Document sent to Surrey County Council Transport Development Planning on 27 March 2023 by residents of Oatlands Drive and adjacent roads, reacting to the consultation responses from Surrey CC TDP on planning applications 2022 / 2118 (4 – 6 Oatlands Drive) and 2022 / 3796 (16 – 18 Oatlands Drive)

Proposed flatted developments at 4-6 and 16-18 Oatlands Drive, Weybridge.

Local residents' concerns regarding highway safety issues

1. Introduction

We are writing to you regarding the proposed developments at 4 – 6 and 16 – 18 Oatlands Drive, Weybridge (Elmbridge PA 2022/2118 and PA 2022/3796) which will replace 4 detached houses with 60 flats. When combined with the 51 flatted dwellings currently under construction at nos. 8-14 Oatlands Drive, there would be a total of 111 flats in adjoining developments. This equates to a probable car ownership of some 161 cars. When this is coupled with the number of associated trade and delivery vehicles, we believe the impact on highway safety is too significant to ignore.

In the context of the very high volumes of traffic in Surrey, the frequent accidents and delays on the M25 and M3 that divert vehicles along local roads and cause additional severe congestion on Oatlands Drive, the continual damage to highway property on the road (e.g. refuges, bollards, traffic lights and road signs), the increasing population of Elmbridge, the complexity of the traffic light system at Walton Bridge, the expected impact from the imminent ULEZ directive and the fact that no comprehensive highways survey has been conducted for the area since 2007 (i.e. pre the new Walton Bridge), we feel it is time that our concerns were given more serious consideration by the county highways' authority.

We are writing to you to request that the impact of the 3 developments are reviewed cumulatively, not individually, to assess their combined impact on road safety and congestion at this location. We further request that these, and any possible future applications in this location, are refused until a comprehensive traffic survey at this junction is carried out.

The text below provides background information and a discussion of road safety implications, together with some photographic evidence.

2. Background Information

2.1. It is our understanding that the last full road safety review of this proposed development area was conducted in 2007, in association with a development proposed by Cala Homes (EBC PA 2007/0841) that was eventually refused on appeal. The Cala Homes development was intended for the same site, namely 4 - 18 Oatlands Drive. This survey noted the site to be one of major traffic congestion, with traffic backing up in all directions around the adjacent traffic lights, particularly along Oatlands Drive where traffic backups of over 50 vehicles were registered. It was also noted that the area was a vehicle incident hot spot with over 50 accidents being reported for the period 2004-2007 within a short radius

of the development site, 3 of which were serious. It was noted with concern that this survey did not report the 2 fatalities at the Oatlands Drive / Beverly Close junction and the 2 fatalities at Walton Bridge, as detailed by the 'Crash Map' report for that period, meaning concerns were understated.

2.2. The Crash Map for the period 2013-2021, shows the stretch of Oatlands Drive from the bridge traffic lights to Oatlands Village to be one of regular vehicle incidents. For this period there have been 35 vehicle incidents, 4 serious accidents and 1 fatality. No data is available to the public for 2022. The amount of traffic entering and exiting these proposed development sites at 4 – 6 and 16 – 18 Oatlands Drive would add further strain to a highly traffic congested area.

2.3. Damage to highway installations in the immediate vicinity of these proposed developments is frequently evident along Oatlands Drive and bears out the noted road safety concerns. Vehicles are repeatedly colliding with the refuge bollards, there is damage to road signs and to the traffic light signals only yards away.

The accidents that cause this type of damage are frequent, but rarely counted on sites like Crash Map. If SCC Highways consult their records, they should be able to see how often they have had to repair these in the last 5 years. The 111++ vehicles entering and exiting the proposed development would significantly add to the danger here.

2.4. Since 2007, the old narrow Walton Bridge was replaced with a new wider bridge (as shown above) that was completed in 2013. This has resulted in a much higher traffic flow. Walton Bridge is now a strategic route for (i) traffic flowing off the M3 via the Sunbury Cross junction, (ii) traffic flowing off the M25 via Weybridge and Hersham and (iii) traffic flowing off the A3 via Weybridge and Hersham. Yet despite the notable increase in traffic flow and the building of the new Walton Bridge, no comprehensive highway study has since been conducted.

