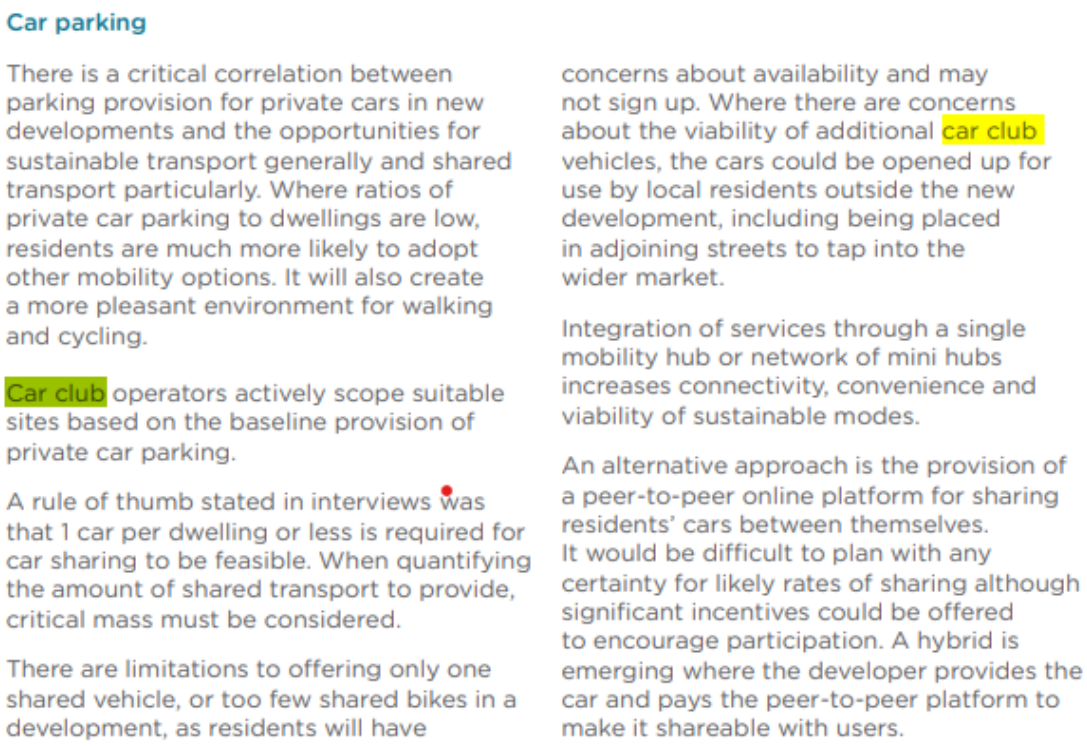
RESPONSE FROM ITP (TRANSPORT CONSULTANT) ON "ENHANCED TRANSPORT STRATEGY" SUBMITTED BY FAIRFAX – 05/11/2025 (Reference planning application 25/00846/OUT)

The i-Transport (9th October 2025) note fails to recognise a key policy consideration in NPPF paragraph 110, which states 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."*** It can be argued that the proposals set out in the new i-Transport report do not offering a genuine choice.

To argue that the site is sustainable in transport terms, emphasis is being heavily placed on proposed improvements to cycle connectivity, bus connectivity and the introduction of a car club.

**Car Club**

While a car club operator has been identified, the long-term viability of this proposal remains questionable. Car club vehicles are generally well utilised in areas with low levels of car ownership. The extract below is taken from the 2022 document *New Developments and Shared Transport : Cutting Car Dependency*, published by COMO (Collaborative Mobility UK), a national charity dedicated to promoting and supporting shared transport. It highlights that *"car club operators actively scope suitable sites based on the baseline provision of private car parking. A rule of thumb stated in interviews was that 1 car per dwelling or less is required for car sharing to be feasible"* .Car ownership rates in Langley Vale are known to be significantly higher than this benchmark, and the proposed development would adopt the local authority's 'minimum' parking standards, resulting in more than one space per dwelling. Consequently, the long-term viability of the car club is highly uncertain.



