

UPDATE SHEET

MINERALS/WASTE MO/2017/0911

DISTRICT(S) MOLE VALLEY DISTRICT COUNCIL

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

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

CONSULTATIONS AND PUBLICITY

District Council

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

Consultees (Statutory and Non-Statutory)

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

Parish/Town Council and Amenity Groups

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

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

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

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

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

Additional key issues raised by public

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

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

General

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

Consultation time period

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

Officer report

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

Risk

- 9) Cannot see how this scheme is safe

Access to the site

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

Lorries and Traffic

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

CTMP itself

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

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

Residents

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

Businesses

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

Knoll Road

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

Flint Hill

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

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

Officer response to new issues raised within representation letters

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

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

Type of rig

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

Lack of consultation

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

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

Safety Audit Findings

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

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

Bus Service

The bus service that goes through Coldharbour is:

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

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