

From: Laura Field
Sent: 01 February 2021 17:47
To: Statutory
Subject: 2019/145: Church Walk
Attachments: TA_19_0145 Church Walk Shopping Centre_CHA amended clean response_20210125.pdf

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| APPLICATION NUMBER | TA/19/0145 |
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DEVELOPMENT AFFECTING ROADS
TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1992

Applicant: Ropemaker Properties Ltd

Location: Church Walk Shopping Centre, Church Walk, Caterham

Development: Full planning application for mixed-use redevelopment comprising 3,945 sqm Gross Internal Area (GIA) flexible retail uses (Use Classes A1/A2/A3), 894 sqm GIA cinema (Use Class D2), 174 dwellings (Use Class C3), the retention of the existing Morrisons supermarket and upgrade of multi storey car park (MSCP), together with additional provision of car and cycle parking, a remodelled service yard, public realm improvements and associated works (including demolition of existing buildings).

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| Contact Officer | Zoe Trower | Consultation Date | 22 February 2019 | Response Date | 25 January 2021 |
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The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused on the grounds that:

1. The proposed redevelopment does not provide safe and convenient access for pedestrian and cyclists, and increases conflict between the intensified and increased pedestrian footfall movements with vehicular traffic. Therefore, the development, by way of layout, connectivity, and access provided for non-motorised traffic (i.e. walking and cycling), is considered to be sub-standard and inconvenient, and gives rise to conditions prejudicial to highway safety.
2. By way of the unjustified cumulative increase of car parking from 433 spaces to 705 spaces, the proposal is not considered to represent a sustainable approach reflective of the highly accessible and sustainable town centre location and does not maximise and encourage walking, cycling, and the use of public transport facilities, and places an over reliance on private vehicle access;
3. The proposed service access by way of design, layout, and operation within a constrained area is sub-standard and unworkable. The proposed intensification of use of the access for delivery, service, and emergency access to support the existing varied uses; as well as service access for the proposed new retail, leisure and residential parking (including cyclists); would lead to conflicts, and thus give rise to highway safety concerns and interference with the flow of traffic on Harestone Valley Road.

REASON

The proposed redevelopment is considered to prejudice highway safety, has not sought to prioritise sustainable modes of transport and would cause inconvenience to other highway users in recognition of:

- The National Planning Policy Framework (2019), Section 2 – Achieving sustainable development, Section 8 – Promoting healthy and safe communities and Section 9: Supporting sustainable transport;
- The Tandridge District Council Core Strategy (2008), Part 1 - Issue 6, Objective 1, Policy CSP 1, CSP 12, CSP 15, CSP 18 and CSP 23;
- The Tandridge District Council Local Plan Part 2 (2014 – 2029), Policy DP1, DP2, DP5 and DP7;
- Tandridge Local Plan (2033) draft policy TLP28 and TLP50; and
- Surrey Transport Plan (LTP3 2011 – 2026), the four main objectives.

NOTE to PLANNER

The County Highway Authority (CHA) supports the principle to re-develop the Church Walk Shopping Centre. However, the CHA would like to see a more coordinated development approach for the area. In that regard, CHA's has since 2018, during the pre-app discussions for Church Walk, advised that the development should complement and be integrated with the wider Town Centre redevelopment proposals. This will ensure a coordinated design approach with regards improvements to the public realm, walking and cycling, and public transport, to promote the use of sustainable modes of transport and thus reduce reliance on the private car.

From the assessments undertaken, the CHA concludes that the redevelopment of the Church Walk Shopping Centre seems to focus primarily on the site alone, rather than integrating into the wider Caterham Town Centre redevelopment plans.

The site is located within the town centre of Caterham. It is directly opposite Caterham Railway Station, with several bus services in proximity to and servicing the site. The site therefore has good public transport accessibility credentials. The development should build upon this by providing facilities that encourage the use of sustainable modes of transport other than the car, to accord with National as well as local development plan policies. The current design fails short of this by way of design, as well as the overprovision of car parking spaces.

The sections that follow explain in more detail the reasons for our objection. We also provide advice/suggestions on how improvements can be made to address CHA's concerns.

Connectivity

This is evident with the way that Church Walk has not sought to connect to the existing safe crossing provision for pedestrians on Station Avenue and has not actively sought to present viable alternatives to address this key change to ensure that improvements are being made to support the increase in pedestrian movements along this active frontage. A key strategy for a redevelopment in this context should be aimed at enhancing the transport integration to ensure that pedestrians and cyclists can be catered for and directed in a convenient manner.

