received

***Summary of publicity undertaken and key issues raised by public***

68. The application was publicised by the posting of 7 site notices. A total of 430 owner/occupiers of neighbouring properties were directly notified by letter. 363 letters of representation have been received raising the following comments:

*Object*

- Object to the development

- Do not destroy this beautiful place

AONB - There is a disregard to the AONB

EIA - No EIA has been done for the CTMP, one should be done

#### *Property Access*

- I will not be imprisoned in my property, I run 2 companies and am continually using Coldharbour Lane
- Seek reassurance that there will be unfettered access to property
- DO not want a Europa vehicle blocking access to my property

*Emergency Services* - Ambulances/ police/ firemen need access to this road

#### *Roads*

- The roads are narrow and unsuitable for the existing traffic let alone lorries
- It is unacceptable for a private enterprise to deny access over public highways to the public
- The lorries will have a wider impact on Dorking as a whole

#### *Lorries*

- The lorries will grind up/ damage the narrow sunken lanes in Coldharbour Lane
- The lorries because of their length will damage the trees along Coldharbour Lane
- Any damage to Coldharbour Lane will be irreparable
- The number and size of the lorries is not appropriate
- No consideration has been given to the impact on the alternative routes i.e. Logmore Lane/ Anstie Lane to take the additional traffic
- Has consideration been given to the width of the structures on the lorries?
- The low loader and drilling rig dimensions are worrying - has a feasibility study been done on moving these vehicles?
- Are there other specialist vehicles that can bring the items in?
- A vehicle stuck behind the convoy will not be able to pass

#### *CTMP document itself*

- Is based on incorrect assumptions
- It appears little has been done to the Traffic Plan since the one submitted and rejected in 2014
- There is no detail of the aluminium carriageway (make/ model/ structural design)
- Has a study been taken of the time taken for three lorries to reach the drill site?
- It provides uncertainty as to how many HGV movements and how long the operation will last
- The plan does not adequately manage the number of vehicles that will be required to wait in a residential area
- Does not properly assess impact on the local community
- It is incorrect to say traffic will be lighter between 0930 – 1500
- It is inadequate to protect the unique character of the sunken lanes
- Where is the rig holding point
- Given the increased visitors at weekends there should be no traffic on Saturdays
- The CTMP should be rejected whilst it retains the option to use crushed hardcore instead of aluminium trackway.

#### *Residents*

- The lorries will cause an inconvenience/ it is unfair on residents
- Residents having to reverse will cause distress

- The road closures will add to traffic in Dorking and there will no alternative route through Leith Hill and Coldharbour
- We can't cope with road closures due to work, school and college runs
- The proposal will impact on schools, local facilities and amenities

*Road Closures* - The proposal results in a road closure for the whole period

#### *Road Surface Condition*

- What measures are there for repairing damage to the road for cyclists?
- Coldharbour Lane is subject to extended periods of icy conditions and flooding
- Damage to the road generally
- There are no details about temporary damage assessments such as that from soil deposits, ice, diesel spills or wet leaves

#### *Waiting Traffic*

- Logmore Lane & Home Farm have no space for waiting traffic
- There are few passing places for normal cars let alone lorries
- Jams are caused by current residential oil supplier HGVs meeting traffic on Coldharbour Lane
- Vehicles will become trapped by delay caused by timing measures

#### *Traffic Surveys*

- No amount of traffic surveys will make this work
- Have any surveys been done along Flint Hill?
- The survey looked at the volume of traffic but not the safety implications for pedestrian traffic
- The three surveys were on Saturdays invalidating the conclusions
- 

#### *Recreational Use*

- The plan makes it impossible to access Coldharbour Village and Leith Hill
- The lorries will have a negative impact on Dorking as a whole
- The proposal will have a negative impact economically on facilities in Coldharbour

#### *Cyclists*

- Cyclists will be involved in severe accidents from this proposal
- Concerned the lorries will endanger cyclists
- Mountain bikers join Coldharbour Lane at any point & this will not be controllable
- Concern danger of CTMP on cyclists who won't acknowledge the road closure signs

#### *Pedestrians*

- It is incorrect to say pedestrians do not use Coldharbour Lane
- There will be an increased risk to pedestrians
- There are one off events that take place involving pedestrians walking in the road
- Additional traffic would be routed past the pedestrian access to Milton Heath and The Nower which is a historic sandstone hill and park

*Equestrians* - Risk to horse riders

*Schools* - Despite the timings proposed, there will be a direct danger to school children

*Accidents* - The proposal will lead to accidents

*Speed Limit* - Request a 20mph speed limit

*Logmore Lane* - Logmore Lane is not suitable for heavy use as it has blind bends and few passing places

### *Knoll Road*

- Any vehicles waiting at Knoll Road should turn their engine off
- The lorries will disrupt residents of Knoll Road
- Knoll Road is in poor condition this will make it worse
- Concerned for the pets that live on Knoll Road - who will be responsible if they get injured?
- Concerned about the noise pollution and diesel particulates from repeated movement of lorries
- Knoll Road is a hill and climbing traffic will cause noise pollution
- Knoll Road is used by a large number of cyclists and pedestrians
- The holding bays in Knoll Road is unacceptable
- Why are no other options to Knoll Road being discussed
- The recent building of 2 houses on Knoll Road caused lots of disruption
- The lorries will not be allowed to park on Knoll Road as they will not be allowed to park within 10m of any junction
- HGVs will not be able to park across the entrances to houses
- The proposal would completely change the nature of the road
- The parking suspensions on Knoll Road will displace residents parking and cause congestion elsewhere
- The swept path analysis for Knoll Road is inconclusive
- If lorries were parked at the junction this would impede traffic and will be unsafe and school buses will be greatly impeded

### *Flint Hill*

- Traffic frequently backs up along this road as it is a main artery route into Dorking
- Flint Hill is already subject to delays & congestion much of the time because of the weight of traffic - this plan will exacerbate it

### *Horsham Road*

- It is currently unsafe to use Horsham Road due to the narrow pavements and speed of vehicles - any increase in HGVs will be disastrous

*Rykas Café* - There is no information on the impact on the A24 from Ryka's café

*Pollution* - Concern with pollution from idling HGVs affecting people

*Alternatives* - Alternatives are available

*Green Belt* - There is a disregard to the Green Belt

### *Wildlife*

- There is a disregard to wildlife
- Nightingales live in the woods on either side of the road and they will be impacted

### *Radioactive Waste*

- There is no mention of this and local residents should be informed of this and when it would be transported

*Water environment* - The proposal will impact on aquifers

### *Fracking*

- It is not appropriate to extract tight oil
- Fracking is not the future

*Climate Change* - We should be upholding the Paris Climate Agreement

*Fire Risk* - Has fire risk been considered when extracting oil from the ground?

