

15 June 2017

THE WOLDINGHAM ASSOCIATION LTD
LIMITED BY GUARANTEE
REGISTERED IN ENGLAND No 65085

Please reply to:
The Hermitage
Park View Road
Woldingham,
CR3 7DJ



WOLDINGHAM
ASSOCIATION

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

Dear Ms Murphy,

Thank you for the opportunity to comment on the periodic review of a mineral site planning permission for the winning and working of chalk for the determination of full modern conditions at Oxted Quarry, Chalkpit Lane, Oxted, Surrey RH8 0QW.

We would like to OBJECT to the proposed operating conditions described in the document entitled "Periodic Review (ROMP) at Oxted Quarry, Chalkpit Lane, Oxted, Surrey, RH8 0QW Transport Statement dated May 2017 by the Hurlstone Partnership (May 2017 Transport Statement) because the report implies no adverse impact from the proposed HGV movement limits. However, the data included in the report shows that the proposed HGV movement limits are significantly higher than historic levels and so we believe that the report under-states the congestion, safety, and noise impacts of the proposal.

The report also incorrectly assumes that all HGVs travel south to Oxted, when our residents regularly report HGV encounters on Chalkpit Lane travelling to/from Woldingham. Therefore, we request more enforcement of the width restriction on Chalkpit Lane to the north to ensure that no HGVs travel north towards Woldingham.

The following sections explain our objections in more detail.

Routing

Paragraph 1.3 of the report incorrectly assumes that all HGV traffic travels Chalkpit Lane to the south via Oxted. However, our residents regularly report encounters with HGVs on Chalkpit Lane to the north of the site travelling to/from Woldingham. The May 2017 Transport Statement appears to recognise this because paragraph 5.1 explains that the

collision data obtained includes The Ridge and Northdown Road which are both in Woldingham, yet this is not considered in the remainder of the report.

While we recognise that not all of these are Quarry HGVs, unless improved measures are introduced to enforce the width restriction, we believe that it is inevitable that should more HGVs be allowed, then more HGVs will travel north along Chalkpit Lane towards Woldingham. We are very concerned about this and so we ask that more measures and stricter enforcement be implemented to prevent any HGVs travelling north along Chalkpit Lane.

There is no other enforcement of the width restriction and no other record of violations (e.g. cameras), and so there is no effective penalty for HGVs that violate it. Chalkpit Lane to the north is steep, narrow, with no passing places, and so HGVs travelling this route inevitably cause considerable delay and near misses.

We also believe that incidents with HGVs along Chalkpit Lane go unreported because the reporting burden is very time-consuming. Those involved are required to take photographs and collect witness statements at the time of the encounter, go to another town (Caterham) to obtain the correct forms, complete them, collate the evidence and photographs, and then return to Caterham to submit the completed package to the police. It is unlikely that someone just going about their usual day will know enough about the procedure to obtain all of the necessary information at the time of the encounter let alone have the time to complete the lengthy procedure and this is why we believe that these incidents go unreported.

The May 2017 Transport Statement also assumes that the voluntary routing is strictly adhered to, but provides no recent evidence to show that this routing is followed beyond including the posted site rules in paragraph 5.10. Recent evidence is important because of the site's variable history since 2008 which means numerous and different HGV drivers will have visited the Quarry since then.

We believe that posted site rules cannot ensure compliance. Our residents also report following HGVs that exit the Quarry southbound, and then detour to other routes beyond, and so we believe that there are examples of non-compliance, contrary to the assumptions in the report.

HGV movements

Paragraph 6.7 of the May 2017 Transport Statement proposes an annual daily average of 50 loads/100 HGV movements with a daily cap limit of 100 loads/200 HGV movements.

This would quadruple the number of HGV movements when compared to the 32 HGV movements prior to imports resuming (5-day average in Table 4.3). The daily cap would double that again which could occur daily for six months of the year. This is because 100 HGV movements is the annual daily allowance which could be used over six months at the 200 HGV movement daily cap limit. In any context and on any measure, the

proposal is a significant increase over both non-quarry and historic HGV levels that include Quarry operations.

