



Little Park Farm
Farm Lane
Ashtead
KT21 1LT

30th August 2025

Issued to:

Micheal Green
Surrey County Council Highways

By Email

Dear Mr Green

Thankyou for your letter of 13th August 2025. I have now had time to consult with a highways/transportation expert.

Your letter is not particularly helpful and it simply regurgitates a lot of the answers that you gave at the planning meeting which missed the key points that we and other local residents raised.

These are:

1). The method of modelling employed to assess the MVDC Local Plan is not detailed enough to demonstrate the scale of the impact of the developments. A microsimulation model was not used. Had this been undertaken there is a potential for the queueing that already occurs between Knoll roundabout and the M25 roundabout to have been evident. This would then present a different impact to National Highways which we feel is being ignored.

2). The cumulative impact of the multitude of local developments has so far not been assessed using a detailed microsimulation model. Also, the microsimulation should include the Ermyn House plans included in the local Plan, i.e. 140 new homes on this site. It is public knowledge that the developer who owns Ermyn House, in December 2024 requested a screening opinion for not 140 but 360 homes. This should also have been included in the modelling to test the sensitivity of the impact of the combined numbers of new homes between 410 and 630 homes on both sites. In addition. the impact of Bul Hill in Leatherhead where 450 or 550 new homes are planned will also potentially impact the local road network and add to traffic using routes to the M25 and Knoll roundabout. These should also be added in and tested.

There are several responses you provided in your letter that I want to make sure we are clear on.

Modelling - our comments on this mainly relate to the local more detailed assessment presented in the TA for the Ermyn Way site. We acknowledge that the SINTRAM modelling evaluated cumulative impact of the Local Plan but,



1). that is strategic in nature and does not model the road network in detail,

and 2). this, therefore needs to be supported by a local assessment capable of replicating patterns of traffic and congestion on the A24 corridor and M25 Junction 9.

I'm afraid we feel that the developer of the Ermyn Way site has been allowed to undertake a sub-standard assessment based on Junctions 9 and LINSig which looks at junctions individually. The assessment is not capable of assessing blocking back of queues along the A24 and onto the M25 and doesn't assess the impact that the school drop off and pick up activity has in adding to congestion.

The TA has painted an incorrect picture of the existing situation and therefore the forecast situation with development.

A microsimulation model should have been requested as you have done for the Bull Hill Leatherhead site. We consider all these points need to be picked up by any future planning applications, with each nearby development being included in the modelling to assess the cumulative impact.

Vision and validate approach - we appreciate this approach is being advocated by central government but feel we are neither getting investment in highways solutions nor schemes to encourage public transport and active travel with the Ermyn Way site, so effectively the worst of both worlds. We are yet to see the S106 but it is essential that the package of improvements ensures 'that there is adequate provision for other modes' to quote your letter. This means the delivery of the new Toucan crossings at the Knoll roundabout (to provide a real walking and cycling route to Leatherhead Town centre) and the full crossings at the Grange Road junction (to provide a viable route to local schools as well as Ashted centre). We are nervous about the commitment to these measures and without them all new residents will drive. They are needed to make sure the site is 'more sustainable in terms of active travel'

Position of National Highways' - thank you for acknowledging that delays resulting in congestion back onto the M25 would constitute an unacceptable level of danger and therefore an appropriate reason to refuse development. We do not understand why National Highways (NH) did not object to the Ermyn Way development but you indicate that it is because the modelling didn't show any impact. This comes back to our view that the local modelling for the Ermyn Way site was not fit for purpose. We maintain that it is well known that the road network suffers from long queues during the peak hours in both directions on the A24 which includes blocking back from the Grange Road signals into the Knoll roundabout from there into the M25 junction 9 roundabout and onto the motorway off slip. If NH relied on the local modelling which does not show any of this then it is no surprise that they did not object particularly if they don't live locally and observe conditions on a daily basis.

Ermyn House - you referred to this in your letter. The office use here is not fully occupied and therefore any assessments are underestimating the trip generating potential of the site. This does not appear to have been addressed by the TA for Ermyn Way. You've indicated that the developer of Ermyn House will probably 'bank' the trip generation of the (fully occupied) office use and offset it against the proposed residential use. I'm sure you recognise this but the tidal flows associated with office are the complete opposite of those for residential so this needs to be properly evaluated by the sites TA. The existing traffic counts undertaken by the developer already include the existing



underoccupied office uses which generates very low traffic volumes, therefore to allow the full office trip generation to be banked is not a true reflection of the current use.

TRICS database – thank you for confirming this will be used to assess the trip generation for all future sites. It will be helpful to know though why this wasn't done for Ermyn Way because we cannot tell whether the trip rates used for that site were representative.

So, as you can see, we are still not satisfied with the approach that was permitted in relation to planning application MO/2025/0033 Land South of Ermyn Way. We do not accept that this was assessed in enough detail in terms of modelling and failed to assess the cumulative impact of other committed developments in the area.

We believe the consequences of this to be that the TA provided and accepted by SCC and NH was insufficient to understand the detailed implications of the increased traffic. It also failed to assess the sensitivity of the range of new homes planned in the area. This is evident from the regular queueing that already occurs at peak times and was not reflected in the results of the TA modelling.

We would request and expect these shortcomings to be corrected in the methodology of assessing all future developments in this location such as Bull Hill/Swan Centre Leatherhead, Ermyn House Ashtead, and any additional developments in the local plan and nearby including any just over the district boundary with Elbridge.

We will be reviewing all future planning applications and will repeat these comments unless we can see that microsimulation modelling based on the full quantum of committed and Local Plan site allocations has been provided by the developers.

I have copied this letter to National Highways in order that they may also be aware of our concerns.

Yours sincerely

Craig Beresford

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CC by email

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