

ROVIA

Nutfield Park Developments Limited

Former Laporte Works Site Nutfield Green Park, Nutfield

Proof of Evidence

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On Transport Matters (CD11.12) Volume 1 (Text)

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1 Introduction

- 1.1 This is the proof of evidence of David Robert Bird. I am a Chartered Engineer and a member of the institution of Civil Engineers. I am a Director of Rovia, a firm of transport consultants specialising in the assessment of all forms of development. I was previously a founding Director of Vectos for 14 years. I have over 35 years' experience specialising in the transport effects of development on behalf of both private sector clients and local authorities. I undertake work for a range of major companies in the transport, housing, retail and commercial sectors, and have extensive experience of presenting evidence at public inquiries.
- 1.2 Rovia has particular expertise and experience of dealing with development sites and currently acts for a broad range of clients including The Crown Estate, Greycoat, Berkeley Group and RPG (formerly Commercial Estates Group). I have provided advice on policy issues to various statutory and non-statutory bodies and assisted with the drafting of the transport section of the original version of NPPF in 2012.
- 1.3 I have wide experience of assessing residential developments and am currently acting on a number of major schemes including Hemel Garden Communities, Bourn Airfield, Culham, Chelmsford Garden Community, Beckton Gasworks, and Kensal Rise.
- 1.4 I am appointed by Nutfield Park Developments Limited (also referred to as the Applicant from here on) to provide transport and highways advice in relation to this site. I have visited the appeal site, and the area within which it is located, on a number of occasions.
- 1.5 My initial involvement in the project was when I was a Director of Vectos (part of SLR), who were the appointed transport consultants. This appointment transferred to Rovia when I joined Rovia on 19 November 2025.

Engagement with Stakeholders

- 1.6 I and colleagues have sought to engage pro-actively with Surrey County Council (SCC), in their role as County Highway Authority (CHA) and Tandridge District Council (TDC) as planning authority before and after submission of the planning application. This led to extensive negotiations on the transport mitigation package and eventual agreement of the package with Surrey CC in Spring 2025.

Agreements and Outstanding Issues

Surrey County Council

- 1.7 Following the extensive engagement with SCC, they withdrew their objection in a response dated 14th March 2025 (CD9.1), recommending various conditions and S106 contributions in the event permission is granted. This included a £4M contribution towards the expansion of the existing 'Surrey Connect' Digital Demand Responsive Transport (DDRT) service; improvements to the National Cycle Route 21 between the site and Redhill, pedestrian/cycle crossing improvements over the A25; speed reduction measures and a junction capacity enhancement. The following is an extract of SCC's response:

“If this [£4M] figure is provided as a S106 contribution, as recommended, towards DDRT and public transport services, along with the other improvements listed above, the CHA would no longer be in a position to sustain the previous objection on highway sustainability and capacity grounds.

The above measures would also reduce the severity of impacts on highway capacity to an acceptable degree and it is acknowledged that the appropriate method for mitigating impacts on highway capacity in the current policy context is through enhanced public transport measures.

It remains the case that this is not an ideal location for the type and scale of development proposed in transport terms, particularly with the diffuse nature of the proposed site layout, however of the above measures are secured then there would be some material benefits to the local and wider transport network due to the highways and public transport improvements.

Providing the funding proposed towards public transport facilities as a contribution towards the wider DDRT scheme and existing bus services not only represents a far more robust mechanism to deliver secure long-term facilities but also has the benefit of providing improved infrastructure for existing residents”.

Tandridge District Council

- 1.8 TDC issued their Delegated Officer’s Report on the 2nd of October 2025 (CD3.1). The report included two Reasons for Refusal. The Reason for Refusal that is relevant to my evidence is shown below.

“The proposed development would constitute inappropriate development in the Green Belt causing significant harm to the openness and harm to the visual amenities of the Green Belt. The proposal would not comply with the requirements of paragraphs 155 and 156 of the National Planning Policy Framework (2024) as the development would not be in a sustainable location and necessary improvements would not be made to local infrastructure to cater for the needs of the occupiers of the new development. No very special circumstances exist, either individually or cumulatively, to clearly outweigh the harm by reasons of inappropriateness and other identified harm. As such, the proposal is contrary to the provisions of Policies DP10 and DP13 of the Tandridge Local Plan Part 2: Detailed Policies and the provisions of the National Planning Policy Framework (2024) as a whole.”

Overview

- 1.9 Taking an overview of the above, we have the situation where the competent transport authority, SCC, after very detailed consideration, concluded that, as a result of the transport measures introduced as part of the proposals, they were satisfied that the measures were fit for purpose and there were no highway sustainability nor capacity reasons not to grant planning permission. Furthermore, they concluded that *“there would be some material benefits to the local and wider transport network”* and *“also has the benefit of providing improved infrastructure for existing residents”*. Hence, they concluded that the appeal proposals are satisfactory and there are benefits to the existing community.

- 1.10 Notwithstanding the above, TDC object on the basis that *“the development would not be in a sustainable location and necessary improvements would not be made to local infrastructure to cater for the needs of the occupiers of the new development”*.
- 1.11 Therefore, the matter that I consider in this proof is: whether the proposed development, including the transport related measures, will be locationally sustainable from a transport perspective when measured against the relevant policy tests.

Scope of Evidence

- 1.12 In this proof of evidence, I will:
- Describe the location of the appeal site from a transport perspective;
 - Provide a summary of the relevant transport policies;
 - Explain the transport measures that form part of the proposals;
 - Demonstrate that the proposals have an acceptable impact on the local highway network;
 - Consider the compliance of the proposals with relevant transport policies;
 - Consider the Reasons for Refusal;
 - Address third party objections; and
 - Summarise and Conclude my evidence.

Declaration

1.13 The evidence which I have prepared and provided for this appeal (in this proof of evidence) is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinion.

David Robert Bird

A handwritten signature in black ink, appearing to read 'DR Bird', is written on a white rectangular background. The signature is cursive and somewhat stylized.

.....

2 Existing Situation

2.1 In this section I give a brief description of the site and its location focussing on the transport aspects. Whilst I give a brief description of the existing walking, cycling and public transport provision, I provide further details on these aspects within the Proposed Development section of the proof (**Section 4**).

The Appeal Site

2.2 The appeal site is described within the SOCG (CD8.1). However, I give a brief summary below.

2.3 The site currently consists of a mixture of grassland, blocks of self-seeding woodland and waterbodies in the northern part of the site with an area of the former infrastructure remains to the south of the site, including access roads and pipework and former settlement lagoons. The site is partially publicly accessible with several public rights of way (PROW) footpaths throughout (see later).

2.4 The site comprises the former Laporte Works Site which was an operational mineral extraction and processing facility until 1986 before it was decommissioned in 1997.

2.5 The site is bound by former restored landfill to the west, Chilmead Lane and residential properties to the north, Nutfield Marsh Road / Church Hill to the east, and the A25, Nutfield Road, and residential properties to the south. The strategic site location is shown in **Image 2.1** and the local site location is shown in **Image 2.2 and 2.3**.

Image 2.1: Strategic Site Location Plan

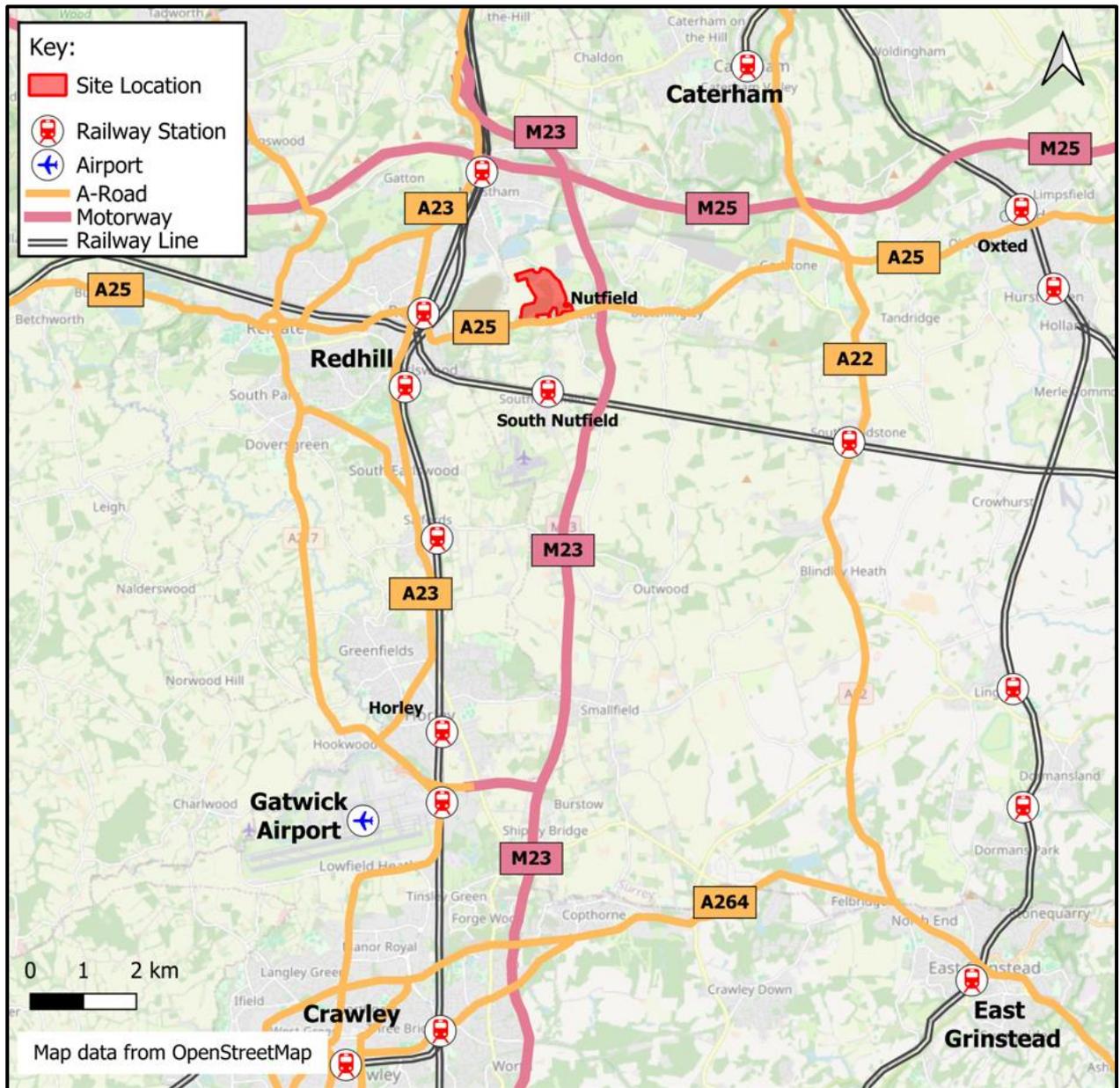


Image 2.2: Local Site Location Plan

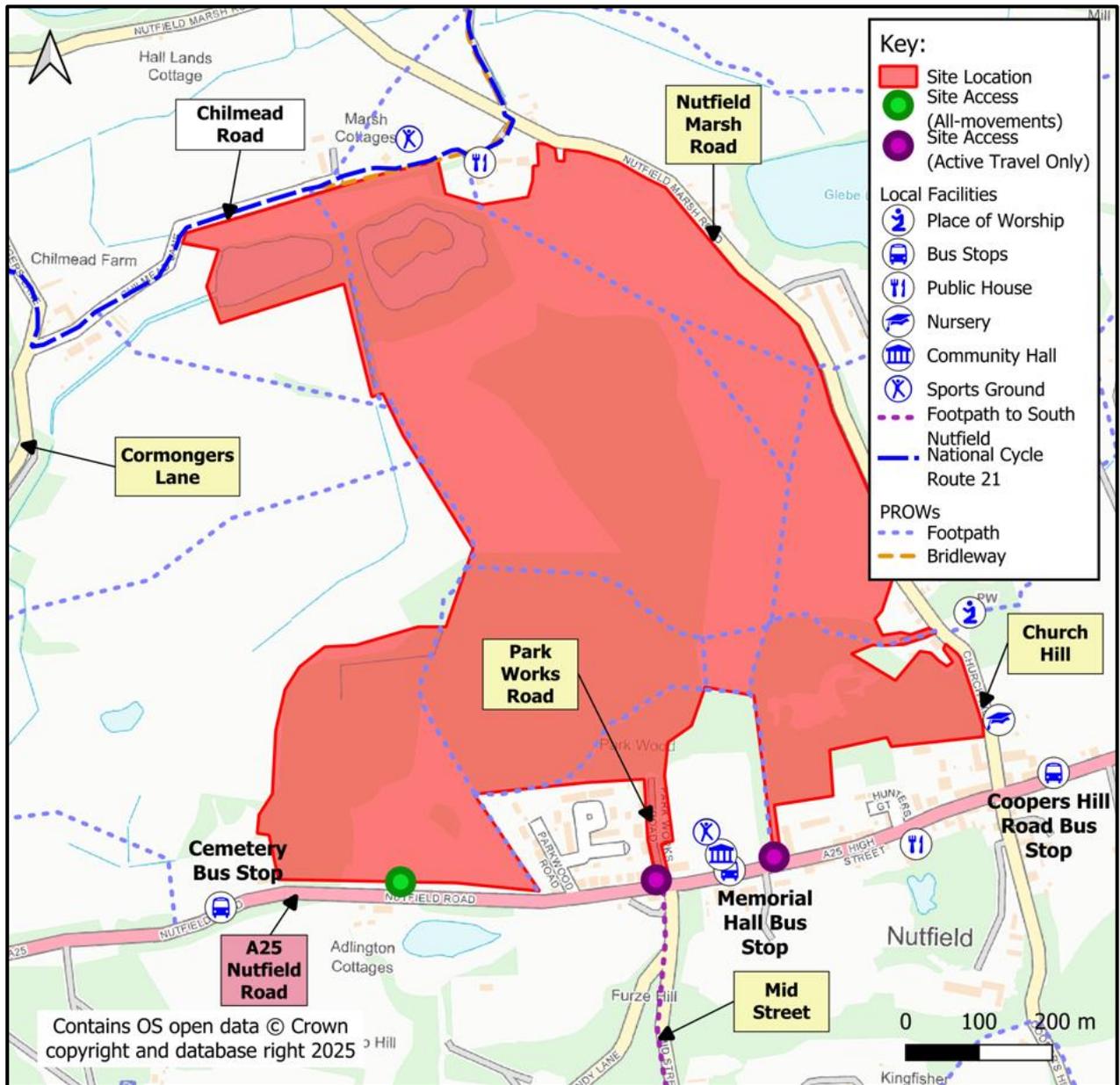
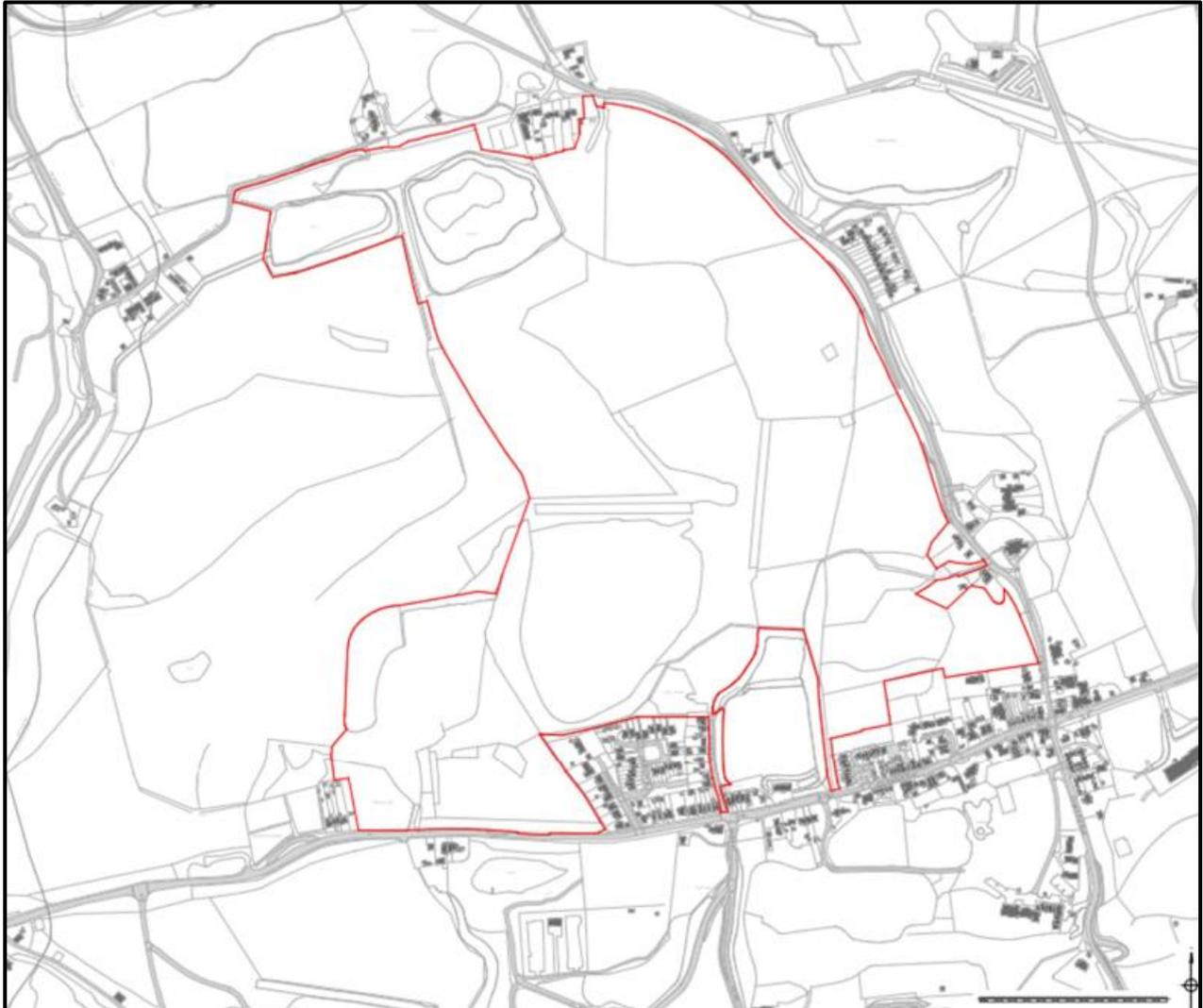


Image 2.3 – The Site



Accessibility by Non-Car Modes

Walking and Cycling

- 2.6 A footway is present along the northern side of Nutfield Road (A25) along the site's southern frontage, providing access into Nutfield. Directly to the east of Nutfield Road's junction with Mid Street, an informal pedestrian crossing is present comprising tactile paving, dropped kerbs and a central refuge island. This provides access to westbound bus stops along Nutfield Road and Mid Street to the south. Along the A25, the footway provides connections to bus stops, Nutfield Memorial Hall, The Queen's Head public house, Crown veterinary clinic, the A25 garage, Nutfield Day Nursery and St Peter and St Paul church to the east.
- 2.7 There is an existing pedestrian access point to the site along Park Works Road which is a very lightly trafficked local residential access road with a low-speed environment. Park Works Road connects to the existing footway along Nutfield Road to the south. The road is within the ownership of the applicant.