2.5. The junction of the A3050 / A244, by definition of their 'A' road status, constitutes a very busy road system and accordingly one of the most strategic, apart from dual carriageways and motorways. The traffic build up is very high at peak times with long tailbacks running along Oatlands Drive, over Walton Bridge, along New Zealand Avenue and Bridge Street. The Oatlands Drive tailbacks have at least doubled since the 2007 survey. It is universally recognized as an area of major congestion.

2.6. The junction handles not only local traffic but is a route for heavy goods vehicles coming off the M25 and A3 as described above. Many of these vehicles are long and wide, and significantly stress the narrow road system along the (residential) Oatlands Drive.

2.7. Local residents familiar with Oatlands Drive know only too well that the road is badly congested at different times throughout the day. The simple concept of peak times/rush hour congestion is no longer an appropriate measure. The changes in traffic patterns reflect, firstly, changes in personal lifestyles - for example (i) the working week has become more flexible than the outdated "9 – 5" model (ii) two parents working, having to cope with differing school runs due to pre and post school pick-ups (iii) greater school traffic as a result of the increased school headcount e.g. expansions at Ashley, St George's, Cleves and Heathside schools. Secondly, they reflect the impact of a very large increase in the numbers of housing units in and around Walton-on-Thames, which inevitably feeds a continually growing flow of vehicles on approach roads to Walton Bridge.

2.8. If we consider the demographics** of the major users of Walton Bridge, the population of Elmbridge grew by 6.1% between 2011 and 2021, in Runnymede the increase over the same period was 9.4% and in Spelthorne 7.7%. The new Walton Bridge, built in 2013, was introduced to accommodate the population increase, but no material changes were made to the surrounding feeder roads. Accordingly, Oatlands Drive (which is a residential road) and other local roads are taking a traffic load that is already very high for their capacity. Adding further vehicles and vehicle movements from the proposed development sites will aggravate road safety issues *(** source: ons.gov.uk*).

3. Road Safety Concerns/Issues

3.1. <u>New up-to-date survey is required</u>. Most residents of Oatlands Drive and the surrounding area are very concerned about the genuine road safety issues, as detailed below. We feel that an up-dated highway safety study is now long overdue, and that such a study should be completed prior to permission being granted here for any further large developments that would add to the vehicle numbers.

3.2. There is a cumulative massive increase in local traffic. A first major concern is that the Transport Development Planning (TDP) currently appears to consider each planning application separately. The impression is of a system that does not allow for the potential cumulative impact on the local road network of approved, proposed and likely developments. And it is not only housing developments that need to be taken into consideration here, but also the cumulative effect of other, wider issues.

3.2.1. With regard to the Oatlands Drive developments (nos. 4-6 proposed - PA2022/2118, nos. 8-14 under construction and nos. 16-18 proposed – PA 2022/3796) they should be considered cumulatively, since in total these developments will squeeze 111 flats into a small area of 1.2 hectares, replacing just 8 family homes. This equates to a probable car ownership of some 161 cars as shown by the table below. Given the inadequate local bus network, the distance of the sites from the railway station (30 minutes brisk walk) and the practical requirement for individual, essential car journeys e.g. school drop-offs and pick ups, surgery/hospital visits, weekly shopping and commuting, the reality is that residents' personal needs will always take precedence. Therefore, 161 cars is a realistic assessment for 111 flats.

The argument proposed by Lanmor Consulting whereby 12% of households have no car and 88% of households have a car, concluding that for 27 dwellings only 24 car spaces are required, is simply not of the real world. This has been put forward as an independent argument but is solely based on a single car per household, a premise that is totally out of touch with reality (see car population details below.) With regard to the need to reduce emissions, those genuinely concerned with global warming will simply turn to electric cars. Hence the argument for reducing the car population is not realistic at this current time.

Also, the pricing and marketing of these flatted developments are for luxury, expensive apartments, based on marketing of Riverside Gardens. So, car ownership is likely to be high, at least in line with current Elmbridge norms.

