1.0 INTRODUCTION

1.1 This note is prepared by John Russell Transport Planning (JRTP) for FEDORA in response to comments made by the County Highway Authority (CHA) in relation to planning application EL/24/2147 which seeks permission to develop land at Clouds Hill Farm Leatherhead Road Oxshott Leatherhead KT22 0ET (the Application Site) for up to 250 residential dwellings (the Proposed Development). The CHA comments are dated 19th December 20025 but were first made available to the public on 7th January 2026.

1.2 Where appropriate this note refers to the following reports submitted to FEDORA:

- Transport Appraisal (TApp); and
- Traffic Survey Summary Note (TSSN).

1.3 The conclusion of this note is that the Transport Assessment remains methodologically flawed, relies on misapplied datasets, and significantly overstates the potential for sustainable travel. The CHA's response is inconsistent, inadequately reasoned, and demonstrates material misunderstandings of key datasets, guidance, and modelling tools.

1.4 Taken together, these deficiencies mean that the Proposed Development fails to comply with national and local transport policy, including the requirement to locate development in accessible locations and prioritise walking, cycling, and public transport. The evidence clearly demonstrates that the Application Site is poorly located, heavily car-dependent, and incapable of being made sustainable through the proposed measures.

1.5 Accordingly, the application should be refused on transport sustainability, safety, and policy compliance grounds in accordance with NPPF.

2.0 CHA COMMENTS

2.1 The table below summarises the comments made by the CHA together with JRTP's response.

CHA Comment	JRTP Response
The Application Site is a sustainable location in transport terms	Elmbridge Borough Council (EBC) has previously commissioned independent consultants to undertake an assessment of the sustainability of green belt sites across the Borough. The conclusion of the consultants was unequivocal: the Application Site is among the worst performing green belt sites in the Borough in terms of transport sustainability[1]. This conclusion is independently corroborated by previous JRTP analysis.

[1] (TApp 2.11-2.16)

CHA Comment	JRTP Response
	In contrast, the County Highway Authority (CHA) provides no explanation for reaching a different conclusion regarding the accessibility of the Application Site. This inconsistency is particularly striking given that the EBC pre-application advice to the applicant clearly stated concerns that the site was not felt to be in a sustainable location, both in terms of proximity to services, facilities and amenities, and in relation to the adequacy of transport infrastructure.
The TRICS database is an independent industry standard tool used for transport planning purposes, and the CHA supports its use	The principle of using TRICS as a source of trip generation data is not disputed. However, the trip forecasting presented in the Transport Assessment (TA) does not provide a sound basis for assessment or decision-making. A revised assessment is required which makes proper use of the TRICS database through appropriate filtering, statistically robust sample sizes, and the selection of genuinely comparable proxy sites, with clear justification provided for all assumptions. Alternatively, or in addition, locally observed actual (not computed) traffic data should be used as this reflects ''real world'' conditions[2]. It is noteworthy that while the CHA explicitly accepts the principle of using TRICS, it is entirely silent on how the TRICS database has been interrogated or applied to the Application Site. This omission undermines confidence in the CHA's conclusions.
The TA has also interrogated other sources of information to predict the modal split associated with these trip rates, using data from the 2011 census based on the Elmbridge 018 area.	The reliance on 2011 Census journey-to-work data to determine modal share is fundamentally flawed. Census data only records the main mode used for commuting and provides no information on travel behaviour for other journey purposes. Evidence from the National Travel Survey (NTS) shows that journeys to work account for only around 25% of all trips made during the morning peak hour—the period assessed in the TA. Consequently, Census data is inapplicable to approximately 75% of peak-hour journeys. The conclusion that 30.4% of all peak-hour trips associated with the Proposed Development will be made by rail is therefore demonstrably erroneous. Furthermore, Census data provides no information on how people access railway stations. As the Application Site does not include a railway station, residents would necessarily need to use a secondary mode of transport to reach one. This critical issue is entirely overlooked. The CHA comment demonstrates a lack of adequate consideration of the limitations of Census mode choice data and

