

Samantha Murphy
Planning & Development Group
County Hall
Kingston upon Thames
Surrey
KT1 2DY

6 July 2017

Dear Ms Murphy,

**Planning Application Number: 2012/0114 (the "Application")
Submitted by Southern Gravel Limited (the "Applicant")
Periodic review of a mineral site planning permission for the winning and working of chalk for
the determination of full modern conditions
Oxted Quarry, Chalkpit Lane, Surrey**

Thank you for your letter dated 7 June 2017 inviting comments on the new information that has been submitted by the Applicant in relation to the Applications.

The following representations are made in respect of the Applications on behalf of the Oxted & Limpsfield Residents Group ("OLRG"). OLRG have previously made written representations dated 28 February 2016 and 7 July 2012 in relation to the Application.

We have reviewed and considered the new documentation, a transport statement dated May 2017 (the "TS") submitted by the Applicant and make the following comments in relation to this.

First and foremost is our fear that if a daily limit of 150 HGV movements is approved by Surrey County Council, it will result in a road accident involving serious injury or loss of life.

1. Inadequate Traffic Data

We consider the traffic data provided in the TS to be inadequate. The original data relied upon is now between six and ten years old. The newer data, obtained from September 2016 and November 2016, is too limited as it represents only one week from each month given.

This short time span of data for each period is clearly inadequate to set a baseline for traffic volumes, as there could be external factors which could affect data for such a period, for example weather conditions. The TS provides no justification for using such a short time period. Whilst figures are provided for post January 2017, the raw data to back this up is not supplied or referenced and this could be anecdotal.

The limited value of the data is demonstrated by the fact that the November figures only record a maximum of 27 HGV movements over a 5 day average, 12 hour period, whereas data from March 2011, collected over a month when the Chalkpit was in full operation, shows 165 movements were recorded. The November data, therefore, although provided as data for the Chalkpit as it would be during operation, cannot be relied upon.

On this basis, conclusions drawn from the data cannot inform a full assessment of traffic impacts and SCC should require the Applicant to provide further data in line with established environmental impact assessment principles.

2. Proposed Movement Limitation Condition

We are very concerned by HGV movements along Chalkpit Lane and adjoining roads, and as such we are looking to SCC to impose strict HGV movement restrictions on the Applicant.

Previously the Applicant proposed a limit on daily movements of 362 movements per day. We note that in paragraph 11.48 of the TS that a limit of an average of 100 movements per day is now

proposed by the Applicant, with a daily cap of 200 movements, with paragraph 1.11 setting out a limit allegedly proposed by SCC of 56 movements per day as an average over the year, with a daily 150 movement limit. The level of movements proposed by the Applicant is lower than previously proposed, but in our opinion is still too high. In our 2012 representation we requested a limit of 20 HGV movements per day, and have seen no evidence to support a change in this request given that the conditions of Chalkpit Lane remain the same, with minimal capacity for HGVs.

Additionally, we object to the use of a daily average across a year. SCC will be aware that this method could still leave residents with long periods of disturbance, with spacing out of such disturbance providing poor mitigation for its effects.

We are also concerned by paragraph 10.12 of the TS, in which the applicant mentions that SCC will not impose limits on HGVs carrying chalk from the Chalkpit. We see no reason for this approach and would expect an overall limit on HGVs in order to protect the safety of local residents. In the event that having no such limit is justified, the need for a restriction on infill HGVs is most important.

3. Road Safety

OLRG's main priority is to ensure safety for local residents near the Chalkpit. We are concerned that although the Applicant itself acknowledges in paragraph 5.9 that the local roads are "*not ideally suited to HGV Access*" it has failed to grapple with the nature of Chalkpit Lane as a narrow road unsuitable for frequent HGV traffic. We can only reiterate the points made in our previous representations in this regard.

We note the comments made in the TS paragraphs 5.1 to 5.8, regarding collision data for the area around the Chalkpit, which is used to portray the area as safe despite HGV movements whilst the Chalkpit was active. We are concerned that not only are the severity of the incidents downplayed, but as alluded to in our representations of July 2012 and February 2016, simply looking at records of incidents as in the TS overlooks numerous near miss incidents our members have been involved with, not to mention incidents which are not recorded. Our members would also emphasise the fact that the number of HGVs on the road creates a feeling of intimidation for residents and road users, another factor not considered by the use of accident records. In taking this approach to assessment, the Applicant has yet to provide a proper road safety assessment as required by SCC's EIA Scoping opinion of 1 May 2012.