	1 Bed	2 Bed	3 Bed	Subtotal	Car Usage Allocation			Subtotal
8-14 Oatlands Drive	19	27	5	51	1	1.5	2	69.5
4-6 Oatlands Drive	4	15	8	27	1	1.5	2	42.5
16-18 Oatlands Drive	3	28	2	33	1	1.5	2	49
Number of flatted developments =				**111**	**Total number of likely cars =**			**161**

3.2.2. There are large developments planned for the wider area, such as the massive housing developments underway around Wisley, Ockham and Ripley. Many of those future residents will need to cross the River Thames on a regular basis and will invariably use Walton Bridge, often entailing a journey along Oatlands Drive. The consequence of such developments should be included in the modelling of the impact on Oatlands Drive and other parts of the local road network, in order that the cumulative burden of new developments forms part of the highways' risk assessment.

3.2.3. The impact of the extended ULEZ area scheduled for end August 2023 needs to be modelled, whereby traffic seeking to avoid the ULEZ payments may avoid the river crossing point at Hampton Court Bridge to cross at Walton Bridge.

3.3. Huge increase in traffic in Walton since the last survey. The **total number of vehicles** licensed in Elmbridge, including plug-in vehicles, increased from 87,511 in 2009 to 96,974 in 2022, an increase of 9.8%. Statistics show that the number of LGVs licensed in Elmbridge increased by 40.9% over this period and the number of HGVs by a staggering 75%. The number of plug-in vehicles went from 11 to 3,474. Similar data for Runnymede shows a 17.7% increase in total number of vehicles between 2009 and 2022, and in Spelthorne the increase was 6.8%**. Clearly the future trend is a move to more plug-in vehicles rather than a general decrease in vehicle numbers, in fact it shows vehicle numbers increasing all the time. The effects of this are already only too obvious on Surrey's struggling, crumbling road network. *(** Department of Transport source references: VEH 0142 – plug-in vehicles and VEH 0105 – all other vehicles.)*

3.4. Complex traffic lights result in dangerous driving. The Walton Bridge traffic light sequence, though necessary, is very complex. Infrequent users often become confused, sometimes even blocking the junction, which leads to impatient driving of the frequent users. Such impatience is totally unacceptable but unfortunately is a dangerous reality and is a contributing factor to the number of vehicle incidents in the immediate area. This situation has not changed for some 20 years and it is unrealistic to make the argument that drivers should (i) have a high level of awareness, (ii) not drive so fast, (iii) adhere to safe driving practices etc. It is clear to local residents that the stretch of road near the development sites is high risk, with inappropriate driving occurring regularly. As an example, vehicles have often been seen driving on the wrong side of the central refuge located near the junction of Oatlands Drive and Ashley Close to get past queuing vehicles on the inside lane, and if they were to meet a vehicle exiting Ashley Close a very serious accident could occur. It should also be noted that ambulances, fire engines and police cars when responding to an emergency will also use the wrong side of the road, often at high speed, when heading past traffic queues towards the lights at Walton Bridge.

3.5. Traffic congestion on Oatlands Drive causes dangerous driving. The 2007 highways report, as noted above, identified a traffic back-up along Oatlands drive of over 50 vehicles at peak times. This traffic back-up has now more than doubled, leading back to beyond the Oatlands Chase T-junction, and often all the way to Oatlands Village, causing huge congestion and associated safety risks. When the traffic is backed-up along Oatlands Drive, vehicles accumulate two-abreast exactly at the exit/entry site of the approved and proposed developments, see 2013-2022 Crash Map below.
Accordingly, any vehicles exiting this approved/proposed development area turning right will have to attempt the crossing of two lanes of oncoming traffic. In reality, any line markings will do little to mitigate the problems and a high-risk situation will often prevail. The siting of two new access / egress roads very close together, almost directly opposite the Oatlands Drive / Ashley Close junction, compounds the accident risk.

