

19 January 2026

Introduction

This further submission in relation to application 2025/2147 is made by FEDORA-The Voice for Oxshott following information provided by Elmbridge Borough Council (EBC) and consideration of the report presented by statutory consultee Surrey County Council (SCC) as the County Highway Authority (CHA). This latter report is dated 19 December 2025 but was only made publicly available to the public in early January.

FEDORA has again retained an independent expert transport consultant to review the CHA submission and a copy of the report to us is attached. This letter provides more context, highlights the most important issues and requests EBC direct assessment of the key issue of walking distances and safety.

One key issue concerning Oxshott that is absent from both the application and the CHA submissions is the extent and nature of existing traffic on the A244. For a settlement the size of Oxshott traffic movement of 6,000 to 8,000 vehicles per day would be considered heavy traffic and above that level alternative road design or traffic calming measures would be considered. The A244 already carries 17,000-20,000 vehicles per day with an average of more than 500 HGV movements. The various consequences of this is the major concern of substantially all residents of Oxshott. The A244 can be scary to use and already deters “average” cyclists, and walking unless absolutely necessary. Any application should be considered on the specific circumstances rather than by the simple use of general rules and in this case that means recognition of the excessive vehicle use of the A244 and the implications for safety.

Sustainability

EBC’s initial assessment of the sustainability of this site was quite clear and set out in its letter to representatives of the applicant of 4 April 2025 following several pre-application meetings. Key comments include:

As detailed in the ‘Impact on parking and highway safety’ chapter below, given the distances to the town and amenities, officers are not convinced the site is located in a sustainable location. Surrey County Council in their pre-application advice response also note that provision of sustainable modes of transport would be necessary to discourage people from using their private cars. As such, further justification for the location of the site and details on the provision for sustainable modes of transport should be demonstrated at planning application stage.

This view was aligned with EBC’s Green Belt study of 2019.

As you will have seen and as documented in our letter to EBC of 31 October 2025 the applicant did not propose any measures to make this a more sustainable location and so EBC’s valid concerns remain unaddressed. The attached report makes it clear that areas of non-compliance with key provisions of the NPPF 2024 raised previously have not been

addressed. The measures proposed by the CHA would not improve the sustainability of the location, rather the CHA has made a number of largely irrelevant or ineffectual suggestions and unsupported assertions. Two key issues not addressed by either the applicant or the CHA are:

1. Despite the proposals to provide cycle lanes to/from the site to the A244 **no** consideration has been given to the safety of cycling **on** the A244 (indeed the topic has, perhaps for obvious reasons, been ignored). As our previous submissions have explained few people attempt now to cycle on the A244 to access village amenities because it is considered unsafe to do so. This omission is inconsistent with National Government policy to promote cycling as a form of transport (c.f. current guidance in LTN1/20) which is endorsed by both SCC and EBC.
2. The lack of a continuous footpath into the village and to the railway station. The fact is acknowledged but the applicant has proposed no solutions and the CHA makes comments which are factually incorrect and an unsupported assertion on the acceptability of this situation. We comment further on this below.

Use of the CHA report

The CHA is a statutory consultee, so EBC is required to seek its views but is not required to follow its recommendations. Given the errors in the CHA submission and the onerous responsibility held by EBC in making its assessment it would, without further investigation, be unwise for EBC to rely on the CHAs recommendations for two key reasons:

1. The CHA has relied on the applicant's use of theoretical models for traffic volumes without giving any recognition to the facts we have presented to show that the resulting projections are demonstrably incorrect based on current real world measurements. This includes recent traffic measurements on the A244 and ANPR based trip data for a neighbouring estate, which were sent to EBC on 25 November 2025. The fact that the use of certain models is common practice should not be allowed to mask the fact that the model outputs in this case are known to be wrong. CHA should base its conclusions on facts not theoretical projections. EBC must also base its assessment on facts.
2. The mitigation proposals put forward by the CHA are in the main unproven or untested or in some cases, based on experience elsewhere, known to be ineffective. Some such as creating easier pedestrian access to an uncontrolled crossing of a road carrying more than 17,000 vehicles per day with a high percentage of HGVs sound positively unsafe and certainly do not contribute to safety or sustainability.

We appreciate the challenges EBC officers will face in making their assessments and so would be happy to make our independent expert available to provide support.

Verification of CHA assertions

As noted above, both the applicant and the CHA have acknowledged the pre-existing problem of there being no continuous footpath from the south of the village and site to the village and railway station but neither has proposed any measures to remedy the problem. We note that neither have been willing to even discuss potential solutions with relevant parties.

Instead, the CHA has asserted with no direct supporting evidence, and misleadingly misquoted existing guidance, on the acceptability of the walking distance from the site to the station.

The veracity of this assertion is key to the assessment of the sustainability of the location and hence to EBC's ability to discharge its responsibilities. We would therefore like to arrange for a walk by the EBC case officer and local EBC councillors from the site (note the site, not where the site exits onto the A244) to the railway station to enable a proper assessment of whether this is an adequate and safe walking route as envisaged by NPPF policy and guidance, to be used regularly. This should be done before the planning officer report is finalised. I appreciate this might mean doing the walk outside normal office hours since to be realistic it should be done during commuting times for office workers (and in the morning when schoolchildren are travelling to the beginning of their school day). It should also be done in normal work attire rather than casual walking attire with a brief case or similar. In due course it may be appropriate for all members of the Planning Committee to make an assessment but that can wait until they have received the planning officer's report. Please let us know how this can best be arranged.

Other matters

Reference has been made to the impact of home working. Clearly measured over many years more home working has been enabled by technology. However, the general trend in most companies, in particular in the City where many Oxshott residents commute to, is to reverse the trend towards home working with many employers now requiring office attendance for most if not all days of the week.

We note that at this stage there does not appear to be an assessment of noise and environmental pollution considerations. These are both EBC responsibilities so we assume will be carried out by EBC officials. It is important that the assessments are based on real world data rather than the applicants theoretical modelling. We have already provided this to you but please let us know if any clarification or further information is required.

FEDORA is content for this letter to be placed on the EBC planning portal.

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