The existing Church Walk Shopping Centre already supports and provides this strategy as the access arrangements are directly connected to the safe crossing provision on Station Avenue. In the proposed redevelopment layout, the proposals are not considered to enhance this strategy but instead, create a disconnect and introduce a more convoluted and potentially unsafe arrangement for pedestrians, as there is no longer a direct and convenient integration being offered. With the proposed redevelopment seeking to introduce 174 new residential units, a new 3-screen cinema and improved retail offering, there will be a significant increase in footfall accessing the new site per day. Prioritising, promoting and connecting pedestrian movements to and from the site in the wider context of Caterham Town Centre is considered a key requirement to reduce conflict between sustainable movements and vehicle traffic. The design as presented is considered to represent a highway safety impact, as a result of the increased levels of conflict and disconnect for pedestrian movements. The CHA recommend that the redevelopment should be redesigned to connect to the existing signalised crossing to avoid a highway safety impact arising.

Car Parking

The CHA also highlights a number of concerns with the approach being adopted in relation to the proposed level of private car parking on the site. As stated earlier, the site is a town centre location offering excellent opportunities for accessibility and sustainability, with frequent bus and rail services. The site's locational advantages is therefore recognised as an exception when compared to the wider Tandridge setting. Given the proximity of the proposed redevelopment to these sustainable transport modes, the mixed-use nature of the redevelopment, and the type of residential units being proposed (flats), the CHA's approach is to promote and encourage reduced parking provision in alignment with our policies as well as national policy and guidance to reduce car dependency, especially in sustainable locations. Our initial correspondence on this matter acknowledged the Tandridge District Parking Standards, with the CHA recommending a ratio of 0.5:1, circa 90 car parking spaces for the flats in addition to the existing 433 space in the multi-story car park (MSCP).

The CHA note that this approach has been amended in the most recent revised plans (dated February 2020), with the applicant setting out that they are proposing 131 car parking spaces to support the new 174 residential units. This equates to a car parking ratio of 0.75:1, which is above the ratio that CHA previously advised at the pre-application stage. These 131 car parking spaces are provided in two separate areas - 86 car parking spaces in a new undercroft car park accessed via the servicing entrance, and 45 car parking spaces within the MSCP. This level of parking in a highly sustainable location like this, will only encourage reliance on private car for the new residents, rather than seek to maximise and promote sustainable transport opportunities.

The CHA recognise that some of the residents would require on-site car parking, to enable access to employment, education and other essential activities. However, the provision of 131 new car parking spaces, is not considered to promote the use of the genuine choice of transport modes available in this sustainable location. It is worth noting that the site's transport sustainability credentials are very well noted and acknowledged in the Travel Plan (dated June 2020) and Transport Assessment (TA) submitted by the Developer.

In addition to the residential car parking levels, the development seeks to increase the general car parking numbers with an uplift of 124 new car parking spaces proposed. This will increase the size of the MSCP from 433 to 557 car parking spaces. The CHA have reviewed the parking standards and based on the reduced retail offering, from 4,891sqm supporting 33 retail units to 3,959sqm supporting 22 retail units, the analysis presented in the TA sets out that 385 car parking spaces would be required to meet the car parking standards. This demand is lower than the existing 433 car parking spaces available within the MSCP, and no justification is provided for the increase being sought. Furthermore, it should be noted that the SCC guidance supports reductions in car parking levels for non-residential uses of between 50 – 75% for town centre locations, such as this. Given that the analysis presented in the TA considers a maximum car parking requirement of 385 spaces, and the current offering is in excess of this maximum standard (i.e. 433 spaces), there is no justification to uplift the general car parking provision by 124 car parking spaces. It is worth noting that the analysis contained in the TA submitted by the Developer also highlighted that the demand for the redevelopment would not exceed the existing supply of 433 car parking spaces, with a maximum demand for car parking in the MSCP connected to the non-residential elements being in the region of 410 car parking spaces.