The vehicles heading towards Weybridge, after clearing the traffic lights, are travelling at increasing speed down Oatlands Drive, exactly at the proposed development sites location. There is a risk that these accelerating vehicles will collide with vehicles leaving the development sites because the vehicles exiting the sites, having to cross queuing traffic, will be partially blind to the Weybridge-bound vehicles. The corollary is also true, such that accelerating traffic travelling along Oatlands Drive in a southerly direction, will be blind to emerging traffic from the development location. This will create a potential hot-spot

for future accidents. To compound the risk, other vehicles travelling along Oatlands Drive towards the traffic lights are often queue-jumping on the wrong side of the road. This situation happens during busy periods when there are long tailbacks of bridge-queuing traffic on Oatlands Drive. The traffic wanting the slip road onto the bridge blocks the traffic wanting to go straight ahead or to turn right into New Zealand Avenue so, out of frustration, vehicles sometimes pull out and drive on the wrong side of the road towards the traffic lights. Such driving is reckless, but unfortunately is a reality and the consequence of queuing impatience. Vehicles involved are many motorcycles and cyclists, as well as cars, commercial vehicles rushing to jobs and even occasionally, lorries and public buses. Most importantly this queue jumping / wrong-side-of-the-road driving happens at exactly the point where the 111 flats are proposed.

The Crash Map data for the period 2013-2021, as discussed in section 2.2, is shown in the diagram above. This section of Oatlands Drive is known to be accident prone, with 35 vehicle incidents, 4 serious accidents and 1 fatality recorded in recent times (not including the numerous accidents that go unrecorded that residents can attest to). The amount of traffic entering and exiting these development sites would add further strain on a highly congested area. Hence it is desirable that an accurate and up-to-date account of the highway incidents for the immediate development area be generated, and factored into the risk assessment.

3.6. <u>Damage to traffic lights, signs and bollards further demonstrates this is an accident hot-spot.</u> Further evidence of the highway safety issues along Oatlands Drive is provided by the history of the damage to refuge bollards, sign-posts and traffic light posts. These should have been fully documented by the highways' authority over the years.

3.7. Danger on cycle route. Not only does the A3050 Oatlands Drive carry large volumes of traffic, including many HGVs and LGVs, it is also identified as a cycling corridor through the LCWIP and has designated cycle lanes on either side of the road. These cycle lanes have pinch points at the central refuges that are staged along the road for pedestrians and speed control. The cycle lanes are routed across and opposite the proposed development sites, such that the daily traffic entering / exiting the proposed sites from different directions will put cyclists at risk. This presents another road safety concern, especially as the developer refused to accommodate SCC's request for a 3m wide pavement for cyclists.

	1 Bed	2 Bed	3 Bed	Subtotal	Car Usage Allocation			Subtotal	Developer number of Parking Spaces
8-14 Oatlands Drive	19	27	5	51	1	1.5	2	69.5	57
4-6 Oatlands Drive	4	15	8	27	1	1.5	2	42.5	27
16-18 Oatlands Drive	3	28	2	33	1	1.5	2	49	32
Number of flatted developments =				111	Total number of likely cars =			161	116
					Parking Shortfall =			45	

3.8. Insufficient parking spaces causes safety issues in Ashley Close.

3.8.1. As noted above the three developments will add some 161 cars versus the 18 cars that were assigned to the residents of the 8 houses before any redevelopment. This is a massive increase. Furthermore, there will be a very considerable shortfall in parking spaces. The table below shows the parking spaces required when the three developments are taken together is 161. The developers are providing 116, which is a shortfall of 45 parking slots. These vehicles will need to find off-site parking in an area where this is extremely limited.

3.8.2. Additionally, there will always be trade, delivery vehicles, friends and family visitors that exacerbate the parking problems for the 111 flats. Hence there will be a considerable overspill and this overspill will gravitate to Ashley Close because: (i) Oatlands Drive is controlled by double yellow lines and (ii) the other closest side road (Tower Grove) is private. Ashley Close is and has been for some time overwhelmed with non-resident parking, shown by the photographic evidence below.

In fact, this particular photograph shows the serious road narrowing caused by non-resident parking on either side of the road, making it almost impossible for large vehicles (as shown) to navigate the road. If this large vehicle were a fire engine, lives could be at risk. Ashley Close is a cul-de-sac and this makes the congestion even more dangerous.

