



**KINGSTON PLANNING APPLICATION 25/02749/OUT  
(= ELMBRIDGE APPLICATION 2025/2765)  
*Hook Park***

Claygate Parish Council **objects** to the above application on the following grounds:-

1. Density and Design of the proposed Development.
2. The proposed Highways and Transportation arrangements, including principally access to/from the site, significantly fail safety and design standards guidance
3. Lack of any plan for primary health care facilities to support development on this scale.

***Density and Design***

A development of the size and density proposed (up to 1952 dwellings) grossly distorts the capacity of any possible development on the site. This represents a population increase for the areas in excess of 5000 persons, a substantial new settlement.

The outline design features mansion blocks, notably including a row of 8 storey blocks along the side of the A3 Esher By-Pass. Blocks of this size are wholly out of keeping with the built form of Hook and, when placed along the extreme outer boundary of a conurbation, as proposed here, will present an overbearing, fortress-like aspect. They also risk cutting off afternoon sun from the central park area.

***Highways and Transportation***

For the reasons set out in the paper at Annex A by Councillor John Burns FCIHT FIHE FRGS AMICE and approved by the Parish Council Planning Committee, the proposed highway access is unworkable. The lack of a Road Safety Audit is a serious deficiency.

Claygate Parish Council has some further concerns about increased traffic turning down Woodstock Lane South to avoid peak hour congestion at the Hinchley Wood roundabout. There are stables along Woodstock Lane South and increased traffic will raise the likelihood of a serious accident with horse and rider. There is also a tendency for a 'rat run' through Claygate to Esher to develop at peak hours, if there is congestion on the A309 between Hook and Hinchley Wood. This will be exacerbated by increased traffic entering and leaving the site via the A309, even on the optimistically low figures for peak hour traffic to/from the A309 of 69 (PM) - 153 (AM) Vehicles per Hour given in Part 19 of the Transport Assessment (pp. 4, 6). *The route through Claygate via Woodstock*

*Lane South, Red Lane and Hare Lane cannot support significantly increased traffic flows.*

### **Primary Health Care**

[Detail omitted, as not relevant to Elmbridge.]

## **Annex A Highway Considerations**

Hook Park Development proposal

RBK reference Planning application 25/02749/OUT

EBC reference Planning application 2025/????

### **Highway considerations**

#### **Background**

Following public consultation, the outline planning application, as referenced above, was issued on 11 November 2025 to Royal Borough of Kingston-upon-Thames (RBKT). An identical application is also lodged with Elmbridge Borough Council (EBC), as the principal highway access and egress point at the north end of the site, on to A309 is in Elmbridge and Surrey County Council (SCC) is the highway authority. Planned car ownership is 0.4 per unit.

Clayton Road access is restricted to arrangements for emergency vehicle access and a bus route, with banned right turns.

We note that we do not have resources to check data sets, so the implications have been assessed based on provided data. This submission addresses only highway matters.

#### **Documentation**

##### **Relevant Highway Authorities**

4. **Transport for London (TfL)**, A3 eastwards to off slip, to A309
5. **RBK**, Clayton Road, A309 slip roads
6. **SCC** for A309 (boundary starts at the nose of the offslip from the A3)
7. **Highways England** for A3, westwards from Hook junction.

##### **Relevant Standards**

Design standards **DMRB**, and **MfS** , **MfS2**. Design speed 50mph for all roads cited, except Woodstock Lane South and Clayton Road. Note the change to 40mph proposal at the site entry/exit point.

##### **DMRB**

CD 116 Geometric Design of Roundabouts v2.1.0

1. Governs the design of new and improved roundabouts on trunk roads.
2. For an 50mph trunk road, roundabouts require circle diameters (typically 36–50m)
3. Entry/exit radii and circulatory carriageway widths are designed to balance speed control with traffic flow

## CD 109 Highway Link Design

For an 50mph trunk road, the SSD is approximately 120m, based on a design speed of 50mph, a 2-second perception-reaction time, and standard deceleration rates per TD9.

1. Forward visibility around curves and at intersections must meet or exceed the 120m SSD requirement

## CD 123 Geometric Design of At-Grade Priority

2. Designs include wider turning radii and larger visibility splays to suit 50mph approach speeds, ensuring safe vehicle movements.

