

Planning & Regulatory Committee 18 October 2017

Item No

7

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 Development Control Committee met on 4 October 2017 where this planning application was tabled and discussed. The Committee resolved to object to the planning application, as consultee, on the following grounds:

- The failure to address issues relating to traffic in Dorking town centre
- The failure to consider the full impact of traffic movements associated with the development on school children in the vicinity
- Question the structural stability of the aluminium trackway and the potential for noise to the surrounding area from the use of such a material
- Traffic movements have not been reduced in the drilling phase
- The passing place is only wide enough for 1 HGV
- Concern raised about what happens when 2 HGVs follow each other
- Question the assumption that the vehicles would travel at a constant speed of 30 mph and that they would not meet cyclists travelling in the opposite direction or that there would be no slower movement traffic e.g cyclists or horses
- There are concerns that there may be no banksmen in the right places if a vehicle turned up unexpectedly
- Does the applicant have permission to use the Cobham MSA

Parish Councils and Interest Groups

Leith Hill Action Group (LHAG) have written a letter dated 11 October raising the following concerns:

The principal concern was the feasibility of getting the required number of HGV movements in the time available during the drilling period without closure of Coldharbour Lane to non-site traffic - what we have referred to as the "workability" of the scheme. A related concern was realistic assessment of driver delay for nonsite traffic. The two are obviously interlinked in that HGV traffic causes delays to public traffic and vice versa.

The new "analysis" of these issues (presented at paragraph 7.23 – 7.35 and drawing 4100 CTMP 15 of the September TMP) relies on absurd assumptions (Note A) and therefore arrives at impossible results. The analysis calculates HGV journey times based on these assumptions. It considers a limited number of ideal scenarios and fails to consider likely scenarios (example at Note 2) which will arise (even in the absence of cyclists, equestrians and pedestrians) and lead to much longer delays.

The absurdity of some of the underlying assumptions in the new “analysis” was pointed out in our consultation response and that fact is referred to in passing in the Officer’s Report; the issue itself, however, is not addressed. Instead these demonstrably erroneous results have been relied upon to support officers’ conclusions that the requisite number of movements can be achieved and delays to non-site traffic will be minimal.

Given the invalidity of the underlying assumptions, it is less important that the results set out in 4100 CTMP 15 clearly contain errors¹. The invalidity of the underlying assumptions cannot be dismissed as trivial; it is these figures that are used to calculate driver delay and transit times, and hence the very workability of the TMP.

A further point: your Committee asked for 3D analysis of the route. The Applicant has supplied pairs of 2D drawings. These do not constitute 3D analysis, for the reasons we set out in our consultation response. The concern here is not just for trees and banks, it is also for the consequences to the pavement of the road and traffic disruption if a low loader should ground on a sharp crest.

In order to get some clarity and avoid endless iterations, we have suggested a meeting with officers and the Applicant. That suggestion has so far been ignored. As things stand, the reliable information required to make an informed decision still does not exist. As a consultee, LHAG has done its best to help in this respect, and will continue in that effort.

For the avoidance of doubt, our object here is not to sabotage anything, but to arrive at a traffic scheme that will allow the development to be carried out to time and with minimum disruption to the public. If that requires closure of Coldharbour Lane throughout the drilling period, your Committee, and the public, must know that before a decision is made.

Additional key issues raised by public

178 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) Object to the proposal
- 2) There should be a Members site visit
- 3) Driving away the very people who bring prosperity to the area.
- 4) The proposal is unrealistic and dangerous.
- 5) There is already Japanese Knotweed there which will likely end up all over the town.
- 6) Europa has made no effort at all to educate the populace about their plan.
- 7) Concerns over the planning application has unlawfully been rush through MVDC.

Support

- 8) The Oil & Gas Authority implements amongst the most stringent conditions for oil & gas companies to operate in the word. I have every faith in their ability to ensure safe.

Trees and Tree Preservation Order

- 9) As 20 trees have TPO status it will be a contradiction to allow large vehicles along this sunken lane where there is no room for another vehicle to pass
- 10) There are no details about protecting the trees.
- 11) Vulnerable trees close to its edge could be easily damaged.

Lawful right to protest

ANNEX A MO/2017/0911

- 12) The CTMP does not consider the impact from lawful, democratic protest - the applicant must act responsibly.