69. Of the comments received, the areas of most concern are: the roads are not suitable for the existing traffic let alone the additional/ new lorries (141 comments), the lorries will have a wider impact on Dorking as a whole (133 comments), the lorries will grind up and damage the sunken lane section of Coldharbour Lane (128 comments), concern for the danger to cyclists from the lorries accessing the site (108 comments), a disregard for the AONB (99 comments), the lorries will damage the trees along Coldharbour Lane (97 comments), the holding bay in Knoll Road is unacceptable (78 comments); objecting to the development in principle (66 comments); and the proposal will increase risk to pedestrians (63 comments).
70. Some of the issues raised above within letters of representation relate to the principle of the development and matters addressed by other planning conditions which have already been assessed and considered by the Inspector in granting planning permission and by the CPA when consider the other details pursuant applications.

---

## PLANNING CONSIDERATIONS

71. The guidance on the determination of planning applications contained in the Preamble/Agenda frontsheet is expressly incorporated into this report and must be read in conjunction with the following paragraphs. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations. In this case the statutory development plan for consideration of the application consists of the Surrey Minerals Local Plan 2011 and Mole Valley Local Plan 2000.
72. The application has been submitted to comply with the requirements of Condition 19. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for managing and mitigating any environmental impact of this aspect of the development are satisfactory. In this case the main planning considerations are whether the CTMP meets the requirements of the condition.
73. The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development but recognises at paragraph 12 that the starting point for decision making should be the Development Plan. Paragraph 12 goes on to state that proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other materials considerations indicate otherwise. The NPPF outlines that it is guidance for Local Planning Authorities and is a material consideration in determining planning applications.

## CONSTRUCTION TRAFFIC MANAGEMENT PLAN

### **Surrey Minerals Plan 2011**

Policy MC15 – Transport for Minerals

### **Mole Valley Local Plan 2000**

Policy MOV2 – Movement Implications of Development

### *Planning Policy and Guidance*

74. The Surrey Minerals Plan 2011 (SMP2011) recognises that one of the most significant impacts of mineral working in Surrey, and the one that usually causes the most public concern, is the lorry traffic generated from transporting the minerals. This is recognised in para 7.1 of the SMP2011 which states that lorries are used for transportation in the overwhelming majority of cases. Paragraph 7.7 recognises the importance of ensuring maintaining the safety of the highway network with regards to mineral related traffic movements; and that highway safety is not compromised with the needs of pedestrians,

cyclists and horse riders needs being considered in decision making. Paragraph 7.9 states that it is important to ensure the effects of mineral related traffic on local communities, the environment and the local road network, are carefully considered.

75. With regards to routing, paragraph 7.10 recognises that many sites do not have direct access to the primary highway network and therefore attention should be given to the routing of vehicles between the proposed development and the primary route network.
76. Policy MC15 recognises the above points by stating that applications for mineral development should include a transport assessment of potential impacts on highway safety, congestion and demand management. and that mineral development involving transportation by road will be permitted only where:
- a) there is no practicable alternative to the use of road based transport that would have a lower impact on communities and the environment;
  - b) the highway network is of an appropriate standard for use by the traffic generated by the development or can be suitably improved; and
  - c) arrangements for site access and the traffic generated by the development would not have any significant adverse impacts on highway safety, air quality, residential amenity, the environment or the effective operation of the highway network.
77. Policy MOV2 of the Mole Valley Local Plan 2000 states “*Development will normally only be permitted where it can be demonstrated that it is or can be made compatible with the transport infrastructure and the environmental character in the area, having regard to all forms of traffic generated by that development [...].proposals for major developments will only be permitted where it can be demonstrated that in order to accommodate the traffic generated by that development appropriate measures are made to obviate the environmental impact*”. The policy also requires appropriate provision for:
- a) *vehicular access and egress and movement within the site;*
  - b) *capacity on the transport network and in the vicinity of the development*
  - c) *access and egress to be obtained, or improved, to and from the primary route and distributor road networks*
  - d) *pedestrians and cyclists*”
78. The policy supporting text for Policy MOV2 outlines that the scale, type and location of development needs to have regard to the capacity of the existing road system in Mole Valley and its ability to accommodate more traffic in the short to medium term. The text goes on to state “*The Plan therefore seeks to ensure that new development should be integrated as satisfactorily as possible within the transport network and that improvements to the network should be made where necessary as part of those developments*”. The text outlines further that the aim will be to ensure that all proposals for new development in the District accords with the principle of maintaining a high environmental quality and that proposals will be assessed in relation to their impact on the environment and the sensitivity of that surrounding environment to accommodate the traffic generated.
79. With regards to transportation, paragraph 32 of the NPPF states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment; and that decisions should take account of whether: safe and suitable access to the site can be achieved for all people; and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

### *Background*

80. As outlined above, planning permission for carrying out exploratory works was granted on appeal in August 2015. The impacts of traffic on Coldharbour Lane and Knoll Road were considered as part of that appeal decision process and it was that process that lead to the Inspector imposing Condition 19. Given the Planning Inspector imposed Condition

19, it is relevant to consider the decision making process that lead up to that point which is outlined within the Appeal Decision.

