

Technical Note

TA Addendum

Land West of Froghall Lane

Project Number: 16007-01
Doc Number: TN02
Prepared for: Kind & Company

3 September 2021

Rev	Issue Purpose	Author	Checked	Reviewed	Approved	Date
A	1 st Draft	EJ	EJ	ESG	EJ	03/09/2021

1. Introduction

1.1 Markides Associates (MA) have been instructed by Kind & Company to provide highways and transport advice relating to the planning application for the development of Assisted Living, located at Land to the West of Froghall Lane, Chigwell.

1.2 An application was submitted to Epping Forest District Council (EFDC) in 2018 (Ref: EPF/1182/18) for a:

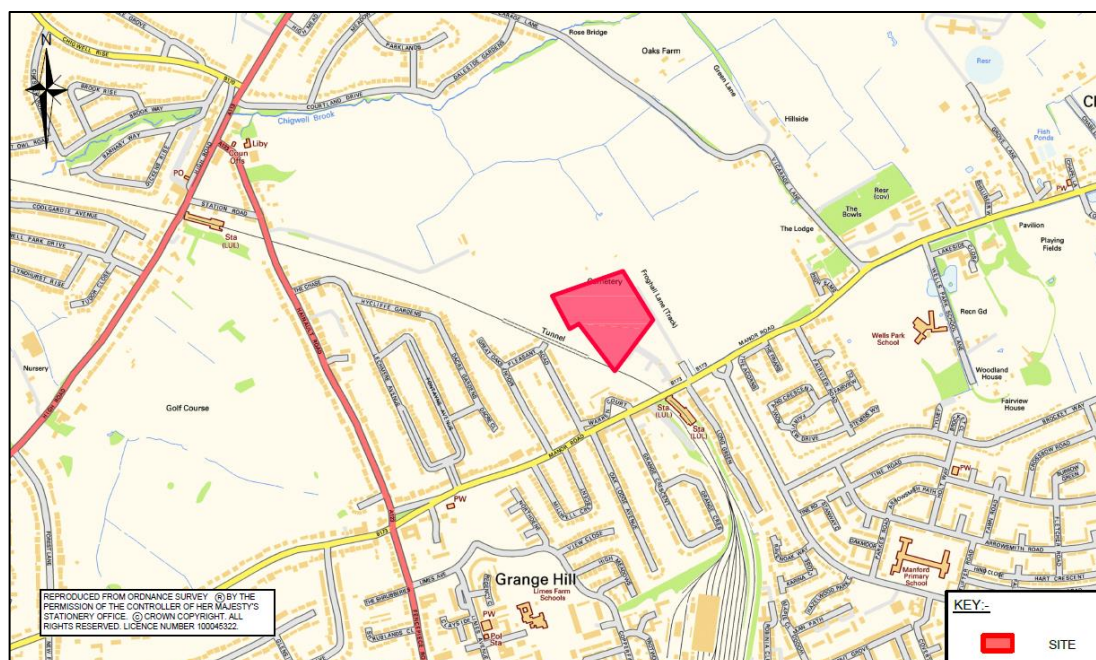
“Hybrid application requesting full planning permission for an assisted living development comprising of apartments and integrated communal and support facilities; landscaped residents' gardens; staff areas; refuse storage; construction of a new site access; a sustainable urban drainage system; a new sub-station and associated infrastructure and services, and outline planning permission for a 0.45 hectare extension of the cemetery.”

1.3 The application was supported by the following documents:

- Transport Assessment (Dec 2016)
- Travel Plan (Dec 2016)
- Delivery and Service Plan (Dec 2016)

1.4 **Figure 1.1** shows the location of the site.

Figure 1.1 Site Location



2. Essex County Council Consultation Response

- 2.1 Essex County Council (ECC), acting as the local highway authority, responded to the application on 19th September 2018 providing the following summary:

"The Highway Authority has considered the above planning application, visited the site and thoroughly assessed the submitted transport information and has concluded that the proposal is not contrary to current National/Local policy and safety criteria.