However, the May 2017 Transport Statement seems to imply there there will be little difference arising from the HGV movement limits. This is not the case because the historic data provided in Tables 4.1 through 4.4 show no time period when HGV movements were either near the proposed daily average or daily cap levels for any length of time. In particular:

- Paragraph 4.8 explains that in 2010 and 2011 average daily HGV flows to the Quarry were 44 (22 in/out) and 56 (23 in/out). This is half the proposed daily average.
- The peak HGV loads shown in Table 4.2 include only a single day in that four-year period when HGV loads/movements (181/362, paragraph 4.11) were in excess of 100 (200 movements). The remainder of the “peak” week entries in this table are all lower, with some of these peak entries lower than either the proposed daily cap or the average daily limit. The proposed daily cap means that the cap limit could occur daily for six months of the year.
- Paragraph 8.22 under-states the quantum of the proposed increase in Quarry HGV movements by presenting it as a very low percentage increase in the total daily traffic volume, and omits the more relevant HGV percentage increase.

Similar under-statements can be found elsewhere in the report, such as in paragraph 7.5 where the proposed daily average is used to conclude that “the potential for HGVs to meet along the narrower sections of Chalkpit Lane is naturally limited.” However, the proposed daily cap doubles this to 1 movement every 2-3 minutes. We believe that this means HGVs could meet nearly every working day along the narrower sections for six months of the year. However, the congestion, safety and noise impact of these frequent meetings is not mentioned in the report.

Safety

The collision data relied on in May 2017 Transport Statement is not representative because it is taken from a period when the Quarry was not operational: 1 January 2012 to 30 November 2016. This means that the historic collision rate is under-stated.

Paragraph 10.2 draws safety conclusions incorporating this non-operational period by stating that a “single reported personal injury collision associated with the HGV activity from the site in the last 9 years”. However, the Quarry was not operational for nearly five and half years of the nine year period and so the safety record is also over-stated.

The serious accident described in the May 2017 Transport Statement occurred during a non-peak period in Sept 2010 (Sept 2010 is not included in Table 4.2). We are very concerned that such a serious accident could occur even during a period of low HGV movements.

In this context it is important to remember that the proposal seeks to add a daily average of 100 HGV movements (200 daily cap) to the non-operational HGV traffic levels of around 30. We believe that the accident risk can only increase significantly because the number of HGV movements will be so much higher than historic levels.

Even if the operational periods are included, the historic HGV movements are still considerably lower than those being proposed, and nowhere near the level and duration of HGV movements possible under the proposed daily cap limit. We also believe that any safety conclusions based on historic patterns are not reliable because of the significant increase. However, this is not considered in the report.

Paragraphs 10.4-10.6 of the report under-states the projected HGV collision rate because it relies on a collision rate statistic that includes HGVs travelling on modern motorways and carriageways. This collision rate cannot reliably represent what could occur on the labyrinth of narrow country lanes and residential streets with compromised safety features which characterises the road network used by the Quarry HGVs.

The report acknowledges that this road network has an absence of safety features and numerous physical limitations which, when combined with being located in a residential area and its associated mixed uses, means that the proposed increase in HGVs represents a substantial risk to all road users and residents. Therefore, we believe that the projected HGV collision rate contained in the report significantly under-states the future collision rate should the proposals be adopted.

Noise

We note that most of the noise impact in the report is based on projected rather than observed information. We note in particular the absence of observed noise data from November 2012 (when imports resumed) to compare against the Sept 2012 baseline with no imports used in the report. We also note the absence of noise evidence from the higher HGV movement period (January to April 2017) described in paragraph 4.22. Given that observed evidence is generally considered to be more robust than projections, we believe that the noise evidence contained in the report is also not robust.

We also believe that the May 2017 Transport Statement under-states the noise and vibration impact because it does not consider that HGV movements could be at the daily cap level for six months of the year. The report explains that the daily cap results in a recognised “moderate” noise impact, which is worse than today. However, paragraph 8.14 concludes that the proposed development “represents no change to the prevailing conditions”, which we believe is not supported.

Conclusion

We request that stricter measures be implemented to ensure that HGVs do not continue to violate the width restriction on Chalkpit Lane towards Woldingham.

We disagree with the conclusions in the May 2017 Transport Statement that the proposals will have little adverse impact because:

- the report under-states the significant and material increase in HGV movements being proposed and instead seems to imply little difference to historic patterns. However, the data shows otherwise because historic average levels are half that being proposed, and there is only one day in the four years where HGV movements were above the daily cap limit being proposed.
- the collision rate is under-stated and the overall safety record is over-stated because both incorporate long periods when the Quarry was non-operational. We believe that it is inevitable more accidents will occur due to the significant increases in HGV movements should the proposals be adopted.
- the impact is also under-stated in terms of congestion, safety, noise and vibration.

Thank you for the opportunity to comment.

Yours Sincerely,

Geoffrey King
Chairman, Woldingham Association

Cc: Cllr David Hodge, Woldingham Action Group, Woldingham Parish Council

Woldingham
Association