

FORMAL OBJECTION – Transport and Highways Grounds

Application: Hook Park / Poppymill Development – Transport Assessment

Dear Planning Officer,

I am writing to formally object to the proposed Hook Park development on the grounds that the Transport Assessment (TA) submitted by the applicant fails to accurately assess, model, or mitigate the true transport and public safety impacts on Chessington, Hook, Tolworth and the wider A309 corridor.

My concerns relate to **rail capacity and reliability, local road safety, cumulative traffic growth, junction safety on the A309**, and **fundamental omissions** within the applicant's own transport evidence.

1. Rail Capacity and Reliability Have Not Been Assessed

The TA relies entirely on **timetabled services**, stating that Chessington North offers “two trains per hour” to London.

However:

- The Chessington Branch Line is **not a reliable service**, with regular cancellations, delays, and short-formed trains.
- The TA **does not assess crowding**, platform capacity, peak loads, or whether the line can absorb the additional passengers from:
 - **Nearly 2,000 new Hook Park dwellings**
 - **The ongoing intensification around Chessington South (final stop on the line)**
 - **Signal Park, Tolworth – a major development already under construction**
 - **Taylor Wimpey's 150-home scheme in Thames Ditton, which will also rely on the A309 corridor**

The TA simply assumes that trains will run on time, at full frequency, and with infinite capacity. This is demonstrably not the case.

Shuttle Bus Proposal is Not a Substitute for Rail Capacity

The developer proposes a privately funded Shuttle Bus (two per hour, using a single vehicle). This:

- **Does not increase National Rail capacity**
- Is not guaranteed long-term
- Fails if the single vehicle is unavailable
- Will still ultimately feed into an already unreliable half-hourly train service

A reliable rail offer cannot be engineered through developer-funded bus services.

2. Cumulative Development Has Been Ignored

The Transport Assessment **treats Hook Park in isolation**, despite being aware that:

- **Chessington South (end of the line)**

A significant number of new homes are being built there. These will also place pressure on the same rail line, same bus services, and same road network.

- **Tolworth – Signal Park Development**

Signal Park is a major intensification directly on the Chessington Branch Line and A240/A3 links. Its residents will also rely on Tolworth Station trains that feed directly into the same rail service as Chessington North.

- **Thames Ditton – Taylor Wimpey (150 homes)**

These residents will also travel along the **A309 Kingston Bypass** and potentially through:

- Chessington Roundabout/Ace of Spades
- Hook Roundabout

This is **the very same corridor** the Hook Park development depends upon.

The TA contains **no cumulative impact assessment**, which is a fundamental requirement of NPPF paragraph 113 (“cumulative impacts must be considered”).

This is a major omission, rendering its conclusions unsound.

3. The A309 Kingston Bypass Access is Unsafe

The proposed new roundabout access onto the A309 is presented in the TA as safe because of hypothetical mitigation. However:

- The A309 is currently a **50mph+ high-speed corridor**.
- The TA **does not provide any guaranteed change to that operating speed**, only aspirational “design-led” reductions.
- Real traffic still travels at high speed and will continue to do so without proven, enforced speed reduction.

Joining 50mph high-volume traffic from a new residential access is a **serious safety risk**, particularly:

- in wet conditions
- in darkness
- for buses and larger vehicles
- for cyclists on the proposed spine route
- when queues form on the A309 from other pinch points (e.g., Ace of Spades, A3, Hinchley Wood)

The developer's own Vision Zero analysis identifies **multiple serious and fatal collisions** on similar sections of local high-speed roads. Yet the TA provides **no independent Road Safety Audit of the new roundabout** under real speed conditions.

This is unacceptable for a scheme of this scale.

4. Local Road Traffic Has Not Been Properly Modelled

The TA makes several unrealistic assumptions:

- **Only AM/PM commuter peaks have been modelled**

This ignores:

- school runs
- weekend shopping and leisure peaks
- Chessington World of Adventures seasonal surges
- A3 incident diversion traffic
- evening and weekend congestion

- **Predicted queues and RFC values are unrealistically low**

Many junction models in the TA show:

- queues of less than 1 vehicle
- “no capacity issues”
- and in some tables “**infinite capacity**” on key arms

No real junction in Chessington or Hook ever performs like that in practice.

- **Heavy reliance on the A309 for site traffic**

The TA's own assignment tables show:

- Up to **91%** of site traffic flows load onto a single A309 link
- Significant new flows onto Woodstock Lane South, Red Lane, Clayton Road, Hook Road, Chessington Roundabout, Bridge Road and Leatherhead Road

Yet none of the known local bottlenecks are meaningfully addressed.

- **No assessment of rat-running or blocking back**

Side streets such as Clayton Road, Elm Road, Moor Lane, and Orchard Gardens are highly vulnerable to displacement traffic during peak congestion or incidents.

The TA does not model this at all.

5. Public Transport Accessibility Level (PTAL) is Very Poor

The TA acknowledges the site has a PTAL of **0-1a**, meaning:

- extremely poor public transport access

- very high likelihood of car dependency
- limited alternative options for commuters, elderly residents, or children

Despite this, the TA claims that the site will be “sustainable” based on design aspirations and uncommitted improvements.

