



5<sup>th</sup> February 2024

Letter sent via email only

ATE  
C/O Reigate and Banstead Borough Council

**Our Ref** IM/SolumRedhillNew.1  
**Your Ref** 23/00572/F

Dear Sirs

### Redhill Station

We have in this letter set out a response to the points raised in the Active Travel England (ATE) response in relation to the above project, dated 28<sup>th</sup> July 2023 (reference ATE/23/00268/FULL).

In particular, we have set out a point-by-point response to the Section 5 of the ATE response 'Areas of Concern'.

Prior to addressing the points raised by ATE, we thought it would be useful to reiterate the key transportation improvements and active and non-car travel objectives of the project, namely:

1. Consistent with all Solum projects, there is no increase in capacity to travel by car to the station, either to park where in fact there is a reduction of 39 spaces, or in terms of drop off and pick up. All of the future growth in rail use at the station will be accommodated by non-car and active travel modes.
2. The station is located within 60m of Redhill bus station and the proposals remove vehicular traffic within the station, to create an unobstructed active travel route following the desire line between the bus station and the Site A station entrance. This represents a major enhancement in bus-rail interchange.
3. The proposals create an improved and expanded bus interchange on Princess Way, providing additional capacity over that which is currently provided at the bus station.
4. The proposals increase cycle storage on both Site A and Site B, increasing from a total provision of 202 to 248 representing an increase of 23%.
5. Consistent with the consent for the site, the proposed development involves a dedication of land to provide a shared surface on Princess Way, tying into Station Road.
6. Consistent with the sustainable location, the development has a reduced parking provision for residents.

Dealing with the ATE points in turn:

### ATE Point 1

*This application provides a valuable opportunity to improve the environment within the station site as well as links to the wider area by all modes. This is especially important if the site is to increase its capacity and attractiveness for rail users and effectively future-proof an integrated and inclusive transport hub and gateway to the town, whilst serving a new population that will need to feel integral to their surrounding area and local facilities.*

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### MB Response

The developers of the site see this point as a shared objective which is realised through their proposals. We trust from the review of the introduction to this letter and the detailed responses and plans contained in this letter, that it is accepted that the proposals achieve this objective.

The final landscape drawings are contained with this letter;

Site A - RHS-PRP-ZZ-00-DR-L-00200

Site B - RHS-PRP-ZZ-00-DR-L-00201

### **ATE Point 2**

*At present the site and its surrounds offer very little in the way of safe and attractive routes for pedestrians and cyclists. These proposals provide a realistic opportunity to address some of these matters in relation to the scale and prominence of the applications proposed. It is noted that this site is adjacent to National Cycle Route 21 and several routes identified in the Reigate and Banstead Local Cycling and Walking Infrastructure Plan (LCWIP). The LCWIP looks to improve cycling facilities between Redhill to Merstham, East Surrey Hospital and Reigate and it is considered that this proposal could do more to support this.*

### MB Response

The LCWIP was reviewed as part of the TA (section 4). This concluded the proposals aligns with the cycle strategy in terms of:

- Linkage of the crossing on Princess Way to Redstone Hill using a shared cycle network which is in accordance with the LCWIP Corridor 5 Options
- Extension of cycle linkage along Princess Way as shown in Figure 4.11 of the TA which is in accordance with the LCWIP Cycle Corridor 8 Options
- An increase in cycle parking at the station to 248 spaces, which represents a 20% increase in cycle parking at the station. The details are shown in Table 4.2 of the TA and the Design and Access Statement which explains also the significant qualitative improvements.

### **ATE Point 3**

*The Travel Plan sets out a general desire to increase walking and cycling to and from the site, but does not appear to specify by how much it intends to do this. However, taking data from historic surveys, it states that over 70% of journeys to and from the station are by active/non-car modes and states that this demonstrates a major opportunity to increase journeys by bus and cycle.*

### MB Response

We would agree with ATE that the travel by active and non-car mean modes, represents the major mode of travel to the station. As set out earlier in this letter all planned future growth in rail travel is by design, to be accommodated by these modes. In addition, the improvements explained at the start of this letter demonstrate clearly an opportunity for major modal transfer to occur. Practical experience demonstrates that this can be achieved through a combination of the interchange improvements provided, together with the policy initiatives of both the local planning and transport authorities. For example, in Chelmsford where there is high quality interchange between buses, cyclists and the railway station, residential developers on sites on the outskirts of Chelmsford have achieved through their Travel Plans up to 30% bus modal shares in the peak period.