## MfS and MfS2

3. Provide adequate sightlines and visibility from vehicle access points. Vehicles entering and exiting the site should have adequate visibility of pedestrians, cyclists, and other vehicles. Sightlines from vehicle access points should satisfy the requirements of Sections 7.5-7.8 of the 'Manual for Streets'.

(MCHW) Manual of Contract Documents for Highway Works as amended September 2025 Series 600, 700, 1100, 1200.

# Transport and Highway submissions from the Developer

## Introduction

The whole development viability depends upon the impact on the surrounding areas in terms of highways and transportation as well as the safety of the access and egress points for the site.

1. The most relevant document, therefore, is the Transport Assessment of October 2025 and the Environmental Statement – Non-Technical Summary. The following analysis
  - a) will review the traffic growth predictions and effect on the surrounding areas, based on the applicant's proposed provisions, then
  - b) it will review the similar sites evidenced by the applicant
  - c) review the main entry/ exit access point design
  - d) highlight the extraordinary lack of a Road Safety Audit (RSA) 1 which is essential at outline design stage and
  - e) set out a basic RSA1 framework to be required.
2. Finally, the Conclusion will show that the access to this site is unviable with any reasonable mitigation measures, and the application should be REFUSED.

## Commentary

3. We must draw attention to a fundamental assumption which the applicant makes. He states in Appendix B – Sustainable Transport Strategy, page 38 that he believes the standard method of calculating vehicle trips is inflated by 20% and has “removed this bias... forecasting a significant mode shift away from private car use.”

# 20%

Our vision-led approach identifies that vehicle trips are inflated as much as 20% (>5,000 vehicle trips) in the standard method. Our detailed technical work removes this bias, and our comprehensive bus and active travel strategies have been rationalised within the data, forecasting a significant mode shift away from private car use.

We note the Technical Note 1 and 2, which attempts to explain the basis for this assertion and exposition in Part 13 of the Transport Assessment.

This is completely unsupported by the generally accepted scientific evidence, admits much of the calculations are based on assumptions (that suit the applicant) and must vigorously be challenged. The result is that ALL the traffic forecast data is tainted and only acceptable if this huge assumption is made. We comment further below using their figures, but the Planning Authorities MUST assess the basis of the forecasts appropriately.

4. Base assumption for all the traffic assessments is stated at **Transport Assessment**, Part 6 Chapter 6.12.1

6.12.1 To meet the overall Sustainable Travel Strategy Objectives the Applicant proposes a restraint-based approach to car parking across the Site with the following principles:

- a residential car parking provision of 0.4 spaces per unit throughout the Site;
- limited car parking provision for Commercial Class E spaces and other uses; and
- no car parking provision provided for staff of any Commercial and other uses.

This is further broken down to show a total of 818 car parking provision places.

It is clearly recognised by the applicant that this provision will be inadequate, since they propose in Chapter 6.13 that they will fund the creation of a CPZ in all the surrounding roads, to stop inevitable overspill of parking from the site. We would comment that currently Clayton Road and surrounding areas have close to 100% parking place usage.

The applicant in various documents attempts to demonstrate that the effect of the increased car numbers upon the highway infrastructure will be *de minimis*. Clearly, that is based on the unlikely 0.4 cars per household scenario plus an unrealistic expansion of the transport network both in buses, trains and Underground!

Para 8.2.12 itself concludes that there will be a significant number of additional trips on the local bus network, which can only be managed by an increase in the provision.

Similarly, in Chapter 8.3 great reliance is placed on the increased rail usage not being significant, because the applicant casts his net much more widely than Chessington N or S, but as far as Wimbledon.

5. The conclusion that the applicant does not draw is that, if such transport provision is *not* realised, and we accept the wider pull of London Underground at Wimbledon, then the vehicular traffic flows will be greatly in excess of the assumptions made by the analysis.
6. To illustrate that the assumptions are not realistic, we have the applicant's own comparisons. TRICS data is used for trip generation analysis and assess future travel mode share. The table 3.1 below illustrates comparisons across London with similar residential provision, but varying parking ratio.

