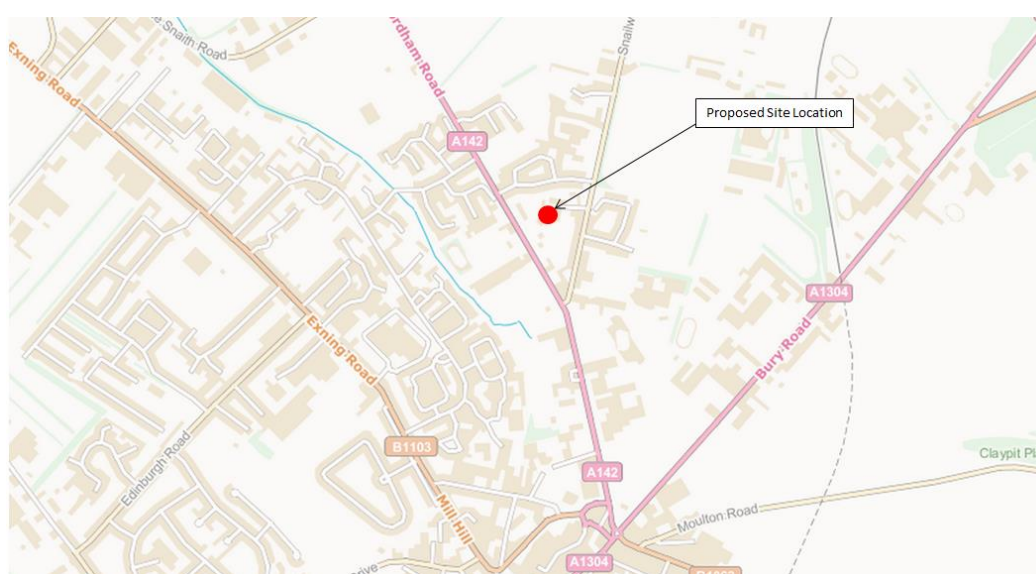


050.0016/ATN2

Project Name:	Kininvie, Fordham Road, Newmarket
Document Reference:	050.0016/ATN2
Document Name:	Review of Parking Standards Guidance
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Approved By:	Jon Huggett (05 ^h April 2016)

1. INTRODUCTION

- 1.1 This Additional Technical Note (ATN) has been prepared by Paul Basham Associates (PBA) on behalf of McCarthy & Stone to justify the proposed level of parking against standards which are not considered appropriate for this type of development. The proposed site location is demonstrated in **Figure 1**.

**Figure 1: Site Location**

- 1.2 The development proposes 26 spaces for 29 'Retirement Living' apartments at Kininvie, Fordham Road, Newmarket. The Suffolk County Council (SCC) highways consultation response to the application (application number DC/15/2120/FUL) stated that the proposed parking levels of 26 spaces were considered insufficient, and that 40 spaces would be required based on local guidance. A Technical Note (050.0016/TN1) was provided to demonstrate that the proposed parking provision was sufficient using independent research based on the developers other sites. Since the original application unit numbers have decreased to 29 units, meaning the parking provision has increased to 0.89 spaces per unit (26 spaces for 29 units).
- 1.3 This Additional Technical Note (ATN) has been completed to assess SCC's approach in setting the new minimum standards and determine whether this is appropriate for 'Retirement Living' units.

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2. SUFFOLK COUNTY COUNCIL UPDATED GUIDANCE FOR PARKING (2015)

- 2.1 It is clear from the outset that the parking standards policy is considered advisory, and is there to assist and advise SCC's highways team. It states that increases or reductions in parking provision may be justifiable as long as evidence is provided to support the proposed level of parking.
- 2.2 For example, with regards to 'Retirement/Warden Controlled Developments' the policy proposes standards but does state 'unless there is the evidence base to support a reduction in the standard'. McCarthy & Stone 'Retirement Living' developments are a unique product, and a number of sites have been surveyed as a result to ensure residents are provided with the appropriate level of parking. The results of these surveys were provided in the original Transport Statement (050.0016/TS/2) and the Parking Survey Technical Note (050.0016/TN/1).
- 2.3 Whilst McCarthy & Stone 'Retirement Living' developments have a minimum age of entry at 60 years, the target age profile is actually 73-83 years old, with the average age of entry being 76 years old. Therefore whilst the age restriction would be for 60 years and above, the average age of residents would be significantly higher.
- 2.4 The document also makes some misleading assumptions and statistical errors in assuming correlation is causation. In particular, 'Although the level of car ownership has increased, the growth of traffic on the highway has not increased to the same level. This indicates that a greater number of vehicles are likely to be parked at the owner's place of residence'. One cannot assume causation because of a correlation, there could be other reasons for a reduction in traffic growth or an increase of car ownership such as population levels, sustainable transport, and highways design. Traffic levels are not provided, and the term 'traffic' is not defined, this could simply be the number of cars on the road or only relating to congestion this is not clear and therefore suggests some statistical errors which may have been repeated throughout the remainder of the document.

