REPORT

Review of Planning Application 25/00846

Transport Review

Client:	Langley Vale Action Group
Reference:	PC8097-RHD-XX-ZZ-RP-R-0001
Status:	Final/P02
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itp by Haskoning

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Executive Summary

This review, commissioned by Langley Vale Action Group and prepared by ITP (Haskoning), critically examines the transport-related aspects of the application, highlighting significant concerns regarding sustainability, highway safety, and policy compliance.

The applicant's position on transport matters, as set out in the Transport Assessment (TA), significantly misinterprets and presents an inaccurate position in stating the sustainable credentials of the development site.

The proposed development is situated in a remote area with poor access to essential services and genuine choice of public transport. Almost all facilities are beyond an acceptable walking distance, and the nearest bus stop exceeds national guidance thresholds. The site scores poorly (42) on the Department for Transport's Connectivity Metric, placing it in the bottom 15% nationally. The Transport Assessment (TA) overstates the site's sustainability and fails to meet NPPF Paragraph 110, which requires developments to be located where sustainable travel options are available. Consideration has not been given to the area's topography.

In reaching this conclusion, the applicant appears to contradict the content of the TA, ignoring the site's limited access to local amenities.

The TA relies on guidance that has been in part superseded, such as the 2007 Manual for Streets, and does not align with the 2024 NPPF, Surrey's Local Transport Plan (LTP4), Healthy Streets for Surrey or guidance published by Active Travel England. The claimed vision-led approach is superficial and unsupported by the evidence.

The proposed access arrangements fail to meet visibility and stopping distance standards for a 30mph road. The Road Safety Audit may not comply with GG119 guidance and overlooks key issues such as equestrian movements and regular surface water build-up. The audit was conducted outside peak hours, when traffic congestion can combine with equestrian movements. Junction spacing is inadequate and swept path analysis is absent.

The TA relies on inappropriate comparable residential (TRICS) sites and underestimates traffic volumes. Local car ownership is high averaging 1.6 cars per household according to Census data, and 2.03 cars per household based on a recent local survey, yet the TA predicts 31% fewer trips in the AM peak and 41% fewer in the PM peak than more accurate estimates suggest.

Suggested 'mitigation' measures, such as EV charging, frontage footway widening, and a car club do not reflect a vision-led approach.

There is no dedicated cycle infrastructure, limited public transport provision, and no enforceable travel plan. The car club is unlikely to be effective given high car ownership and access to car parking proposed on-site.

The proposed development is not sustainable, poses highway safety risks, and fails to meet current planning and transport policy standards. It is recommended that Epsom and Ewell Borough Council object to the application on transport grounds.

1 Introduction

1.1 Preamble

1.1.1 An outline planning application (the planning application) was submitted to Epsom and Ewell Borough Council (Reference: 25/00846) on behalf of Fairfax Aspire Limited. The proposed development comprises up to 110 dwellings with public open space and landscaping. The development is proposed on open land, north of Langley Bottom Farm, Langley Vale, Surrey. The site is designated as Green Belt and within an Area of Landscape Value. All matters are reserved, save for access.

1.1.2 The planning application is supported by a Transport Assessment (TA) and Framework Travel Plan (FTP), prepared by i-Transport, the appointed Transport Consultants. The TA concluded that the proposed development scheme is consistent with relevant transport planning policy guidance and will not give rise to any material transport related impacts, in accordance with the National Planning Policy Framework (NPPF) and the Epsom and Ewell Local Plan.

1.1.3 This Technical Note (TN) has been prepared by ITP, Haskoning's UK Transport Consultancy, on behalf of Langley Vale Action Group, following a review of the planning application. Commentary is provided within this TN where there are technical weaknesses with the transport submission and where it fails in being policy compliant.

1.1.4 The TN will broadly follow the format of the TA and will focus on notable areas of weakness, such as the unsustainable nature of the site's location, the stated vision-led approach, road safety, trip generation, proposed mitigation measures and junction capacity.

1.1.5 In addition, this TN will set out a number of associated concerns, including those relating to planning policy and the FTP, and reference will be made to the planning appeal decision (APP/P3610/W/21/3280881) associated with land adjacent to the proposed development site.

1.1.6 This TN will cover transport matters only, and no other planning related matters, unless this supports the transport concerns raised.

1.1.7 In preparing this TN, ITP are aware of the planning objections made by the Highway Authority, Surrey County Council (SCC), in their response dated 18th August 2025, which states the following.

1) The proposed development is situated in a relatively remote location, with poor sustainable travel opportunities to most every day activities (with the exception of rural recreation), and does not propose sufficient mitigation to enable the prioritisation of sustainable transport modes and would thereby be almost entirely reliant on the private car for access, and therefore contrary to Paras 110, and 115 a) of the NPPF, and CF16 of the Epsom and Ewell Core Strategy 2007, and Healthy Streets for Surrey.

2) It has not been demonstrated that there is sufficient forward visibility for northbound traffic of right turners waiting on Langley Vale Road to turn into the site, and the proposed development would therefore lead to danger to users of the highway and therefore contrary to Para 115a of the NPPF, and meeting the criteria of paragraph 116 of the NPPF.

1.1.8 ITP are also aware of the objection made by the Jockey Club (dated 12th August 2025) in their role as the landowner of Epsom Downs Racecourse and Epsom Training Grounds. Within their objection the Jockey Club state that *"there are significant equestrian safety issues associated with the increased number of vehicular movements, exacerbated due to the specific nature of racehorses which differ from the more docile, domestic horses ridden for amenity hacking. Traffic impact on young racehorses in particular needs greater consideration than shown in the applicants Transport Assessment. The increase in vehicles and lack of consideration for movements of racehorses on the highway increases the risk of harm to the horses and riders and for these reasons the application should be refused."*

1.1.9 In addition to the above noted objections, the Epsom and Ewell Planning Portal connected to the Outline Planning Application also lists over 340 further objections to the development proposal via public comment. ITP have not reviewed all comments made on the planning application.

1.1.10 In ITP's review of the submitted TA and FTP, consideration will be given on the planning objections referred to above and take into consideration other areas of concerns relating to the transport impacts of the proposed development scheme where identified.

1.1.11 Consideration will also be made to national, regional and local planning policies, and this TN will highlight relevant national and reginal guidance documents that are considered relevant as they inform development.

1.1.12 To support the preparation of this TN, site visits by ITP staff have been undertaken to capture the existing 'highway' situation at peak hours of demand.

1.2 Report Structure

1.2.1 The remainder of this TN is structured as follows:

- Section 2 presents an overview of the TA, and highlights key areas for detailed review, covered in following sections

- Section 3 reviews the planning background and context
- Section 4 presents the key issues with the site location and accessibility
- Section 5 presents concerns with the suggested vision-led approach
- Section 6 presents the key issues with the road safety and the special requirements for equestrian use
- Section 7 analyses and critiques the proposed trip generation assessment
- Section 8 sets out the concerns with the ‘standard’ mitigation being proposed
- Section 9 presents key issues and concerns with the junction capacity analysis
- Section 10 considers other key transport concerns, connected to the Framework Travel Plan and adjacent site Planning Appeal Decision, and
- Section 11 provides a summary and conclusion.

2 Key Issues

2.1 Background

2.1.1 This section provides an overview of the key issues identified following a detailed critique of the TA and the two reasons for refusal cited by SCC, one of which relates to sustainability and the other to highway safety.

2.1.2 The following sections comment on where ITP support the conclusions reached by the County Highway Authority and highlight further the technical weaknesses within the supporting transport documents against a planning policy background.

2.2 Planning Policy Considerations

2.2.1 UK planning and transport policies are increasingly emphasising and promoting the importance of sustainable development and public transport accessibility as a means to reduce car dependency, meet emissions targets, and improve public health and safety. It will be highlighted that at all levels of policy, as well as at the local Epsom and Ewell level, policies promote this essential sustainable approach, which are firmly supported and enhanced within more up-to date National and Regional policy and guidance documents.

2.3 Site Location and Sustainability

2.3.1 In support of the SCC objection connected to the unsustainable site location, ITP will critique the site location, highlighting where conclusions reached by i-Transport are considered optimistic at best, and compare these with the existing situation noted from a number of site visits.

2.3.2 The TN will take into consideration the topography of the area, seemingly overlooked by i-Transport, as it relates to gradient, a considered highway safety aspect that has not been addressed in the analysis set out in the TA.

2.3.3 Consideration will also be given to the use of the terminology ‘sustainable’ and ‘vision-led’ that has been referred to in the TA. Commentary will be made that cross references with the nature of the site and whether the TA has embraced the latest NPPF policy approach.

2.4 Highway Safety

2.4.1 In response to the second reason for refusal on highway safety grounds, this TN will review the highway safety considerations presented in the TA. This will include a critique of the Stage One Road Safety Audit submitted and consideration on the existing situation on Langley Vale Road.

2.5 Trip Generation

2.5.1 Noting the unsustainable nature of the site, the trip generation presented in the TA has been interrogated. This has revealed a number of fundamental flaws in the analysis that cast doubt on the analysis presented as being truly reflective of a vision-led approach.

2.6 Mitigation

2.6.1 Following comments on the site location and the vision-led approach referred to in the TA, the TN will review and consider whether the proposed mitigation is sufficient.

2.7 Junction Capacity

2.7.1 Following considerations around the sustainability of the site, trip generation and highway safety, a review of the junction capacity analysis will be presented, with commentary on whether this represents the existing congested nature of the highway network.

2.8 Other Concerns

2.8.1 The Outline Planning Application, also refers to a Planning Appeal decision taken in 2021, connected to Langley Bottom Farm, adjacent to this site.

2.8.2 From a review of the appeal decision (APP/P3610/W/21/3280881), it has been noted that this was objected to on grounds of its unsustainable location. This TN will highlight notable differences between this outline application and the smaller 20 residential unit development, located on a brownfield site.

2.8.3 The FTP submitted has also been reviewed and comments are made on whether this would sufficiently address the unsustainable nature of the development. Although there are mode shift targets being indicated, they are from a very optimistic baseline. Notably, the modal splits referred to in the FTP to not align with the trip generation assessment within the TA. In both cases, the proportion of car driver trips is unrealistically low.

2.8.4 Within the FTP, Fairfax Aspire Limited have provided no commitment to achieving even the minimum requirements on modal shift. If there is no target or commitment to even meet the minimum mode shift, then this underpins the continued position, that the proposed site is NOT a sustainable development and cannot be made to be a sustainable development location.

2.8.5 Another concern is raised is around the environmental and health impacts of the development, principally air pollution and a lack of opportunities for active travel as a result of private vehicle reliance and impact in congestion.

3 Planning Policy Considerations

3.1 Preamble

3.1.1 This section provides an overview of planning policies, highlighting sustainability as a key theme that emphasised at national, regional and local levels.

3.2 National Policy and Guidance

3.2.1 At a national, level the National Planning Policy Framework (NPPF) sets out the UK government's planning policies and how they should be applied by local planning authorities (LPAs), developers, and other stakeholders. SCC have already set out the following paragraphs of the NPPF, that it considers the development has failed to meet in relation to Reason for Refusal one in the response dated 18th August 2025:

- "***110.*** *The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*

- ***115.*** *In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

  (a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

  (b) safe and suitable access to the site can be achieved for all users;

  (c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code [48]; and

  (d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

- ***116.*** *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.*"

3.2.2 The NPPF forms one part of planning policy documentation that must be considered. It is noted that although the TA identifies and makes reference to a number of policies and guidance documents that promote and prioritise sustainable development, the TA appears to have been placed sole reliance on a single NPPF policy. The TA only refers to NPPF paragraph 115 in isolation as being the chief development policy test (para 1.3.2).

3.2.3 The applicant also refers to guidance documents that primarily focus on development within urban areas, such as the Department for Transport's *Manual for Streets*, first published in 2007. It is noted that more recent and relevant guidance is also available, which better aligns with the vision-led ethos of the National Planning Policy Framework (NPPF) at a national level, including Active Travel England guidance (2018), Chartered Institution of Highways and Transportation (CIHT) Planning for Walking (2015) and the Department for Transport's, Transport Connectivity Metric (2025), although the latter is currently only available to local authorities. Although MfS remains a common source of guidance on a range of transport aspects, it is now close to being 20 years old as such some of the principles connected to a sustainable development, in response to the vision-led policy requirement, may not necessarily be captured.

3.2.4 This is most notable in the TA, which refers to a 2 kilometre (km) distance for walking trips and distances of more than 400 metres (m) to a bus-stop as being 'acceptable'. By using references to documents that are published in 2007, rather than those that are more relevant and contain more up to date evidence, i-Transport has failed to acknowledge the importance of realistic travel distances that people are genuinely willing to walk to access day-to-day essential facilities, an important factor in creating a well-integrated, walkable and liveable neighbourhood, that reflect the vision-led requirements.