[2] TSSN Section 2

CHA Comment	JRTP Response
	overlooks the fact that commuting trips constitute a minority of morning peak-hour journeys.
TEMPro v8.1 has been used to forecast background traffic growth. TEMPro is the accepted tool for adjusting baseline flows to future years.	TEMPro is the interface for the Government's National Trip End Model (NTEM). The CHA response incorrectly implies that NTEM produces a single traffic growth forecast. In reality, NTEM generates a range of growth scenarios. It is incumbent upon the assessor to select the most appropriate scenario in light of local conditions. At a minimum, the higher growth scenario should have been applied. Moreover, NTEM is a nationally based model that lacks the resolution to reflect local circumstances accurately. TEMPro allows users to adjust household and employment growth assumptions to reflect local conditions, such as population growth exceeding the 2022 baseline[3] or the significant increase in the number of planned houses from 225dwellings per annum (dpa) when the current version of NTEM was produced, to almost 1,600dpa currently. No such adjustment has been made. The CHA comment suggests that insufficient regard has been had to the way in which NTEM is developed, the nature and limitations of the data it provides, and the manner in which it is intended to be applied at the local level.
This application gives emphasis to assessing and providing for non-car modes of travel	This statement cannot be correct because there is no reference whatsoever to cycling, contrary to National policy requirements and the CHA's own LTP4 and LCWIP documents.
To assess the visibility requirements for the access a 7-day traffic survey was undertaken in September 2024 and the full data from the Automatic Traffic Count (ATC) provided.	While this survey data is referenced, it does not form the basis of the noise and air quality assessments, which instead rely on substantially lower traffic volumes[4]. Observed traffic volumes on Leatherhead road are between 17,000 and 20,000 vehicles per day of which typically 3% are HGVs. The Noise and Air Quality Assessments are based on only 12,500 vehicles per day of which fewer than 2% are identified as HGVs. As a result, the conclusions of both the air quality and noise assessments are unsound. Moreover, the need for, and nature of cycle infrastructure on a route to make it safe and suitable for cyclists is a function of the daily volume of traffic, its HGV component and its speed. For a route with this traffic volume, speed and composition, current guidance requires that a segregated route is provided to facilitate the safe movement of cyclists.

[3] TApp paragraphs 3.10-3.24
[4] TSSN Table 3.2

CHA Comment	JRTP Response
The WRAT evaluates routes for suitability, safety, attractiveness, comfort, and compliance with national guidance (LTN 1/20, Inclusive Mobility)	The CHA refers to LTN 1/20, which provides guidance on the design of cycle infrastructure. However, the applicant proposes no off-site cycle infrastructure improvements and provides no assessment of the existing cycling environment. The CHA is entirely silent on this matter. The Applicant does propose to provide cycle infrastructure within the Application Site. This includes a shared footway cycle way on the site access road feeding cyclists into the A244 Leatherhead Road, which has no protection for cyclists, and which carries in excess of 17,000 vehicles per day at this location travelling at speeds between 33.6mph and 37.6mph (85th percentile speeds). By contrast, the TApp (paras. 5.15–5.34) contains a detailed analysis of existing cycling conditions, concluding that the Application Site does not provide genuine opportunities for cycling due to the lack of suitable infrastructure. The analysis highlights several recorded collisions on Leatherhead Road between the site and Oxshott Railway Station that were sufficiently serious to require emergency services attendance. The CHA neither challenges nor contradicts this evidence. In this context, the CHA's reference to LTN 1/20 is otiose, as it does not materially inform the issue under consideration and appears to reflect a misunderstanding of the scope and purpose of LTN 1/20.
Although there is not a continuous walking route on the western side of A244 from the site to Oxshott village centre there are existing crossing facilities in the form of pedestrian refuge islands on either side of the entrance to Danes Hill School, where there is a 20mph maximum speed limit in force, enabling pedestrians to cross safely to use the footway on the northeastern side	The CHA is aware—having been provided with the relevant data—that Leatherhead Road carries between 17,000 and 20,000 vehicle movements per day, with average and 85th percentile (28mph) speeds exceeding the posted 20mph limit[5]. Even if traffic were evenly distributed across a 24-hour period, this would equate to one vehicle passing every four to five seconds. In reality, daytime flows are significantly higher, with vehicles passing every one to two seconds on average. Crossing Leatherhead Road at this location, without any form of traffic control, is therefore unsafe and at times practically impossible especially when such crossings would be used on a daily basis by parents taking young children to one of two local schools. It is inconceivable that a competent highway authority could conclude that pedestrians can safely cross a road carrying 17,000–20,000 vehicles per day, of which around 3% are HGVs

[5] TSSN Table 3.1

CHA Comment	JRTP Response
	(that is 500-600 HGV movements daily) at speeds approaching 30mph in the absence of a controlled crossing facility.
Guidance from CIHT (Chartered Institute for Highways and Transportation) on providing for journeys on foot suggests that 2km is an acceptable walkable distance to a railway station	'Providing for Journeys on Foot' (published in 2000) suggests that people may walk up to 2km to reach their place of work. It does not suggest that this is a reasonable walking distance to a railway station. More recent CIHT guidance, "Planning for Walking" (2015), states *The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services.* The CHA's assertion to the contrary is incorrect, unsupported by evidence, and calls into question the competence of the assessment.
The TA has highlighted that a good range of facilities, including schools, shops, medical centre, community and leisure facilities are within a 20-minute walking distance.	While the TA may state that facilities are within a 20-minute walk, this equates to approximately 1.5km. CIHT guidance clearly indicates that such distances are not considered reasonable for accessing local facilities. The CHA's reliance on this guidance, while simultaneously misapplying it, suggests a lack of familiarity with the documents cited.

2.2 Based on the technical review undertaken by the CHA, which, for the reasons outlined above, is concluded to be flawed, the CHA has nevertheless identified and agreed upon a set of mitigation measures. A critique of these mitigation measures is provided below, noting that, in the absence of a technically robust assessment, any mitigation strategy is inherently flawed.