Transport Statement, part 11 Table 3.1

Table 3.1 TRICS Sites – Private Flats

TRICS Reference	Date of Survey	Location	TRICS Notes	Parking Ratio	Buses per Hour	Rail per Hour
BE-03-C-01	19/09/18	BEXLEYHEATH		1.063	19	8
BE-03-C-02	19/09/18	BELVEDERE		1.368	10	10
BM-03-C-02	17/10/23	BROMLEY		1.75	14	2
BM-03-C-03	18/10/23	BROMLEY		1.346	14	2
BT-03-C-01	28/09/16	PARK ROYAL		1.247	23	17
BT-03-C-03	16/11/23	WEMBLEY		0.631	8	16
EN-03-C-03	08/11/17	PALMERS GREEN		0.667	21	3
HO-03-C-03	18/11/16	BRENTFORD		0.707	31	8
HO-03-C-05	06/03/20	HOUNSLOW		0.857	23	0
HO-03-C-06	24/06/24	BRENTFORD		0.416	27	15
HV-03-C-02	22/11/16	ROMFORD		0.499	46	11
KI-03-C-03	11/07/16	SURBITON		1.25	2	6
RD-03-C-07	14/06/23	KEW		1.006	4	14
WF-03-C-06	25/05/21	WANSTEAD	Undertaken during C-19 Lockdown	0.69	15	9
Average of Included Sites				0.96	19.00	7.70

Paragraph 3.2.6 As shown, there is a good array of surveys for this land use across London; however, no site well-matches the development parameters across all three criteria. There is an average parking ratio of <1 but public transport access is high.

A similar situation is for the TRICS data for mixed housing, where parking ratio averages 0.93 and buses per hour is 8.20 with rail per hour 7.60.

What is the developer’s answer to this point? Public transport in the area is a small fraction of those in London areas with a 0.4 parking ratio.

This is emphasised in Para 3.2.7 where the only TRICS data that matches public transport in the area as it currently is

Table 3.2 TRICS Sites – Private Houses

TRICS Reference	Date of Survey	Accommodation	Location	Parking Ratio	Buses per Hour	Rail per Hour
EN-03-A-01	24/11/21	TERRACED & SEMI-DETACHED	COCKFOSTERS	1.375	15	15
EN-03-A-02	14/09/22	DETACHED HOUSES	HADLEY WOOD	3.444	3	3

The figures speak for themselves.

### Environmental Statement – Non-Technical Summary

7. Various assertions are made in the chapter 15, including that there are no pedestrian crossings, but there is a major one at the Hinchley Wood roundabout, Claygate Lane.
8. Paragraph 15.2.1 The assessment calculated the worst-case scenario for construction traffic in the peak overlap year (2031), anticipating an average of 315 two-way construction trips per day, including 284 Heavy Goods Vehicle (HGV) flow.
9. Paragraph 15.2.2 states, when these flows were applied to the highway network, only two links exceeded the screening threshold (Rule 1: 30% increase): Links 2a and 2c on the A309 Kingston Bypass. (Link 2a - Kingston Bypass A309 WESTBOUND West of A3 Slip and Link 4, to Claygate Lane Roundabout – 100% . Link 2c - Kingston Bypass A309 EASTBOUND from Claygate Lane Roundabout to Split with A3 Slip north of Site – 50%).
10. It is difficult to reconcile these findings as there appear to be no such flows eastwards from the A3 merge, which is not logical.

11. 15.2.3 These links showed a 35% and 50% increase in HGV traffic, respectively, primarily composed of temporary construction traffic. The overall increase in traffic on these major roads was minimal (2% to 3%).
12. 15.2.4 The increase in traffic HGV flows results in a Minor Adverse effect. This is attributed to the fact that the route is already a high-capacity dual carriageway *with no pedestrian crossing facilities*, meaning the baseline severance level is already substantial. Statement in italics is not correct.
13. 15.3 refers to 1,801 vehicle trips generated by residential and commercial elements. Para15.3.2 The assessment found that the traffic generated by the completed development did not lead to a significant increase (i.e., did not exceed the 30% or 10% thresholds) on any of the links within the study area.
14. Our conclusion from this is that the basis of the forecast is flawed, as described above, and traffic generation is likely to exceed these conservative figures.