3.2.5 By selecting older guidance and ignoring more recent and relevant guidance, i-Transport fail to account for how far people are actually prepared to travel to essential day-to-day facilities. This limited and selective approach has resulted in the TA being set out to present a more positive and optimistically well-connected description of the development. This can be evidenced at para 4.4.12 where is states *"18 different local facilities are accessible within* ***acceptable*** *walking distances,".* This has been based on i-Transport's definition of 'acceptable' as a walking distance of 3.2km from the site. This is well above any recognised or supported maximum walking distance. The CIHT Planning for Walking[1] Section 6.4 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……..People will walk* ***up to 800 metres*** *to get to a railway station, which reflects the greater perceived quality or importance of rail services*". Defining a 3.2km distance as 'acceptable' creates a misleading reliance on excessive walking distances and significantly overestimates the site's credentials as being sustainable.

[1] *Planning for Walking_LARGE_DOC_V1.indd*

3.3 Regional Policies and Guidance

3.3.1 Following on from the national level, SCC have regional considerations when it comes to transport. These are contained within various supporting documents, including the Local Transport Plan (LTP4) and Healthy Streets for Surrey.

3.3.2 The Surrey Local Transport Plan sets out that the way SCC think about travel and its impact on the environment have changed. SCC recognise that urgent global action is needed to avoid dangerous climate change caused by greenhouse gas emissions, including transport's carbon emissions. That is why SCC declared a climate emergency in 2019 and produced a **Climate Change Strategy**[2] which committed to taking action to help turn the tide on climate change. This response to the climate emergency is reiterated in the Local Transport Plan.

3.3.3 In SCCs fourth Local Transport Plan (LTP4), it sets out plans for transforming the County Council transport network from 2022 up to 2032, and beyond. LTP4 was adopted on 12 July 2022 and superseded the third Local Transport Plan (LTP3), which was published in 2011. LTP4 aims to significantly reduce carbon emissions from transport to meet the commitments towards net zero emissions by 2050, in line with the **Government's national legal commitment**[3]. Achieving these targets will require significant changes for all.

3.3.4 SCC's objectives are:

- Net zero carbon emissions
- Sustainable growth
- Well-connected communities
- Clean air and excellent quality of life.

3.3.5 To achieve these objectives, SCC will continue to build on existing measures and develop new ones that align with the following three principles:

- **Avoid** unnecessary travel by reducing the number and length of trips needed. We aim to achieve this through improving planning for homes and employment sites, travel planning and levels of digital connectivity.
- **Shift** travel choices to more sustainable modes of transport, including public transport, walking and cycling, away from car use.
- **Improve** the energy efficiency of vehicles and operational efficiency of roads through technology improvements

[2] *Surrey's Climate Change Strategy - Surrey County Council*
[3] *UK becomes first major economy to pass net zero emissions law - GOV.UK*

3.3.6 Alongside the LTP4, SCC also have a comprehensive Design Code called Healthy Streets for Surrey[4]. This sets out the approach and key criteria in achieving the ambitions of SCC's Local Transport Plan 2022 - 2023 (LTP4) and carbon reduction targets through the Avoid, Shift, Improve framework. Healthy Streets for Surrey will enable the creation of liveable neighbourhoods, where the majority of residents' needs can be met. within a 20-minute walk.

3.3.7 Streets which are designed primarily for moving motorised traffic are associated with reduced social connectivity and neighbourliness in residential areas. Car-dominated streets have poorer air quality levels which impacts respiratory health. Car-dependent areas also tend to suffer from higher levels of congestion and traffic collisions. Vehicle-oriented streets are more disruptive, less safe, less socially cohesive and more damaging to physical and mental health.[5]

3.4 Local Level Policy and Guidance

3.4.1 At the local level, Epsom and Ewell have their adopted Core Strategy[6], with policy CS16 setting out the following in relation to proposed development in the borough, under managing transport and travel:

> ***"Policy CS 16*** *Encouragement will be given to development proposals and management policies which foster an improved and integrated transport network and facilitate a shift of emphasis to non-car modes as a means of access to services and facilities…..*
>
> *In creating new places, highway design should ensure that the needs of vehicular traffic do not predominate to the detriment of other modes of travel or to the quality of the environment created. Development proposals will be required to be consistent with, and contribute to, the implementation of the Surrey Local Transport Plan and should:*
>
> - *minimise the need for travel, through measures such as travel plans or the provision or enhancement of local services and facilities;*
> - *provide safe, convenient and attractive accesses for all, including the elderly and disabled, and others with restricted mobility, and provide links to the existing network of footways, bridleways and cycleways, so as to maximise opportunities for their use; Epsom & Ewell Borough Council 48*
> - *be appropriate for the highways network in terms of the volume and nature of traffic generated, and ensure that the safety, convenience and free flow of traffic using the highway are not adversely affected;*
> - *avoid highway improvements which harm the environment and character of the area;*

[4] Healthy Streets for Surrey - Surrey County Council
[5] 2.2 Why is this important? - Surrey County Council
[6] Core Strategy 2007.pdf

- *provide appropriate and effective parking provision, both on and off-site, and vehicular servicing arrangements;*
- *ensure that vehicular traffic generated does not create new, or exacerbate existing, on street parking problems, nor materially increase other traffic problems, taking account of any contributions that have been secured to the provision of off-site works*

All major developments should be well located for convenient access by non-car modes, including walking, cycling and high-quality public transport".

3.4.2 The Core Strategy is supported with the Revised Sustainable Design Supplementary Planning Document[7] (SPD), dated February 2016. The SPD sets out in the introduction, that "*the Council is committed to ensuring that Epsom and Ewell grows sustainably and Policy CS6 of the adopted Core Strategy requires that new development should result in a sustainable environment and reduce or have a neutral impact upon, pollution and climate change*".

3.4.3 In addition, Epsom and Ewell also have a Development Management Policies Document[8], dated September 2015. This sets out the following policies when it comes to transport:

"*DM 36 Sustainable Transport for New Development*

In order to secure sustainable transport patterns and usage across the Borough we will:

a. *require all major new development, including new homes, commercial and community uses to develop and implement a proportionate, robust and effective Travel Plan in accordance with Surrey County Council's adopted Travel Plan Good Practice Guide;*
b. *prioritise the access needs of pedestrians and cyclists in the design of new developments, protect and enhance pedestrian and cycle access routes to, and where possible, through development sites, including the protection or enhancement of the strategic cycling and walking networks; and*
c. *require new development to provide on-site facilities for cyclists as appropriate, including showers, lockers and secure, convenient cycle parking, in accordance with standards".*

[7] *Sustainable Design Supplementary Planning Document*
[8] Development Management Policies Document

3.5 Policy Considerations Summary

3.5.1 Taking the above as a whole, it can be highlighted that the outline planning submission does not comply fully with the latest adopted transport policies and design guidance in place for this site at all levels.

3.5.2 Instead, by focusing on a single NPPF policy in isolation, the TA concludes that a transport reason for refusal could not be justified. This TN will challenge the conclusion and highlight areas where an overestimation of the existing situation has led to an underestimation of the impact of the proposed development.

3.5.3 Taking into account the above policies and guidance documents, in conjunction with objection raised by SCC, it is considered there is a strong case for Epsom and Ewell Borough Council to object to the application on transport grounds. This TN will set out in more detail as to how this position has been derived.

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4 Site Location, Accessibility and Vision-Led

4.1 Site Location

4.1.1 This section provides a more detailed consideration of the site location, its accessibility and what a vision-led approach to development would be expected to consider.

4.1.2 Although the TA seeks to justify the site location on sustainability grounds and refers to a vision-led approach being taken, this is an area of contention. It is noted that the unsustainable location of the site is one of the objections raised by SCC, being a key policy requirement at all levels.

4.1.3 As detailed above, planning policies, guidance, and design requirements are not static, and over time these are all continually evolving to be commensurate with current thinking, technology, priorities, etc. In just the past five years priorities in local and national policies have changed and these now give much greater weighting to ensuring developments are sustainable, not just in context of transport to provide genuine alternatives to private car use, such as walking cycling and in particular public transport in new developments but also how this contributes to other key pillars of that form sustainability in respect of the environment and health.

4.1.4 As SCC have raised an objection on the location of the development, and this section provides a greater level of detail that supports the conclusion reached by the County Council.

4.1.5 A relevant part of the NPPF is paragraph 110, which states "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health*".

4.1.6 There are many documents that can be referenced that help define sustainable development, at a national level reference can be made to Active Travel England (ATE), who provide guidance on the design of active places, in accordance with the current NPPF. At a regional level there is Healthy Streets for Surrey.

4.1.7 Both provide a number of design assistance tools, including documents to assist local councils and design professionals on what constitutes high-quality design with safe active travel infrastructure embedded from the outset of any new development scheme.

4.1.8 One ATE document under the masterplan heading provides site wide considerations for planning such places, and under the sub-heading of 'Transport and Facilities' the following can be referenced:

> "ATE Extract[9] from Transport and facilities:
>
> ***Public transport services and facilities should be well located and accessible via walking, wheeling or cycling, ensuring easy onward interchange with***

***public transport. Bus stops should ideally be located so that nobody needs to walk more than 400 metres from their home**.*

The ease of movement for people around a place is important within the site, but the movement network must make connections to destinations, places, and communities beyond the site boundaries. The internal active travel network must connect to and enhance off-site routes, rather than create indirect routes of poor quality.

***Proposals for new places should be created around a network of high-quality, well-integrated active travel routes. These routes should be of suitable width, surface and topography, and connect to surrounding areas**.*

Pedestrians and cyclists should be given priority when moving across a site. This will help create routes that are coherent, direct, safe, comfortable, and attractive. Active travel networks should form a continuous and connected grid in a development, reflecting desire lines of where people want to travel.

4.1.9 As has already been identified, SCC publish a comprehensive Design Code called Healthy Streets for Surrey. This sits alongside the LTP4 and provides the design approach to meet the three priorities of Avoid, Shift, Improve framework. Of the most relevance to the proposed development is the focus on enabling the creation of walkable and liveable neighbourhoods, where the majority of residents' needs can be met within a short walk.

4.1.10 The walkable neighbourhood will be referred to later in this TN.

4.2 Site Accessibility and Connectivity

4.2.1 ITP disagree with the conclusion reached in the TA, that the site is considered a sustainable location. The unsustainable site location can actually be derived in **Figure 4-1** below, which is Image 4.5 extracted from the TA. This GIS mapping plot prepared by i-Transport clearly details the remote location of the site and highlights the sparse nature of a few limited facilities. Despite i-Transport's conclusion that the site is in a sustainable location, in reaching this conclusion i-Transport appear to have effectively ignored the analysis they themselves have presented.

4.2.2 In questioning the TA's assertion that the site is sustainably location, the NPPF Paragraph 110 is referred to, which states:

[9] (*ATE Designing inclusion active travel schemes, 'Planning for active places' design documents for professionals, Site wide considerations – website: Site-wide considerations | Active Travel England*)

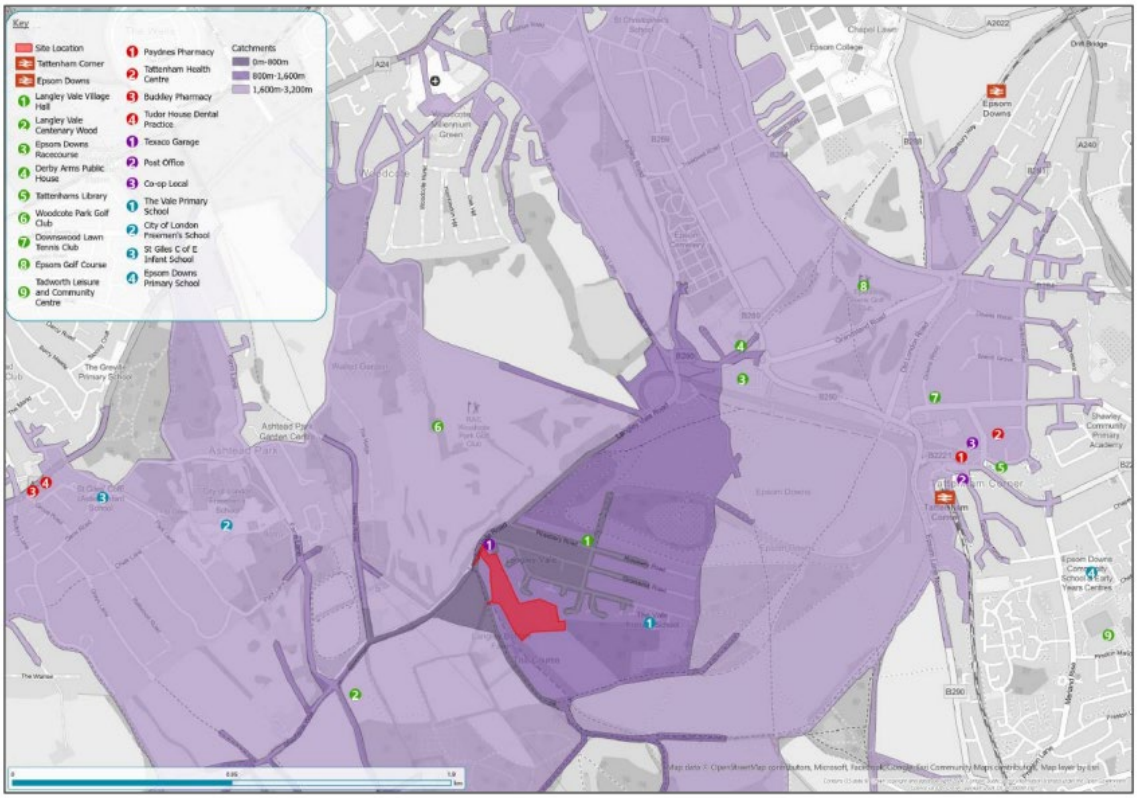
"*The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through* ***limiting the need to travel and offering a genuine choice of transport modes.*** *This can help to reduce congestion and emissions, and improve air quality and public health*".