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- 2.5 When compared to the superseded 2002 standards, parking standards were based on locations and access to facilities. This was based on whether a site has poor off peak public transport services in rural or urban locations. This method allowed sites to be based on a site-by-site basis, with a sites' own merits considered in determining parking numbers. This is an appropriate approach considering the scale of Suffolk and the variety of land uses and levels of accessibility.
- 2.6 The proposed development would be located close to Newmarket Town Centre, in an urbanised area. It is therefore considered that with the site's sustainable location, it's urban nature and the independent research on McCarthy and Stone 'Retirement Living' developments that a reduction in standards appropriate.

3. ISSUES WITH RESEARCH

- 3.1 The research conducted in order to update SCC parking standards achieved a 40% response rate, which is considered acceptable. However, flatted developments only made up 8.5% of the total, with detached housing making up 48% of the total. This suggests that there is a misrepresentation of the class use, with residential developments lending to higher parking provisions being more prevalent in the study.
- 3.2 The research also did not appear to use retirement apartments in the study; it is therefore questionable as to how the parking standard for Retirement Housing has been derived. The original TS and TN both used independent McCarthy & Stone research which is for 'Retirement Living' developments. This information is specific to the nature of use and is therefore more applicable than Suffolk's standards which do not include sites that are similar in nature.
- 3.3 When compared to private open market houses, Retirement Living developments demand fewer vehicle spaces per unit, with a worst case scenario of 0.44 per unit (based on McCarthy & Stone independent research), as identified in TN 050.0016TN1. This demand includes resident, staff and visitor and therefore suggests that 26 spaces for the 31 units would provide sufficient space to accommodate all demand generated by the proposed site.
- 3.4 Only areas perceived as having 'problems' with parking were surveyed for the standards. The areas surveyed did not include Newmarket, suggesting that parking within Newmarket is not seen as a problem in comparison to the other 34 places surveyed.

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- 3.5 The 2001 and 2011 census results were compared in order to support an increase in parking standards and a move towards minimum standards. However, the average of vehicles per dwelling only marginally increased from 1.254 in 2001 to 1.34 in 2011, an increase of 0.086% which is not considered significant to force such an increase in parking standards and numbers from 1 space per 2 units and 1 space per 1 unit plus 0.25 per unit for visitors.

4. CABINET COMMITTEE

- 4.1 In Agenda 8 of the Cabinet Committee, the Cabinet was asked to adopt the document: 'Suffolk Guidance for Parking' as a replacement of the 'Suffolk Advisory Parking Standards, 2002'. Points discussed included making it 'easier for people to access work and businesses to reach their growth potential' and avoiding 'overprovision'. Both of these items are important to the proposed development, as firstly the developers own parking research demonstrates that applying Suffolk's parking standards would result in an overprovision of car parking. It is also prudent to mention that the nature of residents living at the proposed development would not be going to work and neither is it a commercial use. Therefore the reasoning for accepting such standards for Retirement Homes seems unclear and unrelated to the aims of the guidance.

5. OTHER COUNCIL'S STANDARDS

- 5.1 Essex County Council (Parking Standards Design and Good Practice (2009)) follow the same standards as Suffolk County Council with minimum residential parking standards for Retirement Developments of 1 per unit for retirement apartments, plus 0.25 per visitor spaces.
- 5.2 However, the following McCarthy & Stone planning applications received no highways objection, with all three demonstrating a reduction in parking standards.

Planning Application Number	Number of Units	Number of spaces required	Number of Parking Spaces Provided
EPF/3021/15	57 (AL)	71	57
EPF/1103/15	38 (RL)	48	32
EPF/0402/14	11 (OR)	14	13

Table 1: Essex County Council Parking Reduction Examples

- 5.3 For the above schemes, McCarthy & Stones' independent research was used to support the reduction in standards along with the sites accessible locations. The most similar scheme to the proposed development at Newmarket (EPF/1103/15) also provided parking at less than 1 per unit.

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- 5.4 It is therefore deemed that SCC should also take a flexible and pragmatic approach to the number of parking spaces proposed for the development.

6. CONCLUSIONS

- 6.1 In summary, it is considered that the parking standards document produced by Suffolk County Council has unrealistic standards for Retirement Housing and where the council are accepting no flexibility on the proposed number of spaces this goes against their own guidance.
- 6.2 We therefore conclude that the reduced parking provision for a retirement living development should be deemed acceptable.