

WPCA Comments on Parking, The Travel Plan and Traffic

The Westbury Park Community Association (WPCA) are objecting to the planning application on the grounds of overdevelopment and insufficient parking. This submission covers our objection to the proposal on the grounds that the 65 parking spaces proposed by the applicant will lead to overspill parking on surrounding roads which are already at full parking capacity (Section 1).

This submission also comments on the Travel Plan (Section 2) and the traffic analysis section of the Transport Statement submitted by the applicant (Section 3).

SECTION 1

Objection to the Planning Application on Parking Grounds

1 Our View

1.1 The Community Association object to the plan to provide just 65 parking spaces. This will be detrimental to local residents as this low number of spaces will almost certainly lead to overspill parking in surrounding roads which already have severe parking problems. These roads do not have the capacity to accommodate overspill parking.

1.2 Our objection is based on the following analysis and arguments:

(i) The parking analysis set out in Section 6 of the Transport Statement which concludes that 65 spaces would be adequate is seriously flawed:

- In estimating the number of spaces required for residents the City Council's parking standards were totally misinterpreted.
- In estimating the staff parking requirement the City Council's parking standard was applied to the number of staff on site at any one time (15-20 FTE) rather than the total number of staff (possibly 33 FTE, possibly up to 40–45 FTE).
- We cannot comment on the analysis of visitor parking requirements as there was no analysis or estimate of visitor parking requirements.

(ii) The Transport Statement failed to present basic information and analysis on the parking needs of residents, staff and visitors such as resident car ownership rates (and the factors affecting these rates), staff numbers and shift patterns, and likely visitor parking demands and patterns .

(iii) No explanation was offered as to how the parking spaces will be allocated. If a high proportion are allocated (at a charge) to residents the parking spaces available for staff and visitors will be even more inadequate. If staff and visitor parking is prioritised the number of spaces for residents would have to be rationed. Both scenarios increase the threat of overspill parking.

(iv) Far more attempt should have been made to present evidence of parking provision in other extra care and retirement schemes (albeit accompanied, where appropriate, by cautionary notes as to why the parking requirements at these schemes might differ from what is required at St. Christopher's).

1.3 Our assessment in section 4 leads to the conclusion that 60 – 70 spaces will be required to meet the parking needs of residents, 16-22 spaces to meet the needs of staff, 12-15 to meet visitor needs and three spaces for the two car club cars and the minibus. **We therefore estimate that at least 91 and possibly as many as 110 on site parking spaces should be provided to minimise the risk of overspill parking.**

1.4 Putting the above estimates into perspective the pre-application submission made by the applicant in July 2021 actually proposed 120 parking spaces. Were the City Council's use class C3 parking standards to be applied the total number of parking spaces would be as many as 150. (This is based on 11 one bed apartments x 1 space per unit + 111 two bed apartments /cottages x 1.25 spaces per unit.) Other extra care and retirement living schemes close to St. Christopher's provide the same number of parking spaces as the number of residential units.

2 Preamble

2.1 In challenging the Transport Statement Section 6 analysis and conclusions and making a case for higher parking provision we recognise the difficulty in reaching a consensus on parking numbers for extra care schemes. Local authority parking standards relating to institutional and residential use classes C2 and C3 are not applicable as these use classes do not specifically cover extra care or assisted living schemes. As a result many planning authorities take a flexible approach to assessing parking requirements, accepting that the level of parking provision on extra care housing schemes will vary depending upon a range of factors (e.g. the level of care provided, the availability of public transport, access to services and facilities on site and in the near vicinity). This approach has its advantages but will inevitably lead, as it does in the case of St. Christopher's, to differing claims by applicants and local residents / communities as to the appropriate provision of parking spaces.

2.2 In challenging the parking proposals put forward and attempting our own assessment of parking requirements we have been forced to make more assumptions than we would have liked because of the failure of the applicant to provide key information and analysis (e.g. staff numbers and shift patterns, car ownership rates in the over 70 age group, information on the experiences of existing extra care schemes). Presenting "off the shelf" suspect information on parking numbers (the TRICS parking data) is a poor substitute.

3 Comments on the Parking Analysis and Figures presented in section 6 of the Transport Statement

3.1 The applicant's Statement concludes that a total of 65 parking spaces is sufficient to meet the needs of residents, visitors and staff and it is claimed in paragraph 6.20 of the Transport Statement that this provision is higher than the maximum standard and would reduce the risk of overspill parking affecting local residents. We strongly disagree with this assessment.

3.2 The standard being referred to is the City Council's car parking standard for use class C2 convalescent and residential care homes which is one space per 2 full time duty staff and one space per 6 bed spaces for visitors. The Transport Statement reads "*As the proposal is for 122 units with an estimated 15-20 staff on site at any one time the site would require 39 spaces for tenants and ten for staff, totalling 49 spaces*". Although not explained the 39 spaces for tenants/residents figure is calculated on the total 233 bed spaces divided by six.