81. The applicant had submitted a TMP as part of the application documents that were considered at the appeal. However the Inspector noted it had three faults/ matters that appeared vulnerable to challenge. The first of these was the holding lay-by point for HGVs on the A24 prior to them accessing Knoll Road, before then turning into Coldharbour Lane. Second was the increase in cycle usage of Coldharbour Lane and that this had not been recognised. And thirdly a width restriction order had been imposed on Coldharbour Lane in 2013. The matter of the holding bay is covered within the CTMP submitted to comply with Condition 19 and is outlined as Ryka's Cafe. The matter of the increased cycle use has been addressed by the Inspector requiring further cycle surveys as part of Condition 18. Furthermore, the CTMP has been revised to exclude all HGV movements to/ from the application site on Saturdays except in an emergency during the drilling phase. The matter of the width restriction order is not a matter for this proposal as the width restriction does not preclude use for access to land and properties along the route and the application site complies with this regard.

82. There is no doubt that the proposal would involve a large number of lorry movements to and from the site. This is demonstrated in Table 2 above.

*i. the provision, implementation and monitoring of traffic management measures (including details of the HGV holding area) to regulate the passage of relevant vehicles (as defined in Condition 16) travelling to and from the site and these measures shall take account of the road safety audit. Any mitigation measures should be subject to the road safety audit process;*

83. 28 letters of representation have commented that the CTMP as submitted appears to be similar to that submitted, which was rejected, as part of the Public Inquiry. LHAG have commented on this too quoting that the Inspector said during the Inquiry "*I can't see how this can possibly work*". Condition 19 was imposed in the interests of highway safety and paragraph 134 of the Inspector's Report states there was no disagreement with the aims and objectives for the CTMP but its wording. LHAG have commented that they consider that the CTMP as submitted does not address the issue of how to manage a large number of HGVs via Knoll road and Coldharbour Lane without unacceptable impact on residents and the knock on effect to the existing traffic gridlock in Dorking.

84. With regards to these comments, nowhere did the Inspector state in his Report that the basic principles of the Traffic Management Plan were unacceptable or that the plan is unworkable. The principles of the two 3 part day closures, the vehicles travelling in convoy, the use of banksmen and active HGV management are all acknowledged, accepted and referred to in the context of overcoming residents' concerns (paragraphs 53, 55, 56, 62, 63 and 66 of the Inspectors Report). The Inspector acknowledged in paragraphs 54 and 55 of his report that there would be difficulties in access and resulting inconvenience for local residents and those using Coldharbour Lane. However, at paragraph 56, he goes on to state "*Notwithstanding, the HGV traffic usage of Coldharbour Lane, including the two temporary closures, would not, of itself, be a show stopper for the proposed borehole exploration*". The Inspector therefore concluded that despite the difficulties and the inconvenience to residents, the proposed access arrangements were, or could be made, acceptable. This is further considered in paragraph 62 of his report.

85. Turning first to the provision of traffic management measurements the CTMP provides information on what traffic management measures would be used during the construction, rig mobilisation, drilling, testing, rig de-mobilisation and decommissioning/ restoration phases. The CTMP sets out that for all the phases (except the rig mobilisation and de-mobilisation phases) a convoy system would be used to shuttle HGVs from Knoll Road to the application site. As part of the Public Inquiry submissions, assessments had been carried out to ensure the swept pathways of HGVs turning into

Knoll Road and then Coldharbour Lane (and then in reverse) could be met; and assessments were carried out to ascertain the HGVs could travel along Coldharbour Lane. Indeed the Inspector noted at para 71 that “*Although the Lane is narrow, and extremely so in places, it is never of a width less than an HGV, with reasonable clearance*”. The CTMP provides details of signs and how HGVs would be managed to ensure sound passage including waiting for other vehicles to leave Coldharbour Lane before travelling along it and the holding of traffic to assist with HGVs passing through the narrower sections of Coldharbour Lane.

86. In terms of the implementation of the traffic management measures, the CTMP provides information in terms of banksmen controlling the timing of when the convoy of HGVs can leave Knoll Road; how banksmen would be in continual contact with each other and the site and the escort vehicle so that all parties are aware of where the convoy would be along Coldharbour Lane so to ensure any other vehicles on Coldharbour Lane are managed and guided so not to meet the convoy at the narrowest points of the Lane. Additionally in terms of implementation the CTMP provides details of how the two three day part road closures would operate in terms of when the road would be closed at the beginning of each day and then opened and how emergency vehicles would be allowed unfettered access. The CTMP acknowledges that there are residents who live on Coldharbour Lane and that access to their properties should also not be unnecessarily restricted during those closures and states that the banksmen will ensure that resident vehicles and the rig vehicles should not meet. The CTMP describes how signage to be used would be put out each day and removed at the end of the day, ensuring the signage is clean and clear; and how a site engineer would visit Knoll Road every day before 0930 hours and after 1500 hours to check all site related HGV vehicles have left the area.
87. Furthermore in terms of implementation the CTMP outlines that HGVs that require to congregate before heading to Knoll Road would do so at Ryka’s Café, on the A24 north of Dorking. The CTMP states that for trucks bringing aluminium sheeting these would travel directly to Knoll Road and await passage to the application site as such vehicles would not be travelling in convoy.
88. In terms of monitoring, the CTMP states that during the construction and decommissioning phase, the operations involved would be monitored by assessing reports made to the staff held on the application site and unannounced spot checks along the route throughout the day. Monitoring would include an engineer attending Knoll Road before and after the working day to check the area is clear of relevant HGVs. Monitoring would include the checking of signs and ensuring they would be in the correct position. For the road closure monitoring would include checking the road closure procedures comply with specific signage and ensuring residents along Coldharbour Lane during those periods have egress and access to their properties.
89. Additionally it should be noted that the CTMP has been modified since it was submitted to exclude all HGV traffic travelling to/ from the site on Saturdays for all phases. The CHA had requested this change be made in light of the number of cyclists recorded on Saturdays as part of the surveys carried out on Coldharbour Lane and the increased level of risk that could arise from HGVs meeting this high number of cyclists.

#### Knoll Road

90. A large number of concerns have been raised with regards to the use of Knoll Road for the proposal including impact on the road condition, impact on residents who live on Knoll Road, impact on school children using Knoll Road, impact on cyclists and other pedestrians using Knoll Road, impact from fumes from HGVs and impact on parking. It should be noted that the principle of using Knoll Road as part of any CTMP was discussed as part of the Public Inquiry as a plan showing the routing of HGVs to the site from the A24 formed part of that discussion. The impact of the holding area in Knoll

Road is rehearsed in paragraph 61 of the Inspectors report with the Inspector concluding that there would be some short term inconvenience but little residential amenity impact.