2.10 Whilst there is limited cycle provision along the A25 Nutfield Road itself, National Cycle Network Route (NCNR) 21 runs along the northern edge of the site boundary at Chilmead Lane and Cormongers Lane. NCNR21 is provided in the form of an on-road provision along Chilmead Lane Cormongers Lane, beyond which, the route becomes an off-road provision continuing west into Redhill via Nutfield Marshes. This is shown below in **Image 2.5**.

Image 2.5: National Cycle Route 21



2.11 To the north-east of the site, NCR21 routes towards the M25 Junction 7 via Bridleway 119 and Bletchingley Road whereby it connects to NCR20 routing north towards Coulsdon, and NCR21 continuing east towards South Caterham and Woldingham.

Bus Provision

2.12 The site is served by a number of bus services.

2.13 The nearest bus stops to the site are located on Nutfield Road and Mid Street to the south of the site. The ‘Cemetery’ bus stops on Nutfield Road are located approximately 350m west of the proposed site access and are accessible on foot using the footway along the northern side of the carriageway. The Nutfield Road bus stops are served by bus routes 400, 410 and 610 and the Mid Street bus stops by route 315. The frequency of service on these routes is summarised in **Table 1**.

Table 1: Existing Bus Service Frequency

Bus No.	Route	Frequency (Monday-Friday)	Frequency (Saturday)	Frequency (Sunday)
315	Dormansland – Lingfield Station – Blindley Heath – South Nutfield – Redhill Bus Station – East Surrey Hospital	5 services per day (1 is a school service)	-	-
400	East Grinstead – Three Bridges Station - Crawley Bus Station – Gatwick Airport – Redhill Bus Station – Nutfield - Godstone - Caterham	2 per hour (until 20:10)	2 per hour (until 19:08)	1 per hour (until 18:07)
410	Snow Hill - South Godstone Station – Broadham Green – Hurst Green – Oxted Station – Godstone – Bletchingley – Nutfield – Redhill Bus Station	2 per hour (until 19:56)	2 per hour (until 18:46)	1 per hour (until 17:44)
612	Smallfield – South Nutfield – Bletchingley – Godstone Green – Oxted	School Service	-	-

2.14 These services provide for direct access to Redhill Bus Station within a circa 15 minute peak period total journey time. Redhill Bus Station is immediately adjacent to Redhill Railway Station which is deemed the most attractive nearby station for rail trips due to its wide range of destinations and good frequencies (ranging from 2 - 5 services per hour to each destination). Furthermore, Redhill Bus Station is located within the town centre of Redhill with a wealth of facilities, shops, and leisure venues accessible within a 400m walking distance.

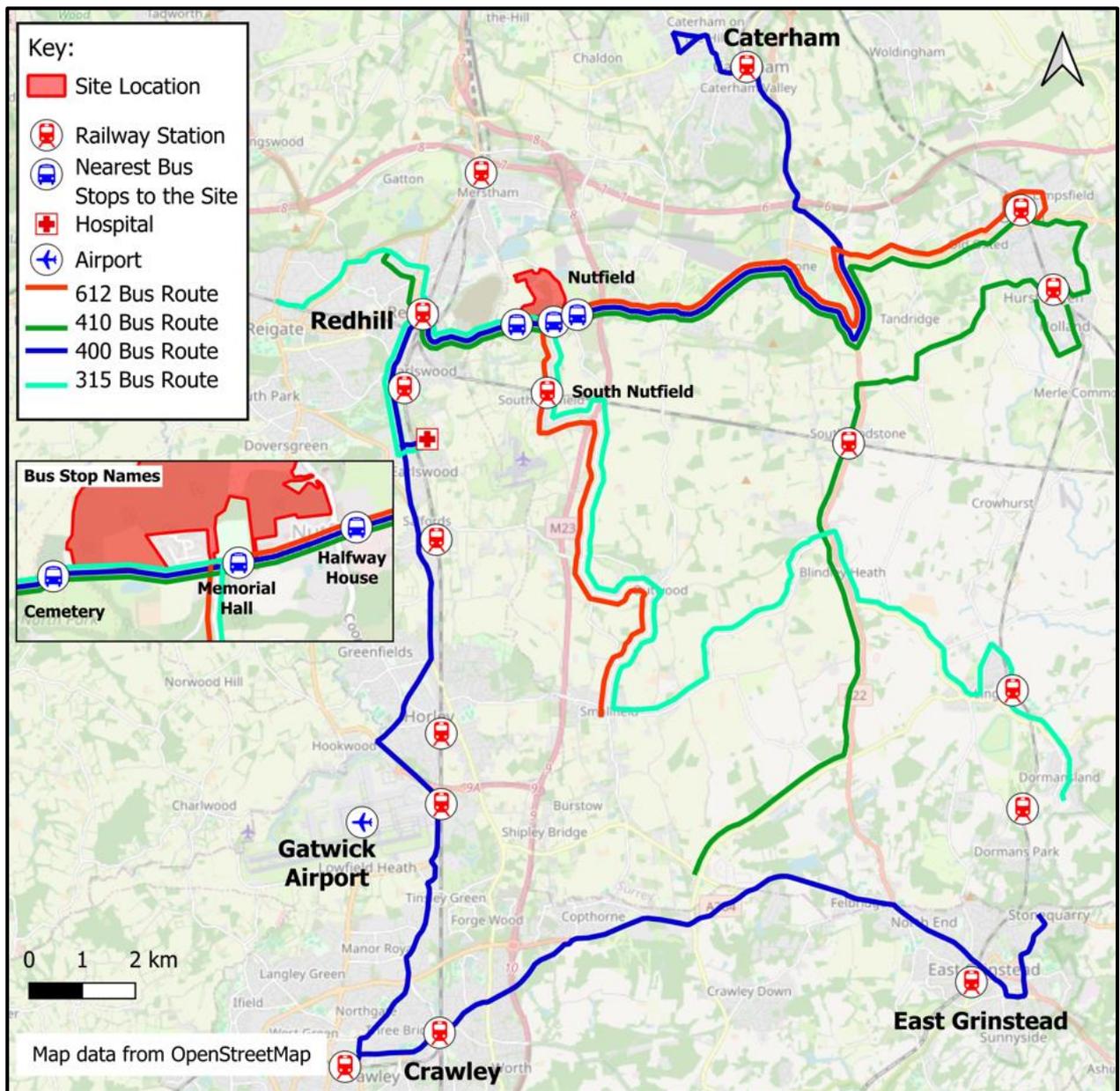
2.15 The table below shows the bus timings between the Cemetery bus stops and Redhill during peak periods. As can be seen, between 7.20 and 9.20 in the morning there are 10 services. In the evening peak between 16.30 and 18.36 there are 7 services:

Table 2: Cemetery Bus Stop Services via Redhill – Peak Times

AM Bus Services to Redhill (07:00-10:00)		PM Bus Services from Redhill (16:00-19:00)	
Bus Service	Time	Bus Service	Time
400	07:23	400	16:15
410	07:24	410	16:31
410	07:50	400	16:54
400	07:55	410	17:32
315	08:00	400	17:32
410	08:17	410	18:02
400	08:26	400	18:14
410A	08:45	410	18:36
400	09:00	400	18:36
410	09:20	410	19:01
400	09:33		
410	09:50		
Total AM Peak Period Services	12	Total PM Peak Period Services	10

2.16 I have provided a plan showing the aforementioned bus routes with key destinations at **Image 2.6**.

Image 2.6: Local Bus Service Route Plan



Rail Provision

- 2.17 The nearest rail station to the site is Nutfield Station which is 1.7km to the south via Mid Street and Station Approach. Nutfield Station provides local services between Tonbridge and Redhill.
- 2.18 Redhill Station is located 3km to the west of the site and can be reached directly by bus routes 315, 400 and 410, and by cycle ride within circa 12 minutes.
- 2.19 Redhill Station provides a much more comprehensive list of services to destinations such as Gatwick Airport, Peterborough, Reading, Tonbridge, Horsham, London Victoria, Bedford and Reigate with between 2 – 5 services per hour.

2.20 A summary of all of the rail services, destinations and frequencies from Nutfield and Redhill stations are set out in **Table 3** below with frequencies to key destinations shown at **Table 4**.

Table 3: Rail Services

Route	Frequency		
	Monday - Friday	Saturday	Sunday
Nutfield Station			
Tonbridge – Leigh (Kent) – Penshurst – Edenbridge – Godstone – Nutfield - Redhill	1 per hour	1 per hour	1 per hour
Redhill Station			
Gatwick Airport – Redhill – East Croydon – London Bridge – London St Pancras International – Luton Airport Parkway - Bedford	2 per hour	2 per hour	2 per hour
Horsham – Crawley – Three Bridges – Gatwick Airport – Redhill - East Croydon – London Bridge – London St Pancras International – Stevenage - Peterborough	2 per hour	2 per hour	No direct services
Redhill – Reigate – Guildford – Farnborough North – Blackwater – Wokingham - Reading	2 per hour	2 per hour	2 per hour
Tonbridge – Leigh (Kent) – Penshurst - Edenbridge – Godstone – Nutfield - Redhill	1 per hour	1 per hour	1 per hour
Reigate – Redhill – Merstham – Coulston South – Purley – East Croydon – Clapham Junction – London Victoria	2 per hour	2 per hour	No direct services

Table 4: Key Destinations by Rail – Peak Hours

AM Rail Services (07:00-10:00)		PM Rail Services (16:00-19:00)	
Destination	Time	Origin	Time
Nutfield Station			
From Nutfield		To Nutfield	
Tonbridge	07:27	Tonbridge	16:21
	07:59		16:51
	08:46		17:44
	09:30		18:14
Redhill	07:44	Redhill	16:35
	08:26		17:04
	09:00		18:08
	09:51		18:38
Redhill Station			
From Redhill		To Redhill	
London Bridge	Every 15 mins	London Bridge	Every 15 mins
London Victoria	Every 30 mins	London Victoria	Every 30 mins
East Croydon	Every 10 mins	East Croydon	Every 10 mins
Gatwick Airport	Every 10 mins	Gatwick Airport	Every 10 mins
Crawley	Every 15 mins	Crawley	Every 30 mins

Highway Network

A25 Nutfield Road

- 2.21 The A25 Nutfield Road is located along the southern boundary of the site and is a two-way single carriageway road. It is subject to a 40mph speed limit which reduces to a 30mph speed limit upon entrance to the settlements of Nutfield and Bletchingley.
- 2.22 The A25 routes through Redhill Town Centre and Redhill Rail Station to the west where the road joins a number of local roads via a 5-arm around (The Station Roundabout) to connect to the M25 westbound at Junction 8. To the east, the A25 routes through Godstone providing a connection to the M25 at Junction 6 via the B2235.

Mid Street

- 2.23 Mid Street routes in a north-south alignment between the A25 Nutfield Road and South Nutfield. The road is a two-way single carriageway set in a cutting of vegetation with a footpath partly set back behind a row of hedgerow/trees along the western side.

2.24 Mid Street is subject to a 30mph speed limit. Access to Nutfield Rail Station can be reached via North Station Approach and South Station Approach to the west of Mid Street.

3 Planning Policy

3.1 In this section I provide a summary of the current transport related policy guidance at national and local level which is relevant to the development proposals. I do not provide a detailed analysis of how the development proposals comply with these policies, since I cover that in my Analysis section of this proof.

National Policy

3.2 The key national policy documents that I have reviewed are as follows:

- National Planning Policy Framework, December 2024 (CD5.1);
- Draft National Planning Policy Framework – December 2025 (CD5.2);

County and District Council Policy

3.3 The key local policy documents that I have reviewed are as follows:

- SCC Local Transport Plan 4, July 2022 (CD6.43);
- Surrey County Council Bus Service Improvement Plan - June 2024 (CD6.48);
- Vehicular, Electric Vehicle and Cycle Parking Guidance for New Developments’ -February 2023 (CD6.49)
- TDC Core Strategy, 2008 (CD4.1);
- TDC Local Plan Part 2, 2014 (CD4.2);
- TDC Parking Standards Supplementary Planning Document, 2012 (CD6.44).

Policy Review

National Policy

National Planning Policy Framework (NPPF) - December 2024 (CD5.1)

3.4 The National Planning Policy Framework (NPPF) was originally published by the Ministry of Housing, Communities and Local Government in March 2012. Since then, the NPPF has been updated several times, and the most recent version was updated and published in December 2024.

3.5 The NPPF sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for development can be produced and planning applications assessed.

3.6 In Section 2, under the heading “Achieving sustainable development”, paragraph 8 b) refers to “.....*fostering well designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;*” Paragraph 9 sets out that the decision maker should “*take local circumstances into account, to reflect the character, needs and opportunities of each area*”.

3.7 Paragraph 109 states that with regards to promoting sustainable transport, issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should include:

- *“a) making transport considerations an important part of early engagement with local communities;*
- *b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;*
- *c) understanding and addressing the potential impacts of development on transport networks;*
- *d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;*
- *e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and*
- *f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”*

3.8 Paragraph 110 states that:

“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.[...]”

3.9 Paragraph 115 states that:

“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 Code⁴⁸; 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.”*

3.10 Paragraph 116 states that:

“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.”

3.11 Annex 2 (Glossary) provides the definition of a Sustainable Transport Mode as:

“Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport”

Draft National Planning Policy Framework – December 2025 (CD 5.2)

3.12 It is also instructive to consider the 2025 December draft of the NPPF. The transport related policies are broadly similar to the current version. However, I note the following:

3.13 Policy TR1 states:

“locating proposed development where it can support sustainable patterns of movement and make effective use of existing or proposed transport infrastructure, reflecting the principles in policy TR3”.

3.14 Policy TR3 (Locating development in sustainable locations) states at paragraph 1 (d):

“In rural areas, opportunities to improve wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed.”

3.15 As well as the NPPF policy document, central government has also published a number of transport related documents in recent years setting out their direction of travel. I refer to two below.

Bus Back Better - March 2021 (CD6.45)

3.16 DfT published its long term strategy for buses in England, outside of London in March 2021. DfT acknowledge in this guidance that buses are at the centre of the public transport network and are key to delivering wider government priorities. The government’s goal is to make buses more frequent, more reliable, easier to understand and use, better co-ordinated and cheaper.

3.17 With regards to making buses more frequent, it is stated in the opening bullet point of Chapter 2 that *“in low-density areas and at low-demand times of day, demand responsive vehicles can provide much higher levels of service than conventional fixed bus routes.”*

3.18 To make bus services more comprehensive in rural areas, the policy states at page 30 within Chapter 2 *“more services should operate in the evenings, weekends, and at night, and to smaller towns and villages, sometimes using new forms of demand responsive transport.”*

3.19 The benefits of demand responsive bus services are set out in the document and these include the provision of a more direct door to door service than a traditional fixed route bus service. Demand responsive services can be particularly useful to improve provision in the countryside and in the evenings and on Sundays, including serving large workplaces with anti-social hours, such as hospitals, tackling the issue of hospital car parking.

Decarbonising Transport – A Better, Greener Britain - 2021 (CD6.46)

- 3.20 Of particular note in this document is the reference to promoting the 20-minute neighbourhoods (Page 157).

Future of Transport – Supporting Rural Transport Innovation - 2023 (CD6.47)

- 3.21 The DfT produced this report in 2023 to support rural communities to make smarter travel choices. The report acknowledges the importance of rural roads for everyday journeys and seeks to deliver greater choice of modes by enabling innovation in rural mobility.
- 3.22 In the introduction the then Minister of State for Transport states:

“The government is working hard to ensure that rural areas are prosperous and thriving across the whole of the UK. Improving the quality of life in rural areas and boosting opportunity and growth are fundamental to this ambition, and the connectivity which transport offers is a key enabler of prosperity for people and business in rural areas”.