CHA Mitigation	JRTP Response
Digital Demand Responsive Transport	The purpose of the Surrey Demand Responsive Transport (DDRT) network is to serve remote areas with poor or non-existent public transport provision. The reliance on DDRT to support the Application Site is, in itself, evidence that the Application Site is poorly located in public transport terms. Notwithstanding this, there is limited existing scheduled public transport within a reasonable distance of the site. It is therefore inexplicable that the CHA has failed to consider the reinforcement of these services as part of a credible long-term strategy to improve sustainability.

CHA Mitigation	JRTP Response
	Furthermore, the CHA comments do not clearly identify what public transport provision will actually be delivered. While reference is made to a Digital Demand Responsive Transport (DDRT) service, the request for a £375,000 contribution from the Applicant is framed as funding towards DDRT *or potentially an alternative, unspecified measure*. As such, there is no certainty as to how, or even whether, this contribution would result in meaningful public transport improvements. In the absence of a defined scheme, it is difficult to understand how SCC can reasonably conclude that the Application Site is sustainable in terms of public transport accessibility. Without clarity on the nature, scope, or delivery of the proposed transport measures, no demonstrable mechanism exists to address the Site's current poor level of public transport provision. The proposed £375,000 payment therefore represents a financial transaction only and does not, in itself, secure any tangible improvement to public transport accessibility for the Application Site.
The availability of a car club on site will offer a ready alternative to private car ownership, further supporting the vision for sustainable transport in combination with active travel modes and use of public transport.	Car clubs are effective and commercially viable in locations with good to high levels of transport accessibility, where residents can realistically meet most travel needs by non-car modes. Importantly, development with successful car clubs have parking restrictions combined with lower car parking provision for each dwelling, thereby discouraging car ownership[6]. In such contexts, car clubs provide occasional flexibility rather than a primary mode of transport. The applicant provides no evidence that a car club serving approximately 250 dwellings in a greenfield location would be viable or make any meaningful contribution to sustainable travel. Nor does the CHA provide any such evidence. A car club in this location would neither be commercially viable nor fulfil its intended function of supporting development with inherently sustainable accessibility characteristics. Once developer funding for the car club expires, it is inevitable that it will close in this location through lack of commercial viability. Indeed Zipcar, the world's largest car sharing firm, has decided to cease UK operations due to a lack of commercial viability for providing car sharing clubs in the UK.

[6] See extensive evidence on this matter prepared by Co-Mobility UK

CHA Mitigation	JRTP Response
Drawing No. 8240574/6107 titled 'Off-site Highway Improvements High Street	This drawing indicates the provision of an uncontrolled pedestrian crossing to the south of Oxshott Manor. The crossing takes the form of dropped kerbs and tactile paving. As noted above, during many parts of the day, there is a car passing this point every couple of seconds rendering an uncontrolled crossing at this location meaningless and potentially dangerous as it implies to a pedestrian that this is a safe place to cross.
Drawing No. 8240574/6108 titled 'Offsite Pedestrian Improvement Works on Leatherhead Road	The drawing indicates a widening of the footway on the western side of Leatherhead Road between the Application Site access and Charlwood Drive, which is welcomed. However, the drawing also proposes a "raised Copenhagen-style crossing" at the junction with Charlwood Road. Copenhagen-style crossings are typically used to maintain cycle priority across side roads within coherent cycle networks and are widely implemented across northern Europe. In this case, the proposed crossing would serve pedestrians only, as neither the Applicant nor the CHA has undertaken any assessment of existing or proposed cycling provision. While the introduction of a raised pedestrian crossing at this location is supported in principle, insufficient detail has been provided regarding its design and operation. For the crossing to be effective, it must be constructed at the same level as the adjoining footway, forming a continuous raised table across the Charlwood Road junction in order to reduce vehicle speeds and reinforce pedestrian priority. However, raising the carriageway alone does not reduce pedestrian risk. The crossing distance across the carriageway would remain unchanged, and it is during this crossing movement that pedestrians are most exposed to traffic risk. Best practice in the design of Copenhagen-style crossings includes narrowing the side-road junction as an integral part of the scheme, thereby reducing pedestrian exposure time and improving safety. It is therefore imperative that junction narrowing is incorporated into the design at this location. Without this measure, the proposed crossing would deliver limited safety benefits and would not achieve the objectives typically associated with Copenhagen-style crossings.

3.0 SUMMARY AND CONCLUSION

3.1 In summary, the Proposed Development is fundamentally unsustainable in transport terms. The Transport Assessment is methodologically flawed, relies on misapplied datasets, and significantly overstates the potential for sustainable travel. The CHA's response is inconsistent, inadequately reasoned, and demonstrates material misunderstandings of key datasets, guidance, and modelling tools.

3.2 Taken together, these deficiencies mean that the Proposed Development fails to comply with national and local transport policy, including the requirement to locate development in accessible locations and prioritise walking, cycling, and public transport. The evidence clearly demonstrates that the Application Site is poorly located, heavily car-dependent, and incapable of being made sustainable through the proposed measures.

3.3 Accordingly, the application should be refused on transport sustainability, safety, and policy compliance grounds in accordance with NPPF.