91. In terms of impact on residents on Knoll Road in terms of the provision of the traffic management measures and subsequent provision of it, HGV traffic would travel outside of peak hours and outside of school drop off/ pick up times. The CTMP states an engineer would go to Knoll Road to check this in terms of monitoring and enforcement. The CTMP has been amended such that no HGVs would go to the site and therefore traverse Knoll Road on Saturdays. It is recognised that reducing the number of days HGVs would travel to the site from 5.5 to 5 would result in a higher number of HGVs travelling on Knoll Road on other working days, the highest number would be 23 HGV movements<sup>5</sup> which is fewer than the Inspectors assessment of the proposal in terms of traffic and harm ("*some 30 movements in any single day*" para 53).
92. With regards to exhaust emissions from HGVs waiting to travel down Coldharbour Lane, LHAG comment that it should state within the CTMP that HGVs at the holding back on Knoll Road should turn their engines off. The CTMP HGV Control card (which forms part of the CTMP) states that all HGV engines should be turned off when vehicles are waiting for orders to proceed.
93. Queries have been raised as to whether the holding bay on Knoll Road would be unusable for the 18 week period. Whilst a Temporary Traffic Regulation Order (TTRO) can be implemented for the speed restrictions and temporary closure of Coldharbour Lane, a TTRO could not be sought for the holding bays on Knoll Road. This is because whilst a restriction needs to be in place to prevent all vehicles from parking it needs to exclude the HGVs associated with the development and this cannot be covered by a TTRO. Therefore a permanent TRO would have to be put in place on the proviso that it would be rescinded at the end of the 18 week period. Consequently the three bays on Knoll Road would not be able to be used by other traffic for parking during the 18 week period.
94. Officers recognise there would be an adverse impact on Knoll Road for the duration of the development as all the HGVs travelling to/ from the application site would have to traverse Knoll Road and HGVs would have a period of time where they are held before travelling on to Coldharbour Lane. However no other route to the site was advanced within the Inspectors report. Paragraphs 60 and 61 of the Inspectors report acknowledges the length of time HGVs may have to wait before travelling down Coldharbour Lane and the visual and noise impacts of them waiting which he considered to be a transient problem.
95. In terms of safety the Safety Audit identified the matter of the need for advance signage on Flint Hill but did not identify any other safety issues associated with Knoll Road. The Safety Audit team having reviewed the Safety Audit raise no concerns with it. The applicant has put in mitigation measures such as HGVs not to arrive before 0930 hours or be in Knoll Road after 1500 hours and an engineer is to visit Knoll Road to check compliance.

#### Impact on Dorking

96. A number of representations have raised concerns about the proposals' impact on Dorking as a whole including recreation and getting to work and school. The HGVs would proceed to the site along the A24 which already has a high volume of HGVs travelling on it. If assuming a maximum of 23 HGV movements per day to the application site the proposal would result in an increase of 3% of HGVs (an increase of 0.1% of all

---

<sup>5</sup> The highest number of movements per day would be during the drilling phase if taking a scenario of the drilling phase lasting 4 weeks = 23 HGV movements (11.5 loads) per day. If the drilling phase were to take 5 weeks this would be reduced to 18 movements (9 loads) per day.

traffic) on the A24. The HGVs would then travel up Flint Hill (the A2003) which is a main road into and out of Dorking. The HGVs would travel approximately halfway up this road. Again taking a maximum of 20 HGV movements per day to the application site the proposal would result in an increase of 12% of HGVs (an increase of 0.2% of all traffic) on the A2003. Such increases on these A roads is not considered significant or material to adversely affect the movement of traffic on the highway.

97. Turning to Dorking town itself, the HGVs travelling to the application site would not travel through the town or one way system. The HGVs should also travel to the application site outside peak traffic hours and would be monitored by a site engineer visiting Knoll Lane. Officers consider the greatest impact on Dorking would be on Knoll Road which is a D class road. The impacts on Knoll Road are discussed above and in the Inspectors report.

### Cyclists

98. LHAG have queried whether any thought has been given to placing personnel at the junction of Roman Road/ Knoll Road to warn cyclists of HGVs travelling along Knoll Road (Roman Road is at the eastern end of Knoll Road approximately 70m from Flint Hill). The applicant has commented that this was considered but was not considered to be necessary. The traffic card issued to HGV drivers states that drivers should ensure awareness of any cyclists along the access road which would include Knoll Road and cyclists travelling to/ from Roman Road.

### Aluminium Trackway and Stone

99. Objectors are concerned that if the application site is to be made larger through the provision of security fencing (subject to planning applications MO/2016/1563 and MO/2017/0222), more stone would need to be brought to the site and whether this would increase the number of HGV movements which is not explained in the CTMP. Analysis does not support this point. The area that would be enlarged by the fencing applications is along the access track from Coldharbour Lane towards the drilling area, along the western boundary and along the northern boundary of the drilling area. There would also be a new ramp area created between the eastern boundary of the drilling area and the access track. The extensions to the access track and the western and northern boundaries would not require stone to be laid as these extensions are to accommodate the walkways for security personnel and stone is not required for these walkways. The proposed ramp would require a limited amount of stone however the applicant has commented that this would not increase or change the number of proposed lorries outlined in the CTMP. In any event the fencing applications have yet to be determined and do not form part of the development permitted on Appeal.
100. Concerns have also been raised that the aluminium trackway vehicles are only marginally shorter than the vehicle required for mobilisation of the rig which has an associated three part day road closure and so additional road closures would be required to accommodate these vehicles. The applicant has stated that the three day part closures are required due to the size of the vehicles bringing in the rig, these being 60t and 2.75m wide; and 50t and 3.17m wide. Such sizes mean these HGVs would be classified as abnormal loads. The HGVs bringing in aluminium track way would be 32t vehicles 2.42m in width and are no wider than a standard HGV and the lorry/ trailer combination would be classified as a normal load. It is however, the length of the aluminium trackway vehicle when attached to a trailer that creates a longer length than the rig vehicles. The applicant has said that a single aluminium trackway vehicle would be the equivalent of two HGVs bringing in stone and would be escorted along Coldharbour Lane in the same manner. There would be a pin that would join the front tractor unit to the trailer providing some manoeuvrability of the HGV. The applicant has provided a swept path plan for the aluminium trackway vehicles to show how the vehicle can travel to the site. The applicant has also confirmed that a computer package called Autocad Vehicle Tracking was used for this assessment in ensuring the vehicle can

travel the proposed access route. The County Highway Authority raise no concerns with regards to this matter and comment that the clearance is tight in certain parts of Coldharbour Lane but it is possible, particularly with a traffic management scheme that will minimise the potential of two vehicles needing to pass.