4.2.3 **Figure 4-1** helps to identify that the location of the proposed significant development site must be questioned and challenged as to the whether it offers a genuine choice and limits the need to travel.

4.2.4 Offering a genuine choice and reducing the need to travel can be described as enabling future occupiers to access a range of travel options that support day-to-day activities in a sustainable way, as defined by the concept of a walkable neighbourhood. As is noted in the TA, much of the area defined in **Figure 4-1** below is landscape in nature or open land, being located within the Green Belt, with the primary routes for active travel being defined by unmade Public Rights of Way (PROW).

4.2.5 As such, **Figure 4-1** (TA, Image 4-5) provides a useful visualisation of just how isolated the site is and how sparse and limited facilities are to the site, for a significant development.

Figure 4-1: Local Amenity Accessibility (Ref: i-Transport TA, Image 4-5)



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4.2.6 The description in para 4.4.12 of the TA that sets out '*Table 4.4 highlights that 18 different local facilities are accessible within acceptable walking distances, with all local facilities accessible within a desirable cycling distance'* is clearly disingenuous, taking into account the low DfT Connectivity score of 42[10], the inclusion of facilities over 800m from the site, the limited range of facilities even at over 2km from the site, and the lack of any genuine choice of transport modes.

4.2.7 As already noted, i-Transport have adopted a very selective approach to the interpretation of sustainable development within MfS. The wider context set out under paragraph 4.4.1 does provide a useful definition of sustainability. This refers to a "*walkable neighbourhood being typically characterised by having a range of facilities within 10 minutes' (up to about 800m) walking distance of residential areas which residents may access comfortably on foot*".

4.2.8 Almost all pedestrian connections to the limited local services and further afield public transport connections are largely on PROWs which are unmade tracks. Distances to the facilities are considerably beyond a comfortable (or even desirable) walking distances being well in excess of 800m. **Appendix A** contains a number of images of these walking routes.

4.2.9 **Figure 4-1** is beneficial in helping to illustrate how unsustainable the site is – notwithstanding the private nature of City of London Freeman's School, there is no pedestrian connection to that facility, nor is there a made pedestrian connection to Ashtead and its services and amenities. The topography of the area is not referred to in the TA and this impacts the propensity of residents to connect to local services on foot.

4.2.10 The TA does not refer to any existing footfall from Langley Vale to local services and public transport connections. Table 4.4 of the TA provides approximate journeys times to services on foot and by cycle – but there are no physical 'made' connections or direct routes to many of the amenities listed.

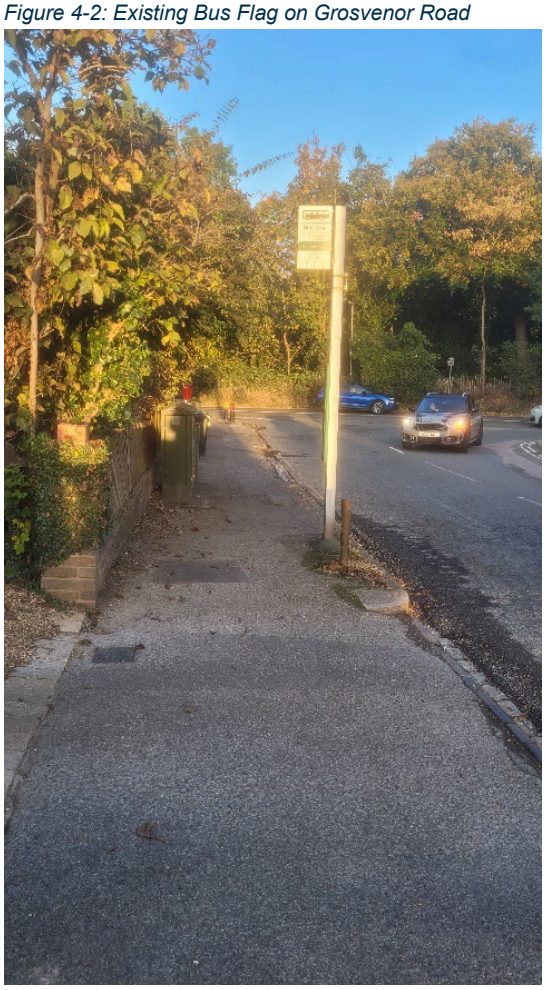
4.2.11 The terminology used in the key to this table is also considered misleading. A walking distance of 800 m should not be classified as desirable, distances under 1.6 km should not be classed as comfortable, and anything beyond this should not be classified as acceptable. Referring to walking distances over 3.2 km as acceptable is fundamentally misleading and significantly overstates the credentials of this significant development site.

4.2.12 A walking distance of up to 800m is generally considered as comfortable (as set out by MfS), but this distance should also take into account the topography of the area and the type of walking environment available. In context of this site, with its noted steep gradients and unmade PROWs, even ITP question whether 800m should be considered as a comfortable distance.

4.2.13 Pedestrians would need to walk on the road to access some of the services referred to in Table 4.4 of the TA.

4.2.14 The identified bus stop is just a bus flag with no shelter. As can be seen in Figure 4-2.

Figure 4-2: Existing Bus Flag on Grosvenor Road



4.2.15 The TA also includes Table 4.2, which seeks to detail that the site has access to rail, including journey times by car to each station, but the distances and PROW infrastructure would not promote or encourage people to walk. In fact, para 4.3.3 of the TA recognises that stations are not accessible on foot, referring to accessing them via a short car journey. While the E5 bus service provides a connection between Langley Vale and Epsom, this service is very infrequent, with a frequency of only one bus every two hours, Monday to Saturday and no service on Sunday.

4.2.16 The TA refers to the upper 2km distance within the older MfS guidance document as justification to support the site as being a sustainable location but then extends this distance even further and instead refers to a 3.2km distance as being acceptable. Relying on significantly greater walk distances fails in a basic understanding of newer guidance available with the ATE and Healthy Streets for Surrey, which consider a sustainable development as having access to a range of facilities that can be 'comfortably' accessed within 800m.

4.2.17 Further, the analysis presented in the TA does not make any allowance for the distances that future occupiers would have to walk (or cycle) just to exit the site and the wider topography. Although reference has been made to measurements being taken from the centre of the site, this is highlighted as consisting of an additional 250m walk distance (as a minimum) or another 4 mins (if on a level gradient, which it can be highlighted the site is not).

4.2.18 i-Transport's narrow view of MfS within their TA is questioned by ITP, the context for i-Transport's quote should be examined as it is notable that as already highlighted, the TA omits the wider context of commentary. Where MfS states at section 4.4.1: *"**Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes'** (up to about 800 m) walking distance of residential areas which residents may **access comfortably on foot**……..MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents."* (the elements in bold are highlighted by ITP). The use of 800m as a comfortable walking metric, aligns with the ATE guidance and supports Healthy Streets for Surrey liveable neighbourhood creation, the more recent and up to date design guidance documents.

4.2.19 In a review of the wider area, ITP highlight that the nearest facility to the site is a 'small' convenience shop as part of the garage offering, with all other facilities considerably beyond 800m, with many being in excess of 2km or more away. Furthermore, the closest primary school is at least 1,270m away. Thus, many essential day-to-day facilities would be beyond a considered comfortable walking distance of 800m for all future site residents, especially given the gradient of the local area, which residents would be required to navigate to and from the site.

4.2.20 In summary, the applicant's position on transport matters, as set out in the TA, significantly misinterprets and ascertains an inaccurate position in stating the sustainable credentials of the development site. From a transport perspective, sustainable development means creating transportation systems that are environmentally friendly, socially inclusive, and economically viable over the long term. It aims to reduce negative impacts like pollution and congestion while improving accessibility, safety, and efficiency. None of the key markers for a sustainable development can be achieved or met with the proposed development.

4.2.21 Fundamentally, the application site is very poorly located in relation to accessing essential day-to-day services for all occupiers. As more accurately defined by SCC, the only real services or activities within reasonable walking distance are a primary school (and at the very end of a steep incline) and a small shop associated with a local garage, which sells a limited range of goods.

4.2.22 Added to this, SCC make reference to the DfT's Transport Connectivity Metric as a marker, which is a tool available to local authorities. Following their analysis, the metric for this site, results in a score of 42, placing the site in the bottom 15 percentile. ITP consider that in terms of this scoring, the site location score of 42, more accurately represents the sites poor connections, limited access to day-to-day facilities and limited access to a choice of public transport modes. SCC in their response, go further and state that for this site to be considered as being able to support a significant residential development, the score would need to be above 70, placing the site in the 60th percentile range.

4.2.23 The TA includes the following statement at paragraph: 4.4.12 *The above facilities would be used by many future residents on a near daily basis and the proximity of these facilities provides significant opportunities for prioritising sustainable travel choices*. There is simply no supporting justification or evidence contained in the TA for this sentence.

4.2.24 As has been set out above it can be clearly demonstrated that the site does not offer any genuine alternative to travel by private car and does little to limit the need to travel for essential day-to-day journeys for all occupiers. The statement in the TA can only be considered in context of leisure trips at best, as noted by SCC.

4.3 Wider Network Connectivity

4.3.1 It is notable that much in the TA is made of the network of PROWs around the site, reflective of its green belt location. Due to the nature of the PROWs, these only offer a very limited choice for future occupiers. Almost all the PROWs are unmade, across and over fields or through woodland, making them almost exclusively suitable for leisure use in good weather. This is helpfully highlighted in the TA through the inclusion of Photo 1, 2, 3 and 4, extract in **Appendix B** all of which clearly demonstrate the unmade nature of the footways and bridleways. These are complimented by the site images in **Appendix A**.

4.3.2 The Images in **Appendices A** and **B** highlight that they cannot be considered to offer a genuine alternative to private car use. These PROWs would be unsuitable for mobility impaired people, use in bad weather, hours of darkness or winter months. Sustainable neighbourhoods are about creating attractive, safe, walkable environments for all ages and level of fitness to encourage active travel for short distances from home to destinations that they visit and services they need to use day to day – shopping, school, community, healthcare, places of works and many more.

4.3.3 As such, the TAs reliance on PROWs for accessing facilities is misleading, as these routes are primarily only useable for leisure use and would be not available to all occupiers.

4.3.4 Given that the PROWs are being advised as providing access to Tattenham Corner Railway station, located over 2.7km from the site, it is questioned as to whether this can be stated as a genuine choice for future occupiers to utilise, if they are required to travel to and from a place of employment via train. It is more likely that any future occupier will simply drive to a place where they could park a vehicle in proximity to the train station, as opposed to walk for almost 30 minutes along unmade earth tracks, through a woodland and across a racecourse, which is exactly what the TA states at 4.3.3 – "*local Railway can be accessed by a short-car based journey".*

4.3.5 There are also no drawings provided to demonstrate that the applicant could suitably improve the bridleways or footways, furthermore it is unclear whether the applicant has the right to make any improvements.

Cycling

4.3.6 There is a general lack of consideration for the potential for cycling trips to/from the development. In fact, the TA provides limited analysis or commentary on cycling in relation to the proposed development, beyond section 4.0 where this simply identifies off-road cycle routes in the area and estimates cycle times to the limited facilities noted in **Figure 4-1.**

4.3.7 Should future occupiers be minded to cycle, then the Langley Vale Road could be seen as offering an on-road opportunity. However, the TA makes no reference to the narrow and congested nature of this road. **Appendix C** contains a number of images demonstrating the heavily congested nature of Langley Vale Road at peak times**. Figure 4-3** highlights once such occasion, vehicles can be seen queuing past the location of the proposed site access location during the morning peak period of travel demand following site visits undertaken on 9th October and 20th October 2025 between the hours of 07:30 and 08:30.