The applicant has submitted a robust Transport Assessment for the proposal and has demonstrated that the impact on the Woodland Rd/Manor Rd junction will be negligible. This is mainly because the future occupiers are highly unlikely to travel during the network peak hours. The parking is considered to be more than sufficient for the development given the location and the good access to other modes of sustainable travel available.

Consequently, the Highway Authority is satisfied that the development will not be detrimental to highway safety, capacity or efficiency within Chigwell or on the wider highway network."

- 2.2 ECC recommended various conditions be applied to any permission granted.

3. Request for Further Information by Epping Forest District Council

- 3.1 In June of 2021 EFDC requested that further information be provided regarding the impact of the proposed development on the Epping Forest Special Area of Conservation (EFSAC), with the Transport Planner stating that:

“The proposed development is consistent with the site allocation for CHIG.R4 in terms of land use, however proposes a higher level of parking than that serving the essential needs of the development. Some daily trip information has been provided but does not account for staff trips or identify AADTs through the EFSAC. Additional information is therefore required for further assessment, as per “Step 1” (a) to (e) of the HRA site-specific process note.”

- 3.2 The above was updated clarifying that the analysis would be required for staff and resident trips through the EFSAC. This was subsequently provided in the July Tech Note.

July Tech Note (TN02)

- 3.3 MA provided a Technical Note (TN02 – dated 8th July) summarising the impact of the level of daily (AADT) staff and residential trips arising from the proposed development. The TN demonstrated that the development will not result in a significant impact on the EFSAC.
- 3.4 However, EPDC maintained their concern regarding the impact of the proposed development on the EPSAC and requested the level of parking be reduced to 66 spaces in recognition of the Council’s Interim Mitigation Strategy on the effects on the Epping Forest SAC which seeks to reduce the impact of development on air quality.
- 3.5 It is noted that the ‘Epping Forest Special Area of Conservation (SAC) – Position Statement (Updated 30 April 2020)’ published by EFDC states that the “key contributor to this [air pollution] pollution is vehicles.”
- 3.6 It is assumed that the interim mitigation strategy only refers to vehicles with an internal combustion engine as contributing towards air pollution with regard to the EFSAC. Therefore, the use of electric vehicles would not impact upon the EFSAC.
- 3.7 It should be noted that the July Tech Note does not distinguish between those vehicles which contribute to air pollution and those which do not – i.e. electric vehicles.

4. Changes to the Proposed Development

Development Proposals

- 4.1 The proposals remain as per the 2018 submission – 105 apartments, with communal and support facilities.

Site Access

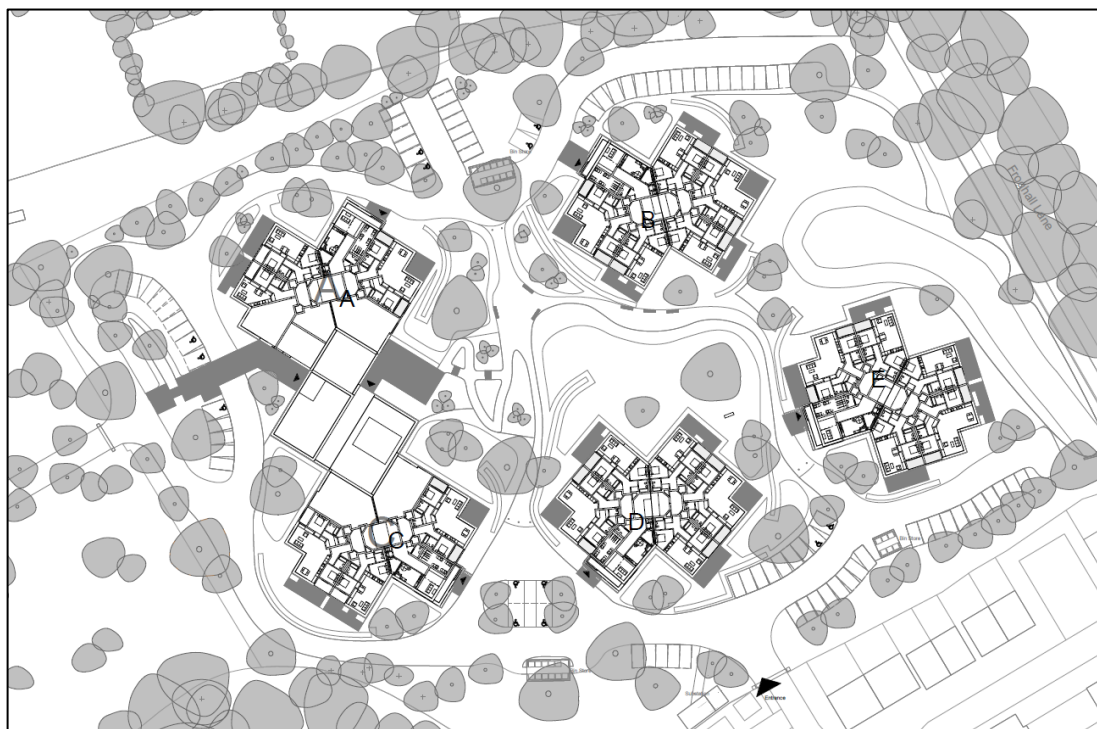
- 4.2 The pedestrian and vehicular access points to the site remain unchanged.