Car parking

There is a critical correlation between parking provision for private cars in new developments and the opportunities for sustainable transport generally and shared transport particularly. Where ratios of private car parking to dwellings are low, residents are much more likely to adopt other mobility options. It will also create a more pleasant environment for walking and cycling.

Car club operators actively scope suitable sites based on the baseline provision of private car parking.

A rule of thumb stated in interviews was that 1 car per dwelling or less is required for car sharing to be feasible. When quantifying the amount of shared transport to provide, critical mass must be considered.

There are limitations to offering only one shared vehicle, or too few shared bikes in a development, as residents will have concerns about availability and may not sign up. Where there are concerns about the viability of additional car club vehicles, the cars could be opened up for use by local residents outside the new development, including being placed in adjoining streets to tap into the wider market.

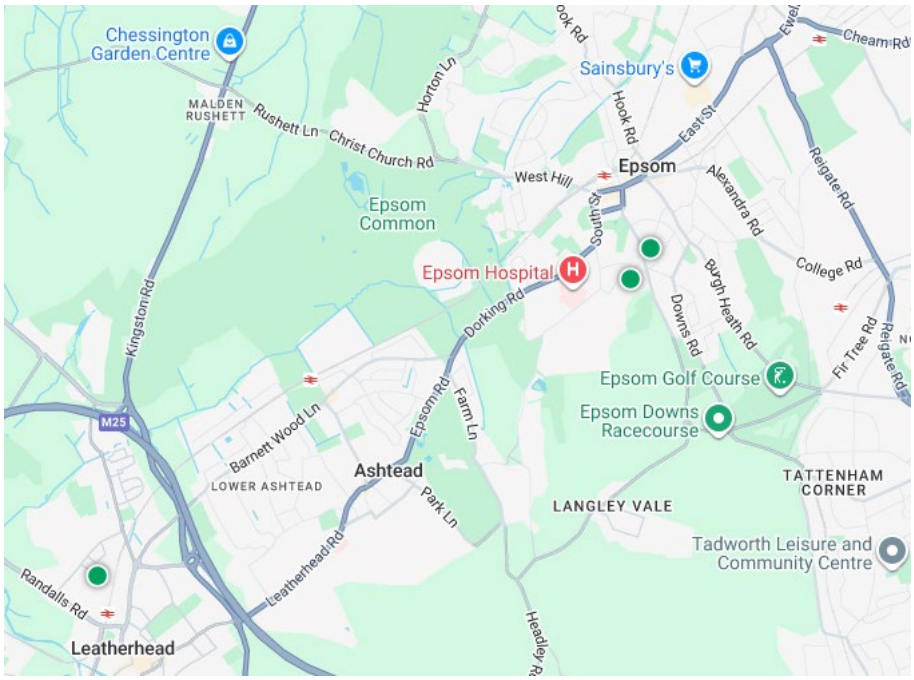
Integration of services through a single mobility hub or network of mini hubs increases connectivity, convenience and viability of sustainable modes.

An alternative approach is the provision of a peer-to-peer online platform for sharing residents' cars between themselves. It would be difficult to plan with any certainty for likely rates of sharing although significant incentives could be offered to encourage participation. A hybrid is emerging where the developer provides the car and pays the peer-to-peer platform to make it shareable with users.

Reference¿New.Developments.and.Shared.Transport¿Cutting.Car.Dependency".document.(8688).published.by.COMO.(Collaborative.Mobility.UK)¡

i-Transport state that the Car Club operator would be Enterprise. Looking at the Enterprise website, they appear to have two cars in Epsom and one in Leatherhead (see mapping below). The new car club vehicle in Langley Vale would not form part of a wider (local) network, with residents relying on a single vehicle to accommodate demand.

Where Enterprise vehicles are located, these are in the built-up areas of Epsom and Leatherhead; locations that do have access to a range of public transport services and where residents may be less reliant on the use of a private car.