101. Concern has been raised that there is no certainty as to whether the aluminium trackway<sup>6</sup> would be used as part of the project given the applicant has also said they wish to keep the option of using stone lorries. The use of the aluminium trackway would be subject to its availability at the point at which the project were to commence. It should be noted that using stone for the application site and the subsequent lorry movements associated with bringing in stone, was discussed at the appeal and found acceptable by the Inspector. Whilst the CTMP includes the possibility of using two options it does contain the worst case scenario which is of using stone; and the CTMP contains a procedure for HGVs travelling to and from the application site.

### Drilling Rig

102. LHAG requested confirmation that the rig BDF28 quoted in the CTMP is the worst case scenario in terms of a rig coming to site in terms of its size and therefore the size of HGV bringing it to site. The applicant has confirmed that the BDF28 rig is the largest base unit of the rigs that may be considered for this site. If another rig were used it would be smaller than the BDF28 rig. Therefore the CTMP has considered the worst case scenario.

### *ii. details of the temporary road closures, the management of traffic, including emergency vehicles, during the road closures;*

103. As outlined above the CTMP states that for the rig to be brought to site and then to subsequently leave the site, Coldharbour Lane would be closed to all traffic for two consecutive three part day periods. Coldharbour Lane would be closed for its entire length from its junction with Knoll Road in the north, to the junction with Anstie Lane and Abinger Road to the south. No access to Coldharbour Lane would be allowed from Logmore Lane either. The road would be closed to all through traffic between the hours of 09:30 – 19:00 for those three days. The applicant has provided a plan showing all signage that would be used not only on the route that the rig would take but also what signage would be placed on routes that are proposed for the diversion.
104. LHAG have commented that the CTMP states at paragraph 2.1 that the road closure would be for a *minimum* of three days and it should be amended to say *maximum* of three days. The CTMP has been amended so that it states that the road closure would be for a *maximum* of three days addressing this point.
105. The County Highway Authority (CHA) are the correct body who authorise temporary road closures by issuing a Temporary Traffic Regulation Order (TTRO). This regime is separate to the planning regime under the Road Traffic Regulation Act. When a TTRO is to be issued, the CHA inform various groups and organisations such as the Police, the emergency services and local councillors. It is then the requestors' responsibility, if the closure is agreed, to identify and inform and/ or consult with all stakeholders affected by the closure. The Surrey Police were consulted on this application and have responded to the consultation and have commented that they recognise the location of the application is less than ideal and that the scheme proposed is the best solution for this. The Surrey Fire and Rescue service were consulted as part of this application however there has been no response received.
106. Road closures on the public highway is not uncommon practice in order to carry out maintenance works to the public highway or for statutory undertakers like Thames

---

<sup>6</sup> Photographs of the aluminium trackway are appended to this report.

Water, to carry out works to their infrastructure underneath the road surface. Such road closures can extend for periods of weeks. In such cases, temporary traffic regulation orders are made and publicised and diversions are put in place for vehicles. Access is maintained for residents and pedestrians and sometimes cyclists and equestrians. Access is also maintained to premises on affected roads including access by emergency vehicles to those properties. This proposal is no different to other such road closures in the county.

107. The CTMP states that during the three part day road closures access for emergency vehicles would remain unimpeded. The CTMP outlines that communication between the site and bankmen would be such that rig vehicles can be held to allow the passage of emergency vehicles. The CTMP states that in an event of an extreme emergency deployment of all three emergency services, that it may be necessary to suspend the road closure until the emergency situation has been resolved.
108. Concern has been raised within representations about the impact of the road closure would have on residents and businesses, including the bus route and those residents that live along Coldharbour Lane. The principle of the need for two three day road closures was discussed at the Public Inquiry. Indeed the Inspector noted at para 56 that *“the two temporary closures, would not, of itself, be a show stopper for the proposed borehole exploration. Yes there would be some inconvenience, but outside the peak hours I strongly suspect that those taking access from Coldharbour Lane would manage their activities to minimise personal inconvenience”*. Officers acknowledge concerns raised in representations on these matters. However Condition 19(ii) only requires details of the temporary road closures which the CTMP provides in terms of how the road closure would be carried out and enforced; and how HGV traffic going to the site during that period would travel to the site from Ryka’s Café assembly area to Knoll Road before then travelling on to the application site. The CTMP has outlined how traffic going to the site over the three day closure period would be managed and has provided information with regards to emergency vehicles. Therefore whilst Officers recognise representations concerns raised about the impact of the three day closure periods, Officers consider the impact of the three part day closure periods were covered by the Public Inquiry and the detail required for Condition 19(ii) in terms of what the closure activity would look like and be managed, has been provided.
109. Notwithstanding this, Officers consider that it would be desirable for signage to be provided on the road network leading to Coldharbour village i.e. on Abinger Road or Henhurst Cross Lane stating that businesses in Coldharbour village are open for business as usual to recognise that Coldharbour is a working village with businesses still operating and not affected by the proposal. This can be the subject to an Informative.

*iii. details of temporary warning signs for rights of way users at the point at which rights of way meet Coldharbour Lane*

110. The applicant has provided details in the form of a plan (plan 4100 CTMP 12 attached to this report) showing what type of signs would be placed at rights of way that meet Coldharbour Lane<sup>7</sup> and the CTMP provides specific detail that such signs would be placed at all rights of way paths at the point where those rights of way meet Coldharbour Lane including footpaths 135,247, 250, 252,257 and 265 and bridleways 260 and 262. Paragraph 73 of the Inspectors report acknowledges that walkers are a major user of Coldharbour Lane and recommends warning signs are placed where formal and informal tracks meet or cross Coldharbour Lane. The signage proposed at the locations proposed meets this requirement.

