As of 2025-11-10 - Objection to 25/02562/FUL - Luke Taylor MP for Sutton, Cheam and Worcester Park.

Ref.
https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport

My objection to the development relates to unacceptable vehicle traffic increases on Green Lane and Browning Avenue, leading to unacceptable delays at the junction of Central Road and Green Lane which will cause severe impact on local roads, and therefore unacceptable impacts on the Worcester Park constituents that I represent.

A. Misstatement of traffic levels generated by the development.

1. Concerns with figures in Transport Assessment Part 1.

Document "25_02562_FUL-Healthy_StreetTransport_Assessment_Part_1-6003103.pdf" presents in section 6 from page 78 onwards, the trip generation calculations for the AM peak for the development.

Table 6.6 presents multi-modal trip generation for the site. For vehicular transport modes shows 3 taxi, 20 car or van, 13 bicycles and 6 motorcycle departures in the AM peak, which all must be considered when evaluating road traffic demand. This vehicle mix creates a Passenger Car Unit (PCU) value of 28 PCU in the peak hour departing.

PCUs are the recommended method for estimating the impact of vehicles on urban roads, more accurate and relevant than simple vehicle numbers. Appropriate DfT and TfL figures for calculating traffic demands using PCUs are given in TfL design guidelines linked below, Table 7-1 Typical PCU values for various vehicle types on page 48;

Ref: https://content.tfl.gov.uk/traffic-modelling-guidelines.pdf

Para 6.23 of the planning document explains the required addition of servicing trips, using the 17 deliveries per hour discounted for linked trips is reasonable, however the vehicle types for servicing and deliveries are likely to be of a larger vehicle than a car or taxi, hence a PCU value of 1.5 (medium 1.5) is appropriate. This creates an additional 25.5 PCU units for the AM peak, which must be added to the departure trips, creating 25.5 + 28 = 53.5 PCU for the AM peak.

Para 6.33 shows the distribution of traffic splits for that using Green Lane to access Central Road / A2043 and Browning Avenue, and suggests that 96% of journeys would use this route, suggesting that 53.5 * 0.96 = 51.36 PCU of traffic would present at the Green Lane / A2043 Junction in the peak hour, which on an even distribution is just below one per minute.

In transport planning modelling it is best practice to model traffic with microsimulation software that applies randomisation and normal distributions to traffic flows, thus more correctly showing the range of demand profiles that would be seen in real life.

The layout of the access road between the development and Kingshill Avenue is single carriageway with passing points, which will inevitably mean a bunching of vehicles exiting the site, creating concentrations of traffic over and above the one vehicle per minute suggested by the calculation.

Further bunching of vehicles travelling along Green Lane will be caused by the three 'pinch point' existing speed control measures, this means that the concentration of traffic arriving at Green Lane / A2043 junction will be considerable, and is likely to cause extended, unacceptable levels of queuing traffic at these traffic lights.

Para 6.34 then completely misstates the cumulative impact of these traffic flows to be "around one vehicle every 3-minutes" which is a huge error when considering traffic flows of 51.4 PCUs in the peak hour, and is likely to mislead Councillors on the committee.

The 'Junction Modelling' section from paras 6.35 to 6.39 then completely ignores the Green Lane / A2043 junction, compounding the omission of modelling of this junction. In Para 7.2, eighth bullet point, the statement mentions only cars, dismisses the impact of servicing trips, and does not present a proper measure of the traffic impact of the development. In additionally, the omission of LBS in the list of bodies that consider this acceptable is disgraceful, and shows how the voices of LBS and of Worcester Park residents is being ignored.

Due to the evidence presented above, the conclusions then outlined in Paras 7.3 and 7.4 cannot be credible, and must be reevaluated with correct figures and with the full input of LBS.

2. Concerns with TfL Position on Modelling

Additional evidence of the impact of the additional traffic on Green Lane and the junction with Central Road is provided by TfL, who in an email me on 16th October 2025 from 'Liam' in Government relations explained why TfL were unwilling to recommend modelling be undertaken on the junction in response to my request for them to request that full modelling be done of the junction;

> *"While we recognise that the Green Lane/Central Road junction does experience congestion, further modelling would likely lead to recommendations for signal timing changes. However, any such changes would risk negatively affecting the journey time performance of the SL7 bus route, which runs along Central Road. Maintaining reliable bus services during peak periods remains a priority, and adjustments that compromise this would not be supported."*

This response clearly demonstrates that TfL accept that the congestion created by the development would create unacceptable delays on Green Lane and require signal timing changes, but that they prioritise reliability of the SL7 on Central Road, above the inconvenience to drivers using Green Lane.

For these two reasons outlined above, there are clear grounds to reject the application due to incorrectly presented traffic modelling figures, and an invalid conclusion being drawn due to incorrect figures and calculations being used.

B. Objections on NPPF Grounds

1. Conflict with paragraph 111.

The London Borough of Sutton has requested proper traffic modelling of the Central Road / Green Lane junction by the developer, because they feel that the traffic impacts as presented underestimate the impact. As demonstrated clearly in Part A of this objection, the traffic levels are indeed misrepresented, and underestimates the impact of the development on Worcester Park residents.

This is in direct contravention of Para 111 of the NPPF which states;

“Planning policies should:

(b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;”

This lack of detailed modelling that was requested means that Sutton Council cannot be regarded as being actively involved in the evaluation of the impact of the development, and therefore strategies for supporting development patterns cannot be aligned.

In addition, Paragraph 6.27 of the Document “25_02562_FUL-Healthy_StreetTransport_Assessment_Part_1-6003103.pdf” Transport Assessment Part 1 states;

“Whilst it is also acknowledged that there are congestion issues at the A2043 Central Road / Green Lane signalised junction. TfL and the local boroughs have agreed this junction does not need modelling as the traffic flows generated from the Site will not lead to a severe impact at this junction.”

This statement is incorrect, and LBS have repeatedly asked for modelling to be conducted at this junction, which has been repeatedly refused by the developer and by TfL.

For this reason, there are clear grounds to reject the application for an unacceptable lack of coordination with LBS, and the lack of clear modelling means that a strategy to

support sustainable transport and development patterns for the development has not been generated, against NPPF para 111.

2. **Conflict with paragraph 116 of the NPPF.**

Paragraph 116 of the National Planning Policy Framework states;

“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.”

At present no mitigations are proposed for the impact of the development on roads in the London Borough of Sutton (LBS) and therefore the development, following on from the construction of the Hamptons Estate, will cause severe impact, as per Para 116 of the NPPF “...residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

In addition, the quote provided helpfully by TfL that;

> *“While we recognise that the Green Lane/Central Road junction does experience congestion, further modelling would likely lead to recommendations for signal timing changes.”*

Demonstrates that residual cumulative impacts would be severe, and even more clear when TfL also confirm that the required mitigation will not be undertaken;

> *“However, any such changes would risk negatively affecting the journey time performance of the SL7 bus route, which runs along Central Road. Maintaining reliable bus services during peak periods remains a priority, and adjustments that compromise this would not be supported.”*

As stated previously, this response clearly demonstrates that TfL accept that the congestion created by the development would create unacceptable delays on Green Lane, requiring signal timing changes, but that these delays will not be mitigated.

For this reason, there are clear grounds to reject the application for an unacceptable impact on the cumulative impact on the road network, against NPPF para 116.