### Highway and access / egress Junction

15. Paragraph 15.3.6 addresses the Highway and Junction Design: The primary vehicular access features a new roundabout on the Kingston Bypass with dedicated pedestrian and cycling facilities. Significant investment is proposed for improvements along Clayton Road and Hook Road to improve walking and cycling conditions.
16. The highways assessment will have to align the proposal with the standards, which are not subjective judgements, but objective against standards and regulations. There is flexibility permitted, but only to steps of Relaxation.
17. In this case, we would not expect more than one step, given the speed and type of roads involved, (for example, Stopping Sight Distance (SSD): For A roads, relaxations may allow a reduction equivalent to one design speed step below the Desirable Minimum if certain conditions (e.g., straight section) apply. This is not applicable here, but here is the table 2.10 in CD 109 for illustration:

Table 2.10 Design speed related parameters

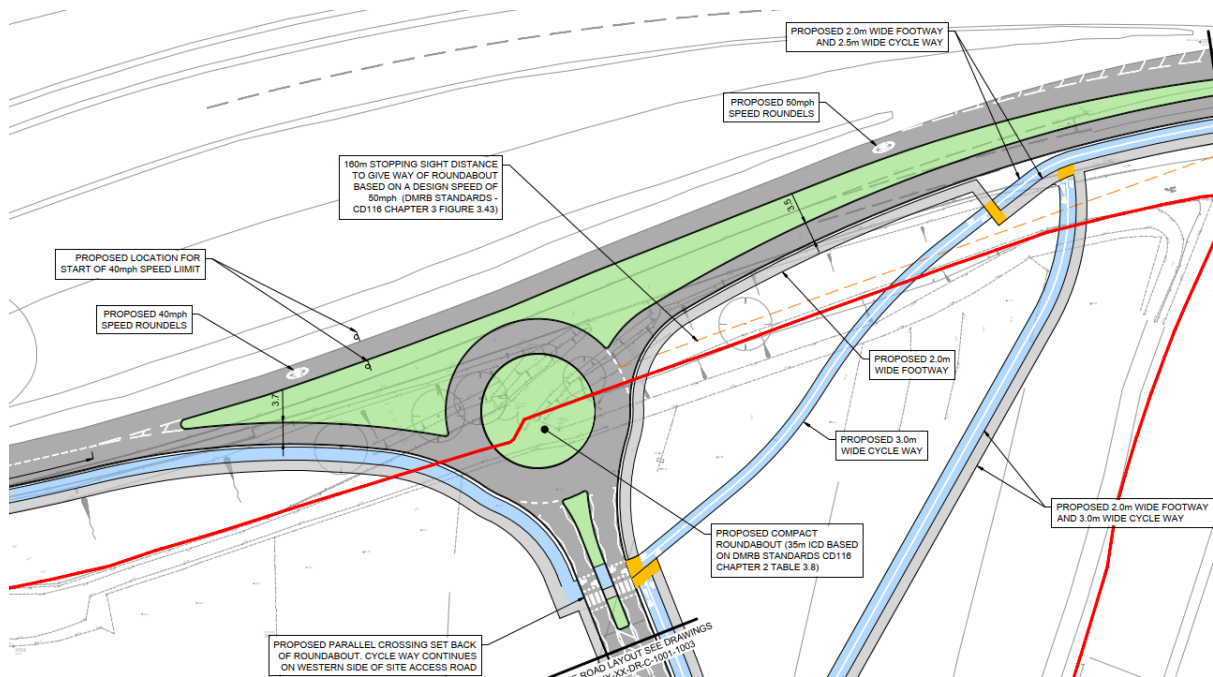
Design speed kph	120	100	85	70	60	50	V2/R
<b>Stopping sight distance (metres)</b>							
Desirable minimum	295	215	160	120	90	70	-
One step below desirable minimum	215	160	120	90	70	50	-
<b>Horizontal curvature (metres)</b>							