The CHA consider that insufficient evidence and justification has been submitted to support the significant increase in the quantum of on-site car parking proposed for both the residential and the retail elements. The CHA acknowledges that an increase in car parking on this site could be supported. However, this should be clearly demonstrated and justified, and how this would meet the National policies and the needs of the proposed development. The CHA considers that there are sufficient parking controls in the vicinity of the site to control indiscriminate parking that interferes with the free flow of traffic or gives rise to highway safety concerns. In addition, there are alternative parking areas within the town centre to accommodate any shortfall in parking demand for the residents. It is acknowledged that this area of Caterham, and the surrounding network of

streets is considered a hot-spot for commuter parking, with residents being sensitive to any increase in associated car parking. However, it is worth noting that events that unfolded in 2020 relating to Covid-19 highlight the potential for new ways of working that would reduce the need for commuter travel in the future. Recent research undertaken in the UK reveals that over 20% of drivers say they will drive less post-COVID. In the UK, there is much greater emphasis now on improving infrastructure to encourage walking, cycling and use of public transport to reduce reliance on the private car. Other cities around the world are promoting developments where access to most of the services are accessible in 15 minutes through sustainable transport modes. These initiatives should be encouraged for future developments, in particular this development, with already good access by non-car modes, to provide sustainable and connected developments that promote the continued move away from reliance on private vehicle.

The CHA is also concerned about the location of the 86 new car parking spaces proposed in a new underground car park, accessed via the service yard. This is discussed further in the next section under 'servicing arrangements'

Servicing Arrangements.

The CHA has reviewed the information and assessed the new layout for the proposed new servicing arrangements. The service access for the retail element is proposed from the existing service access off Harestone Valley Road. This access currently also serves the at-grade parking area for Victoria House and Wren House, which will be maintained but altered. The proposed service access will also serve 86 parking spaces proposed for residential units, as well as cycle parking for the residents. The residential parking spaces and service yard will be underground, and a retaining wall is proposed to separate their access from that for Victoria and Wren House. A traffic signal system and traffic management staff are proposed to manage access to Victoria and Wren House to minimise conflicts. It is worth noting that the service access road proposed is on three levels within a constrained area which is quite challenging to achieve acceptable gradients for the different types of vehicle expected to serve the site. It is also worth noting that the existing service yard operates as a consolidated service area for other units in the area and it is unclear whether this consolidated approach will be able to be continued with the new service arrangements splitting this arrangement up. It is also noted that this access is shared with the Community Hall, and is the service and emergency access for Victoria House, Wren House, Morrisons and the Community Hall. These will also be affected by the proposed service arrangements.

The CHA acknowledge that the servicing arrangements have been set out in detail within the TA and has been supplemented with a separate Delivery and Servicing Plan. However, as stated earlier, it appears that the focus of the redevelopment has been centred on the site alone, without considering the wider town centre's existing operations that also rely on the use this access. The intensification of use of this access within a constrained area, with substandard geometry and general layout will result in conflicting movements, which would give rise to conditions prejudicial to highway safety. It is also highly likely that these will impact the safe and free flow of traffic on Harestone Valley Road. Cyclist using this access would further worsen the situation with regards cyclist/pedestrian/vehicular conflicts. As stated earlier, these inadequacies in the design are a direct result of the development being considered in isolation, and thus intensifying the use of the access, as if it was for the sole use of the Church Walk Shopping Centre redevelopment.

The information submitted provides little detail as to how the existing servicing access from Harestone Road is used by others, and what considerations have been given to mitigate the adverse impacts on other users. The Delivery and Service Plan provides little comfort that the proposed arrangements are robust or detailed enough to accommodate the types of vehicles expected to use the service access. The varying levels, the retaining walls, and the large service vehicles using the access pose challenges with regards visibility between the various users of the space, as well as conflicts in vehicular swept paths. The introduction of signals to control traffic movements is a manifestation of safety concerns in such a tight and constrained area.

It is also noted that the proposed 2.75m wide access to Victoria and Wren House (with retaining walls on both sides), is sub-standard. It is proposed that this will operate as one-way only and controlled with signals to separate entry and exit movements. This cannot serve cars, let alone service or delivery vehicles, if they are required to use this access. For cars, the minimum width recommended for such accesses is 3.6m on the straight (includes structure clearances), and 4.1m at the bend (includes structure clearances). These requirements cannot be provided within the restricted space, and hence the proposed arrangement is not workable. To make this workable, additional space will be required for the access to Victoria and Wren House, which would further narrow the space required to serve residents and service vehicles, thus making that arrangement also unworkable.