<sup>7</sup> The signs at rights of way for rights of way users would say “Coldharbour Lane Traffic Management Scheme in force, please accept out apologies for any delay.

111. A concern raised by LHAG was that whilst equestrians were noted as infrequent in the Safety Audit given the potential for their presence mitigation measures should be provided. Plan 4100 CTMP 12 also shows that signage would be placed on Coldharbour Lane warning HGV drivers to be alert in terms of rights of way users and that there could be equestrians crossing on Coldharbour Lane therefore providing awareness of equestrians. As the Inspector outlined in para 73 of his report, the reduced speed of HGVs would assist and having an escort vehicle ahead of the HGVs would provide opportunity for those vehicles to alert the HGV drivers of equestrians that may be in the road or crossing the road.
112. The Rights of Way team were consulted on this application and reminded, but no comments have been received from them. The Ramblers Association have responded raising no concerns. Officers consider that the applicant has provided sufficient detail on how this matter would be addressed during the life of the proposal and that the details meet the requirements of Condition 19(iii).

*iv. details of temporary signs and any appropriate road marking prohibiting all relevant vehicles from parking or waiting in Knoll Road other than in three temporary marked parking places;*

113. As outlined above the applicant has chosen not to place any road markings or further signage on Knoll Road to inform HGV drivers that they are prohibited from parking anywhere else other than the three parking bays. Instead the applicant has placed that information in the HGV driver information card stating that only the three bays shall be used. Officers are satisfied with this approach as Officers consider that further signage or road markings on Knoll Road may confuse not only HGV drivers but also residents of Knoll Road and also other motorists that park on Knoll Road. HGV drivers have to follow the requirements of the driver cards and if not the CTMP provides information on the process by which HGV drivers are warned and then dismissed if they do not adhere to the requirements. Officers are satisfied that the applicant has met the requirements of Condition 19(iv).

*v. details of the publicity and prior notification signs*

114. As outlined above the CTMP provides details of what publicity would be carried out prior to the commencement of the development. The CTMP says there would be letter drops to inform residents and a list of roads is provided in the CTMP in terms of those roads being kept informed. Representations requested that Anstie Lane be added to the list of roads to be kept informed. The CTMP has been amended to include Anstie Lane. A representation requested Ridgeway Road also be included. The applicant has commented that the purpose of the publicity is to inform residents who live directly on the route which would be affected by the traffic management orders or those roads which may see changes in traffic flow during the traffic management scheme i.e. when Coldharbour Lane is closed the diversion route. Ridgeway Road is not a proposed diversion route. The CTMP outlines that liaison meetings would be held with Capel, Holmwood and Wotton Parish Council's and also LHAG.
115. The applicant has chosen to carry out publicity and prior notification in accordance with best practice approach recommended by the County Highway Authority. The County Highway Authority concur with the recommended level of communication for this proposal being Level 2 and the extent of publicity and notification proposed. Officers consider that the information provided in the CTMP on the level of publicity and prior notification meets the requirements of Condition 19(v).

*vi. banksmen and escort details, including management of the progress of HGVs along Coldharbour Lane to protect trees and banks.*

116. Officers are satisfied with the details provided on the banksmen position and what information the banksmen would adhere to in the form of traffic controller information

cards submitted as part of the CTMP. Officers are satisfied that the banksmen would communicate with each other, the site and the escort vehicle driver to ensure the safe travel of HGVs along Coldharbour Lane. Officers are also satisfied with the information with regards to the escort vehicles with regards to them moving in front of the HGVs along Coldharbour Lane and that HGV drivers would have to wait for the escort vehicle before departing.

117. Queries have been raised as to what information is provided within the CTMP as to the management of the progress of HGVs along Coldharbour Lane to protect trees and banks. The Inspector acknowledged the *“particularly important feature of the sunken lane and need to be protected from ‘erosion’ caused by passing vehicles”* (para 70). However the Inspector went on to discuss that *“Crucially, prevention is key. No-one could advance a realistic solution for remediation of the banks following damage. Having said this, it is necessary to be realistic about the level of risk that would be caused by the HGV movements etc to and from the appeal site”*.
118. The Inspector went on to say in para 71 *“We are talking about professional HGV drivers under the direction of dedicated banksmen, working to an approved TMP. Although the Lane is narrow, and extremely so in places, it is never of a width less than a HGV, with reasonable clearance. As such, I think the fears are somewhat over stated. Importantly, additional preventative measures could be worse than the cure, at least as far as local people are concerns. To further narrow the Lane over the sunken sections to reduce the risk of impact would inhibit general movement and access”*. And then further in para 72 the Inspector discussed that the problems he foresaw would be for the temptation for a HGV driver to overtake a cyclist or for vehicles travelling in opposite direction to a HGV to try and pass on a narrow section of the sunken Lane.
119. As discussed above the Inspector noted that no alternative physical measures were advanced at the Inquiry for the protection of the banks and trees and the Inspector himself noted that such protection could cause problems in themselves. The Inspector noted and it is shown on plan 4100 CTMP 02 that the width of Coldharbour Lane is never less than the width of a HGV. Therefore the protection measures for the bank and the trees are the measures advanced in the CTMP for the control of traffic along Coldharbour Lane. These being the management of HGV traffic such that they do not meet other motorists or cyclists when on the very narrow parts of Coldharbour Lane. The CTMP outlines that the use of stop/ go boards would be employed at key points along Coldharbour Lane and through the constant communication between the banksmen and the escort vehicle, traffic wishing to use Coldharbour Lane whilst a convoy was travelling along it, would be managed to avoid the conflict the Inspector discussed. The Inspector recognised that *“the finger of blame would inevitably be pointed at the Contractors”* for any damage that could occur along Coldharbour Lane hence the provision of cameras on the HGVs to assist with this matter. The Method Statement submitted to comply with Condition 20(ii)<sup>8</sup> outlined that the condition of the banks and carriageway in the sunken lane would be viewed at least twice each working day, before and after the working day, with additional inspections should an incident occur.
120. Officers acknowledge there are no physical measures that can be adopted to protect the banks or trees. Nevertheless, Officers consider that that the management of the progress of HGVs along Coldharbour Lane to protect the trees and banks utilising banksmen, escort vehicles, convoy system and the three part day closure period adequately discharges the requirement of this part of the condition and so achieves the objective of preventing damage to the banks.