Cycle and Car Parking Provision

- 4.3 The level of cycle parking remains as proposed – 22 spaces, with an additional 6 for staff and visitors, a total of 28 spaces.
- 4.4 It is proposed to provide 1 buggy space per 5 apartments, as outlined in the TA.

- 4.5 The request by EFDC to reduce the level of parking to 66 spaces creates an unviable position for the proposed development as it does not:
- Help residents adjust to a new way of living/retirement, by providing enough parking for residents to bring their car with them, even if they do not use it.
 - Provide enough parking for all users of the site – residents, staff, carers, and visitors.
 - Meet with ECC's requirement of preventing overspill parking from occurring on the surrounding roads.
- 4.6 The previously agreed 132 parking spaces remain appropriate and in accordance with the standards and importantly will not result in overspill parking as requested by ECC.
- 4.7 Neither have the adopted (2009) standards changed since the submission of the planning application.
- 4.8 Neither is it accepted that the site proposes a higher level of parking than that serving the essential needs of the development as stated by the EPDC's request for further information in June 2021.
- 4.9 However, the applicant is open to reducing the level of parking in this instance to 85 spaces. The revised parking layout is provided shown in **Image 4.1** and re-provided in full in **Appendix A**.

Image 4.1 Amended Parking Layout



Source: rcka Block Plan PL-ST-600 Rev F

- 4.10 The amended level of parking for 85 spaces includes parking for residents, visitors, staff and includes disabled parking spaces. In accordance with the TA the site will provide unallocated parking to allow for the flexible management of the car park.
- 4.11 It is also important to note that whilst the EFSAC interim mitigation strategy appears to be reliant on reducing pollution from fossil fuelled vehicular traffic, not vehicular traffic per se, the application has nevertheless been amended to provide 85 parking spaces. The justification for this is set out in **Appendix B**.

Delivery and Servicing Arrangements

- 4.12 The delivery and servicing arrangements remain as per the TA.

Trip Generation

- 4.13 Whilst the parking has been reduced, it is not proposed to update the trip generation analysis within the TA as this provides for a robust assessment. As already accepted by ECC the application does not result in a significant impact on the local highway network.
- 4.14 TN02 also demonstrates the trip generation does not result in an impact on the EFSAC.

Travel Plan and Delivery and Service Plan

- 4.15 There are no changes to the Travel Plan and the Delivery and Servicing Plan as a result of the reduction in the level of car parking.

5. Summary

- 5.1 MA have been appointed to provide highway and transportation advice relating to the proposed development at Land to the West of Froghall Lane, Chigwell. The development proposals comprise up to 105 assisted living dwellings.
- 5.2 This TN provides a summary of changes to the proposed development and any subsequent impact on the highway and transport networks.
- 5.3 The main change to the application is a reduction in the level of car parking to 85 spaces, at the request of EFDC in relation to the perceived impact on the EPSAC.
- 5.4 The impact of the proposed development remains negligible. The proposed development does not result in a significant impact on the highway and transport networks. The assessment also indicates that the development will not result in any highway safety concerns.
- 5.5 This TN along with the accompanying TA, TP, DSP and TN02 demonstrate that the impact of the proposed development is consistent with local and national planning policy

