

**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**

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**PROOF OF EVIDENCE**

**HIGHWAYS IMPACT**

**OXTED & LIMPSFIELD RESIDENTS GROUP AND OXTED PARISH COUNCIL**

**EVIDENCE OF: PETER GILES**

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1. I am Peter Giles and I live in Chichele Road approximately 85M from the proposed site access. I am an Oxted Parish Councillor.
  
2. I have lived at my address for 47 years and have witnessed the increase in traffic and road safety dangers as St Mary's Primary School expanded to 600 pupils.
  
3. The proposal will increase the dangers for children walking to and from school, for those being picked up and dropped off, and for pedestrians and cyclists. The existing situation at pick up and drop off is already congested and chaotic as I will explain here, and adding the traffic flows from 116 new dwellings and associated delivery, service and emergency vehicles in and out of the constrained new access point will result in an unacceptable impact on highway safety.

**Impact of the proposal on safety**

4. The Head Teacher of St Mary's writing on behalf of the school Governors sets out their "*grave concerns*" about pupil safety and that the proposed access "*will be unworkable and pose a real danger to our children.*" (attached as Appendix 1 for your convenience).

5. In the immediate vicinity, in addition to St Mary's, there is Oxted School (over 1,900 pupils) and Hazelwood Nursery formerly Laverock (over 150 pupils). As well as the vehicle traffic to these schools, there is additional traffic at the Chichele Road/Silkham Road junction created by the nursery in Woodland Court (81 children). There are many pedestrians pushing buggies and children on scooters.
6. Paragraph 4.16 of the appellant's Transport Assessment refers to "*these lightly trafficked residential roads.*" This statement misunderstands the position at school drop off and pick up times when the roads are extremely busy, verging at times on complete chaos. Once the new school year starts, I intend to take photographs or video and then to supply this visual evidence to the Inquiry.
7. The parking surveys, (Transport Assessment 3.11), were undertaken "*within the vicinity of the site access.*" This does not recognize the wide-ranging impact of drop off and pick up traffic that extends further in all directions and into Barrow Green Road. The Travel Plan, paragraph 3.4, describes Chichele Road as "a two-way single carriageway." In practice, due to parking bays the road is one-way with passing places.
8. The congestion problems arising from school drop off and collection traffic are long-standing. For example, in 2010, local residents collectively requested that parking restrictions be changed to ease the congestion. These changes were implemented but the situation soon worsened.
9. Today, traffic is either slow moving or gridlocked due to the combination of the current volume of traffic and the number of drivers picking up or dropping off children.
10. Parking on the double yellow lines, the bus stop, in fact absolutely anywhere they can, has become the norm. As it is, cars/buses often have to mount the kerb and grass verges to make any progress. This is already dangerous to schoolchildren and other pedestrians (including those with disabilities or

limited mobility) as well as causing damage to the roads, verges and environment.

11. The proposed development will introduce even more cars and pedestrians into this congested and chaotic situation. Children from the proposed development are likely to attend St Mary's adding to the existing school drop off/pick up congestion. It is also likely that parents would park in the new access road to drop off/pick up their children.
12. It would also be very difficult for new residents to drive in and out of the proposed development during the morning and afternoon school run. Access for emergency, service and delivery vehicles to the proposed development may be compromised at these times.
13. Traffic during these periods often causes delays in all directions which will only be made worse by the proposed development.
14. The substantial number of additional traffic movements arising from the proposed development together with increased dwell time for both existing and new vehicles, will have significant adverse air quality impacts with youngsters breathing in more polluted air. There will also be adverse air quality and noise impacts on existing residential dwellings, particularly those along Chichele Road, harming residential amenity.

### **Design and configuration**

15. I believe the proposed access is unsafe because it is located on a dangerous busy corner at a sharp bend with limited visibility, and approximately 7M from a road junction.
16. Root protection measures along the proposed site access require that the access road is higher before it joins Chichele Road. This artificial structure will add to both the actual and perceived dangers of vehicles entering/exiting the proposed site access road.