3.8.3. Residents and visitors from the three development sites, finding inadequate on-site parking, will then most probably cross the busy and often backed-up Oatlands Drive into Ashley Close. This would without doubt create further highway safety risks. The consequential toll on Ashley Close will be high if all these developments are permitted. It is a small road that cannot safely cope with parking on both sides of the road. Its residents have continually complained that they are unable to safely exit their driveways due to the blind spots created by intense non-resident parking that also restricts their driveway turning areas. As a result, there have been numerous “near misses” in this road.

3.9. TRICS data is out of date and inaccurate. TRICS® is the system of trip generation analysis for the UK and Ireland. First launched in 1989, it is an integral and essential part of the Transport Assessment process, and through continuous investment and development it has expanded into a comprehensive database of traffic and multi-modal transport surveys, covering a wide range of development type

3.9.1. The system allows developers to establish potential levels of trip generation for their development scenarios using a series of database filtering processes, and it is widely used by both transport planning consultants and local authorities (the latter of which use TRICS® to audit Transport Assessments).

3.9.2. The system is designed to take users through progressive stages of this filtering, starting off with the full database for a selected development type until all of the compatibility criteria (as decided upon by the user) have been met, with users ending up with a smaller, compatible set of surveys ready to undergo a trip rate calculation. The result is a range of trip generation rates for a development scenario, which can then be used in a Transport Assessment.

3.9.3. For the development sites in question, TRICS data has been compiled by Lanmor Consulting. The key question is whether Lanmor Consulting have based their findings on a reasonable set of premises and provided fair representation to enable an objective understanding thereof. Firstly it is noted that the data used for modelling is out-of-date since it only covers the period 2011 – 2019. Secondly, the data samples are biased since the ‘edge of town’ data dominates the ‘suburban’ context by a factor of 2.3. Thirdly a restricted car ownership factor dominates the modelling, resulting in a self-fulfilling outcome.

3.9.4. First and foremost Lanmor Consulting base all their findings on 27 dwellings with an associated 24 cars spaces. This is based on the premise that Oatlands Drive is sustainable location since there are good links to local transport and there are adequate nearby facilities e.g. retail shops, schools, surgeries etc. Residents know this is certainly not the case. Bus transport is inadequate (with no direct bus to the train station), schools bar Ashley School need to be driven to, surgeries need to be driven to, DIY stores need to be driven to (Homebase is just for minor DIY materials), and

many retail shops have gone. Walton-on-Thames no longer offers good facilities and many residents have to travel further afield for their shopping needs. Lanmor's argument that Oatlands Drive is currently a sustainable development area is therefore questionable.

3.9.5. For the site at 4-6 Oatlands Drive, it has been previously outlined that 27 car parking spaces are wholly inadequate. However Lanmor Consulting have based all their TRICS modelling on 27 units with 1 car per unit resulting in 27 car spaces. The TRICS Multi-Modal Vehicle Occupants (the volume of vehicle and human traffic entering and leaving the site) data sheet shows the following results:

- The 'am' total trips for these units is 92.09 trips, while the 'pm' total trip rates is 101.25, resulting in 193.34 trip rates per day. A massive increase over the trip rates for pre-development times
- The expected trip rates will be very different if 112 vehicles rather than 27 vehicles, are considered coming from the one site entry and exit entrance of 4-6 & 8-14 Oatlands Drive. There will be a factor increase of 4.2. Accordingly the total trips per day will likely increase from 164 to 691 if the impact is taken linearly. The impact on trips rates from the single entrance and exit point for the combined single entrance site of 4-6 & 8-14 Oatlands Drive is clearly significant and constitutes a serious road safety risk.