Figure 4-3: Congestion on Langley Vale Road across the proposed site access

4.3.8 In conjunction with the narrow roads and congested nature of Langley Vale Road, ITP are not of the opinion that this is an attractive route future occupiers would use. When the 'alternative' cycle routes are off-road unmade tracks, ITP do not consider it to be a suitable environment for all cyclists. This is noted in the TA, in the key to Image 4.2 where almost all off-road cycle routes have been flagged as requiring a mountain bike to use these.

4.3.9 Given the steep gradient of the surrounding area to access the development site and the unmade nature of the tracks surrounding the area, there is limited opportunity to promote or encourage cycling. If future occupiers were to cycle, once on the wider network cyclists are likely to be travelling in congested conditions, invariably with likewise, if cyclists have vehicles behind them there are limited opportunities for drivers to pass cyclists safely. There is no mention of dedicated cycle infrastructure through the site.

Public Transport

4.3.10 It is noted that public transport is also not a genuine alternative, the distance to the closest bus stop is beyond 400m. This 400m requirement is clearly stated in ATE and Healthy Streets for Surrey guidance.

4.3.11 The current TA states at para 4.3.1 there would be a 500m walking distance from the centre of the site to the nearest bus stop, in excess of the desired distance. The additional distance to other bus stops, closer to 800m, takes no account of the topography of the area, which would make the walk considerably less attractive. Indeed, access routes within the site may need to be considerably more circuitous and take longer in seeking to navigate the gradients connected to the site and its surrounding topography.

4.3.12 Whilst Table 4.1 of the TA provides some information regarding frequency of service, it is careful not to state the number of buses in a typical or peak hour. The TA does not expand on this, instead seeking to take the stance that as the site is well located to the bus stop, it would not be reliant on the bus services; this is a key weakness of the TA.

4.3.13 Furthermore, the available bus services are of a low frequency and do not present a good level of service, which would be considered to be a bus every 15 minutes, whereby passengers begin not to rely on a timetable. In this instance, the most frequent service is one bus every two hours, unlikely to be an attractive alternative to use of the private car. This demonstrates that the site is therefore inherently unsustainable, with very limited potential for new residents to use public transport.

4.4 Summary

4.4.1 Overall, it is clear the site is not sustainable, it does not offer any genuine alternatives to encourage walking, cycling or public transport use to reduce reliance on private car use, and this fundamental issue is not resolved.

4.4.2 This is a key point to highlight as the overarching National Planning Policy Framework (NPPF) para 110 is clear that Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

4.4.3 The site location is not sustainable, and the measures proposed, covered later in this TN, do not and cannot make the site sustainable.

5 Vision-led approach

5.1 What is Vison-led?

5.1.1 A key change to the NPPF has the been the introduction of a vision-led approach, in prioritising sustainable development. Applying a vision-led approach is a new approach and goes beyond simple adding the terminology of 'vision-led' to a standard/typical TA.

5.1.2 A vison-led approach is defined in the National Planning Policy Framework [1] as follows:

"Vision-led approach: an approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as 'predict and provide')"

5.1.3 There are several key characteristics than define a vision-led approach, defined by various industry bodies such as **Centre for Transport and Society**, **Transport for Quality of Life**, and **CIHT**, these characteristics can be defined as:

- **Outcome-focused**: Starting with a shared vision for how a place should look and function, rather than extrapolating from current trends.
- **Community-driven**: Engagement with local communities early on to shape development goals.
- **Sustainability-first**: Ensuring that transport prioritises walking, cycling, and public transport over car-centric infrastructure.
- **Holistic and iterative**: Encourages flexibility, learning from past mistakes, and adapting to uncertainty.
- **Supports national missions**: Aligns with UK government goals for net zero, prosperity, health, and equity.

5.1.4 Taking a vision-led approach means the goal is to **support sustainable development** by making it easier for people to choose environmentally friendly and health-promoting travel options, rather than being forced to rely on cars due to poor infrastructure or location. There are several critical considerations on transport grounds as to why this matters, as the previous NPPF traditional planning approach invariably led to:

- Increased car dependency
- Poor air quality and health outcomes
- Social exclusion due to limited transport options
- Environmental degradation

5.1.5 The adoption of the vision-led approach in the NPPF aims to **reverse these previous planning trends** by designing places that are:

- Accessible
- Equitable

[1] https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

- Healthy
- Environmentally responsible

5.1.6 The delivery of a 'vision-led' scenario would require the provision of infrastructure that is sufficient to deliver on an 'agreed' vision. It is clear that although Section 3 of the TA refers to a Transport Vision and Approach, the fundamental principles of adopting a vision-led approach, have not been undertaken, instead the TA is very much prepared in accordance with earlier versions of the NPPF, taking a car-centric approach.

5.1.7 The car-centric approach taken is emphasised within the TA, where it appears to recognise the unsustainable nature of the proposed development site, with the inclusion of the following heavily caveated sentence at 3.3.1: "*The outcome of the vision would be a thriving liveable community in which sustainable travel is prioritised where practicably possible, taking into consideration the location and quantum of the development*".

5.1.8 The inclusion of the words '*practicably possible*', and '*consideration of location*' demonstrate that the principles of a sustainable vision-led development cannot be met and the TA seeks to set out the justification why this is not a consideration, from the very outset.

5.2 Summary

5.2.1 The NPPF also sets out that proposals should be vision-led. Although this term is mentioned in the TA, it is clear from the way the analysis has been presented, that this approach has not been adopted. Instead, a car centric approach has been adopted rather than the iterative people focused approach expected with a vision-led TA analysis.

6 Highway Safety

6.1 Stage One Road Safety Audit

6.1.1 It is recognised that in addition to the TA and FTP, the applicant has submitted a Stage One Road Safety Audit (RSA1), undertaken by Fenley. In a review of the RSA1, it is questioned as to whether this has followed the statutory requirements detailed in GG119 Road safety audit v2.0.1[11].

6.1.2 GG119 is commonly adopted by local highway authorities as good practice. All RSAs within the UK (outside London) should be undertaken in accordance with GG119. The standard provides a structured process to identify potential safety problems in highway schemes and can suggest ways to mitigate them. The latest version 2.0.1 of GG119 was issued in April 2025.

6.1.3 Although an RSA1 has been submitted, it has not been demonstrated that the Overseeing Organisation, SCC as the Highway Authority, has either approved the CVs of the audit team, or the RSA brief. The RSA1 cannot be considered as undertaken in accordance with GG119 if these essential criteria have not been adhered to.

6.1.4 In the absence of the brief, it cannot be confirmed whether SCC as the highway authority were provided with the CVs connected to the company undertaking the safety audit and whether they were approved by SCC, as per table of GG119, which states: "*The Overseeing Organisation shall approve the proposed RSA team before the RSA is undertaken*". What approval was obtained from SCC prior to undertaking the Stage One Road Safety Audit?

6.1.5 A key criteria of GG119 is a site visit. Although a site visit has been undertaken, it is questioned whether this was undertaken at a representative time, in context of vulnerable road users and traffic demand. As can be evidenced in **Appendix C**, there can be significant congestion and queuing along Langley Vale Road past the proposed site access location in the morning peak period. This point is raised because the timing of the road safety audit site visit, being undertaken between the hours of 10:00 and 10:30, suggests that this key consideration was not communicated accurately to the road safety audit team.

6.1.6 To ensure that all road users were considered, it is also unclear as to whether equestrian use was advised within the road safety audit brief. Given the TA includes a section on equestrian demands and undertook surveys on equestrian use, it is unclear as to whether this was communicated to the road safety audit team as part of the brief. As such, there is a question raised as to whether the RSA team were appropriately briefed, particularly on matters associated with equestrian activity or the existing situation at peak times. **Appendix D** sets out use of Langley Vale Road for equestrian use, which informs the Jockey Club objection.

by Haskoning

6.1.7 Had the road safety audit team been given an accurate brief then it is clear that the timing of the site visit would have been undertaken at a time when Langley Vale Road is heavily congested and in use by horses, accessing Epsom Downs racecourse. Given that the TA clearly set out that the greatest demand generated by the development would be in the AM and PM peaks, then GG119 would require the road safety audit to be undertaken at a representative time.

6.1.8 Given that a Stage One Road Safety Audit specifically requires that equestrian needs and routes are considered, this is a major omission, as the conclusion reached under A.3 Junctions – states there are no road safety concerns relating to horse riding at this stage. Based on this, the RSA1 must be treated with caution, if all vulnerable road users have not been assessed.

6.1.9 Another concern raised in respect of the road safety audit, is that no reference is made to street lighting. It is common practise that for any new access junction, the level of street lighting is identified as to whether suitable lighting exists or a scheme to improve the lighting is necessary. Street lighting would be expected to match existing adjacent junctions such as Grosvenor Road and Rosebery Road.

6.1.10 Another flaw with the RSA1 is this has not flagged the absence of swept path analysis submitted in relation to the new access arrangement.

6.1.11 Finally, the area is known for flooding, and surface water build-up is not referred to in the Stage 1 RSA. With the proposed development being located at a low point in the area's topography, Langley Vale Road, at the location of the site's access, is subject to surface water build-up. This issue is historical and has also been observed in the most recent site visit on 20th October (**Figure 6-1**). Photos of this surface water build up can be seen in **Appendix F**.

6.1.12 As illustrated, the surface water encourages vehicle travelling southbound to drive away from the kerb-edge, with the water effectively narrowing the carriageway width. ITP are surprised that this has not been raised as a 'problem' within the RSA, especially given this in an area where horses share the carriageway with motor traffic.

6.1.13 ITP would be grateful to be able to review the Stage 1 RSA brief.

[11] *GG 119 - Road safety audit*

Figure 6-1: Surface wate Build-up at the Proposed Site Access (20th October 2025)

6.2 Stopping Sight Distance and Visibility Splays

6.2.1 In terms of highway safety, SCC have raised a highway safety objection that the proposed access does not provide the minimum required forward stopping sight distance (SSD) for northbound traffic in connection to right turners, identified as 49m. This is a significant point. The objection relating to the SSD along Langley Vale Road is connected to vehicles approaching the site access in a northbound direction and being confronted by a vehicle turning right into the site, as demonstrated in **Figure 6-2**. If a vehicle was turning right into the proposed new site access, vehicles travelling along Langley Vale Road may be partially or fully unsighted (subject to the growth of the hedgerow) and could potentially be involved in a rear end collision.

6.2.2 The limited forward visibility for drivers is highlighted with the application of double white lines in the centre of the Langley Vale Road carriageway, which are generally used in locations where there is a risk to drivers associated with overtaking, due to the limited visibility.

6.2.3 The sub-standard forward visibility presents a highway safety concern, particularly for vulnerable road users such as cyclists and slow-moving horse riders. These individuals may not be visible to drivers travelling along Langley Vale Road, as they are likely to position themselves close to the hedgerow on the inside of the bend, making them harder to detect by northbound traffic approaching the proposed new site access junction. Although an equestrian may not be turning into the site, their presence on the highway near a new access junction, where forward visibility is restricted, is relevant in the broader context of a location where new turning movements would be introduced.

Figure 6-2: Google Image relating to SCC objection

6.2.4 ITP also identify that the visibility splay at the proposed site access is 'x' distance of 2.4m and 'y' distance of 49m to the west and 'x' distance of 33m to the east. The 'x' distance to the west is highlighted as being 10m below the required visibility for the posted 30mph speed limit of Langley Vale Road in this location.

6.2.5 In accordance with MfS, a 'y' distance of 43m is expected to be provided on a road with a posted speed limit of 30mph. The TA appears to imply that the proposed 'y' distance reflects the recorded 85th percentile speed recorded by an Automatic Traffic Counter, placed to the east of the proposed site access.

6.2.6 In the first instance, in the absence of the raw data the 85th percentile cannot be checked or verified. Further, without knowing the location of the ATC counter, it cannot be checked as to whether this was placed in a representative location. If the ATC located to the east of the proposed site access was located in close proximity to any speed restrain measures, this could distort the recordings as vehicles slow on the approach to such measures.

6.2.7 There is also a concern that the ATC was in situ at the same time as 'roadworks' were taking place on Langley Vale Road. The TA identifies that the ATC were carried out in March 2025, this is noted as the same month that roadworks connected to Ebbisham Lane were being undertaken, which resulted in a traffic control measures being in operation, noted in **Figure 6-3.**

Figure 6-3: Extract from Google Maps showing roadworks in situ in Mach 2025 (Ref: Google Images)

6.2.8 It is also noted that no vehicular swept path analysis has been undertaken within the TA to demonstrate whether the vehicle access is able to accommodate two-way vehicle movements, including those of large vehicles that are likely to require most of the carriageway width to manoeuvre through the site access junction.