### **ATE Point 4**

*With the above aim in mind, there are significant opportunities here to improve the existing cycling and walking infrastructure. It is noted that the applicant proposes to extend the existing shared path beyond the toucan crossing on Princess Way, however the applicant does not appear to have provided the existing and forecast cycle and pedestrian flows in order to justify the evidence for this approach. It is considered that these could be significant at certain times*

*given the frequency of trains from Redhill to locations such as central London and Gatwick; this could have an impact on whether a shared surface on Princess Way is considered appropriate, particularly as there is the potential for conflict between pedestrians and cyclists, for example in potential pinch point locations where pedestrians will gather to wait to cross the roundabout. It may be that additional space for a fully segregated cycle route is required in order to manage this conflict.*

[MB Response](#)

At present, as can be seen from **Figures 1** and **2**, the crossing between the bus station/ town centre and the railway station involves crossing to a footway of just over 2m and then using the footway to walk or cycle along Princess Way to the station entrance as shown in **Figure 2**.



**Figure 1: Princess Way**



**Figure 2: Princess Way to Station Road**

*The Proposals*

The development completely opens up this area as shown in **Figure 3**, providing:

- A direct desire line route from the Toucan crossing to the enhanced station entrance.
- The route also provides direct pedestrian route through to Redstone Hill.
- A shared surface of a minimum of 2.5m along this section in addition to the pedestrian route.