CD 109 Revision 1

18. It will be noted later that even with a lowered speed limit from 80kph to 60kph the minimums on SSD are not met.
19. There is a grave omission in the whole application submission, since no **Road Safety Audit Stage 1 (RSA1)** appears to have been conducted. This is standard practise at outline design stage, since the early 1990s mandated in DMRB and supported by the advice notes from CIHT. There is no excuse for this omission. On completion of preliminary design, the main requirements are to assess the horizontal and vertical alignments, sightlines, layout and land implications of junctions, slip-roads and laybys. Major changes to the scheme after this stage are limited since land take may be established. It may also be useful to examine the concept of road marking and signing at this stage in relation to alignments and overtaking strategy.
20. In the absence of an RSA1, we will mirror the format in the following comments on design.

### Problem 1

21. Design of 'roundabout'.



CD 116 clause 2.1.2 defines that: “a roundabout should have three or more arms”. Fundamental, however, is the requirement for the geometry of the ‘roundabout’ to effect deflection, in fact the opposite is the case here. Hard braking will be required and any risk assessment will flag this.

22. The roundabout is designed as a ‘compact’ one with a 35m ICD to CD 116 Chapter 2, table 3.8. We note, however, that clause 2.3.1 of CD 116 states that: “Where the speed limit is 50 mph or greater regardless of traffic flow, normal roundabouts should be provided.” There is a presumption for a normal roundabout (for good braking and deflection reasons), though clause 2.3.2 does allow that they *may* be provided.
23. Also, all the functions of a roundabout as identified in clause 2.1.2 Note 1 (1) to (6) are inappropriate to this access for a free flowing road.

### **Problem 2**

24. SSD and visibility splays: General arrangement of north access, drawing 25038-MA-XX-XX-DR-C-0100, notes a SSD of 160m to give way of roundabout, based on 50mph design speed and CD 116 Chapter 3, figure 3.43. However, in this measurement no account has been taken of Note 2 of clause 3.42, visibility requirements include no obstructions to signs, street furniture or planting. With note 2 observed, then SSD drops to less than 85m, bearing in mind the deflecting bend of the approach to the roundabout. This is well below the standard, more than one step of relaxation.