3.9.6. For the site 16-18 Oatlands Drive it has been previously outlined that 33 car parking spaces are wholly inadequate. Again Lanmor Consulting have based all their TRICS modelling on 33 units resulting in 32 car spaces. The TRICS Multi-Modal Vehicle (the volume of vehicle and human traffic entering and leaving the site) data sheet shows the following results:

- The 'am' total trips for these units is 56.39 trips, while the 'pm' total trip rates is 58.95, resulting in 115.53 trip rates per day. A massive increase over the trip rates for pre-development times
- The expected trip rates will be very different if 49 vehicles rather than 32 vehicles, are considered coming from the entry and exit entrance of 16-18 Oatlands Drive. There will be a factor increase of 1.5. Accordingly, the total trips per day will likely increase from 115 to 173 if the impact is taken linearly. The impact on trips rates from this 16-18 Oatlands Drive is clearly significant and constitutes a serious road safety risk, especially when combined with the volumes of multi-modal traffic related to the 4-6 & 8-14 Oatlands Drive site.

4. Conclusion

When all the above arguments are considered in their entirety, the cumulative impact on road safety of the proposed developments on the 3 separate but adjoining sites is very significant. We believe therefore that this impact should have been assessed by Surrey TDP after considering the three sites together, not as separate entities.

The last highways study for Oatlands Drive was conducted in 2007, prior to the building of the new Walton Bridge. All local residents have experienced a continual increase in the volume of traffic over the years and generally accept this situation as part of modern life with its reliance on motor vehicles. However, we are now questioning the approach currently taken by the county highways' authority in its assessment of the impact of new developments on the road network because we believe the repercussions of the system are having an increasingly detrimental effect on established residential areas and their communities.

This dissatisfaction with the system is felt particularly strongly when new developments, such as those in Oatlands Drive, are cramming ever more housing units onto every available plot of land, disrupting and sometimes destroying existing residential communities in the process, without addressing the borough's really urgent housing needs. Whilst we appreciate that consideration of the type of developments being proposed does not fall within the remit of Surrey TDP, it is abundantly clear to anyone that many of these developments are not truly meeting a housing need but are developers' profit-generating projects. The Consero developments proposed at 4 – 18 Oatlands Drive, with expected prices around £1m for a 3-bedroomed flat, certainly fall within this "unessential" category.

Furthermore, the impact of all new developments planned and approved in the wider area around Weybridge and Walton needs to be factored in when assessing the increased volumes of traffic along Oatlands Drive and their impact on the road and its residents. Also, the potential impact of the extension of the ULEZ zones should be taken into account.

The under-provision of parking for all three sites is a genuine and critical concern that we feel has been afforded insufficient weight by the county authority. It will inevitably create parking overspill into Ashley Close that will not only make it difficult and often dangerous for residents of that road to exit and enter their driveways, but will further increase the number of vehicular movements to and from the development sites across the very busy Oatlands Drive traffic, creating more traffic hazards.

The TRICs modelling needs to use a more current database, and not bias the modelling outcome by using subjective control parameters e.g. a low car count, bias to town centre etc. For example, the modelling of the car count is totally disconnected from the facts of car ownership and does not take into account the move to electric cars. Furthermore the TRICS data needs to consider the total volume of traffic, both vehicle and human i.e. using the multi modal approach, which provides a full daily prediction. The available Lanmor modelling leads to an under prediction of the volume of vehicle and human traffic entering and exiting the proposed development sites. Moreover no attempt has been made by Lanmor to model the whole development of 111 units as an entirety, another shortcoming of the work.

Whilst the residents of Oatlands Drive will now have to live with the increased traffic originating from the site at nos. 8 – 14 we urgently request that, in case it transpires that the sites at nos. 4 – 6 and 16 – 18 are likely to be given planning approval, a more thorough assessment of the cumulative impact of 111 flats in this location is first undertaken by the county highway authority.

Although Surrey Transport Development Planning has already responded to the consultation by Elmbridge Council on application numbers 2022 / 2118 (site at 4 – 6) and 2022 / 3796 (site at 16 – 18) there is still time for further comments to be submitted. Application 2022 / 2118 as we understand it has gone to appeal, with no start date known yet, and application 2022 / 3796 is still under consideration by Elmbridge. Enough time remains for the bigger picture to be assessed before these outstanding applications are decided. The residents of Oatlands Drive would be most appreciative and supportive of such an initiative by Surrey TDP and we would be more than ready to assist in any way we can.

Thank you for taking the time to read this lengthy document.