6.2.9 Given the congested nature of the network, the use by horses on a regular basis coupled with the gradient and undulating nature of Langley Vale Road which is prone to the accumulation of surface water in the lower areas and in proximity to the new access, it is questionable whether sufficient or suitable inter-visibility could be provided to allow opposing vehicles to anticipate and stop whilst such overrunning manoeuvres occurred. In the absence of adequate visibility and SSD the risk of collisions could significantly increase, with vehicles regularly required to reverse in the vicinity of the site access or stop on Langley Vale Road, to enable vehicles to enter/exit the new access. The gradient issues connected to the site, are also raised as Problem A.1.1 within the Road Safety Audit.

6.2.10 Minimal details are provided regarding pedestrian crossing points at the proposed access, Problem A.4.1 relating to pedestrians is as highlighted by the RSA1, but mostly confined to tactile paving rather than wider concerns as to whether existing Langley Vale residents could safely cross the proposed access.

6.2.11 Further drawings should also be provided, demonstrating the adequacy (or otherwise) of visibility for movements to and from Langley Vale Road, to demonstrate that the required 43m visibility splay can be provided and that two-way vehicle movements can be accommodated at the proposed access within vehicles having to cross the central line on both the proposed access and Langley Vale Road, to ensure that safe vehicle movements can be made.

6.3 Junction Spacing

6.3.1 The proposed access has also been reviewed in respect of the junction spacing requirements as defined in the latest SCC design guidance, Healthy Streets for Surrey. The adopted design guidance stipulates that junction spacing should be reflective of the surrounding area.

6.3.2 In context of the principal residential junctions in the area, Rosebery Road and Grosvenor Road, are spaced at over 110m, between the two junctions. Grosvenor Road to Ebbisham Lane is spaced over 140m between the two junctions. Taking the Healthy Streets for Surrey Design Code, spacing of 100m or more between junctions is considered required to respond to the local area.

6.3.3 The junction spacing between the proposed new access and the existing junction with Grosvenor Road would be some 77m to the north and the spacing to Ebbisham Lane (access to Langley Bottom Farm) to the south would be 68m.

6.3.4 These distances relating to junction spacing, identify that the location of the proposed development access is considered below what should be the minimum junction spacing, measured to the centre lines, and is not consistent with the wider local setting.

6.3.5 In addition to the principal junction spacing considerations, it is also noted that there is a localised point of access connected to the petrol filling station to the north. When the distance to the closest forecourt access with the petrol filling station to the proposed new site access is considered, this is around 35m (to a central point of the access).

6.3.6 Placing a new junction access close to a frequently used existing access point has the potential to negatively impact road safety by increasing instances of conflict. The new site access being located less than 40m from the petrol filling station, introduces a new access within a confined and limited space. The location of the site access effectively removes any gap seeking opportunities currently afforded to existing users. This is highlighted in context of the congested nature of Langley Vale Road at key times of the day, which is regularly occupied by equestrian users, thus any increase in vehicle movements could lead to an increase in collisions as vehicle movements must now compete for space.

6.3.7 The inadequate junction spacing would inevitably compromise highway safety, which has been raised by SCC relating to the limited forward visibility, inevitably reducing the safety of manoeuvres into and out of the access onto Langley Vale Road.

6.4 Summary of Design Standards

6.4.1 The access plans provided demonstrate that the proposed access arrangements would not comply with the standards required by SCC.

6.4.2 It is clear that the applicant has chosen not to detail the suitability of Langley Vale Road to serve the proposed development site, considered a requirement of an Outline Application that includes access, as it is not possible. Examples of non-compliance include:

- The topography of the area both on Langley Vale Road and the proposed access configuration have not been taken into consideration;
- Non-compliant visibility splay, below the minimum required for a new access onto a road with a 30mph speed limit;
- Non-compliant Stopping Site Distances on Langley Vale Road to the new access;
- The junction spacing between the access being much less than 110m from the proposed site access;
- The introduction of new turning vehicle movements across a route that is shared by motor traffic and horses. The proposed development would introduce a new conflict point as vehicles turn to/from the site across the vehicle and equestrian path on Langley Vale Road, in a situation where equestrians will already be feeling vulnerable.
- The winding, hilly nature of Langley Vale Road limiting forward visibility and intervisibility to enable on-coming vehicle straddling the centre line to be seen; and
- Existing peak hour congestion experienced on Langley Vale Road has not been taken into consideration, limiting the capacity of the road to accommodate new traffic.

6.4.3 Tellingly, as no swept path analysis has been undertaken and as such the junction cannot be demonstrated to safely accommodate two-way movements, on the limited plan submitted it is considered that two vehicles would struggle to pass each other.

7 Trip Generation

7.1.1 The conclusion of the vision-led approach is key, as this has a fundamental impact on the trip generation. The following sets out the concerns with the trip generation presented in the TA, which is considered to underestimate the impact of the development.

7.1.2 I-Transport's Transport Assessment (June 2025) provides an assessment of the development's future travel demand. The exercise refers to multi-modal travel demand surveys of existing residential schemes, as contained in the Trip Rate Information Computer System (TRICS) database. The assessment refers to surveys in the TRICS category 'Houses Privately Owned', with paragraph 8.2.3 of the Transport Assessment stating that TRICS sites located in 'Edge of Town' and 'Suburban Area' locations have been considered in the assessment. The TRICS outputs contained in Appendix E of the document don't align with these parameters, however, and include 11 TRICS sites located in 'neighbourhood centres'.

7.1.3 Within TRICS, a neighbourhood centre is defined with reference to the definition within Planning Policy Statement 6 (PPS6) 'Planning for Town Centres'. PPS6 "Local centres include a range of small shops of a local nature, serving a small catchment. PPS6 defines a 'local centre as follows:

"Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre."

7.1.4 Langley Vale is provided with a single small shop only, the 'Park and Shop' establishment that is connected to the Texaco garage which fronts onto Langley Vale Road. The shop is 138sqm (GEA) in size, and sells confectionary, car related products and some basic day-to-day provisions, including bread and milk. While it is recognised that there are plans to increase the size of the facility (under application number 25/00052/FUL), the expanded shop would remain small (264sqm GEA) and would not provide the range of facilities that would allow Langley Vale to operate as a local centre. Because Langley Vale does not have 'local centre' facilities that are accessible on foot, I-Transport's assessment of development related traffic demand will be an underestimation.

7.1.5 It is noted that the TRICS sites selected include development sites with flatted development. The 'outline' planning submission seeks to establish the principles of a development (e.g. use, scale, access), with detailed matters (like layout and appearance) reserved for later submissions. We are not aware of any reference in the application to flatted development, and in this context we would expect the Transport Assessment to assess a 'worst case' within the parameters that have been submitted. Flats can be expected to have a lower average occupation rate than houses and a lower average level of car ownership. It is our view that TRICS sites with a high proportion of flats should be excluded from the assessment of travel demand, as their inclusion has the ability to unrealistically reduce the traffic demand estimates that would be generated through TRICS.

7.1.6 An important factor in the modal split of journeys will be car ownership. The site is not located with good access to public transport services and there is only limited local amenities available within walking distance. The car is therefore likely to be relied upon for most journeys, and this is reflected by local car ownership rates.

7.1.7 Car ownership for the local area is available through Nomis, the Office for National Statistics (ONS) interface with Census data. Car ownership data for Langley Vale, as collected in the 2021 Census, has been obtained. Car ownership rates, as defined by the Census, indicate an average of 1.6 cars per household. This is considered low in context of the site location, with Langley Vale Action Group analysis determining that existing car ownership levels are closer to 2.03 cars per household. In the context that car ownership rates for new housing are likely to replicate that for existing development in Langley Vale, TRICS sites with a low surrounding 'car ownership' rate should be excluded from the TRICS assessment.

7.1.8 To address the matters raised above, the TRICS assessment of development related trip generation has been re-run. The following TRICS search parameters have been used:

- Site are selected from the TRICS 'Houses Privately Owned' sub-category.
- Only surveys undertaken from 1st January 2016 are included.
- Sites with 80 to 140 units are included (110 units +/- 30).
- Edge of Town' and 'Suburban Area' locations are included – neighbourhood centre sites are excluded.
- TRICS sites that contain circa 20% of more flats, are excluded from the assessment.
- Site located in areas of low car ownership (up to an average of 1.0 cars per dwelling) are excluded.
- Consistent with the I-Transport assessment, sites located in Northern Ireland and Scotland are excluded.
- Surveys undertaken during the Covid-19 pandemic are excluded.

7.1.9 As a consequence of the above site selection parameters the vehicular trip rates (trips per dwelling) detailed in **Appendix E** have been derived. These trip rates, and the associated development related traffic generation, is presented in **Table 7-1**.

Table 7-1: Development Traffic Generation (110 Units)

Time Period	No. TRICS Sites	Av. No. Dwellings	Trip rate (per dwelling)			Total Trips		
			Arrivals	Depart's	Total	Arrivals	Depart's	Total
07:00-08:00	10	111	0.107	0.339	0.446	12	37	49
08:00-09:00	10	111	0.161	0.412	0.573	18	45	63
09:00-10:00	10	111	0.143	0.159	0.302	16	17	33
10:00-11:00	10	111	0.123	0.144	0.267	14	16	29
11:00-12:00	10	111	0.139	0.123	0.262	15	14	29
12:00-13:00	10	111	0.162	0.154	0.316	18	17	35
13:00-14:00	10	111	0.154	0.149	0.303	17	16	33
14:00-15:00	10	111	0.158	0.217	0.375	17	24	41
15:00-16:00	10	111	0.283	0.179	0.462	31	20	51
16:00-17:00	10	111	0.277	0.177	0.454	30	19	50
17:00-18:00	10	111	0.379	0.181	0.56	42	20	62
18:00-19:00	10	111	0.312	0.158	0.47	34	17	52
Total	**-**	**-**	**2.398**	**2.392**	**4.79**	**264**	**263**	**527**

7.1.10 In Table 8.1 of the i-Transport TA, trip rates (trips per dwelling) are presented by mode of travel for the traditional peak periods of travel demand (08:00-09:00 and 17:00-1800). In terms of vehicular movements, i-Transport's proposed trip rates are as detailed in **Table 7-2**, with the ITP trip rates also provided as a comparison. In summary, it is ITP's view that i-Transport have underestimated peak hour vehicular trips by around 17% in the AM peak and 24% in the PM peak. As a consequence, vehicle trips are underestimated by 9 trip in the AM peak hour and 12 trips in the PM peak hour.

Table 7-2: Vehicular Trip Rate Comparison – ITP Rates and i-Transport Trip Rates

Trip Rate Scenario	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arrivals	Depart's	Total	Arrivals	Depart's	Total
I-Transport (Table 8.1)	0.140	0.349	0.489	0.307	0.146	0.453
ITP Trip Rates	0.161	0.412	0.573	0.379	0.181	0.560
Difference +/-	0.021	0.063	0.084	0.072	0.035	0.107
Additional car trips	**+2**	**+7**	**+9**	**+8**	**+4**	**+12**

7.1.11 Although i-transport may comment that the increase in vehicle movements should not be considered as presenting a severe impact in relation to network capacity, as will be set out later in this review no account has been made in respect of the existing congested nature of the highway network, the intensification that these trips present in respect of conflicting with horse-movements, a unique feature, reflecting the wider area and its relationship with the equestrian industry, specifically horse racing.

7.1.12 In Table 8.2 of the i-Transport document, future vehicular trip rates are presented based on a 'vison-led' approach. These future trip rates are 10% reduction on those presented in their Table 8.1 (replicated in **Table 7-2** above).

7.1.13 A reduction in vehicular movements below the assessed numbers would rely on infrastructure or 'measures' that would encourage sustainable travel patterns. As has been set out in this TN, the site is not in a sustainable location and while the phrase vision-led is referred to in the TA, this is not considered to be a vison-led development project. Reliance will be on the use of the private car and the projected traffic generation figures provided for the vision-led' scenario, are not justified.

7.1.14 **Table 7-3** compares vehicular trip generated from the ITP trip rate calculation with that of the i-Transport Vision-led scenario. The table indicates that i-Transport's vision-led trip rate scenario underestimates peak hour vehicular trips by around 31% in the AM peak and 41% in the PM peak. As a consequence, vehicle trips are underestimated by 15 trips in the AM peak hour and 18 trips in the PM peak hour.