3.3 This estimate of parking requirement based on the City Council's parking standard is seriously flawed. This standard is not for tenants / residents but for visitors. There is no comparative figure for residents as the City Council assume that being a C2 care home use class no residents would require a car space. As stated above an extra care scheme does not fit the C2 residential institution use class but neither does it fit the C3 residential use class. The transport consultant has surprisingly not spelt out this predicament and has instead chosen to use C2 parking standard figures which are simply not applicable. There is no basis for the resident parking space figure as it is based on a total misreading of the City Council's parking standards.

3.4 With regard to staff parking requirements the City Council's standard should be applied to all staff, not just to the 15–20 staff (FTE) on site at any one time. Just how many staff the standard should be applied to is open to question as 33 staff (FTE) staff is cited in the planning application and 40-45 staff (FTE) was mentioned by a representative from Amicala at a meeting held in November 2021 (more on staff numbers in paragraph 4.7).

3.5 No attempt is made in the Transport Statement analysis to estimate visitor parking requirements. We estimate that 12-15 spaces will be required for visitor parking (see paragraphs 4.9 – 4.12).

3.6 Paragraphs 6.10 to 6.12 of the Transport Statement cover TRICS comparisons with paragraphs 6.11 and 6.12 stating that *“on average, the developments in TRICS had 0.42 spaces per dwelling, but ranged from 0.375 to 0.545”*. *“Using the ratios above, and multiplying by the proposed development, the parking provision equates to between 47 and 69 spaces. Given that the proposed development is in a sustainable location, and the developer is providing a shuttle bus and car club spaces, the proposed provision of 65 spaces is considered appropriate”*.

3.7 The TRICS spaces per dwelling analysis poses more questions than answers as it is not clear whether the “developments in TRICS’ comparative figures are based on just extra care schemes or on all care related residential schemes, nor is it explained whether the spaces per dwelling ratios relate purely to spaces for residents or total spaces. If the former, more parking would be required for staff (at least 16 spaces) and for visitors (estimated 12-15 spaces assuming one visitor space would be needed for every eight to ten dwellings).

3.8 Paragraph 6.13 of the Transport Statement reports that a brief review of other extra care schemes in Bristol was undertaken and reference is made in paragraph 6.14 to application 17/06914/F in Bishopsworth for 62 units which included 22 spaces, a ratio of 0.35. Transport Development Management commented that they *“deem this quantum to be acceptable”*. Paragraph 6.15 concludes *“applying the 0.35 ratio from the Bristol development would result in 44 spaces across the site, which is lower than proposed”*.

3.9 The review of other extra care schemes was indeed brief judging by the odd decision to use the extra care scheme at Bishopsworth for comparative purposes. The 22 new spaces related to an extension and were proposed primarily as an overspill to cater for the additional 25 FTE staff. The Bishopsworth scheme reveals little about the level of parking required for resident parking at St. Christophers but it reveals a lot about the need to provide ample parking for staff.

3.10 Far more robust research should have been presented on parking / usage patterns in existing extra care / assisted living schemes that are at least broadly comparable to the proposed St. Christopher's development (albeit accompanied, where appropriate, by cautionary notes as to why the parking requirements at these schemes might differ from what is required at St. Christopher's).

3.11 With regard to the parking accumulation analysis presented in paragraph 6.16 of the Transport Statement we can point out that the reference to site *CH-03-P-01* differs from the site featured in appendix E (site TY-03-01). Appendix E proves nothing as there is no description of the site which has been chosen for comparison purposes except for the scheme having 32 units. No information is provided on the type and location of the scheme, no figures are given of the total parking spaces and no information is provided on how spaces are allocated.

3.12 The reference in the conclusion (paragraph 6.20 of the Transport Statement) to "*reducing*" as opposed to removing the risk of overspill parking affecting local residents is revealing. Not even the transport consultant seems to be confident that 65 spaces will be adequate to prevent residents, staff and visitors from parking in surrounding roads.

4 Our Assessment of Parking Requirements

4.1 In the following paragraphs we attempt to estimate the parking requirement of residents, staff and visitors drawing, where appropriate, on parking standards applied by a number of planning authorities and the views of transport experts. Our estimate of the parking space requirements for each of these groups builds into a total parking space requirement figure in the range 91 - 110.

Resident Parking

4.2 Before moving on to an assessment of how many spaces are required to meet the parking requirements of residents it is pertinent to refer to what experts have to say about driving and older people.