Paragraph 5.7 of the TS is also misleading in presenting that no incidents occurred between January 2012 and November 2016. It is disingenuous for the Applicant to highlight this lack of incidents without mentioning that the Chalkpit was not operational during that period, and hence the number of HGVs was less.

Both Chalkpit Lane and Barrow Green Road are highly unsuitable for the HGVs which are too large for them. They are narrow residential roads used by schoolchildren to walk to school, cyclists, and horseriders from the nearby stables. The number of schoolchildren in the vicinity will increase next year when St Mary's School increases in size by more than 100 children. The HGVs create severe road safety dangers.

4. Noise and Vibration Impact

The assessment of noise and vibration within the TS is inadequate for a number of reasons.

Firstly, we would highlight that the noise and vibration assessment makes predictions but does not refer to any actual baseline recordings having been taken on the ground, across a reasonable time period, as would be normal for an assessment of this type. The Applicant cannot rely only upon data that does not take the particular topography and ground conditions of the area into account when drawing its baseline, and so misses the very real impact of increased traffic noise and vibration on residents' lives as referred to in the representation by Amanda and Matthew Griffiths in July 2012.

Further, the traffic noise assessment is also inadequate as it fails to assess the cumulative impacts of the operational noise and vibration generated by the Chalkpit alongside the traffic noise. It should be

obvious that if HGVs are servicing an operational site, noise will be generated by the loading and unloading of these HGVs, which is an integral part of their noise generation.

5. Cumulative Assessment

The Applicant's conclusion in paragraph 9.7 of the TS that no cumulative assessment of the Sandpit need be undertaken is flawed.

Under the relevant regulations (The Town and Country Planning (Environmental Impact Assessment) Regulations 2011, Schedule 4) it is necessary for each application to include an assessment of the likely significant cumulative effects of it on the environment. As such, the Applicant should set out how the Chalkpit and Sandpit will cumulatively affect traffic, which it does not do, instead just describing the Sandpit development and assuming that SCC is happy with both schemes' cumulative impact, without further consideration. Therefore, the Applicant does not meet the regulatory requirements for assessment of impacts.

6. Residents' Concerns Response

We have reviewed the section of the TS that attempts to address our concerns on traffic. Generally, we note that the Applicant does not provide much comfort or offer much by way of mitigation to the local residents' legitimate concerns. In particular, we would respond to the following paragraphs:

11.25: No qualification is given for this statement, or reference to where the assessment can be examined.

11.27: As noted above, local residents have grave concerns over whether the road network is capable of accommodating the number of HGV movements requested in the TS.

11.29: It is telling that this paragraph refers to the data from 2008 to 2011, without reference to the 2016 data. This suggests that even the Applicant considers this data incomplete.

11.30: This paragraph again mentions the 362 daily movement figure as a reasonable maximum. There is no proper argument made out for this as a limit, given that this number occurred on only one day in the 2008 to 2011 time period, with the next highest number of movements being half that amount. The fact that this occurred on one day is insufficient evidence of the ability of the road network to cope.

The paragraph again puts forward the flawed assumption that limiting infill traffic would have no effect, given the lack of limitation on chalk carrying HGVs. Notwithstanding our comments above that we would prefer an overall limit for all HGV traffic, this is obviously a nonsensical statement, which fails to consider the cumulative impact of unrestricted movements of HGVs against movements of infill HGVs.

11.32: We are surprised that the Applicant would characterise a restriction during peak hours as unnecessary. With a number of schools in the vicinity of the Chalkpit, there is a clear impact on traffic, not to mention safety, of permitting HGVs free reign to use local roads during these already busy times of day.

11.40: The Applicant places great weight on the use of site rules to implement a 20mph speed limit. This overlooks the weakness of such rules, which in the experience of our members are not always adhered to, with vehicles exceeding both the 20mph limit and the legal speed limit.

We request that OLRG are consulted in relation to any proposed revised draft conditions. We may also wish to be represented at any future committee meeting for the Application and so please keep us informed of the date of any such meeting.

Yours sincerely,

Catherine Sayer
(OLRG chairman)