“New services such as shared and demand responsive transport, are creating more choice for travellers than ever before”

“Emerging technologies can complement existing transport options and rural areas represent a significant potential market for transport innovators to expand into”

- 3.23 On page 35 the document states:

Survey evidence shows that people are interested in active travel in rural areas. The Department for Transport recognises that barriers posed by distances in many rural contexts and is investing in rural cycle infrastructure. The advent of e-cycles will help lower these barriers for some journeys, increasing confidence and bringing into range trips that would have previously been considered unviable”

- 3.24 On page 40 the document states;

“Demand responsive Transport (DRT) is a form of shared mobility that allows users to specify their desired location, pick up time and drop off time, usually through an online platform, app or phone service. These eservices are especially attractive in rural areas, where demand can be dispersed and fixed route services such as buses, can be difficult to operate commercially.”

“DRT is an exciting and practical addition to fixed-route bus services.”

County Council PolicySurrey County Council Local Transport Plan 4 2022-2032 - July 2022 (CD6.43)

- 3.25 The Surrey Local Transport Plan 4 (LPT4) was adopted on 12th July 2022. LTP4 includes plans to reduce the 46% of carbon emissions currently generated by transport.

3.26 The LTP4 sets out four priority objectives as follows:

- Net zero carbon emissions – To rapidly reduce carbon emissions, ensuring that Surrey is on track for net zero emissions by 2050;
- Sustainable growth – To support Surrey’s growth ambitions and enable business and people to prosper sustainably;
- Well-connected communities – To provide well connected communities that encourage social mobility and ensure no-one is left behind; and
- Clean air and excellent quality of life – To create thriving communities with clean air, excellent health, wellbeing and quality of life.

3.27 The proposals run to 2030 and beyond, and are set out into nine policy areas summarised as follows:

- Planning for Place – Including establishing ‘20-minute neighbourhoods’ and ensuring new development focuses on sustainable travel options
- Digital Connectivity – Through promoting and supporting access to high quality connectivity
- Active Travel / Personal Mobility – Promote more journeys on foot, bicycle, scooting, e-cargo, hire schemes etc
- Public / Shared Transport – Including development of Mobility Hubs and expanding shared transport provisions
- Demand Management for Cars – Including changing parking supply and charging mechanisms, and traffic calming measures
- Demand Management for Goods Vehicles – Promote delivery restrictions and consolidation, and altering traffic routing to decrease is certain locations / times of day
- Efficient Network Management – Managing the operation and maintenance of the highway network with targeted capacity improvements
- Promoting Zero Emission Vehicles – Planning and enabling charging / fuelling infrastructure, and expand the use of Electric Vehicle car clubs
- Supporting Behaviour Change – Awareness campaign e.g. adopting technology, gamifications etc

3.28 LTP4 sets out a roadmap for implementing these nine policy areas. More detail on timings and delivery is provided in the LTP4 Delivery Plan which was published in 2022. The roadmap is separated into short, medium, and long-term timescales and takes into account the scale of change needed to achieve the LTP4 objectives, particularly the rapid reduction in carbon from our transport system.

- **Short term (2022-25)**
 - Develop 20-minute neighbourhoods
 - Extensive rollout of fibre broadband and 5G mobile coverage
 - Develop LCWIPs programme to deliver high quality networks of walking and cycling corridors connecting neighbourhoods to key destinations
 - Post COVID-19 recovery measures in line with Bus Back Better
 - Reduce parking and increase costs to incentivise low carbon alternatives
 - Minor road capacity improvements to alleviate congestion
 - Implement county EV charge point network including on-street, on route and destination charging points
 - Inform, educate, promote and incentivise measures within the other policy areas
- **Medium Term (2025-30)**
 - Develop mobility hubs
 - Develop Mobility as a Service (MaaS) and journey planning with shared transport solutions and mobility credits
 - Implement consolidation and delivery hubs
 - Use technologies to best use data to provide efficient management of travel conditions
 - Accelerate uptake of EV / hydrogen for own fleet, taxi, car club fleet and public / shared transport fleet
- **Long Term (2030+)**
 - Improve rail and bus services combined with shared Demand Responsive Travel (DRT) services
 - Potential national eco-levy (pay-as-you-drive) if carbon reduction targets not met
 - Adopt Connected Infrastructure (C-ITS)

Surrey County Council Bus Service Improvement Plan - June 2024 (CD6.48)

3.29 SCC's Bus Service Improvement Plan (BSIP) supports the expansion of DDRT services in the county as these services can provide all residents and across all age groups with greater flexibility with travel times and destinations, together with increased hours of operation.

'Vehicular, Electric Vehicle and Cycle Parking Guidance for New Developments' -February 2023 (CD6.49)

3.30 SCC parking guidance is set out in the 'Vehicular, Electric Vehicle and Cycle Parking Guidance for New Developments' (February 2023). The residential element of the guidance refers to minimum standards for Use Class 'C3 Dwelling Houses', and the care home with Use Class 'C2 Care Homes/Nursing Homes', as shown in **Table 5** below.

3.31 **Table 5** outlines the cycle parking standards.

Table 5: SCC Minimum Cycle Parking Standards

Use Class		Minimum Standard
C3 Residential	Flats / houses without garages or gardens: 1 and 2 bedroom unit	1 space
	Flats / houses without garages or gardens: 3 or more bedroom unit	2 spaces
C2 Residential institutions		Individual Assessment

3.32 **Table 6** outlines the car parking standards.

Table 6: SCC Car Parking Standards

Use Class		Minimum Standard
C3 Residential	1 and 2 bed flats	1 space per unit
	1 and 2 bed houses	1.5+ spaces per unit
	3 bed houses	2+ spaces per unit
	4+ bed houses	2+ spaces per unit
C2 Residential institutions		1 car space per 2 residents OR individual assessment/justification

3.33 **Table 7** outlines the electric vehicle parking standards.

Table 7: SCC Electric Vehicle Parking Standards

Residential Development	EV Charging Requirement	Charge Point Specification	Power Requirement
Houses	1 fast charge socket per house, plus cable routes for any additional spaces.	7 kilowatt Mode 3 with Type 2 Connector	230 volts alternating current (AC) 32 Amp Single Phase dedicated supply
Flats and apartments	1 fast charge socket per flat (allocated and unallocated spaces), plus cable routes for any additional spaces.	7 kilowatt Mode 3 with Type 2 Connector	230 volts AC 32 Amp Single Phase dedicated supply
C2 Care and Nursing Home	50% of available spaces to be fitted with a fast charge socket, plus cable routes for any additional spaces.	7 kilowatt Mode 3 with Type 2 Connector	230 volts AC 32 Amp Single Phase dedicated supply

District Council Policy**Tandridge District Core Strategy (CD4.1)**

- 3.34 The Tandridge District Core Strategy was adopted in October 2008, with the aim to establish a vision for the district and outline key policies, until 2026.
- 3.35 Policy CSP 1 relates to the Location of Development and it states that;
- *“In order to promote sustainable patterns of travel and in order to make the best use of previously developed land, development will take place within the existing built up areas of the District (the Category 1 settlements listed below) and be located where there is a choice of mode of transport available and where the distance to travel to services is minimised subject to the third paragraph of this policy.”*
- 3.36 Policy CSP 11 addresses the requirement for Infrastructure and Services and states;
- *“Appropriate levels of infrastructure and services will be sought through both public and private funds. In assessing infrastructure and service requirements the Council will have regard to the cumulative impact of development. Developers will be required to contribute to improved infrastructure and services (including community needs) necessary to support the proposed development; the Council will generally require such provision to be made before the development is occupied. Planning permission will only be granted for developments which increase the demand for off-site services and infrastructure where sufficient capacity exists or where extra capacity can be provided, if necessary through developer funded contributions.”*
- 3.37 Policy CSP 12 states in relation to Managing Travel Demand:
- *“The Council will require new development to:*
 - *Make improvements, where appropriate, to the existing infrastructure network, including road and rail, facilities for bus users, pedestrians and cyclists and those with reduced mobility.*
 - *Have regard to adopted highway design standards and vehicle and other parking standards.*

Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (CD4.2)

- 3.38 The Tandridge Local Plan Part 2: Detailed Policies 2014-2029 was adopted in July 2014, and supports the Core Strategy by detailing planning policies to be applied in the assessment of planning applications, from 2014-2029.
- 3.39 DP1 frames the entire document, with ‘Sustainable Development’ being outlined as the *“Council’s overarching policy for assessing development proposals in the District”*, stating:

- *“When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.*
- *Planning applications that accord with the policies in this Local Plan... will be approved without delay unless material considerations indicate otherwise.”*

3.40 Chapter 5 of the document is concerned with Highway Safety and Design, with DP5 stating:

- *“Development will be permitted subject to meeting the requirements of all other appropriate Development Plan policies and where the proposal:*
 - *Complies with the relevant Highway Authority’s and any other highways design guidance;*
 - *Does not unnecessarily impede the free flow of traffic on the existing network or create hazards to that traffic and other road users;*
 - *Retains or enhances existing footpaths and cycleway links;*
 - *Provides safe and suitable access to the site which is achievable by all and promotes access by public transport, foot, and bicycle to nearby residential, commercial, retail, educational, leisure and recreational areas where appropriate; and*
 - *Fully funds where appropriate or contributes towards the costs of any measures required to cost effectively mitigate the significant impacts arising from the development.”*

4 Development Proposals

4.1 In this section I give a description of the scheme proposals as they relate to transport.

Summary of Proposed Development

4.2 The Applicant is seeking planning consent with all matters reserved except for access for the following:

- Up to 166 residential units inclusive of market and affordable homes and self-build plots (Class C3);
- Up to 70 care home beds (Class C2);
- Up to 41 extra care units (Class C2);
- Up to 1,500 sqm Class E(e), F2 flexible use floorspace including health care and community floorspace;
- A new vehicular access junction onto the A25 including pedestrian / cycle facilities;
- Improved cycleways and footpaths; and
- An extensive on-site Biodiversity Net Gain of a minimum of +22%.

4.3 In addition, a package of transport improvements will be provided/funded by the development which I consider within this section. The illustrative masterplan is included at **Appendix A** with an extract included at **Image 4.1** below.

Image 4.1: Illustrative Masterplan



Transport Proposals

4.4 A summary of the transport provision proposed as part of the appeal scheme is as described below. The measures are shown on the two plan extracts below: **Image 4.2** – An enhanced version of The Access and Movement Parameter Plan (which is provided at **Appendix B**) and **Image 4.3** – A25 Strategy – which is also included at **Appendix D**.

Image 4.2: Access and Movement Parameter Plan (Enhanced Version)

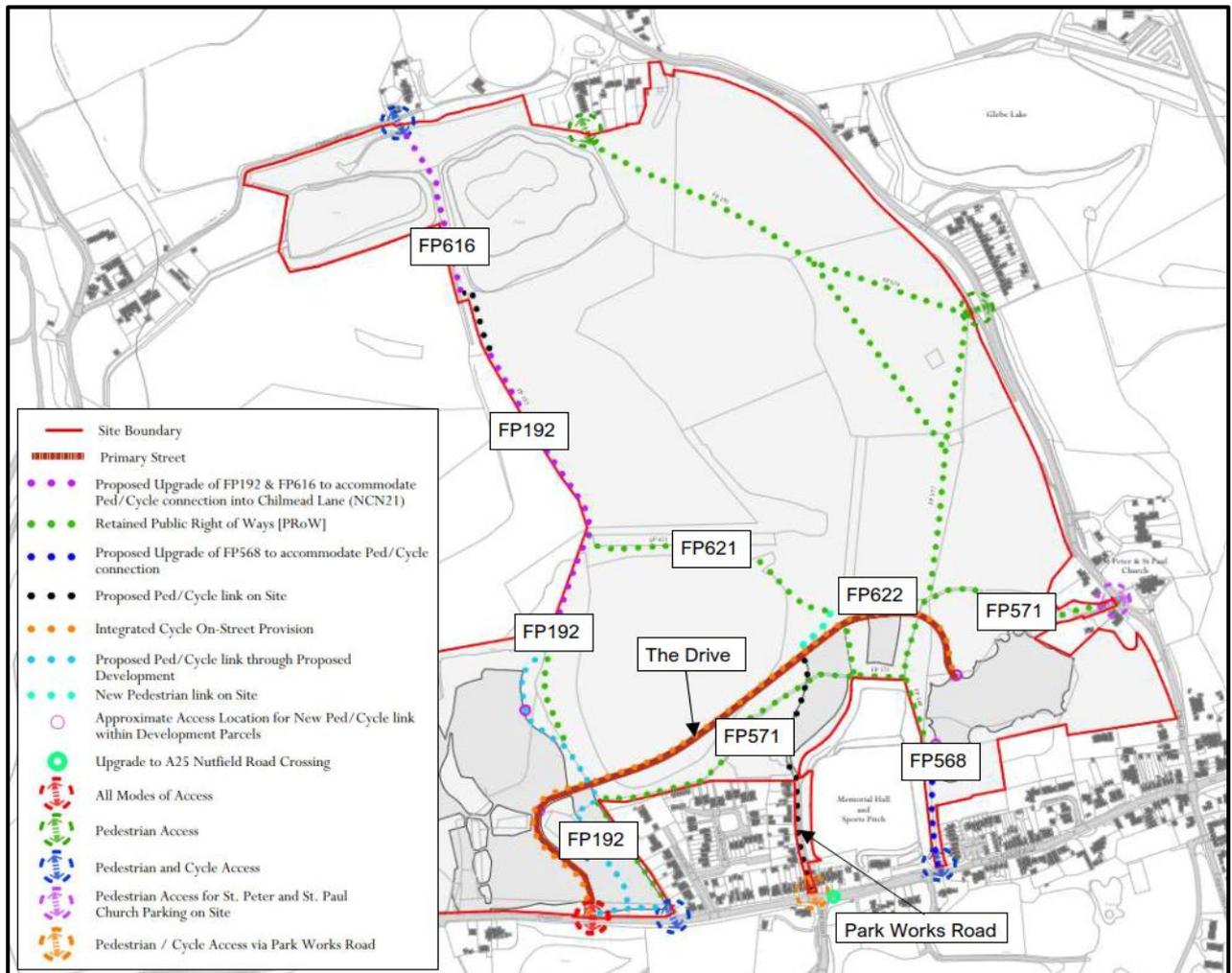
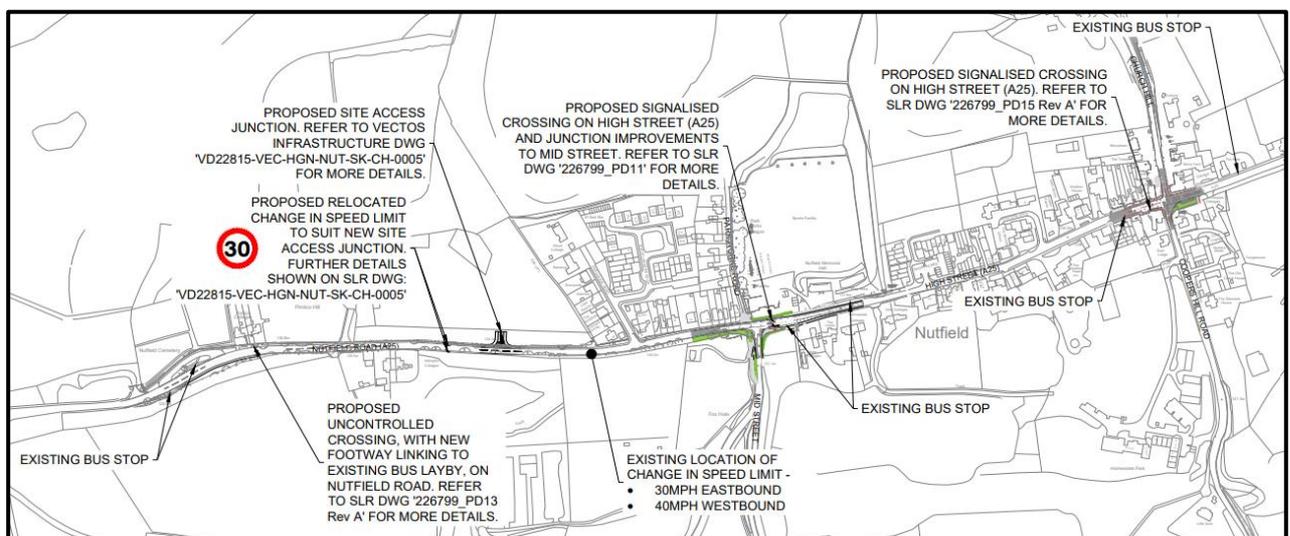


Image 4.3: A25 Strategy



4.5 The proposed measures are as follows:

On Site

- New all-vehicle access onto A25;
- A spine road (The Drive) that provides vehicular access to the site development areas;
- A network of cycle and footpaths that provide connections within the site and connect externally – to the A25, Church Hill and to Chilmead Lane to the north of the site.

Off Site

- A signal controlled pedestrian crossing on the A25 to the west of the junction with Cooper's Hill Road and Church Hill;
- A signal controlled pedestrian crossing on the A25 to the east of the junction with Mid Street;
- A pedestrian crossing on the A25 to the west of the development;
- Alterations to the A25 junction to provide improved capacity on the Mid Street Arm;
- Extension of the existing speed limit to the west of the site access;
- A continuous cycle route, between the site and Redhill (NCR21 improvements).

Contributions

- A contribution of £4M towards extension of the existing Digital Demand Responsive Transport bus scheme operating within Tandridge to provide an additional bus within the area surrounding the appeal site.

Travel Plan

- Introduction of a comprehensive Travel Plan.