Consultation period

- 13) The 14 day consultation period is woefully short.
- 14) No regard for local democratic processes

Area of Outstanding Beauty

- 15) The site is within the AONB.
- 16) The proposal will permanently damage the AONB
- 17) Leith Hill is a historical and cultural landmark

Environmental Impact Assessment

- 18) There is no EIA for the CTMP

Access to the site

- 19) The site is accessed by sunken lanes - how will the CTMP protect the banks of the sunken lane.
- 20) The lane is unsuitable for Heavy Vehicles/ Coldharbour Lane is not wide enough
- 21) Coldharbour Lane will effectively be closed to non-site traffic for the duration of the development.
- 22) It says there will be 48 hours to notify SCC of any damage to road surfaces. This is too long.
- 23) The knock on effect on alternative routes will be chaotic and expensive.
- 24) How will other small lanes cope with extra traffic?
- 25) The sunken lanes will be trashed.
- 26) Coldharbour Lane will become dangerous, muddy and are wholly inadequate for this traffic load.

Lorries

- 27) There will be hundreds of lorries
- 28) The lorries bringing in equipment have shown damage to the lane. Dread to think what 1000+ lorries will do
- 29) 1000+ number of movements is unimaginable
- 30) The lorries will not be able to travel at 25mph but more likely 10mph
- 31) The lorries will not be able to travel at a consistent 30mph
- 32) The whole area will be affected by the heavy traffic involving HGVs and tankers.

CTMP

- 33) Concern the CTMP would allow HGV movements through Dorking during rush hour and school arrival/ leaving times
- 34) There should be 3D survey to give a physical size of Coldharbour Lane
- 35) The driver delay assessment is simplistic based on absurd assumptions
- 36) Ask for heavier penalties to drivers who damage the road and banks
- 37) If the CTMP changes the nature of the lane through removal of foliage then it should not be permitted
- 38) The document does not give confidence to the community of a smooth running/ Inadequate and concerning TMP.
- 39) How much notice will be given to residents of Knoll Road & Coldharbour Lane of the suspension of parking bays?
- 40) Saying SCC endorse the use of aluminium trackway lacks credibility
- 41) If aluminium trackway proves unworkable then a new CTMP will need to be submitted for stone

ANNEX A MO/2017/0911

- 42) It is unacceptable to close the road for 6 days to move the rig.
- 43) The mitigations offered provide scant tangible benefits, suggested changes to the frequency of vehicle movement.

Residents

- 44) The impact of those living on the route will be unacceptable
- 45) There has been no engagement with the community by the applicant
- 46) People won't have access or will have delayed or reduced access to emergency services
- 47) Coldharbour Lane has been closed on numerous occasions for filming and bike races and closed with banksmen operating the road closures. We have had to wait 20 minutes
- 48) It will totally inconvenience those of use who work and live in the area
- 49) The proposal will adversely affect my business
- 50) Public transport will be affected with the additional traffic on the road
- 51) Traffic will cause unnecessary stress

Dorking

- 52) The existing levels of traffic in Dorking are too high for this proposal
- 53) Concern about the air quality in Dorking from the additional lorries

Knoll Road

- 54) It is inappropriate to use Knoll Road
- 55) Knoll Road will experience heavy traffic, noise, air pollution and damage from the proposal
- 56) Knoll Road is used as a 'rat run'

Pedestrians, cyclists and equestrians

- 57) There will be a risk to pedestrians
- 58) The report does not take into account the number of cyclists on weekdays
- 59) There will be a risk to equestrians

The drilling

- 60) The drilling will cause serious impact
- 61) The proposal will damage aquifers
- 62) The decision to frack will affect the countryside
- 63) We are generating more energy from renewables
- 64) Uncertain whether oil extraction by acidification can ever be economically viable.

Wildlife

- 65) Little regard for the local flora and fauna

In addition to the letters of representation, 12 types of proforma letter have been received.

Lack of consultation

Of the further comments received, 3 of those have stated that the consultation on the amendments is inadequate/ too short. The following provides information on this:

- An amended CTMP was submitted with a revised plan on 21 September and this went out for re-consultation and re-notification of the public on 22 September with a deadline for responses on the re-consultation and re-notification on 6 October. 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.

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