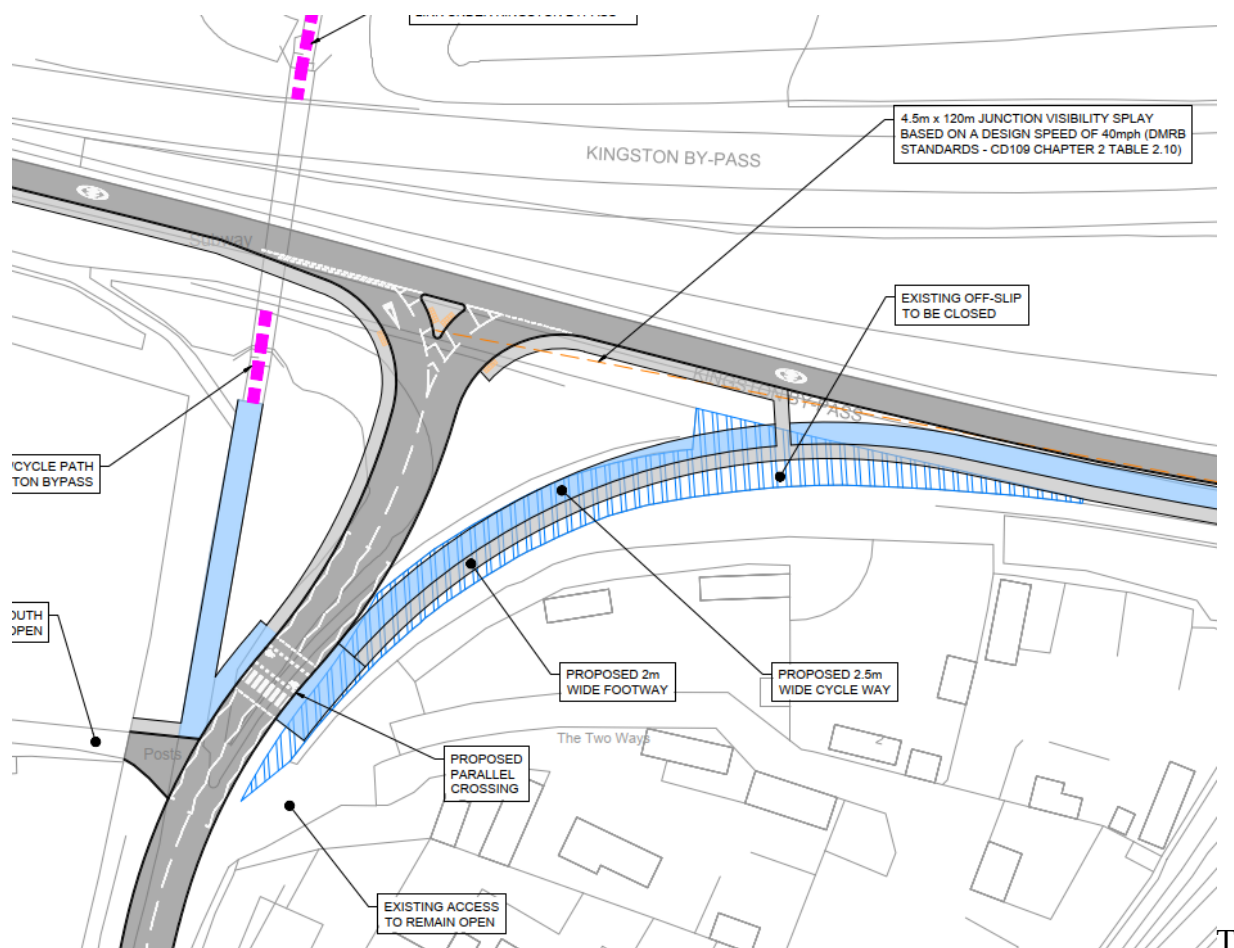


Figure XX Dropped pin marks high point of clash between traffic flows, those decelerating to exit A309 and those accelerating to merge onto A309 from on slip.

In 2014 Surrey CC was asked to allow a small operation accessing this site in the same location as the proposed roundabout. This was refused and clearly highlighted that an access onto the A309 would be a significant risk to highway safety. This was because of high vehicle speeds, the slow acceleration of HGV's leaving the site, the lack of achievable sightlines and achievable taper lanes. The current proposal shows a 90m merge taper to the western arm of the roundabout. This is acceptably above the minimum of 70m if the minor road is not a through road. However, the same cannot be said of the next proposed junction at Woodstock Lane South.

**Problem 3**

25. A new junction is proposed at Woodstock Lane South and the existing offslip from the A309 to Claygate and Clayton Road is proposed for closure.



This combination raises a number of safety hazards.

The new junction for turning off the A309 and entering onto the A309 is designed as close to sub-standard.

Assuming that there is a TRO to reduce the 50mph to 40mph before this point, there is still a requirement for a diverge and a merge taper.

This proposal now addresses one traffic flow clash from the A3 diverge, by building out the onslip nose past the main site access point. However, this simply pushes the clashing traffic flows only a 100m or so and exacerbates a second clash on the A309, with significant decelerating traffic to turn to Woodstock Lane South; accelerating traffic from the proposed development either stuck behind those decelerating or crossing into the faster outside lane. Here a further clash is to be expected, for traffic that has departed from the A3, either continuing to slow down from 50 to 40 or braking considerably to make a sharp left to get into Woodstock Lane South.

None of these hazards are acceptable and there is no proposed mitigation.

#### **Problem 4**

26. Traffic flows and routes. It is known that access from and to Clayton Road is to be closed off from the 'development', except for buses and service vehicles. There is therefore an acknowledged issue about access to Chessington town, A243 and A3 Southbound or northbound to London.