4.6 I deal with each of these elements in greater detail in the paragraphs below.

On SiteOn Site Provision of Facilities

4.7 As described by Mr Henley in his evidence (CD11.3), the planning application includes for E(e) and F2 floorspace. Mr Henley explains that this is flexible to allow the end user to be defined at detailed design stage to ensure its form aligns with the community's needs. The floorspace is able to accommodate, for example, a small convenience store and medical consulting rooms.

Vehicular Access

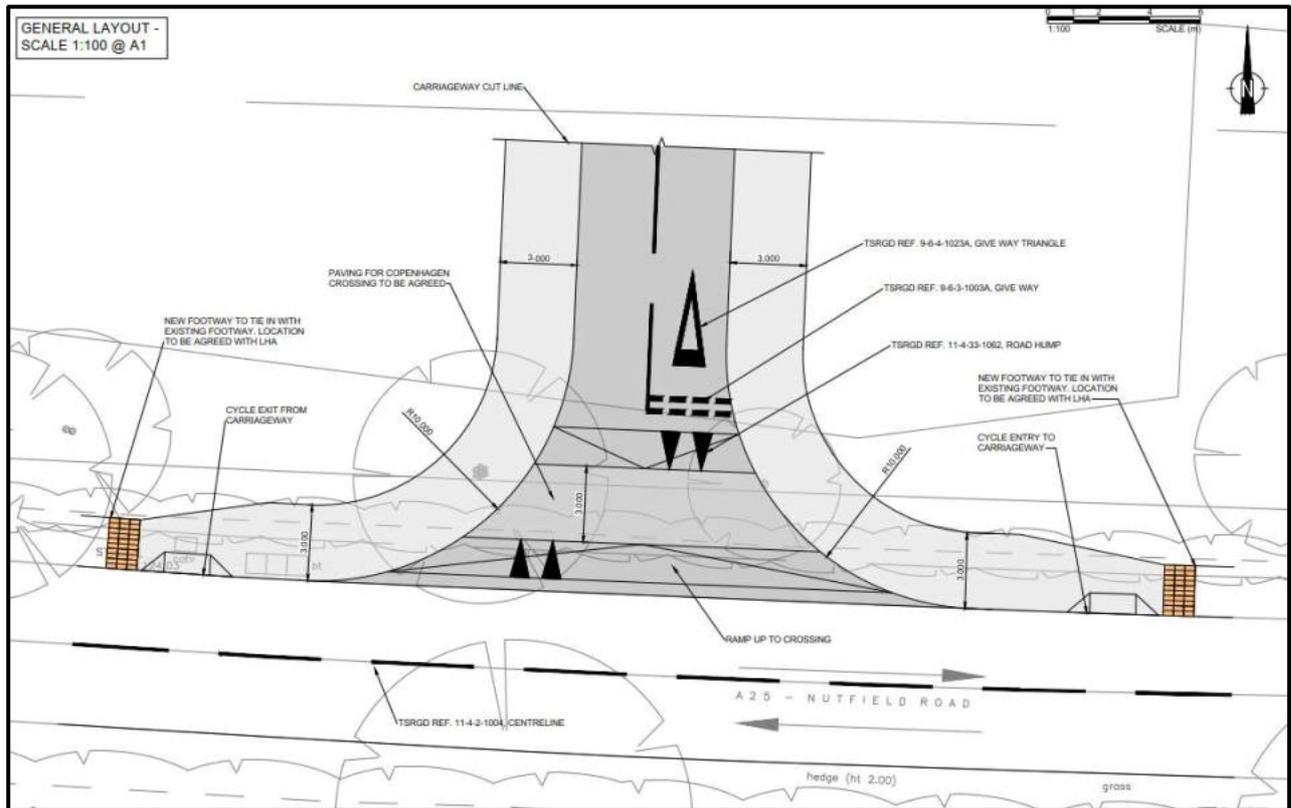
4.8 As I have set out above, the form and principle of access to the public highway is the only matter proposed in detail as part of the submitted planning application.

4.9 There will be one vehicular access point onto the A25 Nutfield Road which will be located at the western end of the development. Following pre and post applications with SCC the agreed junction layout is shown in **Image 4.4** below and provided in full at **Appendix C**. The proposed access junction will include a 3.0m shared

footway/cycleway on both sides of the access along with a raised ‘Copenhagen’ style crossing for pedestrians and cyclists.

- 4.10 It has also been agreed that the current western limit of the 30mph speed limit will be moved further west and a gateway feature introduced as shown at **Image 4.3** and at **Appendix C**.

Image 4.4: Indicative New Access Junction onto A25



- 4.11 A Stage 1 Road Safety Audit (RSA) (CD1.54) was undertaken on the proposed access junction (and adjacent pedestrian crossing over the A25 on 5th September 2023). The Stage 1 RSA did not flag any significant safety concerns and all comments raised within the Audit can be addressed at the detailed design stage.
- 4.12 SCC have accepted the site access arrangements in principle and included the site access design as part of their recommended planning conditions (Condition 1), in their Highways Response dated 14th March 2025 (CD9.1) which states;

“No part of the development shall be first occupied unless and until the proposed access to the A25 has been constructed and provided with a continuous pedestrian footway crossing and vehicular visibility zones in accordance with the approved plans (drawing number VD22815-VEC-HGN-NUT-SK-SH-005) and thereafter the visibility zones shall be kept permanently clear of any obstruction over 0.6m high”.

The Drive

- 4.13 As shown in the indicative masterplan at **Image 4.1**, the development parcels are separated by a lagoon and areas of woodland/vegetation. A link road is proposed to provide a vehicular and cycle connection between the parcels and this is referred to as 'The Drive'.
- 4.14 The link road alignment has been based on detailed topographical survey information and informed by arboriculture and ecological assessment and advice by consultants FPCR.
- 4.15 The road design will be able to accommodate all vehicles requiring access to all parcels.

Walking and Cycling Connectivity

- 4.16 A comprehensive network of footways and cycle routes will be provided within the site as shown at **Image 4.2**. This network allows:
- connectivity from the A25 and Church Hill;
 - connections between the development plots;
 - connections to and within the open spaces within the site;
 - connections to the north to Chilmead Lane.
- 4.17 Dealing with each of these in turn:

Connectivity from the A25 and Church Hill

- 4.18 As can be seen from **Image 4.3**, there are 5 connections to the A25 as follows, giving comprehensive access options. Working from west to east:
- New site access
 - New pedestrian/cycle route to east of access
 - Footpath 192
 - Park Road Works which is a very low trafficked road giving access to a few houses and within the Appellant's ownership. Surface improvement works will be undertaken along this route;
 - Enhanced footpath 568.
 - Footpath 571 (Church Hill)

Connections between the Development Plots

- 4.19 As can be seen from **Image 4.3**, there is walking and cycling connectivity between the various plots using The Drive and footpaths. The maximum gradient of any utility route is 5% thus making them suitable for the mobility impaired.

Connections To and Within Open Spaces within the Site

- 4.20 Various footpaths give access from the proposed development plots into the open space that forms part of the appeal site. This will allow people to exercise, walk dogs etc within easy reach of their homes. A circular route from the proposed housing area via Chilmead Lane is circa 2.5km or a 30 minute walk.

Connections to the North to Chilmead Lane

- 4.21 Footpath 192 and 616 will be upgraded to provide a high quality walking and cycling route directly from the main development area to Chilmead Lane. This provides a route to the Inn on the Pond pub and the Sustrans cycle route, which I discuss later in this chapter.

Parking Proposals

- 4.22 Car and cycle parking provision for the residential element of the proposals will comply with Use Class 'C3 Dwelling Houses' and the residential institutions i.e. care home and nursing home with Use Class 'C2 Care Home / Nursing Home' as set out within SCC guidance on 'Vehicular, Electric Vehicle and Cycle Parking Guidance for New Developments' (February 2023) (CD6.49). Of particular note is the requirement for all houses and flats to have a fast charging socket.
- 4.23 In relation to e-bike charging, a charging socket will be provided for each residential dwelling in the residential cycle storage areas (ie within garages or dedicated cycle stores).

Off-Site

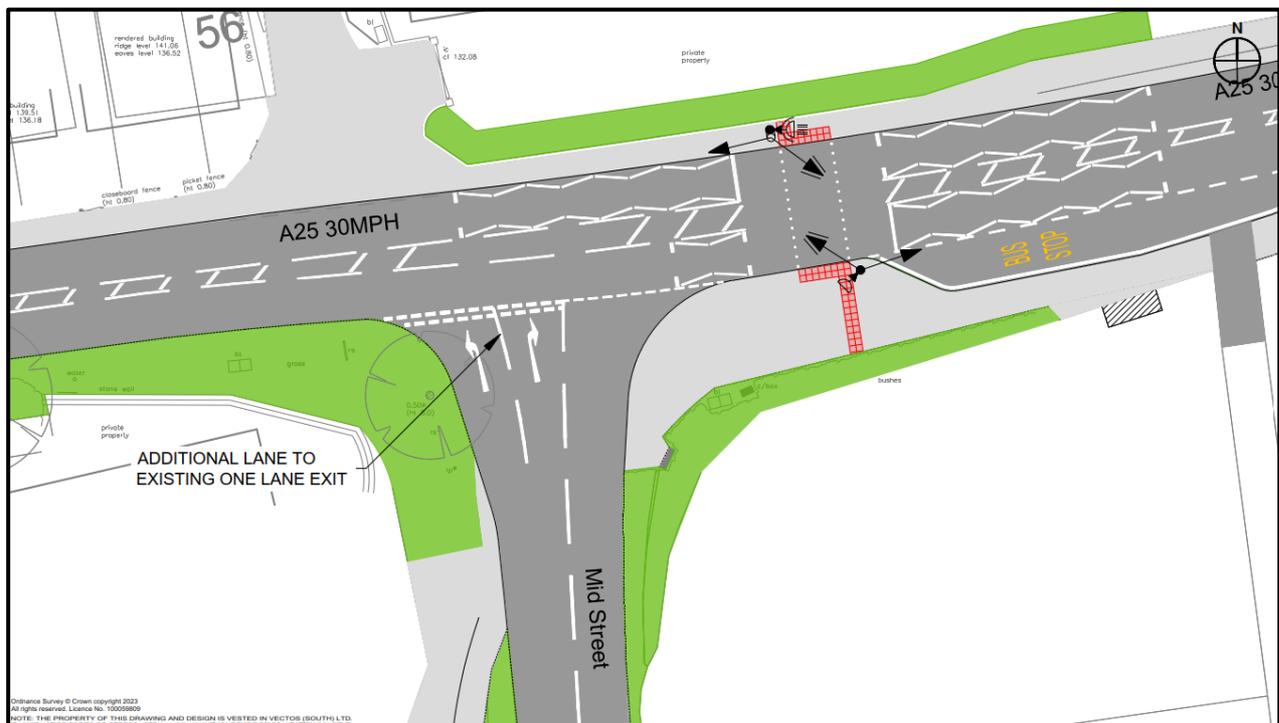
A25 Improvements

- 4.24 As I have noted in the summary above, a package of improvements will be introduced on the A25 to improve the safety and connectivity for residents and employees/visitors of the proposed development along with members of the existing community. The package has been agreed with SCC.
- 4.25 The following improvements have been agreed with SCC. The relevant plans are included in **Appendix D**.
- 4.26 Drawing 250103-ROV-HGN-XXX-PL-TP-0001-p1 shows the overall A25 strategy.
- 4.27 Two new signal controlled pedestrian crossings will facilitate the safe crossing of the A25 at both ends of the proposed development and within Nutfield itself. This will, for example, allow residents of the proposed development to access the Queen's Head public house, the Crown Veterinary clinic and South Nutfield. The relevant drawings are drawing no. 226799/PD15 Rev A and drawing no. 226799/PD11 included at **Appendix D** and I have included an extract of the relevant drawings at **Images 4.5 and 4.6** below. The image of Mid Street also includes the minor capacity enhancement on the Mid-Street arm of the junction.

Image 4.5: Signal Controlled Pedestrian Crossing A25 West of Cooper’s Hill Road and Church Hill

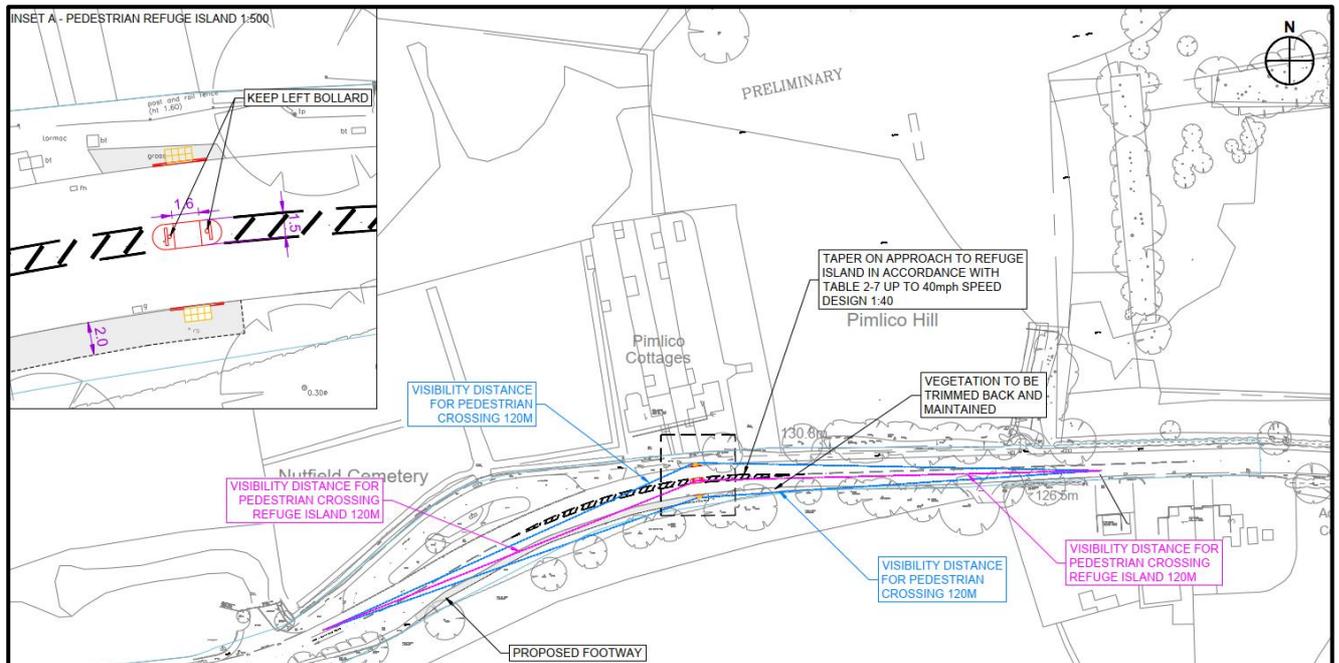


Image 4.6: Enhancement of Mid Street Junction and New Signal Controlled Pedestrian Crossing



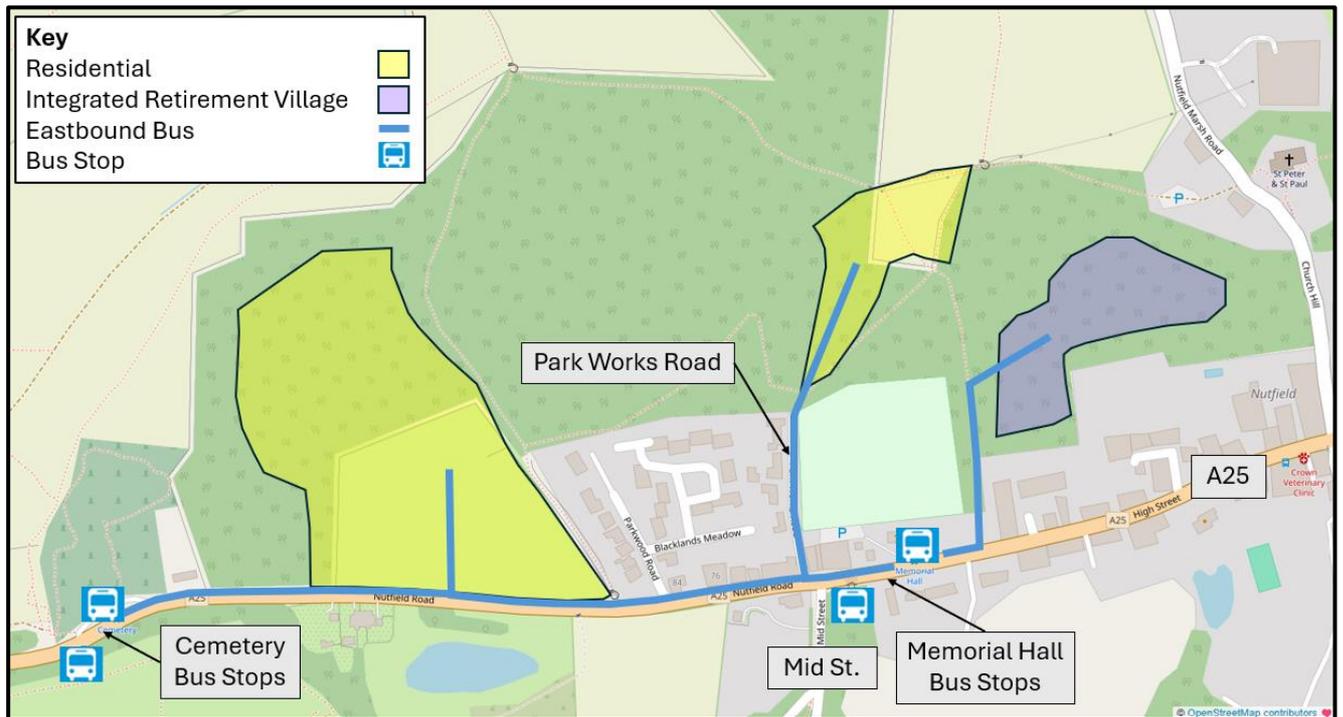
4.28 A new pedestrian crossing along with a section of new footpath on the southern side of the M25 will be provided in order to enhance access to the westbound Cemetery bus stop. This is the closest bus stop for residents of the western parcel of the site for buses in the Redhill direction. This is shown at drawing no. 226799/PD13 Rev A, at **Appendix D** with an extract at **Image 4.7** below.