#### *Dirt on the public highway*

<sup>8</sup> Application ref: MO/2016/1848

121. Concern has been raised within the representations (20 comments) about dirt going on to the public highway and that there is no information on this. The CTMP has provided information on how HGVs would be managed to ensure that no debris is carried on to the public highway stating should deliveries be made of stone to the site to form the working area of the site, it would be end-tipped onto the area receiving the stone, without the vehicle leaving the made-up surface of the highway or the access track. The CTMP states that no HGV would be allowed to drive onto uncovered soils and then leave the site. However the CTMP does go on to say that in the unlikely event of dirt being deposited on the public highway it would be cleaned away using shovels and a road brush, or water spraying, depending on the severity of the deposits. The regime for ensuring road vehicles leave the site with clean wheels has been detailed in the report submitted, and approved, to satisfy Condition 22: Wheel Cleaning Statement. Should HGVs bring in and remove stone from the site, they would be sheeted<sup>9</sup>.

### *Emergencies*

122. LHAG have requested a schedule be prepared to ensure that all deliveries take place and are brought to the site in agreed timescales to avoid the need for “deliveries to the site will only be made during the working day, except in the case of emergencies that endanger life or the safety of the operation”. The CTMP outlines that the case of an emergency would only occur during the drilling phase. The CTMP would not allow for any deliveries to take place outside of the delivery hours or Monday – Friday for the other phases. In terms of what constitutes an emergency or an emergency response being required in the drilling phase this could be unforeseen change in pressure in the well and so to counteract this, a delivery of materials to add weight to the drilling mud would be required. Dealing with such matters would fall within the remit of an emergency given the risk to life or the safety of the operation. Officers are satisfied that the applicant is not proposing to introduce additional vehicle movements in the construction or decommissioning phase and that any additional movements would be for an emergency only to ensure the welfare of site workers.

## **ENVIRONMENTAL IMPACT ASSESSMENT**

123. Representations received (41) and LHAG have commented that no EIA has been carried out for the CTMP, and have asserted that one should be done. Capel Parish Council have also commented that they wish for “...the Environmental Regulations to be met in all respects”, although reference is ambiguous and it is unclear which environmental regulations they refer to. Given that this is a subsequent application, submitted in response to a condition attached to the original appeal decision (ref. APP/B3600/A/11/2166561), the process set out in Regulation 8 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) (the ‘EIA Regulations’) applies in this instance.
124. Regulation 8 of the 2011 EIA Regulations in respect of ‘subsequent applications’ where environmental information has previously been provided. Where it appears to the planning authority that:
- (a) *an application which is before them for determination—*
- (i) *is a subsequent application in relation to Schedule 1 or Schedule 2 development;*
  - (ii) *has not itself been the subject of a screening opinion or screening direction; and*
  - (iii) *is not accompanied by a statement referred to by the applicant as an environmental statement for the purposes of these Regulations; and*
- (b) *either—*
- (i) *the original application was accompanied by a statement referred to by the applicant as an environmental statement for the purposes of these Regulations; or*
  - (ii) *the application is for the approval of a matter where the approval is required by or under a condition to which planning permission deemed by section 10(1) of the*

<sup>9</sup> Application ref: MO/2016/1009

And it considers that “*the environmental information already before them is adequate to assess the environmental effects of the development, they shall take that information into consideration in their decision for subsequent applications.*” (Regulation 8(2)).

125. Officers are therefore required to consider if the information submitted in the original ES, all subsequent updates and amendments made to that document, and the information provided as part of the applications for subsequent consent, is sufficient to meet the requirements of the EIA Regulations, with reference to the likely significant effects of the current application.
126. With reference to the further detail that has been provided in the current application about the number of vehicles that would be generated by the development permitted on appeal (ref. APP/B3600/A/11/2166561), it is noted that the maximum number of daily HGV traffic movements that is now expected to arise from the development is 23 per day, during phase 3 of the operation (drilling of the borehole). That represents a level of daily traffic movements that is lower than the level that was predicted when the appeal decision was made (paragraph 53 (p.11) of the Appeal Decision report cites a maximum of 30 HGV movements in any given day). As the number of highest rate of daily HGV movements predicted under the current application is lower than the highest rate of daily HGV movements considered at the appeal, on the basis of the information provided in the original ES, it is reasonable for that ES to be relied upon for the determination of the current application.
127. With reference to the concerns that have been raised in respect of the socio-economic impacts of the CTMP on the local community, including in relation to effects on the local bus service, on the local public house (the Plough Inn), and on the motoring costs incurred by local residents having to use diversion routes, such effects were taken into account by the Inspector at appeal, on the basis of the information provided in the application documents, which included the original ES, at paragraphs 89 (pp.17-18) and 95 (pp.18-19) of the Appeal Decision report:
  - “89. *Penultimately, there are some objections on the basis that the road management and closures would cause businesses and customers inconvenience. The submissions on this point are largely subjective, with no independent assessment of the likely economic effects. First off, it would be silly to say that there would be no effects. Even so, as said before, people and businesses would manage the inconvenience. Other than for the two 3-day closures of Coldharbour Lane, when access might be more difficult, though not denied, businesses and customers would have unfettered access during the peak hours. As such, there may be a small level of inconvenience that constitutes a negative factor, but not of itself crucial.*”
  - “95. *Turning to other matters, the traffic, ecology, effects on businesses and visitor enjoyment are all topics that raise negative quotients in the balancing equation. Notwithstanding, taken individually or cumulatively, I have found these not to be compelling. Even the traffic protocols can be made to work effectively and safely through the TMP. In particular, because the duration of the project is so short, I am certain local people, visitors and businesses would manage the inconveniences that would occur as best they can. No doubt the experience would prove irritating, but not life changing. The raft of conditions proposed would mitigate much of the feared harm.*”
128. Whilst the submitted CTMP considers more detail than that submitted in the original application for the well-site and on appeal, the key principles of managing the traffic remain unchanged, and include: two three day closure periods for the rig to be brought on and off to the site; a shuttle service involving three HGVs at a time in convoy along