Table 7-3: Vehicular Trip Rate Comparison – ITP Rates and i-Transport Vison Led Scenario

Trip Rate Scenario	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arrivals	Depart's	Total	Arrivals	Depart's	Total
ITP Trip Rates - Trips	18	45	63	42	20	62
I-Transport – Vision-led Scenario	14	35	48	30	14	44
Additional car trips	**+4**	**+10**	**+15**	**+12**	**+6**	**+18**

7.2 Multi-modal assessment

7.2.1 Table 8.1 of the TA provides trips rates for non-car modes of travel. The table indicates the development would result in a 69.1% vehicular mode share in the AM peak and a 80.7% vehicular mode share in the pm peak. Furthermore, the assessment indicates a 22.3% pedestrian mode share in the AM peak and a 14.6% pedestrian mode share in the PM peak. Section 4 of this TN details the lack of connectivity between the site and day-to-day services, meaning a pedestrian mode share of greater than 10% is an unlikely scenario for this site.

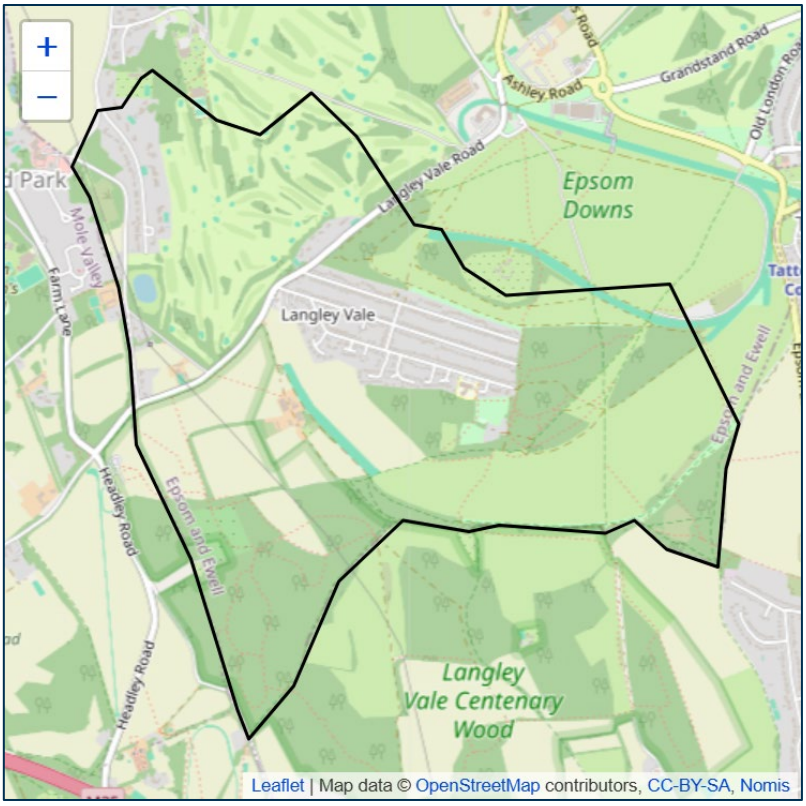
7.2.2 Travel to Work data published in the 2011 census indicates the likely mode split of journeys associated with development in Langley Vale (**Table 7-4**).

Table 7-4: 2011 Travel to Work Data – Super Output Area Epsom and Ewell 009E

Mode of Travel	201 Raw Census Data	Model Split (%)
Underground, metro, light rail, tram	2	0%
Train	101	14%
Bus, minibus or coach	9	1%
Taxi	2	0%
Motorcycle, scooter or moped	8	1%
Driving a car or van	530	73%
Passenger in a car or van	17	2%
Bicycle	16	2%
On foot	34	5%
Other method of travel to work	8	1%
Total	**727**	**100%**

7.2.3 The data in **Table 7-4** is obtained for the Census Super Output Epsom and Ewell 009E, the extent of which is illustrated below. This area is specific to Langley Vale and an area of housing on the periphery of Ashstead Park. Data obtained for this area is likely to be representative of the travel patterns experienced at the proposed development.

Figure 7-1: Super Output Epsom and Ewell 009E



7.2.4 Importantly, Census presents the 'main mode' of travel for any given journey, with most journeys being multi-stage trips with a variety of modes used. In this case, the high 'train' mode share could indicate commuting travel pattern, and it is likely that high proportion of journeys to the local station would be undertaken by car. Therefore, at the site itself, we might expect a higher 'car mode share to be more than 85%.

7.2.5 The data in the **Table 7-4** is inconsistent with the TA mode split, and wholly inconsistent with the vision-led trip scenario contained in Table 8-2 of the TA, which, in our view, significantly underestimates future car travel.

7.2.6 As is set out later in this TN, none of the mode splits referred to above, those within the submitted TA or those generated by census, are consistent with the data presented in the accompanying FTP.

7.3 Local Growth

7.3.1 A review of the TA notes that a level of growth has been applied to the base traffic flows. However, limited information has been provided to verify the growth factors used, and notably, the following paragraph states: "*An additional manual review of EEBC's planning portal has been undertaken, which confirms that no significant further committed development in the local area is coming forward which should be separately or specifically accounted for.*" Given the proximity of the site to the borough boundary, no consideration appears to have been given to committed developments in neighbouring areas that could increase vehicle demand on Langley Vale Road.

7.4 Summary

7.4.1 The trip rate analysis is flawed as this does not take into consideration the unsustainable site location. I-Transport's vision-led trip rate scenario underestimates peak hour vehicular trips by around 31% in the AM peak and 41% in the PM peak. As a consequence, vehicle trips are underestimated by 15 trip in the AM peak hour and 18 trips in the PM peak hour.

7.4.2 The i-Transport assessment of travel demand is inconsistent with the data contained in the Census for Langley Vale.

7.4.3 The increase in vehicle flows on Langley Vale Road are potentially being significantly underestimated with no account taken of local committed developments and limited growth on the network being proposed.

7.4.4 As will be set out in Section 8, there are no mitigation measures that would be considered vision-led to bring about any reduction trip rates, as these are all standard requirements of a significant residential development. Beyond maybe a few hardy future residents, there is nothing proposed by the applicant that could be considered as offering a genuine alternative to sustainable transport and certainly nothing that prioritises walking, cycling and public transport use.

8 Proposed Mitigation

8.1.1 Following the identification of several concerns regarding the site's unsustainable location and the questionable adoption of a vision-led approach, emphasis has been placed on a review of the proposed mitigation measures.

8.1.2 When reviewing the list of proposed 'transport' measures in the TA, under the guise of suggesting a vision-led approach has been adopted, it is clear that these are just standard measures expected of any significant residential development. **Table 8.1** provides commentary on the measures stated with the TA and whether they could be considered as falling within the vision-led ethos.

Table 8-1: Consideration as to whether proposed measures are vision led

Measure	Comment	Vision-led Y/N
Footway widening on site frontage	Standard measure where a standard width footway does not currently exist	N – isolated to site frontage only and does not provide any onward connectivity
Connectivity to PROW network	An outcome of development site being located in Green Belt	N – a circumstance of the location – does not seek to improve or upgrade to make usable beyond leisure use. Routes are unmade and are not lit.
Car parking to meet requirements of Epsom and Ewell Borough Council	Standard requirement of any residential development. Accommodate anticipated levels of car ownership, thereby encouraging car use.	N – does not seek to reduce car parking levels or set out how reliance on car use would be reduced.
EV Charging	Standard requirement of any new residential development. Encourages car ownership and use.	N – does not present anything beyond expected of any development
A further informal off-site connection will be provided to the southeast of the site, which will connect to the Warren via a network of well-tread existing paths.	Would expect off-site improvements to be identified in context of a large development.	N – does not seek to enhance connectivity beyond leisure use.
Framework Travel Plan	Standard requirement for any residential development over 80units	N – although a Travel Plan can be part of a Vision-Led approach is should be set out in accordance with the latest guidance following a Monitoring and Evaluation Plan approach.

Measure	Comment	Vision-led Y/N
Car club provision	Unclear as to why a car centric measure is proposed for a site that is already reliant on car use, and provides more than sufficient car parking to enable future residents to own a car.	N – this continues to prioritise and promote private car use. Does not reduce congestion and would not be considered as a sustainable travel option. Without on and off-site parking restrictions, this measure does not support low-car or car free lifestyles.
Contribution towards Demand Responsive Transport (DRT) and off-site pedestrian improvements within Langley Vale	In the absence of any detail on the contribution level, it is unlikely to be of a quantum sufficient to sustain the operation for the lifetime of the development.	N – if there is no DRT at present then a contribution would have a limited impact. To be a true vision-led measure the DRT would need to be fully funded and pump primed to actively encourage future residents to use.
Cycle parking - in accordance with SCC's 'Vehicular, electric vehicle and cycle parking guidance for new development	Required of all developments to comply with policy. In the absence of any detail, it cannot be quantified whether this would prioritise and promote cycling or just seek deliver the basics by suggesting a shed in a garden is sufficient.	N – offering to provide the bare minimum as required of the policies is not a vison-led approach. No dedicated or segregated cycle infrastructure proposed, no details on whether the cycle provision would meet the requirements of all future occupiers, and be of high quality, well located and easy to access.

8.1.3 **Table 8-1** does not include the proposed new priority access junction, as this is classed as essential enabling works, and should not be considered as a measure to mitigate the development.

8.1.4 It is also questioned whether the introduction of a car club should be considered as a mitigation measure. There are some general principles that guide a successful car club operation, these include being close to public transport links, such as train or tube stations, have easy access to road network with minimal traffic congestion, in residential developments where there is high demand for use from people who don't own cars but occasionally need one, in locations with high footfall and have the backing of local councils. It is questioned whether any of these key requirements can be met and in terms of demand, given that the proposed development is providing car parking on-site above the minimum standards, it could be considered that there would be no demand for its use as all future residents are proposed to be provided with sufficient car parking levels to meet the car ownership requirements.

8.1.5 While reference is made to footway widths being widened along the site frontage, this measure in itself is not sufficient to encourage journeys to be made by foot to key local destinations, as genuine alternatives are not available, it can be considered that such a significant development would promote and encourage travel by private car, as the only genuine access options available to future residents to access essential day-to-day functions.

8.2 Summary

8.2.1 Although the TA would suggest that a vision-led approach has been taken, these 'measures' are not over and above any typical standard residential development would be required to provide and in a more accessible location.

8.2.2 As such there is nothing listed that is different from a typical standard approach to residential development. In fact, given the site's location, ITP would go as far to say that the measures fall some way short from a standard requirement to provide multi-modal connectivity to services and amenities in an effective way. i.e. the measures listed fail to make the development genuinely sustainable. On this basis, the NPPF requirement to take a vision-led approach has not been met.

9 Junction Capacity

9.1.1 It is noted that i-Transport commissioned traffic surveys in proximity to the location of the access junction proposed to serve the development site. Thes included Automatic Traffic Counts, Video Surveys and Equestrian Surveys.

9.1.2 However, following a number of site visits undertaken by ITP in preparing this TN, there is no mention or recognition of the existing congested nature of Langley Vale Road, specifically how this has been accounted for in any junction modelling.

9.1.3 The TA has only undertaken junction assessments at two junctions, that of Langley Vale Road junction with Ashley Road and the proposed new access junction. However, it is notable that the junction of Langley Vale Road and Farm Lane has been excluded, and no justification has been given for this even though this is the closer junction to the site.

9.1.4 In reviewing Section 8 of the TA relating to Highway Impact Assessment, it is noted that a robust future scenario has not been modelled. Instead, the modelling results have already introduced a percentage reduction to vehicle trips. This is a weakness of the TA as not only has it been demonstrated that the trip rates are underestimating vehicle demand, but a further vehicle reduction has also been made in respect of the 'sustainable' location of the site and in relation to vison-led, neither scenario, whether as a sensitivity test or vision-led scenario, can be supported.

9.1.5 This TN highlights that the site is not in a sustainable location as it provides no genuine alternative to travel other than private car. The trip generation is optimistic at best, with TRICS sites selected being unrepresentative of either the site location or the type of development that is proposed.

9.1.6 The measures are not considered mitigation, as they only represent the very minimum of what would be expected of a significant development. None of the measures are considered to realistically make the site sustainable. As such, undertaking junction modelling with reduced vehicle demand is disingenuous and presents an inaccurate outcome of the development impacts

9.1.7 However, as can be seen in the **Appendix D,** with photos taken at various times over the course of many weeks, there is congestion on the network already and the modelling results take no account of this existing situation. Nor does the modelling take account of slow moving traffic that takes place behind equestrian users each time a horse enter As such the junction results should be treated with caution as the results do not represent the existing situation.

9.1.8 As the existing situation has not been presented currently, the results should not be relied upon. It is considered that the increase in the queue length would severely impact the operation of Langley Vale Road, increasing length and duration of vehicles queuing on the network.