Image 4.7: Proposed Uncontrolled Crossing on Nutfield Road



4.29 The walking routes from the centre of the residential and integrated retirement village elements to the bus stops on the A25 are shown in **Image 4.8**.

Image 4.8: Bus Stop Proximity to Development Use



4.30 The relevant distances from the centre of each of the development areas to these bus stops are summarised in **Table 8**.

Table 8: Bus Stop Proximity

Location	Cemetery Eastbound	Cemetery Westbound	Memorial Eastbound	Memorial Westbound
Residential (West)	460m	500m	550m	500m
Residential (Central)	N/A	N/A	360m	435m
Retirement Village	N/A	N/A	330m	405m

4.31 As I have noted above, currently the speed limit on the A25 reduces from 40 MPH to 30 MPH at the start of the built-up area of Nutfield. It has been agreed with SCC to move this further west so that it includes the new site access junction. This is shown at drawing no. VD22815-VEC-HGN-NUT-SK-CH-005 at **Appendix C** and at **Image 4.3** above.

4.32 The above measures will act to “tone down” the A25 through Nutfield by which I mean speeds will reduce and crossing manoeuvres will become easier. This will lead to safer and more pleasant conditions for residents.

Cycle Route Improvements

4.33 It is proposed to provide a significant enhancement to Sustrans NCR 21 which passes from the northern boundary of the site to Redhill. Plans of the route are included at **Image 4.9** and **4.9A** below.

Image 4.9: NCR21 Cycle Route to Redhill

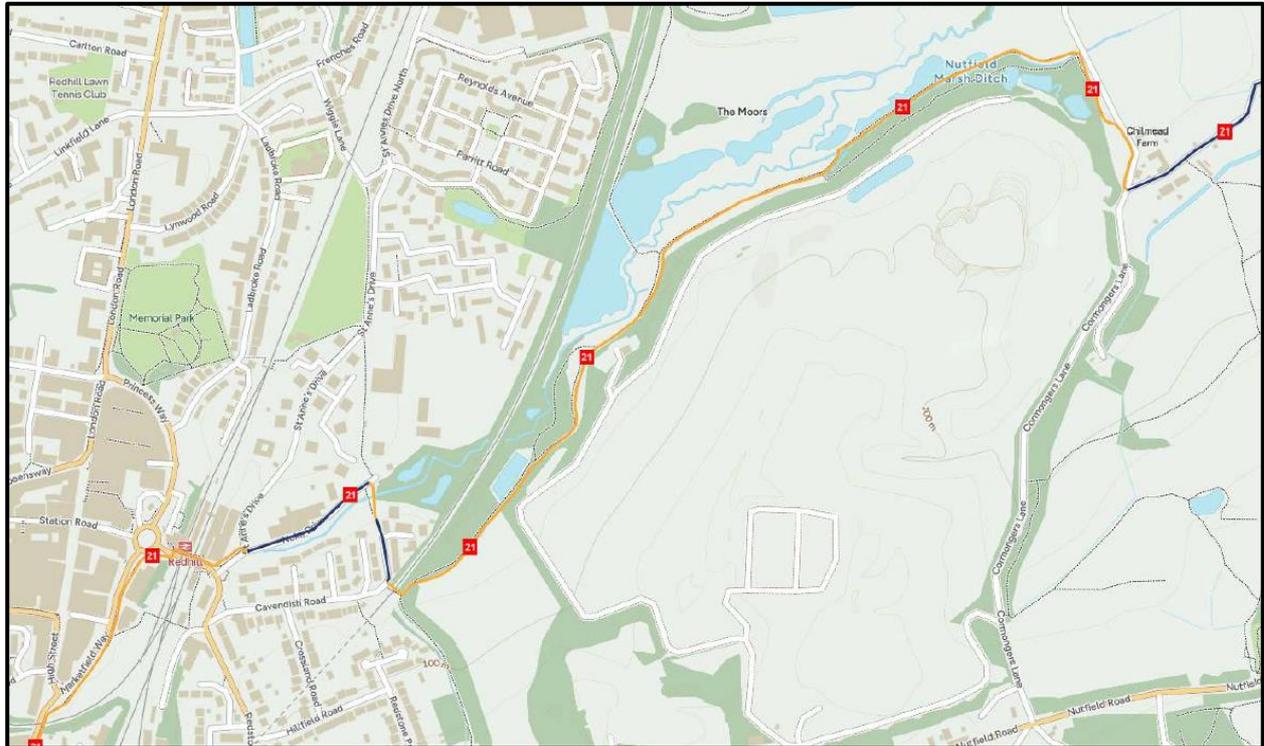
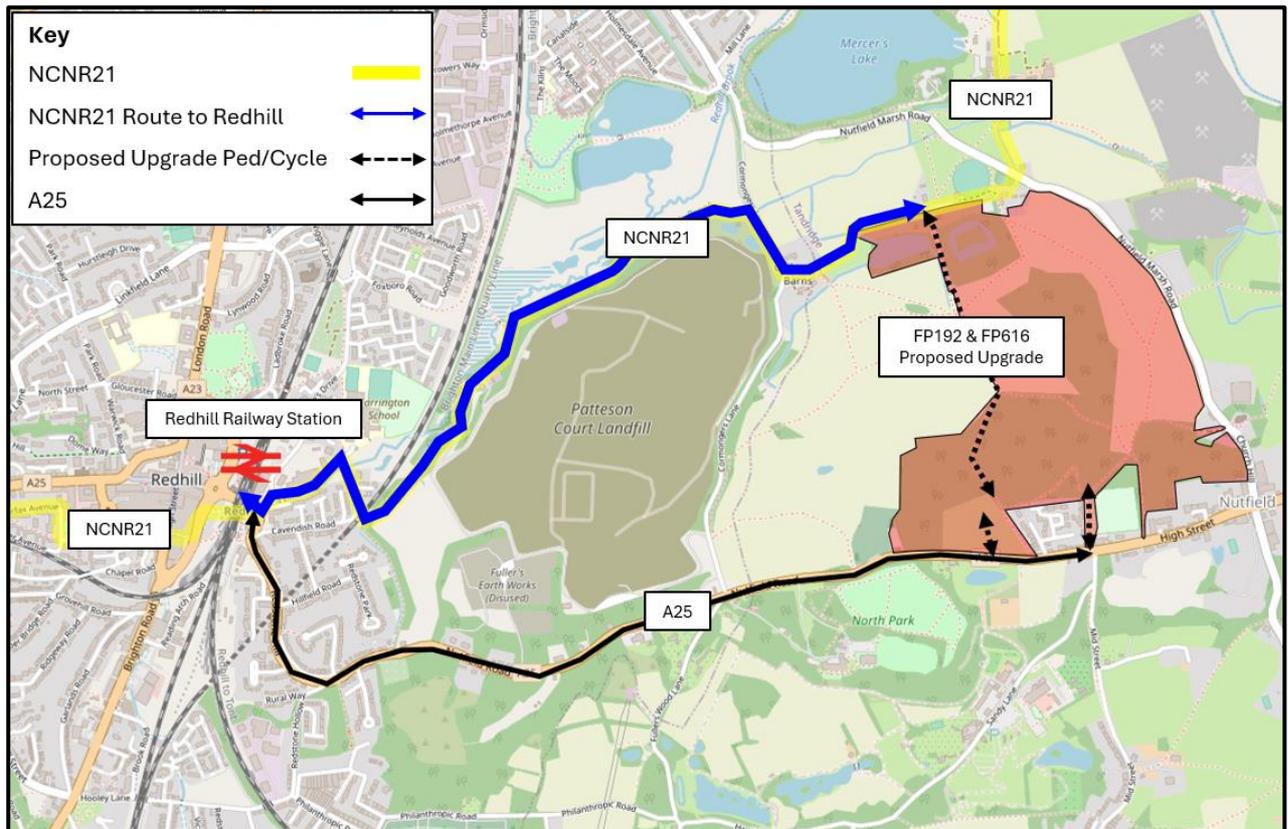
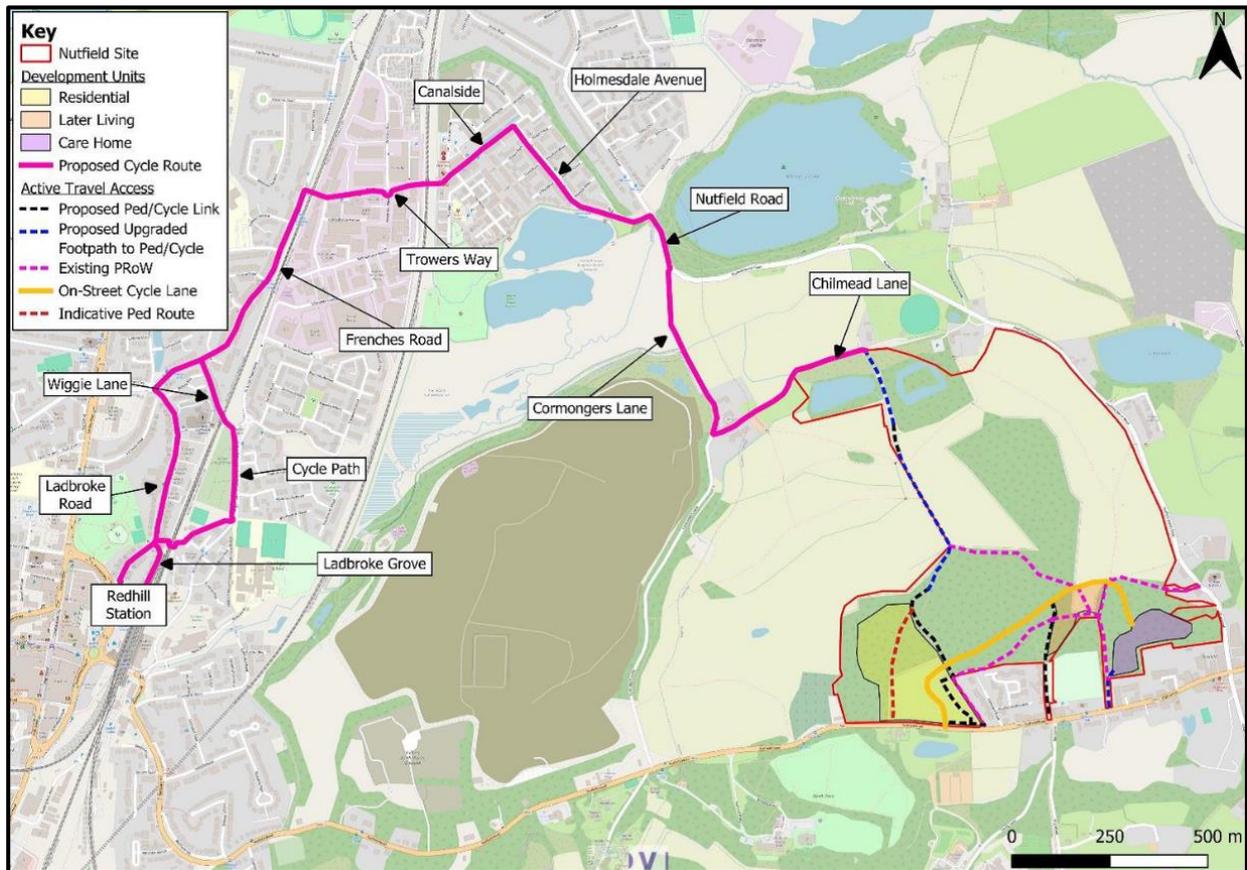


Image 4.9A: NCR21 Route (Site Context)



- 4.34 The off-road section of NCR 21 currently has a poor surface and is subject to flooding due to a lack of maintenance of adjacent watercourses.
- 4.35 The applicant has retained Land and Water Group to develop an upgrade strategy and their Summary Report is included at **Appendix E**.
- 4.36 The conclusions from the report are that significant enhancements can be made to the route. This primarily involves resolving drainage issues and providing appropriate surfacing along the route. The scheme has been fully costed and will be provided in full by the applicant.
- 4.37 This is a major benefit to the area and will assist new and existing residents and visitors to the area. It is supported by the Walk Wheel Cycle Trust (formerly Sustrans) and I have included their letter at **Appendix F**. It will provide an appropriately surfaced traffic free or lightly trafficked route to Redhill and Redhill station with the journey distance of circa 3km taking some 12 mins
- 4.38 I would also note that an alternative cycle route does exist between the site and Redhill Station using existing lightly trafficked streets and without the need to use the off-road section that is proposed to be upgraded. This route is shown at **Image 4.10**. From the northern end of site to Redhill station is a distance of 3.5km, well within government recommendations on acceptable cycle distance.

Image 4.10: Alternative Cycle Route Plan



Bus Service Enhancements

4.39 The appeal site is already served by existing bus services as I have set out in Section 2. Notwithstanding this, it has been agreed with SCC to further enhance the bus provision through funding of an extension to the Surrey Digital Demand Responsive Transport (DDRT) scheme. I describe this below.

4.40 In an email received from SCC on 11th April 2025 (included at **Appendix G**), the proposals for a DDRT service were set out and summarised as follows;

- *The funding [£4,000,000] would provide a dedicated one vehicle Surrey Connect DDRT service for Nutfield Green Park, establishing an operating zone with a circa 5-mile radius, including important local destinations residents would wish to access, and SCC would expand the offer to include local communities in the vicinity.*
- *The DDRT service would operate Monday to Saturday between 6am and 11pm and on Sundays between 8am and 10pm.*
- *In terms of finance, the estimated running costs are circa £195K / annum, less expected fares income of £48K (the assumption made by the applicant), this would total a cost of £148K / annum. These costs are based upon current SCC contract costs [correct as of 11th April 2025] following competitive tender process for similar services and have been extrapolated out as necessary to reflect the loner operating model.*

4.41 SCC stated in this correspondence that:

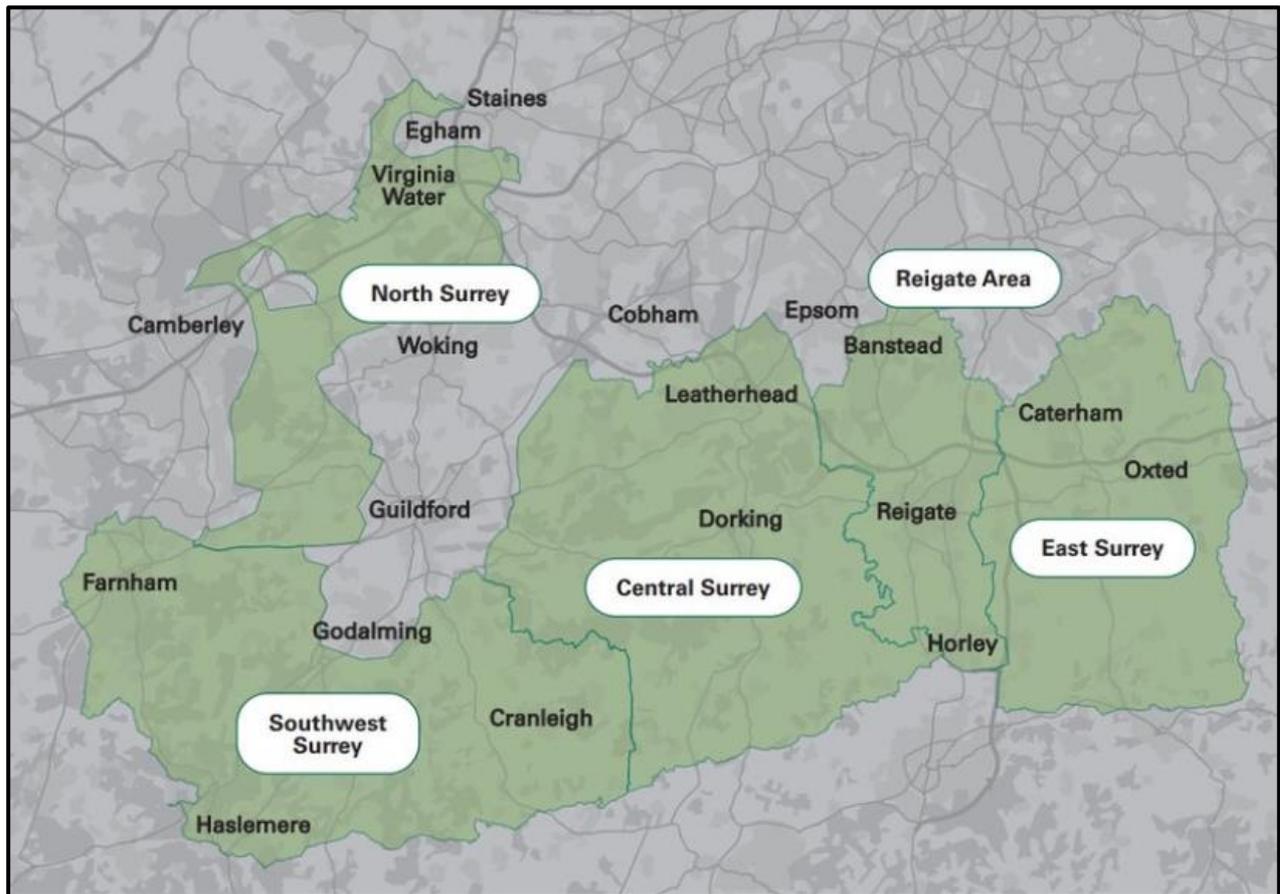
“It is not considered realistic that an in-perpetuity scheme can be delivered by a single development of this scale however the above approach represents the best approach to delivering long-term and meaningful improvements to address the CHA’s reasons for objecting to the proposals. By utilising the funding to build on an existing scheme which is being delivered by the County Council, there is far greater scope for a high-quality service to be provided over the longest achievable term.