4.3 The Housing Learning & Improvement Network published a paper entitled "*Better planning for car ownership and well-being in old age*" in May 2016 which contained the following observations:

"Most of the increase in travel among older people is as a car driver. The percentage of over 70 year olds holding a drivers licence in Great Britain has grown from 15% in 1985 to almost 54% in 2009, with males increasing from 34% to 76% and females 4% to 37% in that time. This rise is expected to continue, and it is predicted that 10 million people over 70 in Great Britain will have a driving licence by 2050"

"Car ownership of senior people will increase during the coming years. This is due to the fact that the middle aged people of today probably will maintain their mobility behaviour in old age ("Ageing of travel intensive lifestyles"). It also expects that mobility levels (i.e. number of trips and distances) will increase within the next years".

4.4 A technical report* drafted in 2010 by a transport consultant, Dr. Allan J Burns¹, relating to a retirement housing development in Basingstoke recorded that 0.47 of people in Great Britain aged 70-75 owned a car; for those aged 75-80 the figure was 0.32.

4.5 Were just 65 spaces to be provided as proposed by the applicant there would be relatively few spaces available for residents (estimated 30-35) once provision has been made for staff, visitors and communal transport (an estimated 30-35 spaces or thereabouts). This equates to approximately one space for every five residents or less than one space for every three units. We believe this level of parking provision to be far too low.

4.6 Trying to gauge the number of residents who will own a car and require a parking space is tricky. On the one hand there are factors that will restrain the figure, for example some residents will have medical conditions that prevent or deter them from driving, and the availability of a shared car and a minibus for occasional use will also have a dampening effect. On the other hand there will be residents in the higher car ownership 65 -70 age group and partners not suffering medical conditions. Weighing these factors and the projected age structure of up to 200 residents at St. Christopher's (predominantly over 75 *) it seems reasonable to assume a relatively modest car ownership ratio of the order of 0.30 – 0.35. Applying this range would mean **that a total of between 60 and 70 spaces would be required for residents' parking**. The lower figure equates to a rate of just over one space for every two units, the upper figure to almost six out of ten households having a space.

** Stated by Amicala and used as the basis for making our estimate of resident parking requirements. We note, however, that the minimum age for residents is 65 and there is therefore a possibility that the age profile may be lower than that projected by Amicala.*

Staff Parking

4.7 Applying the Council's C2 parking standard for staff in residential care homes – one space for every two staff FTE – **a total of between 16 and 22 spaces for staff would be required depending on which number of staff figure is accurate** (the 33 staff (FTE) cited in the planning application or the 40-45 staff (FTE) mentioned at the meeting with the developers in November 2021). As there will be well over 100 residents signed up to care packages and requiring a range of care support the number of care staff will be considerable while non care staff will also be needed for various duties (overall management, running the communal facilities, maintenance, security, transport, etc). We believe the 33 staff (FTE) cited by the applicant is too low and that 40–45 staff (FTE) is a more accurate estimate of the staff required. It is frustrating that we have to speculate so much about staff numbers because of the failure of the applicant to provide a detailed breakdown and explanation of staff numbers in their supporting documentation.

4.8 The applicant may claim that the parking standard level of provision is not required because of the plan to provide minibus transport for staff from pick up points but given that staff will almost certainly be travelling to and from different directions and working different shift patterns it is difficult to see how much this alternative travel option will actually be used. With regard to the possible argument that spaces are only required for staff working on site at any one time it is pertinent to point out that parking spaces would be taken by both departing and arriving staff unless shift times are staggered. Nowhere has it been stated whether this will be the case.

¹ *Proposed Retirement Housing Development at New Road, Basingstoke : Report on Transport Considerations, May 2010. Dr. Allan J Burns.*

Visitor Parking

4.9 Trying to assess visitor parking requirements is another challenge. Allowance has to be made for personal visitors arriving at similar peak times rather than being evenly spread, and visits by delivery vans and health professionals might be on the relatively high side compared with a more traditional residential development.

4.10 The City Council parking standard for residential care home visitors (one space per six bed spaces) is not applicable to extra care schemes. Residential care residents are housebound and are therefore dependent on receiving visitors: extra care scheme residents will be able to make trips to friends, family, shops and services, etc.

4.11 Guidance from local authorities for assisted living / extra care schemes is variable. The few authorities who do set visitor space standards for assisted living/ extra care schemes tend to favour the standard of one visitor space for every eight to ten units. The neighbouring local authority, North Somerset, goes a few steps further, opting for a one space per four units for age restricted dwellings.

4.12 Applying a one visitor space per ten units standard would mean providing 12 visitor spaces and a one visitor space per eight units standard would require 15 visitor spaces.

Communal Transport

4.13 Parking spaces will also be required for the minibus and two electric car-club cars that will be provided on site for use by staff and residents Travel Plan (paragraphs 6.2.5 and 6.2.6)

The Total Parking Requirement

4.14 From the analysis above we estimate that the total parking spaces requirement for residents, staff, visitors and communal transport is in the range of 91–110 with the actual number required within this range depending largely on agreed staff (FTE) numbers and the age profile of residents.