Source¿https¿—www¡enterprisecarclub¡co¡uk

Surrey County Council publish guidance on 'Car Clubs in New Development' (August 2018 - Guidance on Car Clubs in new developments). Under the heading Criteria for a Successful Car Club the following table is provided. In my view, items 1, 2, 3, 4, 5, 6, 7, 9 and 10 would not be met by this development, indicating that not only would Surrey's own criteria not be met by the proposal, but that the car club would have little impact on the sustainability credentials of the development.

| | Location success factors | Yes | No |
|---|---|---|---|
| 1 | In an urban area, with high population density (above 25 persons per hectare) and easy access to local amenities by walking and cycling.<br>*See Annex1: Population density by ward* | | |
| 2 | High density residential development (50 dwellings or more per hectare), with a high proportion of one and two bedroom dwellings. | | |
| 3 | Car club to be easily accessed by, and visible to, occupants of the development and the surrounding neighbourhood. | | |
| 4 | Identified potential day-time business use, to complement evening / weekend residential use. | | |
| 5 | Good accessibility to public transport: Within 800m walking distance of a train station with a minimum two services per hour in peak time and / or within 400m of a bus stop with a minimum service of one bus every 30 minutes. | | |
| 6 | Parking constraint within the development and within surrounding streets:<br>For residential developments a parking ratio of no more than 1 space per unit. For business premises with a minimum threshold of 2500m$^2$ a maximum of 1 car space per 100m$^2$.<br>Within an area in which on-street parking is controlled, or other evidence of local parking pressure. | | |
| 7 | Car-free developments (developments in which there are no parking spaces provided within the curtilage of the site). | | |
| 8 | Favourable socio-economic and demographic characteristics: In upper quartile of Surrey wards ranked for car club potential considering levels of private car ownership, number of people working and MOSAIC profile.<br>*See Annex 2: Car club potential by ward.* | | |
| 9 | Will be part of an existing car club network in the wider area and occupants of the development will have access to that network. | | |
| 10 | To be delivered as part of a coherent package of sustainable transport measures, normally as part of a Residential Travel Plan for a large-scale development (ideally promoted at point of sale) or a Business Travel Plan. | | |

Source: Car clubs in new developments August 2018, Surrey County Council

## Cycle Connectivity

i-Transport propose to formalise a cycle connection to Epsom from Langley Vale, via Headley Road. The image given by i-Transport to represent the design solution to this route is replicated below. The image shows advisory cycle lanes, with cyclists being overtaken by motor traffic, with a sizeable gap between the car and the cyclist.


Headley Road is narrow and does not provide the width illustrated above for cars and cyclists. The route descends steeply towards Ashtead Garden Centre, includes blind bends, and has a poor carriageway surface, particularly in the areas where cyclists would be expected to travel (see image below).

Source: Goggle images

The suggested route is, in part (and where the route is at its narrowest), subject to a 40mph speed limit. The national design guide for the cycle infrastructure (LTN 1/20) states that:

**7.2.4** Close overtaking can be intimidating and hazardous to cyclists in free-flowing traffic. Only at speeds lower than 30mph might a minimum clearance of 1.0m be acceptable. No values are given for speed limits greater than 30mph because cyclists should be provided with protected space away from motor traffic (see Figure 4.1).

Figure 4.1 of the same design guide is replicated below.

| Speed Limit[1] | Motor Traffic Flow (pcu/24 hour)[2] | Protected Space for Cycling | | | Cycle Lane (mandatory/ advisory) | Mixed Traffic |
|---|---|---|---|---|---|---|
| | | Fully Kerbed Cycle Track | Stepped Cycle Track | Light Segregation | | |
| 20 mph[3] | 0 | | | | | |
| | 2000 | | | | | |
| | 4000 | | | | | |
| | 6000+ | | | | | |
| 30 mph | 0 | | | | | |
| | 2000 | | | | | |
| | 4000 | | | | | |
| | 6000+ | | | | | |
| 40 mph | Any | | | | | |
| 50+ mph | Any | | | | | |

Provision suitable for most people

Provision not suitable for all people and will exclude some potential users and/or have safety concerns

Provision suitable for few people and will exclude most potential users and/or have safety concerns

Notes:
1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied
2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow
3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day

Source: LTN1/20 (Figure 4.1 – Appropriate protection from motor traffic on highways)

Importantly, Figure 4.1 of LTN 1/20 states that a 40mph section of carriageway with an advisory cycle route would exclude most potential users and/or raise safety concerns.