This approach would have the significant benefit of covering a wider and more flexible geographical area than the proposed private scheme. A further benefit also therefore arises as it would serve to reduce reliance on the private car in the local area, beyond the site boundary, thereby reducing the pressure on local congested sections of the public highway and addressing both the sustainability and highway capacity objections raised by the CHA concerning the proposed development. Given that this would form part of a wider existing and ongoing County led scheme, economies of scale allow this scheme to achieve a greater value for money than could realistically be achieved for a scheme delivered in isolation.”

4.42 The Surrey Connect Digital Demand Responsive Transport (DDRT) is a bus sharing service available to everyone in Surrey. The DDRT service uses accessible, electric, minibuses, with journey bookings made using an app or by phone. Passengers are able to book up to 7 days in advance or on the same day up to 30 minutes before the requested pick up time. The software takes the requested time and compares it with other customer requests in the area, before linking them up to create single journeys that are convenient for a group of users at once. The pickup time is scheduled within a window of 10 minutes before or 10 minutes after the preferred booking time.

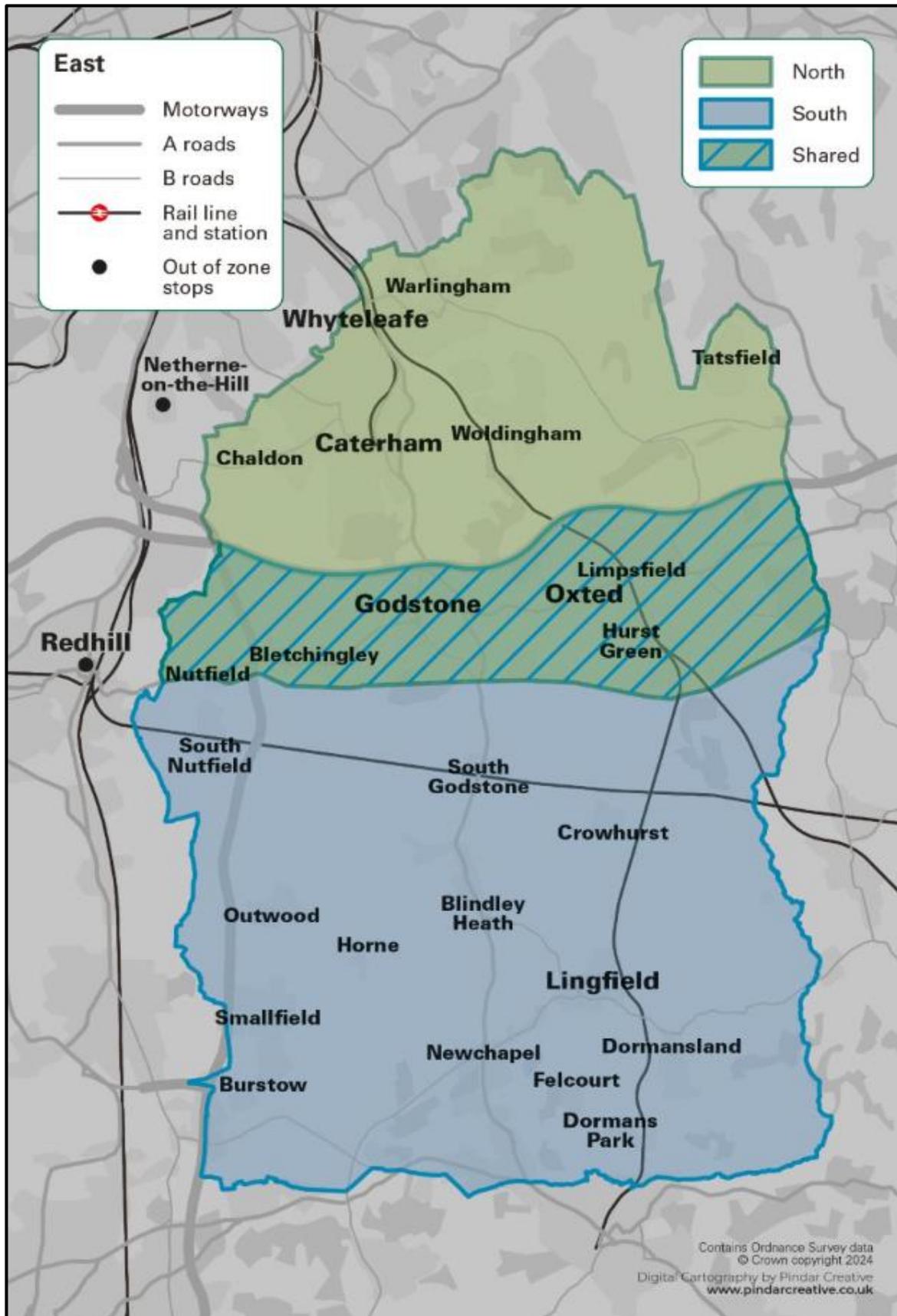
4.43 The DDRT allows travel within five different areas of Surrey. These are North Surrey, Southwest Surrey, Central Surrey, Reigate Area and East Surrey, as shown in **Image 4.11** below.

Image 4.11: Surrey DDRT Catchment



4.44 The site is located in East Surrey, shown in Image 4.12 below.

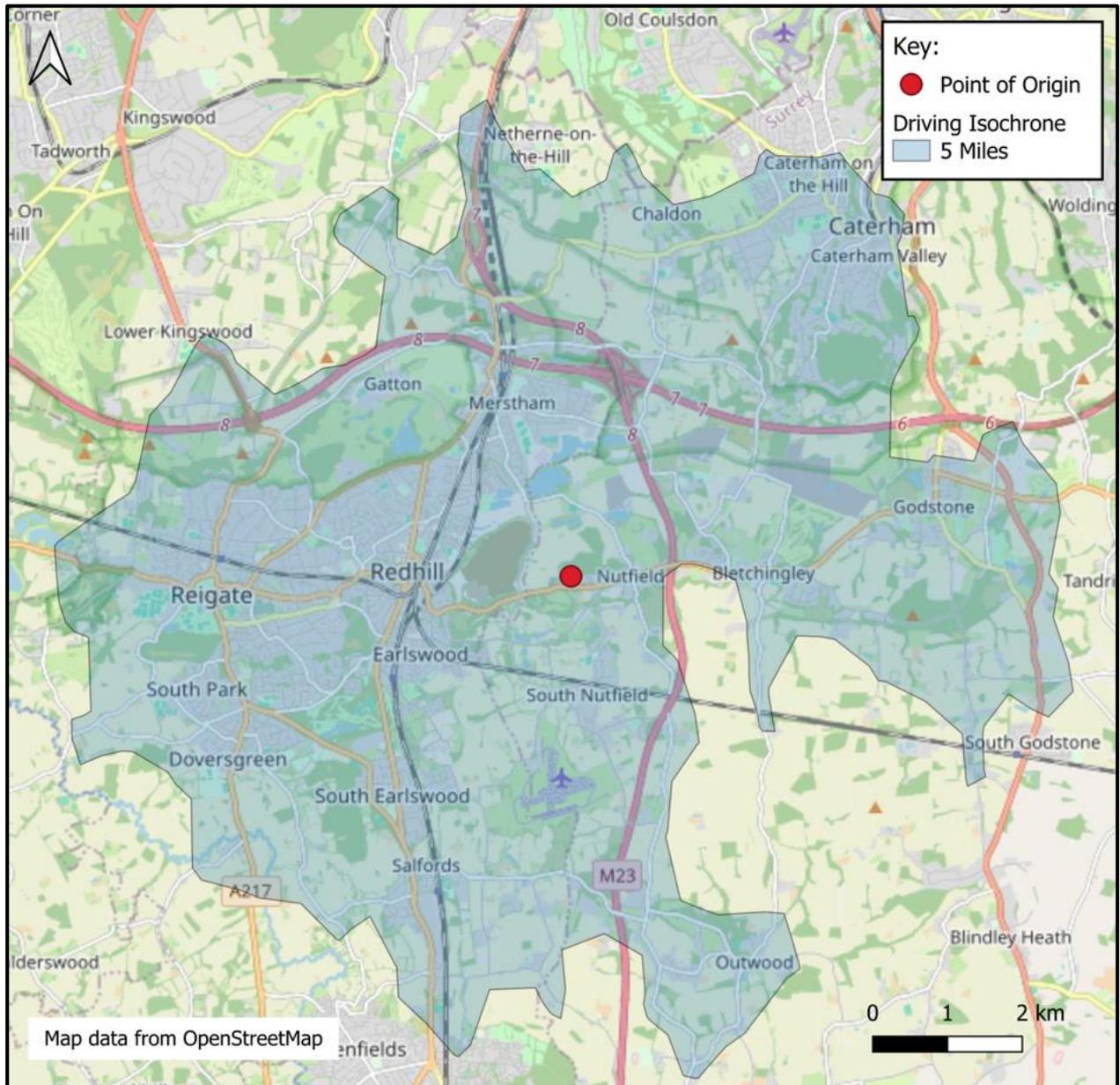
Image 4.12: East Surrey DDRT Catchment



4.45 Passengers living in Nutfield (the shared zone) can travel anywhere in the East Surrey Area (North and South). In addition passengers can travel to Redhill.

4.46 As part of the development, funding will be made available to the DDRT service to provide an additional bus which will operate within a 5 mile radius of the site as shown below at **Image 4.13**.

Image 4.13: 5 Mile DDRT Catchment from Site



4.47 Key destinations that can be reached with a 5 mile radius are:

- Redhill
- Reigate
- Godstone
- Caterham

4.48 The availability of the existing DDRT service and the enhancement funded by the development will lead to greater choice of service for those living in Nutfield including at the proposed development.

4.49 I consider some of the advantages DDRT are as follows:

- Improved access for passengers compared with fixed route buses– the DDRT can allow access to facilities that fixed stops are either further away from or do not serve;
- Flexible – passengers can book rides when needed;
- Extended operating times (Monday to Saturday between 6am and 11pm and on Sundays between 8am and 10pm);
- Convenient – shorter distances to virtual stops from passenger’s residences;
- Accessible for the mobility impaired;
- Reliable – the DDRT will arrive at the specified time.

4.50 In summary, the funding of the DDRT service for an extended period of time will lead to excellent accessibility to key destinations over an extended operating period. This will be of significant benefit to both new residents and existing communities in the area.

Travel Plan

4.51 A Framework Travel Plan was submitted with the planning application (CD1.57). The FTP sets out the broad measures that will be implemented as part of the development proposals and the overall aims of the Travel Plan along with the proposed management regime. Subsequent Full Travel Plans will be submitted to support any reserved matters application for the residential / later living and commercial occupiers (the care home and other community uses).

4.52 I provide a summary of the key measures included in the FTP below:

- Explore the potential for Car Clubs;
- Welcome Packs for Residents and Staff;
- Community noticeboards;
- Range of promotional activities;
- Car sharing scheme;
- Details and promotion of DDRT services.

Promotion of All Travel Planning and Sustainable Transport Measures

- 4.53 The key to the success of the FTP will be the marketing strategy and information provision to ensure that people are aware of the measures discussed above. Information will be disseminated through the following channels:
- Community notice boards;
 - Bespoke public transport / walking / cycling / community guides created specifically for the development;
 - Welcome packs (tailored for residents) which will contain information on the Travel Plan and sustainable travel;
 - Travel Awareness initiatives and events in conjunction with the Local Authority; and
 - Community / development website detailing travel options.
- 4.54 The FTP includes targets for a reduction in single occupancy car use compared with the current mode share in the local area. The target is to reduce single occupancy car trips by 5 percentage points with a corresponding 5% increase in sustainable transport modes (active travel and public transport). I consider this to be an achievable target given the transport provision which I have described in this section.

Amenities

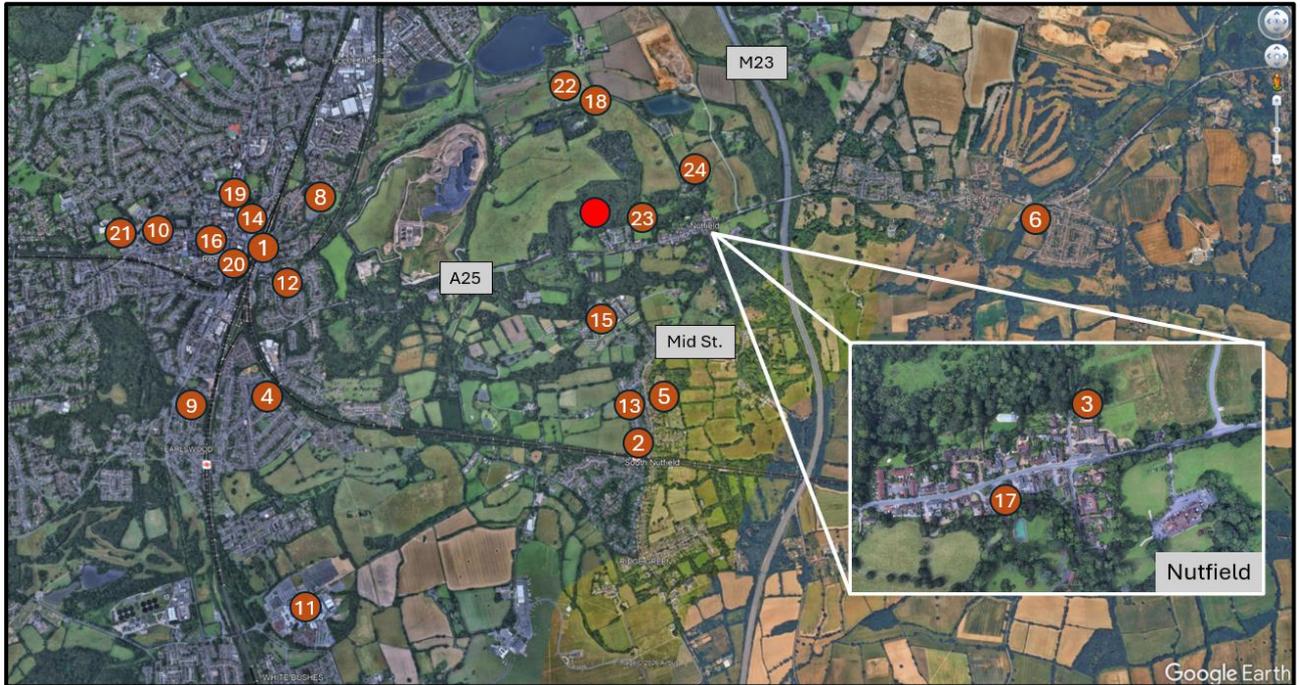
- 4.55 Both within the Transport Assessment (CD1.53-1.56) supporting the planning application and in preparation of this proof of evidence, I have given careful thought to key amenities that residents of the proposed development will wish to access to undertake their daily lives and how they can access those amenities conveniently and sustainably.
- 4.56 I have included at **Appendix H** a table showing the key amenities in the area and how residents can access those amenities sustainably along with estimated walking, cycling and bus journey times. This table is included in the Transport Statement of Common Ground (CD8.2) and is agreed. The Table is reproduced below along with a plan of the location of the amenities.
- 4.57 A summary of the methodology I have used in deriving this table is as follows:
- Distances and times are taken from a mid-point within the main residential area of the site as shown below.
 - I have used a standard walking speed of 80m/minute (hence 10 min for 800m) and cycling time of 15km/hr (9.5mph). the cycling speed is conservative, especially if e-bikes are used.
 - Bus journey times have generally been taken from timetable information or using a speed of 15kph (circa 9.5mph). A range is given between peak and off-peak times.
 - Bus journey times include for relevant walk distances to bus stops as described in Section 4.
 - Real Time information is available for bus journeys in the area so it is not appropriate to include an extended wait time. I have assumed a five minute wait time on the basis that someone will arrive 5 minutes before the bus departs.
- 4.58 I consider the implications of this table in the next section of this proof.