9.1.9 This is noted in the modelling results detailed in Table 8.10 of the TA, which suggest that when the proposed new access is constructed, the RFC on Langley Vale Road is 0.06 with a queue of 0.1 vehicles. Given that queuing already takes place from Farm Lane and Headley Road back along Langley Vale Road to at least Rosebery Road, as can be evidenced in **Appendix D**, the reported junction modelling results are likely to be inaccurate.

9.1.10 In light of the existing situation, the conclusion reached in the TA at paragraph 8.6.7, which states "*demonstrates that the proposed site access junction operates well within capacity for both the vision-led and sensitivity scenarios*", must be taken as duplicitous.

10 Other Notable Transport Concerns

10.1 Adjacent Planning Appeal decision

10.1.1 In reading the wider context of the outline application, it appears that a planning appeal decision (20/00475/FUL) secured on the adjacent Langley Bottom Farm, (by the same applicant), which was granted planning permission for 20 new residential dwellings, has been used as justification for this scheme.

10.1.2 It is noted from the appeal decision that the unsustainable location of the site was a reason for refusal:

> "*Reason for Refusal 2. The proposed development is located within the Green Belt outside the defined Built Up Area, and it is without good public transport links. If the development is permitted, it would encourage journeys that would be heavily reliant on private transport. This would not comply with Policy CS8 and CS16 of the Core Strategy 2007, and paragraphs 102 and 108 of the NPPF 2019*".

10.1.3 It comes across that as this adjacent site has been granted planning on appeal, then the same outcome should be accepted for this outline Application. However, this position fails to acknowledge the fact that this outline application is a new development, whereas the adjacent site was an existing brown field site with a level of movements connected to its extant use operating as Langley Bottom Farm.

10.1.4 Furthermore, the planning Inspector concluded that the small 20-unit residential scheme did not meet the threshold for being a 'significant' development in context of para 105 of the NPPF dated 2019. (Reference to significant development is contained in para 110 of the NPPF 2024).

10.1.5 This outline application is being proposed on land designated as Green Belt land and an Area of Landscape Value; transport remains a material planning consideration and any refusal on these grounds would be based on totally new movements generated by this application site and reflect policies and guidance in place.

10.1.6 It is also important to recognise that there has been a shift in key national planning policy between the 2019 and 2024 iterations of the National Planning Policy Framework (NPPF), with a focus on transport and sustainability.

10.1.7 The 2024 update reflects a more integrated, forward-looking approach, aligning planning with broader climate and place-making objectives. A comparison between the 2019 and 20204 NPPF can be seen in **Table 10-1**.

Table 10-1: Key Differences in 2019 and 2024 NPPF Transport and Sustainability Policies

Policy Theme	NPPF 2019	NPPF 2024
Transport Planning Approach	*Predict and Provide* – infrastructure planned around forecasted demand	*Vision and Validate* – infrastructure shaped by desired outcomes and place-making goals
Car Dependency	Emphasis on mitigating traffic impacts; car use often assumed	Focus on reducing car reliance; prioritises modal shift to sustainable transport
Sustainable Transport Modes	Encouraged but often secondary to road capacity considerations	Central to policy; active travel and public transport are prioritised
Community Engagement	Encouraged but not embedded in transport strategy	Integral to early-stage transport and accessibility planning
Climate and Net-Zero Alignment	General reference to sustainability goals	Explicit alignment with net-zero targets and climate resilience
Integration with Design and Place-Making	Transport treated as a technical consideration	Fully integrated with urban design, accessibility, and community outcomes
Decision-Making Tools	Reliance on traffic impact assessments and mitigation thresholds	Encourages scenario-based planning and accessibility-led development
Policy Language and Framing	Focus on avoiding “severe” transport impacts	Emphasis on shaping sustainable, connected, and inclusive communities

10.1.8 This evolution reflects a broader shift in planning philosophy, from reactive mitigation to proactive place-shaping. The 2024 NPPF encourages local authorities and developers to embed transport and sustainability considerations at the heart of spatial planning, ensuring that development supports long-term environmental and social goals.

10.1.9 This shift is key in the consideration of the outline application, as this demonstrates that the sustainable development in respect of transport has moved on since the appeal decision was made in 2021. As such, the conclusions reached by the Inspector are valid in so far as they relate to the 2019 NPPF. The same position on sustainable development is not reflective in relation to the 2024 NPPF, and this appeal decision for a small residential development on a Brown Field site, generating traffic movements from an extant use, is not comparable to this Outline Planning application.

10.1.10 As the proposed development is designated as Green Belt land and an Area of Landscape Value, transport remains a material planning consideration and any refusal on these grounds would be based on totally new movements generated by this application site.

10.2 Framework Travel Plan

10.2.1 It is recognised that a Residential Travel Plan has been submitted. However, as has already been flagged in this TN this is a typical standard approach and nothing in the FTP provides any assurances or measures that would bring about the level of modal shift being indicated.

10.2.2 Given the unsustainable location and the NPPF requirement to deliver vision-led mitigation measures, the application would be expected to include the submission of a Monitoring and Evaluation Plan (MEP) that set out clear measure that have been agreed with SCC to achieve the modal shift and more importantly have clear and ring-fenced funding secured to deliver the modal shift targets.

10.2.3 In the absence of any committed or funding against the measures, the Travel Plan is not considered sufficiently robust to achieve any of the outlined objectives, principally reducing reliance on private car journeys and increase walking, cycling and public transport use.

10.2.4 The targets set out in Table 5.1 of the FTP are considered totally unrealistic, with limited evidence to justify the modal split connected to this site in an unsustainable location recognised as having limited access to essential day-to-day facilities or no genuine choice of transport modes. Implying that a baseline 57% of people would drive is considered low for a car reliant site. This baseline figure is inconsistent and well below the vehicular trip generation data presented in the TA and is inconsistent with the ‘travel to work census data for the location area (reference **Section 7**). ITP are unsure how this baseline figure has been derived.

10.2.5 Table 5.1 of the FTP also suggested that 10.8% of people would walk and 22.6% of people would use the train. In ITP's view this does not accurately represent the site location, this reflects the misleading and disingenuous approach to the development proposal. While some residents could travel by train, most journeys to a local station are likely to be undertaken by car.

10.2.6 In summary, the FTP's assessment of baseline travel patterns and subsequent reductions in the proportion of trips made by car are unrealistic.

10.3 Environmental Concerns

10.3.1 Another aspect that does not appear to have been taken into consideration are the consequences of an unsustainable development in terms of the environment and health impacts.

10.3.2 As the site will be heavily reliant on private car use, the introduction of new vehicle trips onto Langley Vale Road would increase air pollution as vehicles would increase existing congestion, increasing the amount of time vehicles are sat stationary in queues.

10.3.3 Another consequence of enabling a car reliant development is that people will be less inclined to adopt a sustainable lifestyle, and by placing greater emphasis on accessing essential day-to-day facilities by private car the development does not encourage active travel and an associated healthy lifestyle.

10.3.4 This therefore brings into question whether the environment aspects have been considered in detail or appropriately addressed. As noted in Section 7, the trip generation has already been demonstrated as underestimating the volume of traffic generated at these congested times.

10.3.5 Road safety and air pollution are both concerns as a result of increased traffic generated by the development, adding to congestion and environmental impacts. There are no measures proposed within the application that can be considered to be focused on reducing traffic related air quality emissions, as the measures being proposed are minimal and in no way could be considered as designed to reduce vehicle reliance to the level that could be considered as acceptable.

10.3.6 For this development, all car trips generated by the proposed development would be totally new trips onto the network, as the site has not existing use as it is a field in the Green Belt. This is a significant point as the development will be adding the predicted vehicle trips to an already congested network, introducing a new conflict point, increasing overall delay and increasing the length and duration of the congested period.

11 Summary and Conclusion

11.1 Summary

11.1.1 The proposed development on Land to the North of Langley Bottom Farm, Langley Vale Road, seeks outline planning permission for 110 residential dwellings on Green Belt land. The site is located in a designated Area of Landscape Value and is supported by a Transport Assessment (TA) and Framework Travel Plan (FTP) prepared by the applicant's consultants. This review, commissioned by Langley Vale Action Group and prepared by ITP (Haskoning), critically examines the transport-related aspects of the application, highlighting significant concerns regarding sustainability, highway safety, and policy compliance.

11.1.2 A central issue raised is the unsustainable nature of the site's location. The development is remote, with poor access to essential services such as shops, schools, health, and public transport. Most facilities are well beyond the recommended 800-metre walking distance, and the nearest bus stop exceeds the 400-metre threshold set by national guidance. The area's steep topography further discourages walking and cycling, and the available public transport is infrequent, with buses running only every two hours and no service on Sundays. The site scores just 42 on the Department for Transport's Connectivity Metric, placing it in the bottom 15% nationally, which underscores its poor accessibility.

11.1.3 Highway safety is another major concern. The proposed access road has a steep gradient makes it unsuitable for pedestrians and potentially hazardous for vehicles. Visibility splays and stopping sight distances at the access point fall short of the requirements for a 30mph road, and junction spacing is inadequate. The Road Safety Audit submitted with the application fails to comply with GG119 standards and does not adequately consider equestrian use, despite the site's proximity to Epsom Downs Racecourse and regular horse movements on Langley Vale Road. The RSA does not refer to surface water build-up at the proposed point of access, which is a known and a regular occurrence.

11.1.4 The TA's trip generation analysis is also flawed. It relies on inappropriate TRICS sites, including urban and flatted developments, which do not reflect the rural context or housing type proposed. Car ownership in Langley Vale is high, averaging 2.03 cars per household, yet the TA underestimates vehicle trips by 31% in the AM peak and 41% in the PM peak. As a consequence, vehicle trips are underestimated in the TA by 15 trips in the AM peak hour and 18 trips in the PM peak hour.

11.1.5 Mitigation measures proposed in the TA are standard and do not reflect a vision-led approach as required by the National Planning Policy Framework (NPPF). Measures such as footway widening, EV charging, and car club provision are typical of any significant residential development and do not address the fundamental issues of sustainability. There is no dedicated cycle infrastructure, limited public transport provision, and no funded or enforceable travel plan. The car club proposal is particularly questionable given the high car ownership and proposed car parking levels, making it unlikely to be effective.

11.1.6 The TA also fails to comply with current planning and transport policies. It relies on old guidance, such as the 2007 Manual for Streets, and does not align with the 2024 NPPF, Surrey's Local Transport Plan (LTP4), or the Healthy Streets for Surrey design code. The claimed vision-led approach is superficial and not supported by the analysis or proposed measures. The TA's reliance on older standards and optimistic assumptions misrepresents the site's credentials and overlooks the evolving policy landscape that prioritises sustainable, accessible, and health-promoting development.

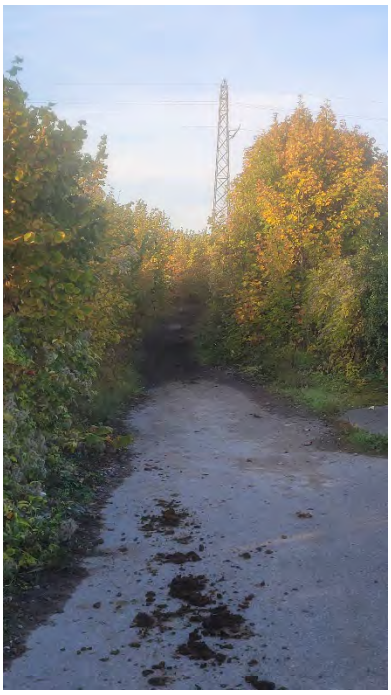
11.1.7 Environmental and health impacts are also a concern. Increased car dependency will worsen air pollution and congestion, particularly given the site's contribution of entirely new trips to an already congested network. The proposed access point is prone to surface water build-up that can lead to localised flooding, and the development's design may exacerbate this issue. The lack of genuine alternatives to car travel undermines efforts to promote sustainable lifestyles and improve public health.

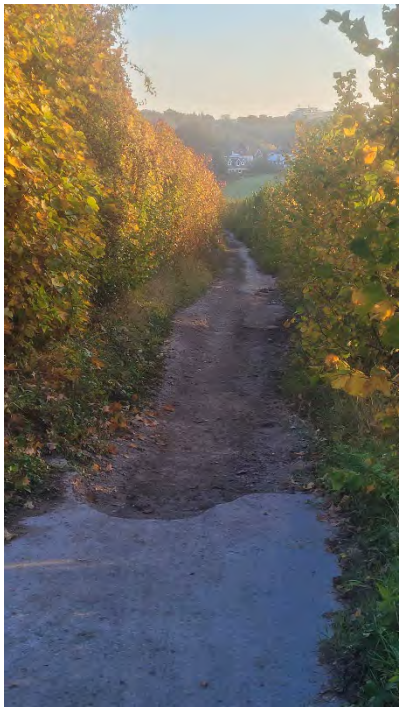
11.2 Conclusion

11.2.1 In conclusion, the review finds that the proposed development is unsustainable, unsafe, and non-compliant with current planning and transport policies. The site's poor accessibility, flawed access design, underestimated traffic impacts, and inadequate mitigation measures all point to a development that fails to meet the standards required for approval for a significant development.