To ensure alignment with LTN 1/20 Figure 4.1, traffic volumes and vehicle speeds on the roads affected by the proposals should be established.

In terms of the required width of an advisory cycle lane, the national guidance (LTN1/20) states:

> **6.4.3** Cycle Lanes less than 1.5m wide should not normally be used as they will exclude the use of the facility by larger cycles and are therefore not inclusive. They can also encourage 'close-passing' of cyclists by motorists, who tend to judge their road position with reference to the nearside marking.

Given the narrow width of the Headley Road carriageway, we are unsure how 1.5m cycle lanes could be provided on both sides of the carriageway and still accommodate vehicular movement in an appropriate way. The section of route, within the 40mph zone, does not appear to have the width for the proposed design to be implemented.

Given the narrowness of the route, the bends in the road, the poor forward visibility for drivers the poor carriageway surface, i-Transport's proposal appears inappropriate. If this cycle scheme is required to make the development acceptable, then it is requested that the concept design be developed further and then be subject to a safety audit prior to planning determination.

Notwithstanding the appropriateness of the design, the topography of the route has not been considered or referred to in the report. The i-Transport report assumes a cycling speed of 16kph, which is plausible for cyclists routing towards Epsom. However, this cycling speed is not plausible (in the vast majority of cases) for cyclists travelling from Epsom towards Langley Vale, with a steep gradient impacting the route.

The proposed route incorporates bridleway B146. Would the proposal incorporate change of surface on this PROW to encourage cycling? Presumably not, given the use of this route by equestrian users.

In summary, the topography of the route, the speed limit, the carriageway surface, the narrow carriageway and limited forward visibility make the route unsuitable for the installation of advisory cycle lanes. With or without an advisory cycle lane, the route will not be attractive to the vast majority of Langley Vale residents and does not offer a meaningful alternative to the use of the private car. If the cycle scheme is required to make the development acceptable, then the proposal should be subject to a Road Safety Audit, and the Auditor should be made aware of where the design deviates from guidance. It is also questioned as to whether any such scheme, if deliverable, offers a genuine choice for future residents.

**Public Transport Improvements**

Image 5.2 of the i-Transport document extends the area of the proposed built development to the south-east, in comparison to Image 6.1 – are there ambitions for a further residential expansion within the defined red line?

The i-Transport report refers to the provision of a financial contribution to extend the Surrey Connect service to cover both the proposed development and the village of Langley Vale. The

proposed value of the contribution is not provided, however. It is not, therefore, known whether the contribution would be sufficient to result in meaningful impact to local travel patterns.

While the DDRT service is helpful, it is not sufficient to make an unsustainable location, sustainable. The service operates with mini-buses and we understand that the service does not support journeys to school. Given the site's location, the ability to own and maintain a car will be required for the majority of occupiers and while the DDRT service may become available, it is unlikely to impact car ownership levels and the car will remain quicker and more convenient. It is, therefore, unlikely that the DDRT service would have a meaningful impact on the development's mode share.

In relation to the Grosvenor Road bus stop improvements, in the absence of any detailed designs regarding the raised kerb for bus passengers, it is questioned as to whether this is could be deliverable, both in height and length of kerb space required for such a measure, without requiring significant changes to the footway levels, potentially impacting access to properties on Grosvenor Road. Should such a scheme be proposed, then detailed design would be expected to be submitted for a design critique to be undertaken.

### Walking Improvements

While walking improvements are unchanged from the previous i-Transport proposal, save their inclusion in a S278 agreement, the drawings provided highlight a potential issue with vehicle tracking. The addition of a pedestrian refuse island at the junction of Grosvenor Road and Beaconsfield Road could impact the ability for larger vehicles to access. I-Transport should demonstrate the ability of the measure to accommodate the swept path of a lorry.