

LEITH HILL ACTION GROUP

c/o Chasemore End, Coldharbour, Surrey RH5 6HF

Rosemary Cottrell
Planning & Development Technical Support Team
Surrey County Council
County Hall
Kingston upon Thames
Surrey KT1 2DY

29th September 2017

Dear Ms Cottrell,

SCC Ref – 2017/0027, Traffic Management Plan

This is the consultation response of the Leith Hill Action Group to your letter of 22nd September 2017 regarding Europa's Traffic Management Plan, the version dated 20th September 2017.

The response to the P&R Committee's request for a firm commitment by Europa to either stone or Aluminium Trackway for site surfacing is welcome. The use of Aluminium Trackway will bring a significant reduction in HGV movements during the Site Construction and Reinstatement phases. However, the workability of the scheme needs to be assessed during the periods where the concentration of HGV movements is greatest, which, as we have pointed out previously, is during the drilling phase. Aluminium Trackway will make no difference to that.

- The revised TMP attempts in section 7 to quantify expected driver delays. The analysis is deeply flawed and based on unjustifiable (indeed absurd) assumptions.
- Further statements have been made about how residents of Coldharbour Lane can get to and from their properties, including assertions that cannot be borne out in logic about maximum waiting times.
- The P&R Committee asked for a 3D analysis of the HGV route. This is "not considered to be necessary" by the Applicant.

We consider these points further below.

It is also our understanding that Mole Valley District Council's Development Control Committee objected to the previous version of the TMP on a number of grounds including that it was "wholly inadequate with regard to the impact of the development on traffic congestion in Dorking town centre and to schoolchildren in particular". The revised TMP does not address this issue. If answers have been provided by the Applicant or by the county Council, we ask that they be made available to consultees and the public.

The workability of the TMP

There was a degree of confusion at the 2nd August P&R Committee about the number of HGV movements. To be fair, there has been a huge degree of either uncertainty or obfuscation on the part of the applicant throughout the last nine years. The latest version of Table 5.1 has reverted to using "loads" rather than HGV movements - unhelpful when trying to compare with the figures discussed at Committee. And the figures for rig mobilisation and demobilisation appear only once

although these movements occur twice. Appendix 1 to this letter sets out our understanding of the figures. We would be grateful if officers could confirm that this accords with their understanding.

The figures to focus on are the movements occurring during the drilling phase. Appendix D to Mr Elliott's Proof of Evidence to the 2015 Inquiry shows "HGV traffic" during the drilling period totalling 56 – or 112 if we assume that he was quoting return journeys; the figure now is 464. That's 24 HGV movements per 5.5 hour working day, with 75% of the vehicles of such size that they can only travel singly rather than in convoys of three. (Para 9.3 of the TMP asserts an average number of deliveries of 9 per day – that is 18 movements. That would require the drilling program – and consequently the whole development – to extend beyond the 18 weeks permitted by Condition 4. There may, in the event, be reasons why the 18 weeks might be exceeded, but to plan to exceed it is unacceptable. Further, where is the evidence to support the assertion at 9.4 that "the capacity of the road is still adequate to cope with the traffic"?)

The new "analysis" of HGV transit times and driver delays at para 7.23 et seq. and drawing 4100 CTMP 15 is simplistic in the extreme. The drawing is not at all easy to understand and does not seem to be consistent with Table 7.1. It appears that the conclusions drawn rely on a number of assumptions including the following:

- *Site HGVs and other traffic can pass each other at any point on Coldharbour Lane where the width is greater than 4.8m.*

Given that 50% of site HGV movements during the drilling phase are by vehicles of 2.80m width, this can only be the case when all the non-site traffic is <2m wide. It isn't.

Are the widths quoted the pavement width or the width between banks? If the former, when were they last measured – the usable width has reduced in a number of places, particularly in the southern, steep part of the Lane.

- *Site HGVs can always pass each other at the Logmore Lane Junction.*

What happens when two HGVs are each followed on their approach to that passing place by a non-site vehicle of more than 2m width? For 75% of the site HGVs there is only room in the "passing place" for one.