17. Paragraph 4.3 of the appellant's Transport Statement states that due to tree constraints and adjacent boundaries, the access road includes a pinch point, stating: *"As such, vehicles entering the site will be required to give-way to vehicles exiting the site."* This will cause further confusion, danger and congestion which will adversely impact the safety of all road users.
18. Pre-application advice from the Highways Authority, Surrey County Council, states that *"A 3M wide pedestrian/cycle route should be provided along the access to/from the site. This route should run the entire length within the site and connect to the pedestrian/cyclist access onto Bluehouse Lane."*
19. However, the appellant's plans propose carriageway widths of 5.5M which they claim *"render them suitable for on-carriageway cycling."* The pinch point means the carriageway reduces to 3.7M part way along, with only a 2M footway. This is neither suitable nor safe for cyclists.
20. Paragraph 116 of the NPPF 2023 states that new development should give priority first to pedestrians and cycle movements both within the scheme and with neighbouring areas. It also states that new development should create places that are safe and secure and which minimise the scope for conflicts between pedestrians (in this case primary schoolchildren), cyclists and vehicles. This proposal does the opposite of all these things.
21. In its response of January 2024, the Highways Authority agrees that the proposed junction layout *"would introduce an interruption in the existing footway and the proposed design would not properly communicate to drivers that pedestrians should be given priority across the junction."* This is a significant safety defect in the proposed access, made worse by the proximity to a number of schools.
22. At the moment, it is still common for parents to walk their children across the Bluehouse Lane zebra crossing then let them proceed on their own to St Mary's (A - B on Map). In the afternoon, the parents meet their children at the

corner of Chichele Road to take them safely over the zebra crossing. As the children gain in confidence some manage the zebra crossing on their own.



23. With the proposed vehicle access to the site accompanied by the increased volume of traffic from the development, the increased danger, and the perception of increased danger, will deter parents from allowing their children to walk to school and parents will drive them instead. Government policy is to increase the number of children walking to school and not to discourage them.

### **Implications of the proposed removal of the bus stop**

24. The removal of the bus stop would mean all bus and coach traffic would use the bus stop adjacent to St Mary's School in Silkham Road.
25. The appellant states that the removal of the bus stop "*will not result in a detrimental impact for passengers using the bus services in the local area.*" We disagree with this conclusion because it fails to understand the current usage of the two bus stops.
26. The scheduled bus services currently only stop at the Chichele stop. A number of the drivers use this stop for their rest breaks which means buses park there for an extended period of time. The school bus service also uses this stop. Providing these functions solely at the Silkham Road stop would require a change of route along roads that are already congested at that time of day.
27. Both of the existing two bus stops are also used for school trip coaches. These coaches have significantly longer waiting times than the scheduled bus services. They also generate a high volume of children walking to the coach. Removing the Chichele bus stop removes flexibility in accommodating all of the bus/coach services and passengers, and increases congestion.
28. This proposal would bring about a reduction in safe access to sustainable modes of travel, which is contrary to Government policy.

### **Conclusion**

29. The proposal would result in an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would be severe. It is in conflict with paragraph 151 of the NPPF2023. The proposal is also detrimental to neighbour amenity.
30. For the reasons given here, the proposal is also contrary to paragraphs 108, 114, 116 and 191 of the NPPF2023 and to development plan policies CSP11 and 12, DP5 and DP7. The harm from the highways impacts (including the

adverse effects on air quality and amenity) should be taken into account in the determination of this appeal, including as “other harms resulting from the proposal” under para 153 of the NPPF2023. I respectfully request that the appeal is dismissed.

## Appendix 1



Head teacher  
Mrs S Lewis  
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St. Mary's C of E (Aided) Primary School  
Silkham Road  
OXTED  
Surrey  
RH8 ONP

9<sup>th</sup> January 2024

Planning application 2023/1345: Land to rear of Chichele Road, Oxted, RH8 ONZ

On behalf of the Governors at St Mary's I am writing to you about the proposed development to the rear of Chichele Road.

We have grave concerns over the vehicular access to the site – and the impact that this will have on pupil safety moving to and from school. At drop off and pick up times the junction (which already has limited visibility) is highly congested. There are pupils from St Mary's school, and those from Oxted school, all using Chichele Road and Silkham Road to walk to and from school, in addition to all the parents using their vehicles. There are added challenges for those parents who have children at our neighbouring infant schools. We fear that to have a single point of vehicular access adjacent to our main school entrance will be unworkable and pose a real danger to our children.

In addition, the area of our school site adjacent to the proposed development is prone to flooding. We have concerns that the proposed development would increase the flow of water into the culvert, which is already beyond capacity, and increase the flooding risk to our school buildings.

Many local schools are currently operating with a significant number of vacant places which will need some careful stewardship if pupil numbers do not rise. However I believe that the merits, or otherwise of the specific proposal around housing on this site is something best left to residents to describe.

Yours sincerely



Sarah Lewis

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