

REIGATE AND BANSTEAD BOROUGH COUNCIL

THE REIGATE AND BANSTEAD BOROUGH COUNCIL (MARKETFIELD WAY)

COMPULSORY PURCHASE ORDER 2018

AND

ASSOCIATED APPLICATION TO EXTINGUISH PUBLIC RIGHTS OF WAY

TOWN AND COUNTRY PLANNING ACT 1990

AND

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976

AND

ACQUISITION OF LAND ACT 1981

REBUTTAL PROOF OF EVIDENCE

OF

Mr Andrew Benson

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DEVELOPMENT MANAGER

FOR

REIGATE & BANSTEAD BOROUGH COUNCIL

Planning Inspectorate and Planning Casework Unit Reference:
APP/PCU/CPOP/L3625/3198457

Department for Transport Reference: NATTRAN/SE/S251/3220

25th September 2018

1. This rebuttal is made in response to the comments made by Mr Frankie Lau in his email submission to the National Planning Casework Unit of 19 September 2018, relating to the implications of the publication of the new National Planning Policy Framework on 24 July 2018. A copy of this submission is appended to the rebuttal proof of Neil Rowe at Appendix A.
2. Mr Lau cites paragraph 102 of the new Framework stating that the Marketfield Way Development has not promoted sustainable transport as it does not consider the opportunity for building adequate car parking infrastructure and because existing patterns of parking have not been properly considered. A copy of the new Framework can be seen at CD56.
3. Paragraph 102 of the Framework requires transport issues to be considered from the earliest stages of plan-making and development proposals. The approach to development at Marketfield Way is entirely consistent with this. As set out within my main proof of evidence, the strategy for growth within the Borough is set out within the Council's Core Strategy (CD38) which is to direct development to Redhill because of its identification as a transport hub (see policies S020, CS6, and paragraph 5.1.9 of the Core Strategy). Parking is one aspect of an integrated sustainable transport approach within the new Framework, but it is concerned primarily with promoting walking, cycling and public transport. This is evidenced at Paragraph 102(c), with the only reference to parking within the paragraph being to ensure that it is integral to the design of schemes. The Core Strategy was underpinned by evidence, including the Redhill Parking Needs Study (CD13) detailed within my proof of evidence which set out the parking over-supply within the town, a position which has not changed following the significant new provision following the development of Warwick Quadrant.
4. Paragraph 103 of the Framework is clear that the approach to development should be about directing it to the most sustainable locations where the need to travel is minimised and accessible by a range of transport modes, rather than relying on trips by private vehicle.

5. Mr Lau considers that the development has not provided for the required large scale transport facilities that need to be located in the area (citing Paragraph 104(e) of the new Framework). However, this paragraph relates to policy making in order to facilitate strategic growth and should not be required by development of the Marketfield Way site itself. The Core Strategy sets out the vision for growth in the Borough, directing it to Redhill, with an accompanying consideration of the transport facilities and infrastructure available and capable of being delivered to facilitate this (see policies S020 and CS6 of the Core Strategy, and which are discussed in my main proof of evidence).
6. Mr Lau continues that the planned number of car parking spaces is not sustainable in the long term and the development should provide larger car parking facilities for the public and residents. However this is not borne out by the over-provision concluded by the Redhill Parking Study as detailed within my proof of evidence and significant recent new provision following the development of Warwick Quadrant.
7. Mr Lau continues that the Framework states that local car ownership levels should be taken into account and the latest census indicates that for Reigate and Banstead, the number of cars/vans per 1000 people is 592. Mr Lau contends that there would likely be 233 people residing within the development equating to 138 car parking spaces for the residents rather than the 47 provided and that no provision is made for visitors to the retail and cinema uses.
8. Paragraph 105 of the new Framework does indeed state that local car ownership levels should be taken into account but this is in respect of setting local parking standards, rather than determining individual planning applications. The submission Development Management Plan seeks to require a local parking standard (CD55, Annex 4, page 175) and this is informed by the Parking Standards evidence paper (see appendix A) which considers car ownership across the Borough. This shows that car ownership within the Redhill East and Redhill West wards are lower than any other ward within the Borough as well as the fact that flats have lower car ownership levels than houses and rented flats

have lower ownership levels than owned flats. The Marketfield Way development is intended as a build to rent scheme with 1-bed rented flats having an ownership ratio of 0.62 and 2-bed rented flats having a ratio of 0.92. This is across the Borough as a whole however meaning the actual ratio for this development would be lower still given the lower ownership levels within the two Redhill wards.

9. The DMP approach to local parking standards seeks to reflect the above ownership statistics as well as an accessibility matrix, requiring a lower proportion of parking in more sustainable locations close to centres or railway stations, such as the Marketfield Way site. This was also reflected within the suggested parking standards within the Draft Redhill Town Centre Area Action Plan (CD14) which suggested 0.25-0.5 spaces per 1-bed flat and 0.37-0.75 spaces per 2-bed flat (see Appendix B of the Draft Area Action Plan). The proposed development with 47 spaces to serve the residential apartments was therefore considered to accord with parking standards, aligned to the provisions of lower parking provision within sustainable, town centre developments and the planning application was considered acceptable on this basis.

10. Finally Mr Lau cites Paragraph 106 of the Framework which states that local authorities should seek to improve the quality of parking within town centres. Whilst this is so, it is a reference to making it convenient, safe and secure rather than a statement about quantity. Mr Rowe's proof of evidence and rebuttal considers the issue of convenience but in short, it is considered that other parking exists which is accessible and convenient. With regards safety and security, the latest police statistics show 8 crimes reported on or near Marketfield Way in July 2018 (see appendix B). The Site is a large, open area with poor natural surveillance and lighting. Its mixed use development would help provide activity and surveillance during the day, into the evening and at night. Significant new parking provision has been provided as part of the Warwick Quadrant development which is covered and lit and so the redevelopment of the site would have a net positive impact on safety and security with alternative parking available locally which is both safer and more secure.

11. In conclusion therefore the new Framework supports the objectives and provisions of the Marketfield Way development. The development would make efficient use of a sustainable town centre site for a mix of uses to help revitalise Redhill, providing a range of socio-economic and environmental benefits in accordance with the presumption in favour of sustainable development promoted by the new Framework.