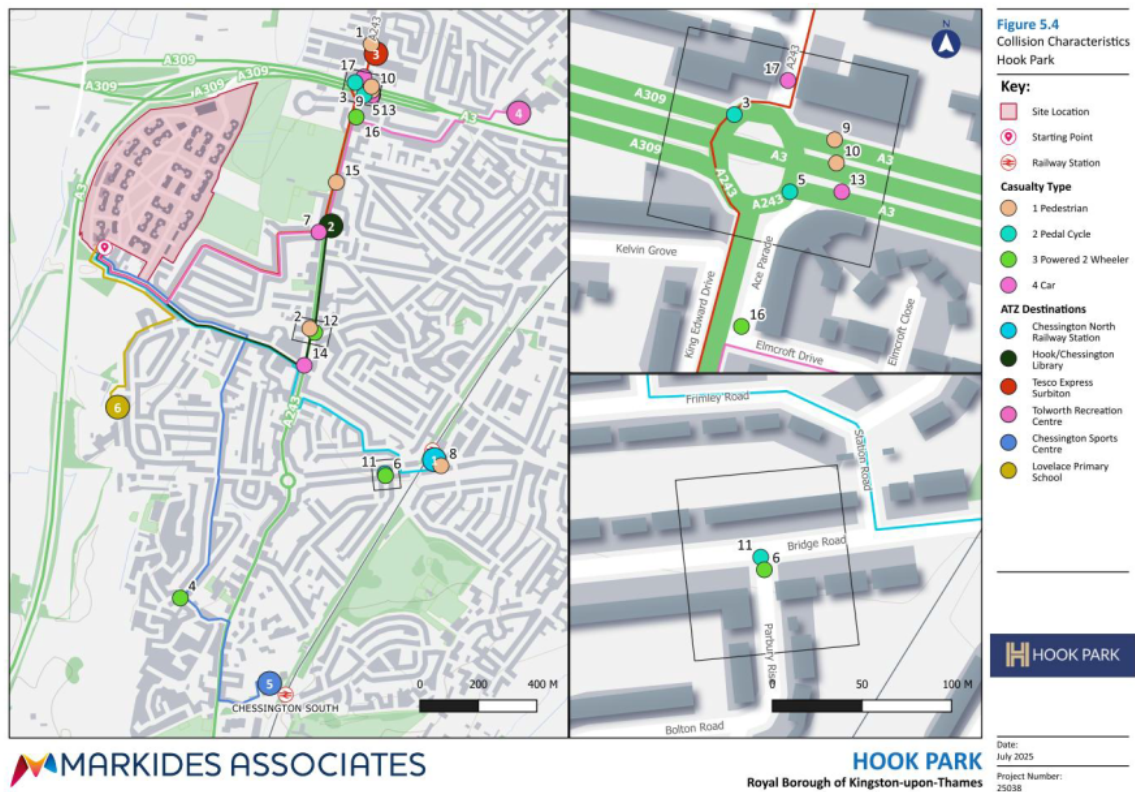
Alternative routes include:

1. A3 northbound to London, proceeding down to Claygate Lane roundabout, Hinchley Wood School main access point, then back along A309 to A3.
2. To access A3 southbound, back up A309, then A3 to Ace of Spades junction and return on A3 or
3. Portsmouth Road to Esher High Street and on to A244 or, the most difficult
4. Woodstock Lane through Claygate up to A244 junction at Copsem Lane.

- For Chessington town, expected to be local bus services and bicycle, but for A243 to M25, intended route is to A309 roundabout at Claygate Lane and then back up to Hook junction, and turn down A243.

Despite assurances that increased traffic flows will be low, the evidence is absolutely the opposite. The main junctions that are expected to be used are already at peak capacity during peak periods, causing queuing and increasing clash between pedestrians and motorised vehicles. In particular, we note in the Environmental Statement Appendix 15.4

**Figure 5.4 Characteristics of Collisions Along ATZ**



5.3.7 The occurrence and severity of collisions signal a need for improvements to meet London’s Vision Zero targets and reduce fatalities and injuries when travelling, with particular attention to pedestrian and pedal cycle crossings and safety around Hook Junction and high vehicle traffic areas. These are shown by location in **Figure 5.4**.

Showing the locations of KSIs fatal and serious accidents on the Hook roundabout. The whole access to the new development would be to and from London via this route as well as to and from M25. This will increase substantially the risk of collision and injury, as well as congestion increase in an area already highly congested throughout the working day. This is acknowledged by para 5.3.7 cited above.

## Conclusion

Claygate Village Parish Council recommends that this application is **REFUSED** on the grounds cited above.