Table 9: Local Amenities

Ref	Service	Category	Distance (m)	Walking Time (mins)	Cycling Time (mins)	Existing Bus Time (mins)	Proposed Bus Time (mins)
1	Redhill Station	Transport	3000	36	12	15-19	7-14
2	Nutfield Station	Transport	1850	23	7	0	Circa 5 mins
3	Church Hill Nursery	Nursery	850	11	4	0	Circa 3 mins
4	Earlswood Nursery & Infant School	Education	2650	33	11	22-25	6-11
5	South Nutfield Primary	Education	1450	18	6	0	Circa 5 mins
6	Bletchingly Village Primary School	Education	3400	43	14	23-24	7-14
7	Oxted School	Education	13350	0	0	34	0
8	Carrington School	Education	2750	34	12	0	6-12
9	Woodlands Surgery	Health	3250	41	13	26-32	7-14
10	Greystone House Surgery	Health	3450	43	14	25-30	8-16
11	East Surrey Hospital	Health	4950	0	20	28-34	12-24
12	Lowcroft Dental Surgeries	Health	2450	31	10	18-22	5-10
13	Holborn's, South Nutfield	Retail (inc food Post Office)	1550	19	6	0	Circa 5 mins
14	Sainsbury's	Retail (inc food)	3150	39	13	16-21	7-13
15	Priory Farm Shop & Garden Centre	Retail (inc food)	1050	13	4	0	Circa 5 mins
16	The Belfry Shopping Centre	Retail (inc food)	2950	37	12	16-21	7-13
17	The Queen's Head, Nutfield High Street	Public House	800	10	3	0	Circa 3 mins
18	Inn on the Pond, Chilmead Lane	Public House	850	11	3	0	Circa 5 mins
19	The Gym	Leisure	3150	39	13	16-21	7-13
20	The Light (Cinema/Bowling Alley/Bar)	Leisure	2850	36	12	16-21	6-11
21	Donyngs Leisure Centre	Leisure	3550	44	14	26-31	8-17
22	Nutfield Cricket Club	Community/Leisure	850	11	3	0	Circa 5 mins
23	Nutfield Youth Football Club	Community/Leisure	450	6	2	0	Circa 3 mins
24	St Peter and St Paul Church	Community	800	10	3	0	Circa 3 mins
25	Gatwick Airport	Transport/Employment	13250	0	0	44-55	N/A
26	Crawley	Town Centre	19350	0	0	54-66	N/A
27	Redhill	Town Centre	3000	37	12	16-21	6-12
28	Reigate	Town Centre	5750	0	23	0	13-25
29	Godstone	Town Centre	5350	0	21	21-22	11-22
30	Oxted	Town Centre	12850	0	0	33-41	0

4.59 In addition to the table above, journey times via the bus and train, to Gatwick Airport and Crawley were also investigated. Using a combination of bus and rail, it would take 23-36 minutes to reach Gatwick Airport and 35-46 minutes to reach Crawley.

Image 4.14: Local Amenities Plan



5 Effects of Development

- 5.1 A Scoping Note was agreed with SCC prior to submission of the planning application and, following some discussion, this was agreed with SCC (CD1.53-1.56).
- 5.2 The traffic analysis was undertaken based on this Scoping Note and the agreed trip generation figures. Following some discussions and sensitivity testing, along with agreement to a small mitigation scheme at the Mid Street junction, SCC agreed the analysis and agreed that there were no capacity or safety concerns with the development.

6 Analysis

- 6.1 In this section I will analyse the locational sustainability of the proposed development and then seek to test this against the relevant national and local policies before considering the objection raised by TDC.
- 6.2 I do this by summarising the transport offer that I described in detail in the previous section and then considering how this can be used to access facilities that residents of the proposed development will need to reach to undertake their day to day lives. This can be described as a “day in the life” analysis.
- 6.3 The transport provision can be summarised as follows by mode:

Walking

- 6.4 A comprehensive series of footpaths within the site giving access to on-site facilities (including open space); to the A25; Church Hill; and to Chilmead Lane.
- 6.5 Significantly improved crossing facilities over the A25.
- 6.6 Upgrading of the off-road section of National Cycle Route NCR 21 to provide a good quality route to Redhill

Cycling

- 6.7 Cycling routes within the site giving access to the site from the A25 and Chilmead Lane.
- 6.8 Upgrading of the off-road section of National Cycle Route NCR 21 to provide a good quality route to Redhill.

Public Transport

- 6.9 Improved walking access to existing bus stops on A25.
- 6.10 Existing bus services that provide for 10 services to Redhill during morning peak 2 hour period and 7 services from Redhill during the evening peak 2 hour period, providing for direct links to destinations including: Reigate, Godstone; Oxted; Gatwick Airport; and Crawley, along with a dedicated school bus to Oxted School.
- 6.11 Enhancement of the DDRT bus service giving an on-demand service directly between the proposed development and any destination within a 5 mile driving radius.

Amenities

- 6.12 I have included a table of key amenities that those living at the proposed development will use at the end of **Section 4**.
- 6.13 It is also relevant to the analysis to consider what are acceptable walking, cycling and bus journey times. There are various pieces of advice and guidance available and the answer depends on a number of factors such as the importance of the destination, the people undertaking the journey and topography.

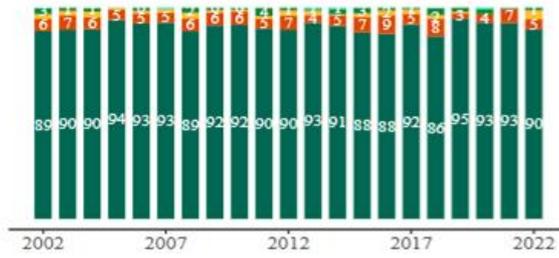
6.14 Walk distances of up to 2km are suggested in IHT guidance ‘Providing for Journeys on Foot’ (2000) (CD6.51). However, this varies when one considers education trips. I include National Travel Survey (NTS) data below which demonstrates that the great majority of primary school children walk to schools under 1 mile (1.6 km) and a significant number (30%) still walk when the distance is between 1 and 2 miles.



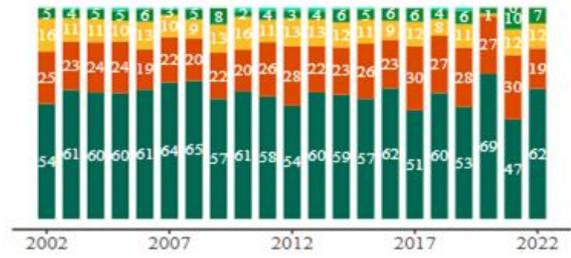
6.15 For secondary education the great majority of trips under 2 miles are by walking with cycling and bus being used for greater distances.

Aged 11 to 16

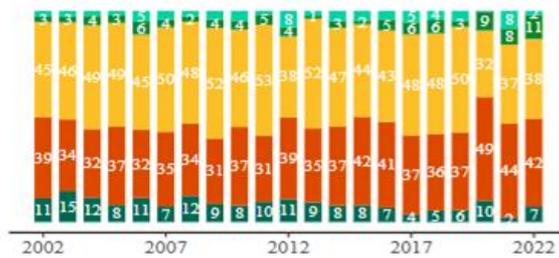
Trip length under 1 mile



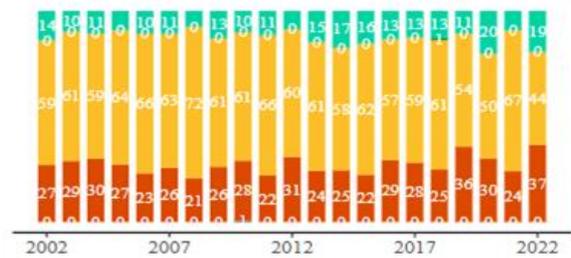
Trip length 1 to under 2 miles



Trip length 2 to under 5 miles



Trip length 5 miles and over



Mode ■ Other ■ Pedal cycle ■ Bus ■ Car or van ■ Walk

- 6.16 For cycling, DfT’s “Cycle Infrastructure Design” (October 2008) (CD6.52) states that “in common with other modes, many utility cycle journeys are under three miles, although, for commuter journeys, a trip distance of over 5 miles (8km) is not uncommon.”
- 6.17 Finally, in considering this issue, it is instructive to recognise the proportion of trips that people take by different journey purposes. This is recorded in the National Travel Survey and the daily journey purpose data is shown below.

Table 10: NTS 2021 Daily Journey Purpose

Journey Purpose	2021
Commuting	21%
Education	13%
Leisure	48%
Other	18%
All Purposes	100%

- 6.18 I now go on to consider the various key destinations that people will seek to access to carry on their regular lives.

Education

Nursery

6.19 There is a nursery at St Peter and St Paul's Church in Nutfield and this is a convenient circa 10 minute walk from the proposed main residential area.

Primary

6.20 The closest school is the Church of England school in South Nutfield. This is a circa 1.5km (18 minute) walk from the site although times may be slightly greater than this due to the topography. As can be seen from the NTS data, this is within a distance that a significant proportion of children will walk.

6.21 The alternative primary schools are Earlswood School in Redhill and Bletchingly Village Primary School.

6.22 Both these locations are accessible by existing bus services or the proposed DDRT. However, it is likely that a proportion of parents will elect to car share which is a common way for primary school children to travel.

Secondary

6.23 For secondary education there are two choices. These are Carrington School in Redhill and Oxted School in Bluehouse Lane, Oxted.

6.24 Both schools are easily accessible by bus. For Carrington, as I have set out above, there are 10 bus services available between 7.30 and 9.30 in the morning and for Oxted there is a dedicated Schools Bus Service (612) that goes directly from Nutfield to the school. Both journeys take less than half an hour.

6.25 Given the NTS data I have included above, I would expect a significant majority of pupils to travel to secondary school by bus.

Employment

6.26 There are significant employment opportunities available within a reasonable travel to work time from the proposed development. These include:

- Redhill
- East Surrey Hospital
- Gatwick Airport
- Crawley
- East Croydon
- London Victoria

6.27 The first four of these destinations can be reached by direct bus services from Nutfield. Gatwick and Crawley are also accessible by bus to Redhill and then a train. East Croydon and London can be accessed by bus and train with a total journey time of circa 40 mins to East Croydon and 60 mins to Victoria. The existing bus services can be used or the enhanced DDRT.

6.28 The above locations give a very extensive employment area that can be reached within one hour by sustainable modes of transport.

Health

6.29 There are a number of GP medical centres within a 3 mile radius of the site. However, I have focussed on two, Woodlands Surgery and Greystone House Surgery that are accessible by existing public transport within a circa 25 minute journey time (off peak). Both are within an approx. 500m walking distance of bus stops served by the 400 and 410 bus services. Both these and other surgeries will also be accessible conveniently by the enhanced DDRT service.

6.30 Similarly, the Lowcroft Dental Surgery is accessible by existing bus services (20 minutes off peak) or the DDRT.

6.31 It is also a major advantage of the site that it is located within good proximity of East Surrey Hospital. The 400 bus route goes from Nutfield to a dedicated stop at the hospital. The door to door off peak journey time is circa 25 minutes using the 400 bus or circa 12 mins using DDRT.

Retail

6.32 The planning application includes for 1,500 sqm of E(e), F2 floorspace which will allow for a range of community, medical and small retail uses to be introduced as explained by Mr Henley in his proof.

6.33 Holborns is a popular local store in South Nutfield and is a circa 20 minute walk from the proposed development. It not only offers a good range of food but is also a post office. The shop can be accessed using the existing footway on Mid- Street.

6.34 For larger scale food shopping the Sainsburys in Redhill is the closest and most convenient food store. This is accessible utilising the existing bus services to Redhill along with DDRT.

6.35 Two further points are relevant. First, I would note that many people combine a trip to a foodstore with another purpose. This may be working in Redhill or undertaking a leisure or wider shopping trip there. Hence, food retail trips are often not “primary” trips (ie where the main or only purpose is food shopping) but rather form part of a multi-purpose trip – which leads to more sustainable travel patterns.

6.36 Secondly, residents will be able to have food delivered by home delivery thus reducing the need for a journey.

6.37 Redhill itself provides a good range of non-food shopping including the Belfry Shopping centre.

Leisure

6.38 Leisure clearly encompasses a range of land uses.

6.39 The starting point is that the site has significant open space and a series of footpaths that will allow people to walk their dog, go for a stroll, exercise etc within the site itself and without having to drive to a suitable location. A circular walk through the site will be about 2.5km or a half hour walk. This is a major advantage of the site and will encourage healthy lifestyles.

6.40 Other leisure activities such as the gym, cinema, shopping and restaurants can be found in Redhill.

Community

6.41 The site is well placed for community activities in Nutfield. These comprise The Memorial (Village) Hall, St Peter and St Paul Church and the Queen's Head pub, all of which are within a few minutes walk of the site. There is also the Nutfield Cricket Club immediately to the north of the site and the Nutfield Youth Football club that meets adjacent to the Memorial Hall.

Summary

6.42 Based on the above evidence, I conclude that the great majority of destinations that people will wish to access in their daily lives can be accessed by sustainable modes from the proposed development. These are not convoluted journeys or journeys with significant friction since most can be undertaken by walking, a single bus journey or using the upgraded cycle route between the site and Redhill.

Policy and Guidance Analysis

6.43 I now go on to consider the policy position and consider the extent to which the proposed development complies with the relevant policies.

National Policy and Guidance

6.44 The starting point and pre-eminent policy is the NPPF December 2024 version (CD5.1).

6.45 Paragraph 8 sets out the sustainability objectives of NPPF and, in particular, the desire for developments to have "*accessible services and open spaces*". Paragraph 9 sets out that the decision maker should "*take local circumstances into account, to reflect the character, needs and opportunities of each area*".

6.46 As I have set out in this section, the site has access to services needed by residents by sustainable modes and access to extensive open space within the site.

6.47 Paragraph 109 introduces the concept of a vision led approach and this has very much been the applicant's approach here by setting a vision for a sustainable led development.

6.48 Looking at the detail of Paragraph 109, I set out below the policies and how the proposed development complies:

"a) making transport considerations an important part of early engagement with local communities; There has been extensive engagement with local stakeholders and members of the public including on transport issues;

b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; As can be seen from the Illustrative Masterplan and Access and Movement Parameter Plan, transport considerations and, in particular, foot and cycle paths have been an integral part of the scheme design;

c) *understanding and addressing the potential impacts of development on transport networks*; Full analysis of the impact of the development were undertaken and agreed with SCC;

d) *realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated*; Existing transport infrastructure and services have been recognised through the availability of existing bus services and the upgrading of NCR 21. New technology has been embraced through the funding of the DDRT enhancement;

e) *identifying and pursuing opportunities to promote walking, cycling and public transport use*; these opportunities have been pursued and agreed with SCC ie. on site foot and cycle paths; enhanced crossings of A25; upgrade of NCR 21 and funding of DDRT enhancement;

f) *identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.*” These have been recognised and significant highway enhancements have been avoided. The transport provision will encourage residents to use sustainable transport modes but will also encourage a shift by the existing communities in and around Nutfield to sustainable modes, thus leading to environmental gains. It is noteworthy that the DDRT bus services use electric buses.

6.49 Paragraph 110 states that development should be focussed on *“locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.....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”* (my emphasis). I consider that the transport provision associated with the proposed development has a significant influence in making the site more sustainable and offering a real choice of mode of transport, for example for journeys to Redhill where cycling or bus can be used. This is especially the case given the rural nature of the site.

6.50 Considering Paragraph 115, my detailed analysis is as follows:

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*; The site layout clearly prioritises sustainable modes with an emphasis on walking and cycling routes. External to the site there is only one minor highway capacity improvement but significant investment in pedestrian, cycling and bus modes;

b) *safe and suitable access to the site can be achieved for all users*; This is not in dispute with the site access and internal road and foot/cycleways being designed for all users with maximum gradients of 5%.

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 Code48*; Again this is not in dispute, with no issues having been raised by TDC or SCC over compliance with standards.

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.” This is not in dispute, with it being agreed with TDC and SCC that there are no residual capacity or safety issues with the application. Indeed, SCC state in their 14 March response that “There would be some material benefits to the local and wider transport network due to the highways and public transport improvements.”

- 6.51 In relation to paragraph 116, it is agreed by TDC and SCC that there is not an unacceptable impact on highway safety (in fact highway safety is enhanced due to the new pedestrian crossings of the A25 and the extension of the 30mph speed limit) and the residual cumulative impacts of the road network are not severe.
- 6.52 I have also given consideration to the December 2025 draft of NPPF (CD5.2). The transport related policies are similar to the current NPPF but I do note Policy TR3 which encourages, for rural areas, improvements to wheeling, cycling and public transport and the connectivity of an area where such improvements can be supported by the proposed development. This is exactly what is proposed with the appeal proposals, where the development is supporting improvements to sustainable transport links for both new and existing residents.
- 6.53 The government’s “Bus Back Better” document (CD6.45) gives encouragement to demand responsive transport that can be the best option in low density areas and with the ability to provide for extended hours of operation.
- 6.54 I have provided several references from the government’s “Future of Transport – Supporting Rural Transport Innovation” (CD6.47) in Section 3 of this proof. These references clearly demonstrate the government’s enthusiasm for improving rural transport and the role DDRT, as well as cycle routes and e-cycles, can play in this.

Surrey CC Policy and Guidance

- 6.55 SCC’s Local Transport Plan (CD6.43) reflects many of the policies incorporated into NPPF. There is the aim to reduce carbon emissions whilst at the same time supporting Surrey’s growth and housing agenda.
- 6.56 Of the nine policy areas that the LTP sets out, the most relevant for assessing the proposed development are as follows:
- *Planning for Place – Including establishing ‘20-minute neighbourhoods’ and ensuring new development focuses on sustainable travel options.* The proposed development focusses on sustainable transport options and a number of facilities are within a 20-minute walk. I note that 20 minute neighbourhoods are referenced to both new and existing communities and one of the aims is to reinvigorate town centres;
 - *Public/Shared Transport – Including development of Mobility Hubs and expanding shared transport provisions.* The proposed development is investing heavily in expanding shared transport provision for new and existing residents;

- *Promoting Zero Emission Vehicles – Planning and enabling charging / fuelling infrastructure, and expand the use of Electric Vehicle car clubs.* All dwellings on the proposed development will have an EV charging point along with bike charging facilities;
- *Supporting Behaviour Change - Awareness campaign e.g. adopting technology, gamifications.* The Travel Plan will support this policy objective.

6.57 Surrey’s “Bus Service Improvement Plan” (CD6.48) supports the expansion of DDRT services which form an important element of the proposed development’s transport offer.