- *Site HGVs will travel at a constant 30 mph along the whole length of the route along Coldharbour Lane, including when passing other vehicles, apart from one 200m section at 10 mph.*

Which implies that they have infinite acceleration (including when moving away uphill fully laden) and braking, and that there is no need to slow at all when passing non-site traffic even when available clearance is a centimetre.

- *No cyclists will be encountered travelling in the opposite direction.*
- *No slower moving traffic – cyclist, equestrian – will be encountered.*

All of these assumptions are at the very least questionable; some are simply absurd.

And could someone explain how a man with a stop/go board and a radio controls a three-way junction like Coldharbour Lane/Logmore Lane, or a four way junction like Coldharbour Lane/Knoll Road/Ridgeway Road?

It may be that the only practical traffic management that will work here is an alternating one-way system between Knoll Road and the Site. That is not the plan presented here.

Residents and deliveries

As noted above, the assessments of impact on residents and delivery/service vehicles in terms of delays in accessing or leaving properties along Coldharbour Lane is flawed. And the suggestion at 7.8 that a meeting will be held with one resident to “agree a workable protocol” once the TMP is accepted by SCC seems like putting one cart before several horses.

3-D analysis of the HGV route

At its meeting on August 2nd the P&R Committee resolved that consideration of the TMP should be deferred “*in order to receive further information on concerns raised by members including 3D analysis ...*” At Paragraph 1.20 et seq. of the TMP we read that “*3D surveys were carried out along Coldharbour Lane in 2011*”, and were “*presented in 2D*” in Richard Elliott’s Proof of Evidence [to the 2015 Public Inquiry]. Because of that “*further surveys have not been considered necessary*” by the Applicant.

Mr Elliott’s Proof of Evidence to the 2015 Inquiry in fact contains no evidence that a 3D survey has been carried out. It presents plan views (i.e. views from the top), end elevations (views from in front or behind), but no side elevations. And certainly no 3D analysis. This appears to be confirmed by Appendix 2, para 4.32.

Rapid changes in gradient, such as exist on Coldharbour Lane, mean that the effective height of, for example, a forty foot long, fourteen foot high tanker – of which there are hundreds in this scheme – is greater than fourteen feet at the middle of a hollow. This has not been taken into account in Mr Elliott’s work.

Similarly, the ground clearance of a long vehicle is less at a crest. LHAG has asked repeatedly since 2011 for wheelbase and ground clearance data for the low loaders to be used for excavators and “rig loads”. This has not been forthcoming.

LHAG commissioned an elementary 3D survey in 2012 which was presented to the first Public Inquiry (which refused Europa’s appeal), and is therefore on the public record. The resolution was necessarily low, but it did indicate clearances (both positive and negative) well within the error margin.

We cannot say with certainty that the larger loads will definitely hit trees, or that low loaders will ground. We don’t know because the higher resolution analysis required has not been carried out. The P&R Committee was right to ask for 3D analysis and it must be provided.

Conclusions

Mr Elliott told the P&R Committee on 2nd August that his TMP had been “approved by HM Inspector subject to sorting out a few details”. That is not true. HM Inspector said of the TMP “I cannot see how this can work”, and requested that a new TMP be prepared. The Plan now presented involves HGV traffic volumes in the drilling period which are significantly different from those considered by HM Inspector, but contains little clarification as to the way the Plan is supposed to work.

The fulfilment of Condition 19 cannot be treated as a box-ticking exercise. The plan must be examined professionally and a judgement made as to its workability.

To do that clear and unambiguous information is required, together with clarity on underlying assumptions in order to assess (i) the feasibility of achieving the requisite number of movements (particularly during the drilling period) within the working hours and total elapsed time set by

Condition, and (ii) the consequences of that to other traffic on Coldharbour Lane during that period. It would then be for the Committee to decide whether those consequences are acceptable.

LHAG has looked in great detail over nine years at all aspects of this overall development and – like HM Inspector in 2015 – we cannot see how the TMP can work. At a meeting on 11th May 2016 attended by SCC, representatives of the Applicant, Capel Parish Council and LHAG, the potential contribution of CPC and LHAG to detailed discussion of the pre-commencement conditions was acknowledged. Now we are asking for that acknowledgement to be made real. In the interests of progress, and in the interests of public engagement, we suggest that endless iterations might be avoided by inviting Mr Elliott to attend **a meeting where factual queries can be answered, the operation of the TMP can be discussed, and the assumptions underlying drawing no 4100CTMP15 can be explored.** At a minimum we would suggest attendees include a representative of the Applicant (presumably Mr Elliott), appropriate SCC officers, and representative(s) of LHAG.