For all these reasons, the CHA recommends a rethink about the approach to servicing, delivery, emergency access, and car parking for new residents via this access. The CHA would reiterate that further consideration is given to the removal of the 86 spaces proposed for residents from this access. This would reduce the overall quantum of car parking being sought for this redevelopment, and it will minimise the conflicts at the access.

In the sections that follow we provide comments on other aspects of the proposed development.

Site-wide Amenity and Design Comments

In addition to the key points of objection raised in the preceding sections, the CHA set out below other concerns that highlight the fact that the redevelopment of the site has been considered in isolation, rather than being integrated to complement the wider Caterham Town Centre Masterplan proposals. Some of the issues raised are that of amenity, which the Local Planning Authority (LPA) may want to consider adding weight to our reasons for objecting to this development.

Cycle Parking

The CHA is concerned about the locations identified for cycle parking for residents. They are tucked away in the basement car park and/or are located in places furthest away from the access points to the residential units, and hence not easily accessible. The CHA recommends a revised cycling strategy to be considered to improve overall cycle parking locations within the site, and make them easily accessible to users to promote cycling as a sustainable transport mode in accordance with advice contained in local and national guidance, notably the National Planning Policy Framework (NPPF).

Car Club and Electric Vehicles

The applicant seeks to provide 2 car club bays on-site. The CHA doubts the effectiveness of the car clubs given the overall increased quantum of car parking provision on-site from 433 to 705 spaces. With such a large increase in private car parking numbers, both for the residential and retail elements, it is unclear how the car club would achieve a reduction in vehicle trips, as there is no incentive to discourage car ownership, use, and dependency. The primary purpose of car clubs is to provide access to cars without the need to own one. This encourages car sharing, and thus minimises congestion, pollution, and all the other negative impacts of reliance on the private car. There is really no incentive for anyone to use car clubs if they are encouraged to own cars by providing abundant space for them to park.

In terms of the Electric Vehicle Charge Points (EVCP), the proposals are quite vague. It appears to suggest that no more than 3 electric spaces are required to meet the CHA guidance. This is incorrect. The current Draft 2020 CHA guidance (dated June 2020) on EVCP requires one fast charge space to be provided for each residential unit (including flats), which equates to 131 spaces. Even for the previous guidance, dated January 2018, the requirement was for 20% of spaces to be fitted with a fast charge socket, which would be closer to 26 spaces. It should be noted that the Draft 2020 guidance (dated June 2020) requires further provision for power supply to be made available for an additional 20% of spaces to be fitted with fast sockets for future use to meet demand, if necessary.

The TA does not set out what provision of the uplifted car parking spaces proposed for the non-residential uses within the MSCP would be provided with EVCPs. The guidance dated January 2018, sets out a provision for 10% of available spaces to be fitted with a fast charge socket (if this is applied to the new uplift in car parking spaces based on the remaining increase in car parking numbers considered as 141, including 15 staff and 2 car club spaces only) this would equate to 14 spaces. It is highlighted that the Draft 2020 guidance (dated June 2020) increases this provision to 20% for the remaining spaces with fast charge sockets. This would equate to a provision of 28 EV spaces, to be fitted with a fast charge socket. The Draft 2020 guidance also requires further provision for power supply to be made available for an additional 20% of spaces to be fitted with fast sockets for future use to meet demand, if necessary. The proposed development should set out how an increased provision can be made, and how the EV spaces would be managed, as shared spaces for both electric and non-electric vehicles, for users of the MSCP.

Travel Plans

The CHA recognises that the Residential and Workplace Travel Plans submitted in June 2020 has been generally considered as acceptable when considered as a standalone Travel Plan. However, in a general wider context, the CHA would question whether the objectives and targets set in the Travel Plan are achievable given the significant increase in car parking provision - from 433 to 705 spaces.

Public Realm Proposals

The proposals set out a potential public realm improvement along Station Road and Church Walk, however this is outside the red line plan for the application. Taking this into account, it is noted that the redevelopment seeks to maintain a level of servicing from Church Walk in addition to the servicing yard accessed via Harestone Road. It should be noted that maintaining the servicing along Church Walk conflicts with the aspirations of creating a public realm space on Church Walk. Furthermore, the Developer should note that the CHA would require such proposals to be subject to a formal agreement secured through a statutory Highways Act 1980 s278 process. Initial feedback from CHA Highway Engineering Team raised concerns about planting, especially trees, within the public highway. This will not be approved or supported. The CHA therefore recommends further engagement with the Developer to ensure that schemes submitted in the future are accepted by the highways team.