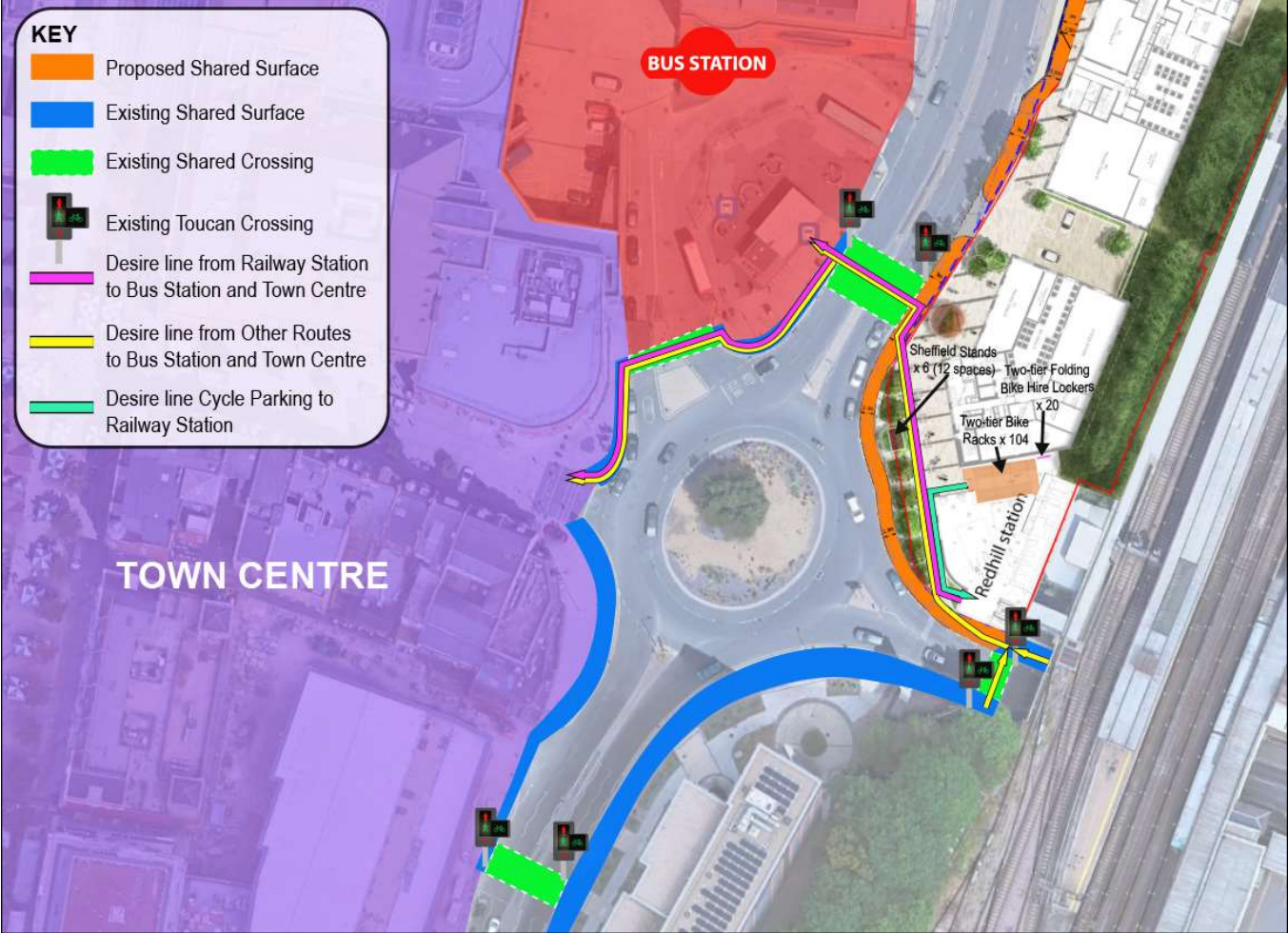


Figure 3: Proposed Development

It is noted that 5.3 of LTN1/20 shows that 2.5m shared surfaces could accommodate cycle flows in excess of 300 per hour. It is clear with reference to Figure 3 that users of the station cycle parking would not need to use this section of cycle route, so combined with the comparison with the parallel pedestrian route it is a substantial increase in capacity at this locality.

#### **ATE Point 5**

*The pedestrian and cycle route to and from the town centre to the west encounters a large roundabout which presents a significant barrier; it is also considered that the proposal makes little attempt to address this or enhance connectivity with the bus station, which is located on the opposite side of Princess way. Further consideration is needed here given the proximity of the site to the town centre and the strong potential to improve external linkages and public realm. The LPA should consider - in conjunction with the Local Highway Authority - whether it is appropriate for this proposal to contribute to any wider off-site highway improvement schemes in this respect.*

#### **MB Response**

We don't share this view. The proposals provide a substantial improvement in accessibility between the town centre, bus station and station. Not requiring users to cross the roundabout. This was shown in **Figure 3**.

#### **ATE Point 6**

*It is noted that the proposed development is to be car-capped; physical or regulatory measures may therefore be required to prevent overspill parking from this development to cause obstruction and parking congestion on local roads in a way that would serve to obstruct access by pedestrians, cyclists, mobility scooters and buggies/ pushchairs and in so doing discourage active travel. The site currently lies within an existing Controlled Parking Zone, so a judgement may be required on whether the additional residential accommodation in this area results in the need to review the extent and/or restrictions currently in place in order to ensure and maintain the intended low levels of car ownership and reliance of this development.*

#### **MB Response**

A parking survey was undertaken on the surrounding highway network, in accordance with the Lambeth Methodology and agreed with the Local Highway Authority. The results were shown in the Transport Assessment Addendum (dated April 2023), and demonstrated limited cars parked on-street outside of the restricted periods, which would be a result of the fact that the ability to use the car parking is heavily constrained and therefore would be very unattractive for residents at the proposed development.

Nevertheless, it would be proposed that in accordance with the Car Parking Management Plan, which is shown illustratively in the TA and would form a condition of any consent, that annual surveys (following the same methodology as set out in this report) are undertaken up to the completion of the development and one year after the final occupation with funding available for additional restrictions if a notable change in on-street parking occurred.

It is clear that with the restrictions proposed on applying for permits, together with the restricted ability to park in the surrounding streets that there is no reason to consider that any issues of highway safety will arise as a result of the parking proposals.

#### **ATE Point 7**

*The proposed cycle parking does not appear to clearly show where all proposed cycle spaces are as listed in the TA; these must be clearly marked on the plans. It is noted that a proposed 20% uplift in station cycle parking is proposed; clarification as to how this figure was arrived at would be welcomed, as the existing cycle parking provided at the station would appear to be very well used.*

#### MB Response

Please see the enclosed plan 'Site A and B - Parking layout Rev A' which sets out the details of the cycle parking spaces as listed in the TA.

Whilst not totally certain, the rail industry forecasts indicates that pre-Covid demand levels will be reached by the mid 2020's, remain broadly flat until 2029 and then growth from then. The 20% uplift therefore represents a major increase in provision compared with the currently flat growth forecasts.

#### **ATE Point 8**

*The LPA should ensure proposed cycle parking on both sites is sufficient for larger bikes and ebikes (LTN 1/20, figure 11.2), as well as allowing for tyre pumps and tools (Figure 11.9) and CCTV.*

#### MB Response

As shown in the plan 'Site A and B - Parking layout Rev A' there is provision for 6 x oversized cycles on Site B.