Although requested by the P&R Committee, no 3D analysis of Coldharbour Lane has been undertaken. **It should be.**

As things stand, **the information on which the P&R Committee can base an informed decision still has not been provided.**

Except where they have been answered directly, the points made in our letters of 21st June and 31st July, and in our letter of 3rd September addressed to the case officer, still stand. The points made in the last of these in relation to Environmental Impact Assessment require an answer. As does this letter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Alan Hustings', with a long horizontal flourish extending to the right.

Alan Hustings
for Leith Hill Action Group

cc Cllr H Watson
Cllr S Cooksey

Table 5.1: Summary of Heavy Goods Vehicle Types

| Description | Weight | Vehicle dimensions (m) | | | Number of HGV movements | Phase TMS | |
|------------------------------------|--------|------------------------|------|------|-------------------------|-----------|--------------|
| | Tonnes | L | W | H | | Total | Working Days |
| Site Construction | | | | | | | |
| Fencing, security cabins & welfare | 32 | 5.61 | 2.38 | 4.00 | 14 | | |
| Miscellaneous HGVs | 32 | 7.32 | 2.43 | 4.00 | 52 | | |
| Aluminium Trackway | 32 | 18.30 | 2.43 | 4.00 | 10 | | |
| Excavator on Low Loader | 49.5 | 12.19 | 2.59 | 3.60 | 12 | 88 | 30 |
| Rig Mobilisation | | | | | | | |
| 100 tonne crane | 60 | 13.63 | 2.75 | 3.90 | 4 | | |
| Articulated Lorry | 32 | 15.50 | 2.60 | 4.00 | 8 | | |
| Drilling Rig | 50 | 14.10 | 3.17 | 4.26 | 1 | | |
| Rig Loads on Flat Bed Trailers | 32 | 15.50 | 2.60 | 4.20 | 94 | | |
| Rig Loads on Low Loaders | 32 | 12.10 | 2.59 | 3.50 | 14 | 121 | 3 |
| Drilling | | | | | | | |
| Water tanker | 20 | 12.19 | 2.80 | 4.30 | 232 | | |
| Pipe supplies on flat bed | 32 | 15.50 | 2.60 | 3.50 | 40 | | |
| Mud/cement supplies | 32 | 15.50 | 2.60 | 4.00 | 32 | | |
| Cuttings | 32 | 5.61 | 2.38 | ? | 104 | | |
| Misc Skips etc | 32 | 5.61 | 2.60 | ? | 16 | | |
| Flares for Testing delivered | 32 | 15.50 | 2.60 | 4.00 | 40 | 464 | 20 |
| Testing | | | | | | | |
| | | | | | 0 | 0 | 4 |
| Rig Demobilisation | | | | | | | |
| Flares for Testing removed | 32 | 15.50 | 2.60 | 4.00 | 40 | | |
| 100 tonne crane | 60 | 13.63 | 2.75 | 3.90 | 4 | | |
| Articulated Lorry | 32 | 15.50 | 2.6 | 4.00 | 8 | | |
| Drilling Rig | 50 | 14.10 | 3.17 | 4.26 | 1 | | |
| Rig Loads on Flat Bed Trailers | 32 | 15.50 | 2.6 | 4.20 | 94 | | |
| Rig Loads on Low Loaders | 32 | 12.10 | 2.59 | 3.50 | 14 | 161 | 3 |
| Site Restoration | | | | | | | |
| Fencing, security cabins & welfare | 32 | 5.61 | 2.38 | 4.00 | 14 | | |
| Miscellaneous HGVs | 32 | 7.32 | 2.43 | 4.00 | 52 | | |
| Aluminium Trackway | 32 | 18.30 | 2.43 | 4.00 | 10 | | |
| Excavator on Low Loader | 49.5 | 12.19 | 2.59 | 3.60 | 12 | 88 | 30 |