A site with **near-zero PTAL** cannot credibly be described as a sustainable transport location.

6. Summary: The Transport Assessment is Not Adequate Evidence

In summary:

- Rail capacity and rail reliability have **not been assessed**
- Cumulative developments on **the same rail line and same A309 corridor** have been **ignored**
- The A309 access introduces **significant unmitigated safety risks**
- Traffic modelling does not represent **real-world congestion**
- PTAL remains **critically low**, meaning car dependency will rise, not fall
- The claims of “no significant impact” are unsupported

The Transport Assessment does not represent a realistic or safe evaluation of transport impacts.

On this basis, planning permission **should not be granted**.

ADDITIONAL OBJECTION – Local Road Safety on Clayton Road & Woodstock Lane South

7. Increased Traffic and Road Safety Risks on Clayton Road

Clayton Road is a narrow, residential road used daily by children walking to and from several local schools.

It currently operates as a **slow-speed street**, with on-street parking forming a natural traffic-calming feature.

The Transport Assessment proposes widening Clayton Road through the application of **extensive double-yellow lines**, which would remove on-street parking and significantly **increase the effective road width**.

This change will:

- Encourage **higher vehicle speeds**
- Remove natural traffic-calming effects
- Increase danger for children crossing the road
- Force existing residents to walk further to reach their vehicles
- Reduce informal crossing opportunities currently made safe by slower traffic speeds

Children’s Safety Has Been Ignored

Clayton Road is used heavily by schoolchildren walking between:

- Hook Road
- Local primary schools
- Bus stops for secondary schools
- Residential areas east and west of the site

The Transport Assessment **does not contain any Child Safety Audit**, Safe Routes to School analysis, or pedestrian behaviour modelling.

This is a serious omission given the scale of the changes proposed.

Introducing hundreds of additional vehicle trips, construction traffic, and faster-moving vehicles on a widened Clayton Road places schoolchildren at clear and unacceptable risk.

8. Woodstock Lane South – Increased Traffic, Speed and Conflict with Vulnerable Users

Woodstock Lane South is already a constrained corridor with:

- **No footways in places**
- **Heavy equestrian use**
- Cyclists travelling between Chessington, Claygate and Thames Ditton
- Drivers using it as a cut-through when the A3 or A309 is congested

The TA proposes “improvements” but does **not** model the increased traffic resulting from:

- The new A309 junction
- Construction traffic
- Displaced drivers avoiding the A3/A309
- Cumulative growth from Tolworth, Chessington South, Thames Ditton and Hook Park itself

Woodstock Lane South will inevitably become a **pressure relief route**.

The TA’s suggestion that the development will “reduce aggressive driving” does not reflect lived reality or the existing accident history along this corridor.

The increased traffic will create **additional danger** for:

- Horse riders
- Cyclists
- Walkers
- Local residents accessing properties directly from the lane

None of these groups have been properly considered.

9. Risk of Forced Residents' Parking Zones (RPZs)

By removing large areas of on-street parking through double-yellow lines, the applicant will displace resident vehicles into an already saturated parking environment.

This will inevitably force Kingston Council to consider:

- **Residents' Parking Zones (RPZs)**
- **Pay-to-park permits**
- **Visitor restrictions**

Residents on Clayton Road, Elm Road, Moor Lane, Orchard Gardens and other surrounding streets **do not want RPZ controls** and have not been consulted.

The TA fails to acknowledge that:

- Existing homes rely on on-street parking
- Yellow lines will displace vehicles
- Displacement pressures will spill across multiple connected residential streets
- RPZs would impose new financial burdens on residents

A development should not impose new parking controls simply to “make room” for its own traffic.

10. Summary of Additional Objections (Clayton Road & Woodstock Lane South)

- Removal of parking + yellow lines = **wider, faster road**, not a safer one
- Children's routes to school are **not assessed**
- No Child Safety Audit or Safe Routes to School analysis
- Increased traffic on Woodstock Lane South endangers **equestrians, cyclists and walkers**
- The TA ignores cumulative diverted traffic from the A3/A309
- Risk of **forced RPZs** that residents do not want and should not have to pay for
- Real, lived road behaviour contradicts the developer's theoretical modelling

These issues must be fully assessed before any planning decision is made.

Request to the Council

I respectfully request that Kingston Council:

1. **Reject the Transport Assessment as submitted**, due to its failure to meet NPPF requirements for cumulative impacts, safety assessment, and realistic modelling.
2. Require the applicant to submit:

- A full **cumulative transport assessment** including Tolworth Signal Park, Chessington South intensification, and Thames Ditton 150-home scheme.
 - A **train capacity and reliability assessment** for the Chessington Branch Line.
 - An **independent Stage 1 Road Safety Audit** for the proposed A309 access at real-world speed conditions.
3. Consider whether a development of this scale is sustainable given the PTAL, rail constraints, and strategic road network impacts.