Tandridge District Council

6.58 The Core Strategy (CD4.1) was adopted in 2008 and hence is inevitably somewhat dated. Policy CSP 12 advises that the council will require new developments to “*Make improvements, where appropriate, to the existing infrastructure network, including road and rail, facilities for bus users, pedestrians and cyclists and those with reduced mobility.*” The proposed development complies with this policy by enhancing facilities for bus users, pedestrians and cyclists. The development is also accessible by those with reduced mobility.

6.59 The Local Plan Part 2: Detailed Policies 2014-19 (CD4.2) was adopted in 2014 and therefore is also somewhat dated.

6.60 Policy DP5 states the following:

- *Complies with the relevant Highway Authority’s and any other highways design guidance.* It is an agreed position that the proposed development complies with this policy;
- *Does not unnecessarily impede the free flow of traffic on the existing network or create hazards to that traffic and other road users.* Again, it is an agreed position that there are no highway capacity or safety concerns with the proposed development and that introduction of additional A25 crossings and extension of the 30 MPH speed limit will enhance safety;
- *Retains or enhances existing footpaths and cycleway links.* The proposed development enhances a number of foot and cycle paths on site and significantly enhances NCR 21;
- *Provides safe and suitable access to the site which is achievable by all and promotes access by public transport, foot, and bicycle to nearby residential, commercial, retail, educational, leisure and recreational areas where appropriate.* Section 5 of my proof demonstrates how the proposed development promotes access by these sustainable modes to nearby amenities;
- *Fully funds where appropriate or contributes towards the costs of any measures required to cost effectively mitigate the significant impacts arising from the development.* The proposed developments provides significant funding towards, not just mitigating the impacts of the proposed development, but enhancing the sustainable connectivity.

Summary on Policy Compliance

6.61 In summary, I have demonstrated in the paragraphs above that the proposed development accords with relevant, applicable national, regional and local policies and guidance on transport issues. In the main this is due to the vision for the development being a sustainable place to live and hence the emphasis on

improvements to sustainable links to the amenities that people will wish to visit, thus reducing use of the private car.

Reasons for Refusal

6.62 In the paragraphs below I consider the Reasons for Refusal raised by TDC and why they are inappropriate and not in accordance with relevant policy and guidance.

6.63 TDC's objection on transport grounds is set out in their first Reason for Refusal with the relevant section of said Reason for Refusal being as follows:

The proposal would not comply with the requirements of paragraphs 155 and 156 of the National Planning Policy Framework (2024) as the development would not be in a sustainable location and necessary improvements would not be made to local infrastructure to cater for the needs of the occupiers of the new development.

6.64 TDC's objection is referred to in their Statement of Case (SoC) (CD12.1). At paragraph 10.1 they state that "The Highway authority acknowledged the proposal is not in a sustainable location". This is not the case. The SCC response of 14 March (CD9.1) states "It remains the case that this is not an ideal location for the type and scale of development proposed in transport terms, particularly with the diffuse nature of the proposed site layout, however if the above measures are secured then there would be some material benefits to the local and wider transport network due to the highways and public transport improvements."

6.65 The SoC then reproduces some, but not all, of the paragraphs in the Officer's Report (OR) (CD3.1). Hence, for completeness, I have referred to the OR and the paragraph numbers within that.

6.66 Paragraph 1.1 and 1.2 of the OR state the following:

"As such the settlement falls into the category of development where the fundamental factor is that the settlement can neither meet the basic day to day needs of its own residents and relies on the need to travel to other settlements to gain access to goods and services as a necessity" and

"it is not considered that these measures would go far enough to improve the access to goods and services for occupiers of the development to a level that would make the development sustainable under the terms of the NPPF."

6.67 These quotes encapsulate the two strands of TDC's objection ie:

- The settlement itself cannot meet the basic needs of its own residents; and
- Measures provided and funded by the proposed development do not go far enough to satisfy the requirements of NPPF.

6.68 Dealing with the first element, there is no requirement within the NPPF (CD5.1) for a particular range of services to be present within a particular settlement. In drawing this conclusion, I have considered

paragraphs 8, 9, 109, 110, 115 and 116 of NPPF. Indeed, as I have noted above, paragraph 110 provides specific flexibility in relation to rural areas.

- 6.69 Similarly, there is no such requirement within TDC’s Core Strategy (CD4.1). Policy CSP1 seeks to promote *“sustainable patterns of travel”* and states that development should be located *“where there is a choice of mode of transport available and where the distance to travel to services is minimised”*
- 6.70 CSP 11 states that *“Planning permission will only be granted for developments which increase the demand for off-site services and infrastructure where sufficient capacity exists or where extra capacity can be provided, if necessary through developer funded contributions”*. This policy recognises that developments will inevitably generate off-site movements and it is important to provide for those movements.
- 6.71 Furthermore, it is not correct to characterise the proposed development and surrounding settlement as not providing for any of the basic day to day needs of residents. There will be the following provision on site or within reasonable walking distance:
- Retail: Provision is being made for a retail store on site and Holborns store in South Nutfield is within a circa 20 minute walking distance. It should also be recognised that on-line shopping deliveries are available and this dissipates the need for a food store within close proximity of a settlement;
 - Education: There is a nursery school on Church Hill which is within an easy 10 minute walking distance of the proposed development;
 - Leisure: As I have noted earlier in this section, there is a generous amount of green space available on site which will allow people to walk and exercise in close proximity to their homes; There are also 2 public houses within a circa 10 minute walking distance;
 - Community: There is St Peter and St Paul Church along with the existing Memorial Hall plus community hall provision within the scheme. These facilities along with the public houses will facilitate community activities.
- 6.72 Hence, in summary, on the first element of TDC’s objection, the proposed development has a range of services available on or close to the site. However, there is no requirement in policy for a particular set of services to be available within or adjacent to a settlement.
- 6.73 Turning to the second strand of TDC’s objection, as well as the reference in paragraph 1.2 of the OR (that I refer to above), para 12.37 of the OR states that *“In short, the proposed transport measures, whilst delivering some benefits will not be anywhere near sufficient to change the site’s overall status from a “limited and unserved settlement” location to one that can genuinely be deemed as sustainable”*. Similar comments are made in paragraph 12.48.
- 6.74 The OR does not provide any evidence or reasoning on how this conclusion has been reached.
- 6.75 There are no absolute tests in NPPF on whether the transport provision associated with a development is *“sufficient”* to pass the test of sustainability. However, the analysis I have undertaken earlier in this section demonstrates that there is excellent accessibility to the majority of amenities that residents will use including

Redhill town centre; health provision including East Surrey Hospital; secondary schools and employment opportunities. These links are by existing bus services, the enhanced DDRT and the enhanced NCR 21 cycle route to Redhill.

- 6.76 At paragraph 27.9 of the OR, TDC make a number of negative comments regarding the DDRT. I deal with each of these in turn.
- 6.77 Reliance: Whilst the DDRT provides a significant enhancement to the bus provision to/from the site, it is not the only provision and existing services are available within a short walk of the proposed development.
- 6.78 Certainty over frequency and quality: The Council present no evidence to support the implication that DDRT services will be less reliable in terms of frequency and quality compared with conventional bus services or indeed that there will be any such issues. The DDRT system is well established in Surrey including Tandridge. A report entitled “Surrey Connect: Digital Demand Responsive Transport Update” (29 April 2024) to the SCC Communities, Environment and Highways Select Committee (CD9.5) reports on the roll out of DDRT and its planned expansion. It reports on there being 7,000 registered users. The Table at paragraph 37 of that report gives satisfaction ratings for the different services within Surrey as follows.

Table 11: Surrey DDRT Satisfaction Rating

Zone	Service Rating (out of 5)	%
Cranleigh	4.93	98.60%
Farnham	4.92	98.40%
Longcross	5.0	100.00%
West Guildford	4.89	97.80%
Tandridge	4.96	99.20%
Mole Valley	4.93	98.60%
Total	4.94	98.77%

- 6.79 Hence, it can be seen that there is a high level of satisfaction with the service.
- 6.80 Furthermore, the Council make no reference to the extended hours that DDRT will operate compared with conventional services.
- 6.81 There is also reference to “*the limited period in advance that the scheme can be booked*”. As I have noted earlier in this proof, a service can be booked up to 7 days in advance which is plenty of time for forward planning.

Summary on Reasons for Refusal

- 6.82 In summary, there are two strands to the TDC objection.
- 6.83 In relation to amenities on or close to the site, there are a number of facilities in Nutfield and there will be additional facilities provided on site. Furthermore, there is no specific policy test on the level of amenities that should be provided within a settlement, especially in rural areas.
- 6.84 In relation to sustainable links to other locations, and in particular Redhill, I consider that there will be excellent sustainable links via the enhanced NCR 21 cycle route (which can be used by conventional and e-bikes), existing bus services and the DDRT scheme.

7 Third Party Objections

7.1 I am aware of objection letters received from nine local residents and one Rule 6 Party. Six of them raise issues related to transport. These are the letters from:

- Bletchingly Parish Council
- Mr De Souza
- Mrs Mills
- Mr Pitcairn
- Mrs Reynolds
- Mrs Doney (Rule 6 Party)

7.2 I deal with these letters on a thematic basis rather than going through each letter line by line, except that I do deal with some specific points raised by Mrs Dorney.

7.3 The themes raised (in no particular order), with my response are given below:

Traffic Flows & Congestion on the A25

7.4 The A25 is an A-road and expected to carry significant volumes of traffic including HGVs. In 2029 the daily traffic flows on the A25 through Nutfield are expected to be 16,422 vehicles per day. The completed development is estimated to add an additional 580 vehicles, which is an increase of 3.5%. This increase is not considered to be significant as it is within the daily variation in flow along the road.

Road Safety

7.5 No accident data is yet available for 2025, and therefore it is not possible to verify any accidents that may have happened during that year (as referred to by Mr De Souza). Accident statistics for a 5 year period were submitted in the Transport Assessment (CD1.53-1.56) and no concerns were raised by SCC.

7.6 In addition to the above, the infrastructure that will be provided along with the development will reduce traffic speeds in the vicinity of the site and enhance crossing facilities and thus create a safer environment for all road users.

Road Speeds

7.7 The latest speed data on the A25 at the location of the proposed access shows that the average daily speed is 37.3mph. This is within the speed limit of 40mph. The introduction of the site access and the signalised crossings on the A25 will further reduce road speeds. In the vicinity of the site access the 30mph speed restriction is to be extending to west, which will help reduce speeds further.

Construction Traffic

7.8 The A25 is a major route and is used by construction vehicles throughout Surrey. On the A25, around 5% of vehicles are HGVs (a normal figure for a road of this nature). In the short term, the construction of the

proposed development will generate a modest number of construction vehicles that will temporarily be added to the existing traffic.

- 7.9 In addition to the above, Mrs Dorney raises concerns regarding the surveys used by the developer, the traffic impact on Junction 6 of the M25, and the impact HGVs had on the Godstone sinkhole.
- 7.10 The traffic surveys were undertaken on Wednesday 19th October 2022. This is well outside the lockdown period, which ended in July 2021. Both SCC and National Highways had no issues with the impact of the development on Junction 6 of the M25. There is no evidence to support the notion that HGVs had a significant role in creating the Godstone sinkhole. In relation to concerns that there will be a lack of sufficient car parking, the provision will be in accordance with TDC standards.
- 7.11 I therefore conclude that these objections raise no new issues that have not been dealt with in the submitted assessments and in my evidence.

8 Summary and Conclusion

8.1 I conclude my evidence in the paragraphs below.

Site Location

8.2 The site is located close to the A25 in Nutfield and is accessible via walking and cycling to local services and to existing bus routes with regular services to a number of locations including Redhill along with access to Surrey County Council's existing Digital Demand Responsive Transport (DDRT) bus system.

8.3 This accessibility will be significantly enhanced by the transport elements of the development proposals.

Proposed Development

8.4 A comprehensive package of transport measures is proposed as part of the development and has been agreed with the transport authority, Surrey County Council. The proposed measures are as follows:

On Site

- New all-vehicle access onto the A25;
- A spine road (The Drive) that provides vehicular access to the site development areas;
- A network of cycle and footpaths that provide connections within the site and connect externally to the A25, Church Hill and to Chilmead Lane (to the north of the site).

Off Site

- A signal controlled pedestrian crossing on the A25 to the west of the junction with Cooper's Hill Road and Church Hill;
- A signal controlled pedestrian crossing on the A25 to the east of the junction with Mid Street;
- A pedestrian crossing on the A25 to the west of the development to assist in accessing the westbound Cemetery bus stop;
- Alterations to the A25/Mid Street junction to provide improved capacity on the Mid Street Arm;
- Extension of the existing speed limit to the west of the site access;
- Significant enhancements to the existing off-road sections of National Cycle Route 21 to provide an enhanced, continuous, cycle route, between the site and Redhill, a distance of 2.9km.

Contributions

- A contribution of £4M towards extension of the existing Digital Demand Responsive Transport bus scheme operating within Tandridge to provide an additional bus within the area surrounding the appeal site.

Travel Plan

- Introduction of a comprehensive Framework Travel Plan

The Effects of the Development

- 8.5 The traffic analysis that was contained within the Transport Assessment submitted with the planning application was undertaken on an agreed basis with SCC. Following some discussions and sensitivity testing, along with agreement to a small mitigation scheme at the Mid Street junction, SCC agreed the analysis and agreed that there were no capacity or safety concerns with the development.

Locational Sustainability and Policy Compliance

- 8.6 I summarise the accessibility of the proposed development by different modes as follows.

Walking

- A comprehensive series of footpaths within the site give access to on-site facilities (including open space); to the A25; Church Hill; and to Chilmead Lane.
- Significantly improved crossing facilities are provided over the A25.
- Existing footpaths on the A25 and Mid Street provide access to existing facilities.
- The option of using the enhanced National Cycle Route 21 to walk between the site and Redhill.

Cycling

- Cycling routes within the site give access to the site from the A25 and Chilmead Lane.
- The enhanced National Cycle Route 21 provides a direct and safe cycling route of circa 3km between the site and Redhill.
- An alternative route using between the site and Redhill is also available using existing quiet streets with a cycling distance of 3.5km.

Public Transport

- Improved walking access is provided to existing bus stops on the A25 within 500m.
- Existing bus services provide 10 services to Redhill from the site during the morning peak 2 hour period and 7 services from Redhill to the site during the evening peak 2 hour period, thus providing for direct links to destinations including: Reigate, Godstone; Oxted; Gatwick Airport; and Crawley, along with a dedicated school bus to Oxted School.
- An enhanced Digital Demand Responsive Transport (DDRT) bus service giving an on-demand service directly between the proposed development and any destination within a 5 mile driving radius.

- 8.7 I consider this transport provision provides a choice of means of sustainable transport between the site and a range of local amenities including education, retail, leisure, health and work. As well as local amenities (including those on site) there will also be excellent cycling and public transport connections to Redhill which is the main local service centre in the area.

- 8.8 The provision will significantly enhance facilities for existing residents of Nutfield as well as new residents.

Policy Compliance

- 8.9 I have demonstrated in Section 6 of this proof that the proposed development accords with relevant national, regional and local policies and guidance on the transport aspects of development. This is due to the vision for the development being a sustainable place to live and hence the emphasis on improvements to sustainable links to the amenities that people will wish to visit, thus reducing use of the private car.
- 8.10 In particular, I have demonstrated that the proposals comply with the NPPF requirements for sustainable development from a transport perspective.
- 8.11 Paragraph 8 of NPPF sets out the sustainability objectives of NPPF and, in particular, the desire for developments to have “*accessible services and open spaces*”. Paragraph 9 sets out that the decision maker should “*take local circumstances into account, to reflect the character, needs and opportunities of each area*”
- 8.12 As I have set out in this proof, the site has access to services needed by residents by sustainable modes and access to open space within the site.
- 8.13 Paragraph 110 of NPPF states that development should be focussed on “*locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.....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”* (my emphasis). I consider that the transport provision associated with the proposed development has a significant influence in making the site sustainable and offering a real choice of mode of transport, for example for journeys to Redhill where cycling or bus can be used.
- 8.14 I have provided several references from the government’s “Future of Transport – Supporting Rural Transport Innovation” (CD6.47) in Section 3 of this proof. These references clearly demonstrate the governments enthusiasm for improving rural transport and the role DDRT as well as cycle routes and e-cycles can play in this.
- 8.15 In terms of TDC Policy, I have demonstrated in Section 6 of this proof that the proposed development complies with all five strands of Policy DP5.

Reasons for Refusal

- 8.16 TDC’s objection on transport grounds is set out in first Reason for Refusal with the relevant section of said Reason for Refusal being as follows:

The proposal would not comply with the requirements of paragraphs 155 and 156 of the National Planning Policy Framework (2024) as the development would not be in a sustainable location and necessary improvements would not be made to local infrastructure to cater for the needs of the occupiers of the new development

- 8.17 I have demonstrated in my evidence that, with the proposed transport improvements, the development would be in a sustainable location with access to amenities available using a choice of means of sustainable

transport. I have also demonstrated that necessary improvements are proposed to the local infrastructure to cater for the needs of the occupiers of the new development ie footpath and cycle route improvements and a significant enhancement to the existing DDRT service.

- 8.18 It is noteworthy that the competent transport authority, Surrey County Council, raise no objection to the grant of planning permission assuming the agreed package of transport improvements is provided.

Overall Conclusions

- 8.19 I consider the proposed development to be in a sustainable location from a transport perspective due to the existing sustainable transport links that exist to local amenities along with the significant enhancements to transport provision that will be brought forward by the development and which will be available to existing residents as well as residents of and visitors to the proposed development.
- 8.20 Furthermore, I do not consider there are any transport related reasons why planning permission should not be granted.