11.2.2 The review recommends that Epsom and Ewell Borough Council object to the application on transport grounds, citing the unsustainable nature of the site, highway safety concerns, and lack of effective mitigation and could consider adding NPPF paragraphs 96, 109 and 117 in addition to those already referred to.

Appendix A – Images of local footways and Bridleways (images dated October 2025)





Appendix B – Photos Extracted from TA

Photo 1: Bridleway Route 33

Photo 2: Bridleway Route 127 / NCR22

Photo 3: Bridleway Route 65

Photo 4: Bridleway Route 66

Appendix C – Images capturing congestion on Langley Vale Road


AV71


Supreme Fuel
133.9
143.9

Appendix D – Equestrian Use on Langley Vale Road

Appendix E – TRICS Analysis

Audit Code: d6e09ea0-b4b2-4485-8fca-84795379d712

Filtering Summary:

Land Use: 03/A RESIDENTIAL/HOUSES PRIVATELY OWNED

Selected Trip Rate Calculation Parameter Range: 80 - 140 DWELLS

Actual Trip Rate Calculation Parameter Range: 4 - 1817 DWELLS

Date Range: Minimum: 01/01/2016 Maximum: 17/09/2024

Parking Spaces Range: All Surveys Selected

Parking Spaces Per Dwelling Range: All Surveys Selected

Bedrooms Per Dwelling Range: All Surveys Selected

Percentage of Dwellings Privately Owned: All Surveys Selected

Population Within 500m Range: 950 2731

Days of the week selected:

Thursday	3
Tuesday	4
Wednesday	2

Main Location Types selected:

Edge of Town	8
Suburban Area (PPS6 Out of Centre)	1

Inclusion of Servicing Vehicles Counts:

Servicing Vehicle Excluded	8
Servicing Vehicles Included	1

Population <1 Mile ranges selected:

10,001 to 15,000	3
15,001 to 20,000	2
5,001 to 10,000	4

Population <5 Mile ranges selected:

100,001 to 125,000	1
125,001 to 250,000	2
25,001 to 50,000	1
5,001 to 25,000	2
50,001 to 75,000	2
75,001 to 100,000	1

Car Ownership <5 Mile ranges selected:

1.1 to 1.5	8
1.6 to 2.0	1

PTAL Rating:

No PTAL Present	9

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 03 - RESIDENTIAL

Category: A - HOUSES PRIVATELY OWNED

Selected Vehicle Type: Total Vehicles

Selected regions and areas:

02	**SOUTH EAST**		
	ES	EAST SUSSEX	2 days
	KC	KENT	1 day
	SC	SURREY	1 day
	WB	WEST BERKSHIRE	1 day
	WS	WEST SUSSEX	1 day
04	**EAST ANGLIA**		
	NF	NORFOLK	3 days
09	**NORTH**		
	IM	ISLE OF MAN	1 day

This section displays the number of survey days per TRICS® sub-region in the selected set.

Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	DWELLS
Actual Range:	4 to 1817 (units:DWELLS)
Range Selected by User:	80 to 140 (units:DWELLS)
Parking Spaces Range:	6 - 2604

Public Transport Provision:

Selection by:	All Surveys Included
Date Range:	01/01/16 to 17/09/24

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Friday	1 days
Thursday	3 days
Tuesday	4 days
Wednesday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	10
Direction ATC Count	0

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines

Selected Locations:

Edge of Town	9 days
Suburban Area (PPS6 Out of Centre)	1 days

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Out of Town	1 days
Residential Zone	9 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:

Servicing vehicles Excluded	9 days
Servicing vehicles Included	1 days

Secondary Filtering Selection:

Use Class:

C3	10 surveys

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

300 - 3200

Population within 1 mile:

10,001 to 15,000	4 surveys
15,001 to 20,000	2 surveys
5,001 to 10,000	4 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

100,001 to 125,000	1 surveys
125,001 to 250,000	3 surveys
25,001 to 50,000	1 surveys
5,001 to 25,000	2 surveys
50,001 to 75,000	2 surveys
75,001 to 100,000	1 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5	9 surveys
1.6 to 2.0	1 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No	1 surveys
Yes	9 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	10 surveys

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

No

LIST OF SITES relevant to selection parameters:

Site 1:	ES-03-A-07	**Site area:**	3.49 hect
Development Name:	MIXED HOUSES & FLATS	**Number of dwellings:**	91 DWELLS
Location:	HAILSHAM	**Housing density:**	34.87
Postcode:	BN27 4FR	**Total Bedrooms:**	256.00
Main Location Type:	Edge of Town	**Survey Date:**	07/11/2019
Sub Location Type:	Residential Zone	**Survey Day:**	Thursday
PTAL:	n/a		

Site 2:	ES-03-A-10	**Site area:**	5.41 hect
Development Name:	MIXED HOUSES & FLATS	**Number of dwellings:**	139 DWELLS
Location:	BEXHILL-ON-SEA	**Housing density:**	33.49
Postcode:	TN39 5DQ	**Total Bedrooms:**	388.00
Main Location Type:	Edge of Town	**Survey Date:**	28/09/2023
Sub Location Type:	Residential Zone	**Survey Day:**	Thursday
PTAL:	n/a		

Site 3:	IM-03-A-06	**Site area:**	6.9 hect
Development Name:	MIXED HOUSES	**Number of dwellings:**	129 DWELLS
Location:	RAMSEY	**Housing density:**	22.28
Postcode:	IM8 2AF	**Total Bedrooms:**	531.00
Main Location Type:	Edge of Town	**Survey Date:**	23/05/2024
Sub Location Type:	Residential Zone	**Survey Day:**	Thursday
PTAL:	n/a		

Site 4:	KC-03-A-10	**Site area:**	3.91 hect
Development Name:	MIXED HOUSES	**Number of dwellings:**	106 DWELLS
Location:	STAPLEHURST	**Housing density:**	33.12
Postcode:	TN12 0GT	**Total Bedrooms:**	311.00
Main Location Type:	Edge of Town	**Survey Date:**	09/05/2023
Sub Location Type:	Residential Zone	**Survey Day:**	Tuesday
PTAL:	n/a		

Site 5:	NF-03-A-34	**Site area:**	3.15 hect
Development Name:	MIXED HOUSES	**Number of dwellings:**	80 DWELLS
Location:	SWAFFHAM	**Housing density:**	31.13
Postcode:	PE37 8GY	**Total Bedrooms:**	256.00
Main Location Type:	Edge of Town	**Survey Date:**	27/09/2022
Sub Location Type:	Out of Town	**Survey Day:**	Tuesday
PTAL:	n/a		

Site 6:	NF-03-A-35	**Site area:**	5.34 hect
Development Name:	MIXED HOUSES & FLATS	**Number of dwellings:**	116 DWELLS
Location:	NORWICH	**Housing density:**	25.55
Postcode:	NR6 7FA	**Total Bedrooms:**	384.00
Main Location Type:	Edge of Town	**Survey Date:**	28/09/2022
Sub Location Type:	Residential Zone	**Survey Day:**	Wednesday
PTAL:	n/a		

Site 7:	NF-03-A-52	**Site area:**	5.31 hect
Development Name:	MIXED HOUSES	**Number of dwellings:**	130 DWELLS
Location:	KING'S LYNN	**Housing density:**	28.76
Postcode:	PE30 3FD	**Total Bedrooms:**	366.00
Main Location Type:	Suburban Area (PPS6 Out of Centre)	**Survey Date:**	07/11/2023
		Survey Day:	Tuesday
Sub Location Type:	Residential Zone		
PTAL:	n/a		

Site 8:	SC-03-A-11	**Site area:**	5.82 hect
Development Name:	MIXED HOUSES	**Number of dwellings:**	96 DWELLS
Location:	FARNHAM	**Housing density:**	25.07
Postcode:	GU9 0AX	**Total Bedrooms:**	272.00
Main Location Type:	Edge of Town	**Survey Date:**	14/05/2024
Sub Location Type:	Residential Zone	**Survey Day:**	Tuesday
PTAL:	n/a		

Site 9:	WB-03-A-03	**Site area:**	3.9 hect
Development Name:	MIXED HOUSES	**Number of dwellings:**	108 DWELLS
Location:	READING	**Housing density:**	36.24
Postcode:	RG31 7ET	**Total Bedrooms:**	286.00
Main Location Type:	Edge of Town	**Survey Date:**	09/09/2022
Sub Location Type:	Residential Zone	**Survey Day:**	Friday
PTAL:	n/a		

Site 10:	WS-03-A-14	**Site area:**	2.83 hect
Development Name:	MIXED HOUSES	**Number of dwellings:**	117 DWELLS
Location:	LITTLEHAMPTON	**Housing density:**	42.70
Postcode:	BN17 7PL	**Total Bedrooms:**	371.00
Main Location Type:	Edge of Town	**Survey Date:**	20/10/2021
Sub Location Type:	Residential Zone	**Survey Day:**	Wednesday
PTAL:	n/a		

DESELECTED SURVEYS

Site Ref	Survey Date	Reason for Deselection
AN-03-A-10	07-06-2024	Northern Ireland excluded
AS-03-A-02	20-04-2022	Scotland excluded
ES-03-A-08	12-10-2022	c. 20% Flats
ES-03-A-14	30-04-2024	c. 20% Flats
HC-03-A-28	08-11-2021	c. 20% Flats
TY-03-A-02	14-03-2019	Northern Ireland excluded
WS-03-A-19	15-05-2023	c. 20% Flats
WS-03-A-22	19-03-2024	c. 15% Flats

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Total Vehicles

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00					
06:00-07:00					
07:00-08:00	**10**	**111**	**0.107**	**0.339**	**0.446**
08:00-09:00	**10**	**111**	**0.161**	**0.412**	**0.573**
09:00-10:00	**10**	**111**	**0.143**	**0.159**	**0.302**
10:00-11:00	**10**	**111**	**0.123**	**0.144**	**0.267**
11:00-12:00	**10**	**111**	**0.139**	**0.123**	**0.262**
12:00-13:00	**10**	**111**	**0.162**	**0.154**	**0.316**
13:00-14:00	**10**	**111**	**0.154**	**0.149**	**0.303**
14:00-15:00	**10**	**111**	**0.158**	**0.217**	**0.375**
15:00-16:00	**10**	**111**	**0.283**	**0.179**	**0.462**
16:00-17:00	**10**	**111**	**0.277**	**0.177**	**0.454**
17:00-18:00	**10**	**111**	**0.379**	**0.181**	**0.560**
18:00-19:00	**10**	**111**	**0.312**	**0.158**	**0.470**
19:00-20:00					
20:00-21:00					
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			**2.398**	**2.392**	**4.790**

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

Parameter Summary:

Trip rate parameter range selected:	80 - 140 (units: DWELLS)
Survey date date range:	07/11/2019 - 23/05/2024
Number of weekdays (Monday-Friday):	10
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	10
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Appendix F – Surface Water Build-up

Haskoning is an independent consultancy since 1881, combining engineering, design and consultancy services with software and technology to deliver more added value for clients. Based on our mission Enhancing Society Together, we take responsibility for having a positive impact on the world and contributing to the United Nations Sustainable Development Goals. We challenge ourselves and our clients to develop sustainable solutions to local and global issues related to the built environment, infrastructure and industry.

Change is happening. And it's happening fast – from climate change to geopolitical tension and from the energy transition, digital transformation to changing customer demands. The speed and extent of these changes create complex challenges that cannot be addressed in isolation. We offer new perspectives to address the broader societal and technological picture and meet the needs of our ever-changing world.

Backed by the expertise of over 6,800 employees, we work from offices in more than 25 countries worldwide. We are helping clients to turn their challenges into opportunities and make the transition to smart and sustainable operations.

We act with integrity and transparency, holding ourselves to the highest standards of environmental and social governance. We are diverse and inclusive. We will not compromise the safety or well-being of our team or communities – no matter the circumstances.

We actively collaborate with clients from public and private sectors, partners and stakeholders in projects and initiatives. Our actions, big and small, are driving the positive change the world needs, and are enhancing society now and for the future.

Haskoning is a 'Royal' business as designated by the Royal House of the Netherlands in 1981.

Our head office is in the Netherlands, and we have offices across Europe, Asia, Africa, Australia and the Americas

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