In terms of tyre pumps and tools a maintenance facility would be provided adjacent to the cycle storage.

#### **ATE Point 9**

*The Station Travel Plan should include the likely number of employees (also taking shift work into account) and proposed changing facilities.*

#### MB Response

The Station Travel Plan is a Framework document, which will be subject to a condition or obligation, and a further Travel Plan will be submitted for final approval prior to occupation.

#### **ATE Point 10**

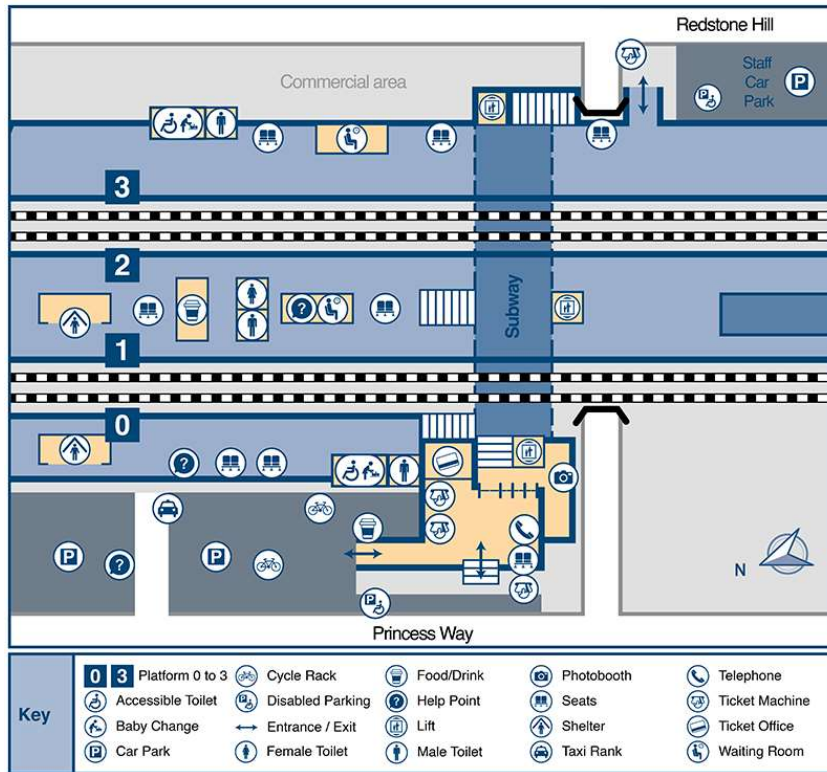
*Clarification is required for the provision of level access to the existing pedestrian subway connecting the sites and increase ease of use for wheelchair users and cyclists.*

#### MB Response

Mobility impaired provision is provided the station entrances to the platforms as shown in the Redhill Station Plan in Figure 4.

The development proposals provide upgrades to the station entrances on both Site A and Site B, including for gate line adjustments which include for wide gates suitable for mobility impaired users. As discussed earlier in this letter, the proposals also create a step-free route between the Toucan crossing on Princess Way and the Site A station entrance.

### Redhill Station Plan



**Figure 4: Redhill Station Plan**

#### ATE Point 11

The existing shared path and footway between the two sites (adjacent to the road going under the railway) is unattractive and unappealing. The LPA should consider any improvements (such as lighting) that might improve the experience for those walking, wheeling and cycling along this route.

#### MB Response

The proposals play a role in enhancing this route through the upgrades on the Site B part of the application area. This is shown in plan RHS-PRP-ZZ-00-DR-L-00201 REV E..

#### ATE Next Steps

ATE have set out 'Next Steps' which we fully support. In particular:

1. The proposals make a substantial improvement in interchange between the town centre, bus station and railway station combined with enhanced cycle storage, pedestrian routing and bus interchange, fully consistent with creating a culture of non-car and active travel from the outset.
2. The developer has been working proactively with SCC, the local highway authority, to agree a) Active travel enhancements which would be implemented through a S278 agreement, b) non-car enhancements including for improved additional bus interchange on Princess Way, c) a restraint based parking provision for the residential uses and d) has provided Framework Travel Plans which would monitor the mode share of journeys and establish remedial actions where targets are not met.

A copy of the drawings submitted to SCC are appended to this letter.

Site A – GA1 Rev p11

Site B – GA2 – Rev p9


Combined Plan – Ped and Cycle -02 Rev p7

Yours sincerely

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