Public Transport

Given the significant increase in footfall for the proposed development, the CHA note that there are no firm proposals put forward by the applicant to support and promote sustainable transport modes. Specifically, given the introduction of the cinema and number of new residents, it is disappointing to note that the applicant has not set out any conversations with bus operators about improvements to bus services in the area cater for the increased and varied nature of the trip purposes for the site such as the cinema, the CHA note that the TA refers to the significant increase in public transport trips, circa 494 trips, being generated by the redevelopment. However, the applicant places the responsibility to mitigate and manage the impact of their development on other statutory bodies, such as through the Caterham Masterplan, and the individual bus operators. As set out earlier, this redevelopment should tie into the Masterplan and wider Town Centre proposals, this approach to mitigation does not fully accord with an integration approach.

Caterham Town Masterplan

The CHA is aware that the LPA has been developing a new Masterplan for Caterham Town Centre, and that a number of key principles of the redevelopment proposals have been subjected to extensive consideration and technical reviews. The Church Walk Shopping Centre proposals is considered a key component of the wider town centre Masterplan. The proposals for Station Avenue, as part of the Church Walk redevelopment was therefore reviewed by the Masterplan

design team. Station Avenue has a number of kerb-side operations, such as bus stops and taxi set down facilities, as well as a pedestrian crossings. The outcomes of the technical review of the Masterplan is considered important. It reviewed in detail whether the signalised crossing on Station Avenue could be relocated, and concluded that the crossing could not be moved. At the pre-application stage, the CHA also advised that the redevelopment should tie into the wider town centre Masterplan proposals. Given that the wider area Masterplan technical review report was issued in July 2019, and it clearly advised that the signalised crossing cannot be moved, it is disappointing to note that this key recommendation was known at the time but not responded to in the Church Walk redevelopment proposal.

General points of note in respect of the traffic impact assessment considerations.

The CHA has reviewed the information provided regarding the trip generation and an associated modelling audit of the nearby Godstone/Croydon Road/Station Avenue roundabout. This indicated that the proposed redevelopment in terms of vehicle movements would not have a significant impact at the nearby roundabout. In the majority of scenarios operational performance is predicted to be within capacity, despite increases associated with the proposed development.

The CHA's audit of the development's impact on the nearby junction in terms of vehicle movements has been found to be within acceptable parameters. Additionally, the TA considers the peak demand for vehicle movements and parking demand is likely to result in movements outside the traditional peak-period hours, given that the likely peak time for shopping will be within lunch hour breaks or at weekends for other users within Caterham. As such, the direct impact of movement within the traditional peak hours is considered primarily connected to the residential aspect of redevelopment. Information within the TA and the audit information submitted indicate that the estimated trip generation is generally sound and in line with the criteria the CHA would expect. The CHA also acknowledges that the redevelopment of the site as a more mixed-use site, would result in peak spreading throughout the day rather than concentration during the typical peak hours.

The CHA recognise the need to consider potential trip reduction associated with linked trips and cross visitation trips for such a mixed use site. However, the TA has applied a thirty percent (30%) trip reduction for cross visitation trips to the food and drink and leisure land uses, but did not outline in detail the justification for this value, in relation to TRiCS based considerations. The pre-application correspondence made it clear that if this was used, then it should be justified and would not want to see a figure higher than 30%. Although the CHA recognise that this figure was referred to, the TA does not provide any justification for the 30%. The CHA therefore considers that the TA presents only a best-case scenario rather than a robust or worst case scenario, as both motorised and non-motorised trips could increase if this level of linked/cross-visitiation does not materialise. A sensitivity analysis should also be considered to test other scenarios when the forecast/predicted linked trips do not materialise.

Summary and Conclusion

In summary, the CHA recognise and support the principle of the redevelopment of the Church Walk Shopping Centre. However, the proposal as submitted has a number of issues and design aspects that are considered to give rise to highway safety concerns. There are also issues with regards transport sustainability and accessibility by non-car modes that would result in encouraging reliance on the private vehicle. These will result in a scheme that does not fully tie itself into the wider Caterham town centre Master planning, and is inconsistent with government guidance, local planning policies and NPPF. As such, the CHA is unable to support the proposal as currently submitted. Should any future proposal be submitted that seeks to address the concerns and objections raised, the CHA would review their position accordingly.