

TOWN AND COUNTRY PLANNING ACT 1990
LAND AT CHICHELE ROAD, OXTED
APPEAL BY CALA HOMES (SOUTH HOME COUNTIES) LTD
PINS REF. APP/M3645/W/24/3345915

REBUTTAL PROOF OF EVIDENCE

HIGHWAYS IMPACT

OXTED & LIMPSFIELD RESIDENTS GROUP AND OXTED PARISH COUNCIL

EVIDENCE OF: PETER GILES

1. I wish to make the following comments regarding the Proof of Evidence and associated Appendices of Andrew Whittingham which comprises a response from Motion consultants to the Rule 6 highways concerns.

2. In Surrey County Council's Highways pre-planning advice regarding Passenger Transport they stated "*The proposed access to Chichele Road will require the removal/relocation of the existing bus stop, this will need to be subject to consultation.*" What was the result of this consultation? The removal/relocation of the existing bus stop is a fundamental element of the site access design, the requested consultation must surely be a key input to that design.

School Traffic Movements

3. The appellant's analysis of parking considers areas close to the junction of Chichele Road, Silkham Road and the proposed site access focuses on the boxed sections A1, A2, A3, B1, B2, C1 and C2. This analysis is sufficient for 'normal traffic', further analysis over a wider area that includes Barrow Green Road and the full length of Chichele Road is required to properly understand parking behaviour during the drop off and pick up times.

4. The appellant's evidence refers to a traffic movement survey on one day only, the 21st February 2023. This records a peak in traffic flows at 8.30-8.45am which Mr Whittingham describes as commonly occurring in the vicinity of schools. He makes no reference to two lesser peaks in flows in the afternoon around 15.30 and 16.30. The first is clearly related to school pick-up.
5. The pattern of flows from this one survey does not square with my experience of traffic movement and congestion along Chichele Road. My impression is that it can frequently be busier and more congested in the afternoon pick-up period than in the morning. Parents tend to park for longer in the afternoon as they wait for children to leave school.
6. It does not seem robust to rely on one day's data for vehicle movements.
7. I enclose in Appendix 1 photographs taken at school pick up time on 5th September 2024. I will talk through these at the Inquiry and will have video footage available.
8. Existing Pedestrian Movements takes a similar zoned approach to the parking analysis mentioned above, looking at pedestrians crossing existing roads. From the information gathered how many pedestrians cross the proposed access track? Further analysis by pedestrian profile, such as adult, unaccompanied child, supervised group of children, would provide a helpful insight into likely dangers.
9. What is the context of the survey of pedestrians and cyclists using footpath 75 conducted in August 2024? This survey is unlikely to be reliable because all of it was carried out during the summer holidays (dates 9 August to 15 August).
10. The private road, Bluehouse Lane, is to have potholes filled by the Appellant. Is this the work that is mentioned in the Travel Plan as "upgrading the surface to allow access by all modes of transport"? That potholes will be filled with the landowner's consent raises the question who

will be the land owner of the private road, Bluehouse Lane, should the proposed development go ahead?

11. Paragraph 4.11 states that the appellant's proposals will "*much more effectively manage the haphazard drop-off and collection of schoolchildren and mix of pedestrians/ schoolchildren.*" How can this be the case when parking spaces are being removed, the bus stop has moved and large numbers of schoolchildren and parents will be required to navigate across the access? There will still be the same number of vehicles at the same times.
12. What are the plans to prevent vehicles from using the speed tables to drive on the footpath during times of high congestion?
13. Discussion of horizontal or vertical traffic calming implies that it is recognised that the existing situation for parking provides natural traffic calming as the road is effectively one lane with passing spaces.
14. In Surrey County Council's consultation response, they have in Condition 1 regarding a CTMP required that paragraph J be include in the CMTP. Paragraph J assumes that construction traffic will access the site via the Chichele Road access. However, I believe the private road Bluehouse Lane is to be the access for the construction traffic. Should planning permission be granted, the LPA should impose the same restrictions as in Paragraph J on the private road Bluehouse Lane and the public highway Bluehouse Lane.
15. Motion's Transport Assessment has in Traffic Flow Figures TF5, TF6, TF7 and TF8 made the same assumption that construction traffic will use the Chichele Road site access. Surely the Traffic Flow Figures should show the impact of construction traffic on the public highway Bluehouse Lane which the traffic will actually be using?

Appendix 1 Photos
School Traffic







Courier Deliveries