4.15 The above figures may seem on the high side but:

(i) Were the City Council's use class C3 parking standards to be applied the total number of parking spaces would be as many as 150 (11 one bed apartments x 1 space per unit +111 two bed apartments /cottages x 1.25 spaces per unit).

(ii) The pre-application submission made by the applicant in July 2021 actually proposed 120 parking spaces.

4.16 We accept that the full application of the C3 parking standard would be too generous a provision given the likely age profile of residents but the 65 spaces proposed by the applicant (a 43% application of the C3 standard) takes us far too much in the opposite direction.

5 Other Independent Living Schemes

5.1 We recognise that drawing parking provision comparisons with other independent living schemes is fraught with difficulties given that schemes differ for all sorts of reasons – different age restrictions, the different health care needs of residents, the different levels of health support on offer, the location of schemes, the provision of public transport services, etc. Nonetheless, a cursory study of two other age restricted schemes in Bristol does suggest that the proposed provision of parking spaces at St. Christopher's is on the low side even allowing for the fact that the two examples selected both have lower age restrictions than St. Christopher's. The Vincent scheme in Redland has 65 residential units and the same number of parking spaces. Westbury Fields Retirement Village comprises 98 units and a similar number of parking spaces (plus an off road overspill car park next to the cricket pavilion).

SECTION 2

Comments on the Travel Plan

Almost completely devoid of detail and analysis, and shifting primary responsibility for both planning and implementation from the applicant to the City Council the so called Travel Plan is simply not fit for purpose. Very little effort seems to have been expended on drafting the Travel Plan, not even carrying out basic research on Travel Plans that have been produced for similar schemes such as The Vincent development on Redland Hill.

- There is no analysis of the likely travel patterns and needs of the three separate groups – residents, staff and visitors (number of residents, car ownership rates, number of staff, work patterns, etc.).
- No attempt is made to set modal split targets for residents, staff and visitors against which the effectiveness of the Travel Plan can be measured.
- The Travel Plan simply lifts the City Council's "off the peg" list of general outcomes set out in the City Council's Travel Plan Guidance rather than devising outcomes more specifically geared to an extra care development.
- Just three measures are specified in chapter 6 (Measures and Initiatives) to help achieve the outcomes listed in chapter 4 of the Travel Plan but no details are given about how these proposed measures will be implemented, e.g. how will the car club scheme work and how will the mini bus proposal operate and be funded?
- What about other measures (e.g. travel packs for all residents and staff)?
- It is a requirement set out in City Council Guidance that a Travel Plan must include an action plan and budget. Chapter 7 covering the Action Plan and Budget fails to comply with this requirement, comprising as it does just one short statement indicating that the City Council will not only be appointed as Travel Plan Coordinator (which we acknowledge it can on payment of a fee) but will also be responsible for the action plan and budget.
- As all of the key measures which are mentioned (the notice board, the shuttle bus and car-club cars) will be the direct responsibility of site management why is not Amicala taking on the Travel Plan coordinator role ?

Consultation on the Travel Plan Action Plan and Budget

As the Travel Plan does not include an action plan or budget there is no opportunity to comment on these crucial elements during the planning application consultation stage. Will

there be any opportunity for interested parties to comment on the action plan and budget when these are produced?

SECTION 3

Comments on the Traffic Generation Section of the Transport Statement

(i) The traffic generation figures presented in the paragraph 7.6 table purport to be based on the TRICS database of trip rates undertaken at various developments around the country. TRICS figures are exhaustingly presented in appendices E and F without any clear explanation of how these figures are used to forecast the traffic flows at St. Christopher's. Without such an explanation and with some of the TRICS trip rate figures in Appendix 7 relating to care homes rather than assisted living schemes it is difficult to treat seriously the TRICS trip rate figures and how they have been interpreted to arrive at the traffic generation figures shown in paragraph 7.6.

(ii) Taking into consideration the probable car ownership and usage rates of the residents we accept that the traffic generation figures are likely to be relatively low compared with a more standard residential development, although not as low as the figures shown in the table in paragraph 7.6. More staff are likely to drive to work than is being assumed by the developers, and service and delivery vehicles will also contribute to traffic flows.

(iii) The site is currently being occupied by a significant number of security staff and transient workers, possibly generating the level of traffic more in line with what might be expected with the proposed development than the previous educational use. Has any attempt has been made to monitor the level and pattern of traffic generated by these occupants?

(iv) We also note that no attempt has been made to estimate the traffic capacity of Westbury Park at different times of the day and to reach a conclusion as to how much the traffic generated by the new development will impact on traffic flows at peak times.

Kevin Chidgey and Jeff Bishop on behalf of Westbury Park Community Association