Coldharbour Lane, during the construction period and the decommissioning / restoration period; a holding area for three HGVs on Knoll Road, prior to them travelling in convoy down Coldharbour Lane; and, the route to the site being defined as via the A24 – Flint Hill (A2003) – Knoll Road and Coldharbour Lane. Accordingly Officers consider that as the CTMP proposed by the current application is consistent with the key aims of the traffic management plan submitted as part of the original application, and as the questions of socio-economic effects of the proposed traffic management measures had been taken into account by the Inspector, as reflected in paragraphs 89 (pp.17-18) and 95 (pp.18-19) of his report, no further assessment is required to inform the determination of the current application.

129. In summary Officers consider that the environmental information already before them in respect of the current application, which includes that provided by those making representations about the proposed CTMP, is adequate for the planning authority to take account of and assess the environmental effects of the development.

---

## HUMAN RIGHTS IMPLICATIONS

130. The Human Rights Act Guidance for Interpretation, found at the end of this report, is expressly incorporated into this report and must be read in conjunction with the following paragraph.
131. In the case of this application it is recognised that the HGV traffic generated by the development and measures in the traffic management scheme will inevitably cause disruption and some delay to local residents and users of the public highway over the temporary period it would be operational. In addition the three day road closures for rig mobilisation and demobilisation will also cause disruption to users of Coldharbour Lane. These issues have been discussed within the report and given the scale and temporary nature of the impacts they are not considered sufficient to engage Article 8 or Article 1. As such, this proposal is not considered to interfere with any Convention right.

---

## CONCLUSION

132. The Planning Inspectors Appeal Decision granted planning permission for the use of the application site as an exploratory wellsite for a period of 18 weeks. During the Public Inquiry process, an extensive site visit was carried out which not only looked at landscape impacts but that of traffic. The Planning Inspector was fully aware of the constraints the Coldharbour Lane provides in terms of the number of traffic movements involved in this development and also the size of the vehicles involved, i.e. up to 60t for the rig mobilisation. With this knowledge, the Planning Inspector granted planning permission subject to the imposition of two highway conditions, 18 and 19. Whilst a number of representations received on this application are concerned with the use of the road network in the vicinity of the application site in principle, its location in the AONB and Green Belt; and its impact on groundwater and wildlife, those matters were discussed at the Inquiry. In the granting of planning permission through the appeal process, the use of Coldharbour Lane and Knoll Road has been granted in principle. There is no alternative route to the application site in terms of the planning decision arising out of the appeal or prescribed through Condition 19.
133. The stated aims of the traffic management scheme are to ensure the safety of road users, to minimise any delay to road users, to avoid attempts by vehicles to pass each other where the road width is not adequate, to avoid vehicles speeding reduce the likelihood of collisions and to avoid damage to the delicate banks of the sunken lane. It is considered that whilst this is a complex traffic management scheme, it is the only practical way of getting HGV vehicles to the site, given the constraints of the highway network. Planning permission has already been granted for the development, including the use of Coldharbour Lane, and therefore the only consideration in respect of this submission is whether or not the traffic management scheme meets the requirements of

condition 19. The view of the CHA is that it does. The CHA had requested that all references to HGV movements on Saturday mornings should be removed and only be in case of emergencies that endanger the safety of life or the safety of the operation. The operator will need to plan in advance in order to ensure that they have sufficient supplies on site before the weekend for drilling and testing. The CTMP has been amended to take account of this request.

134. With regards to Policy MC15 and Policy MOV2, Officers are satisfied that the submitted CTMP provides sufficient information to demonstrate how HGVs associated with the proposal would be navigated along Coldharbour Lane and Knoll Road to ensure the safety of other highway users and pedestrians; that the HGVs can reach the application site; and prevent damage to Coldharbour Lane as far as is reasonably practical. Officers recognise that the movement of HGVs would be noticeable but that the proposal is limited in duration. Officers consider that the applicant has submitted information that meets the requirements of Condition 19.

## RECOMMENDATION

The recommendation is that the details of the CTMP submitted pursuant to Condition 19 of Appeal Decision APP/B3600/A/11/2166561 dated 7 August 2015 contained in application ref: MO/2017/0911 be approved.

### Informatives:

1. The applicant is reminded to use aluminium trackway whenever possible for the duration of the exploratory programme.
2. In determining this application the County Planning Authority has worked positively and proactively with the applicant by: entering into pre-application discussions; assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework, providing feedback to the applicant where appropriate. Further, the County Planning Authority has: identified all material considerations; forwarded consultation responses to the applicant; considered representations from interested parties; liaised with consultees and the applicant to resolve identified issues. Issues of concern have been raised with the applicant including impacts of traffic and on residential amenity and highway safety, and addressed through negotiation and acceptable amendments to the proposals. This approach has been in accordance with the requirements of paragraphs 186-187 of the National Planning Policy Framework 2012.
3. The applicant is requested to place signs on the public highway network to the south of Coldharbour village stating that businesses operating within Coldharbour village are open for business as usual whilst the three day part closures are in force.

---

### CONTACT

Samantha Murphy

### TEL. NO.

020 8541 7107

---

### BACKGROUND PAPERS

The deposited application documents and plans, including those amending or clarifying the proposal, responses to consultations and representations received as referred to in the report and included in the application file and the following:

### Government Guidance

[National Planning Policy Framework 2012](#)

---

**The Development Plan**

[Surrey Minerals Plan Core Strategy Development Plan Document \(DPD\) 2011](#)  
Mole Valley Local Plan 2000

**Other Documents**

Planning Appeal Report for APP/B3600/A/11/2166561 dated 7 August 2015  
<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=2166561>

---

This page is intentionally left blank