APPENDICES

APPENDIX A – AMENDED SITE LAYOUT



PLANNING

Planning Revision	02-09-21	AS	F
Planning Revision	15-04-20	RT	E
Planning Revision	09-05-18	AS	D
Planning Revision	07-04-17	RD	C
Planning Revision	13-01-17	EV	B
Planning Issue	08-12-16	EV	A

Revision description	Date	Init	Rev
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Title
Block Plan, As Proposed

Project	PegasusLife, Chigwell	Client	MPM Ltd.
Date	15/04/2020	Drawn by	RT
Checked	AS	Scale	1 : 500 @A1
Job No	1427	Drawn by	PL-ST - 600
Revision	F		

©2015 RCKA. This drawing is not to be scaled - use written dimensions only. Any discrepancies to be reported to the architect. All dimensions to be checked on site.

APPENDIX B

JUSTIFICATION FOR PROPOSED PARKING LEVEL

A1 Review of Parking Policy

The Interim Mitigation Strategy makes no reference to reducing car parking provision and the Council's car parking standards remain the starting point for determination. The level of 132 spaces was previously agreed as appropriate under this policy framework. While we are open to negotiation on this matter, this figure was based on robust evidence and sought to react to local concern and the views of the Highways Team at Essex County Council on parking provision. A balance needs to be struck in this matter and we feel that a parking provision of 66 spaces (circa 0.4 for the independent living units) is not appropriate and tips the balance in the wrong direction.

No justification for the reduction has been provided other than as part of a mitigation strategy regarding the impact on the Epping Forest Special Area of Conservation (EPSAC). The TA and subsequent technical notes demonstrate that the application does not result in a significant impact on the EPSAC. Applying arbitrary reductions in parking levels which are not based on evidence does not translate to reductions in car use, particularly as there are no controls preventing residents from owning a car and parking it offsite. Preventing older people from bringing their car with them can impact on the mental and social wellbeing.

The TA demonstrates through the census data that the likely level of car ownership for the 105 units is 101 cars. The development proposed 105 resident parking spaces with a further 27 for staff and visitor spaces including 8 disabled spaces. Reducing the level of car parking to 66 is a significant reduction likely to result in overspill parking onto the surrounding roads. Essex County Council requested a level of parking which would not impact on the surrounding local roads. Clearly the provision of 66 spaces which would need to include accessible spaces, staff and visitor spaces as well as resident spaces means that a significant level of overspill parking may occur, with potentially the same number parking on-street.

Table 5.1 shows adopted (2009) parking standards for the different uses which the proposed development could fall into:

Table 5.1 Parking Provision

Land Use	Standard	Permitted No. Spaces
C2 (residential Care Home)*	1 Space per staff and + 1 visitor space per 3 beds)	15 staff 66 Visitor Spaces 81 Total Spaces
C3	1 Bed – 1 Space 2 Bed – 2 Spaces	1 Bed – 11 Spaces 2 Bed – 188 Spaces Total – 199 Spaces
C3 Retirement	1 space per dwelling	105 Spaces
C3 Visitor Spaces	0.25 spaces per dwelling (unallocated) (rounded up to nearest whole number)	27 Spaces

** Standard based on number of visitor spaces (assumes none of the residents own a car)*

The table above shows that the closest land uses in the adopted parking standards result in a parking requirement between 81 and 132 parking spaces (although the 81 spaces assume none of the residents would own cars). The TA submitted in support of the application took a more evidenced based approach to the parking provision as outlined above. This was accepted by both EPDC and ECC at the time as an appropriate level of car parking in order to minimise the risk of any overspill parking. A parking provision of 85 spaces provides an appropriate level of parking in with C2 or C3 (Retirement) land uses whilst still achieving a large reduction of 35%.

The proposed level of parking is broadly in accordance with the adopted parking standards and therefore should be afforded significant weight.

No changes in the adopted car parking standards have been made since the application was lodged, the draft local plan retains the existing car parking standards.

While the site is within walking distance of Grange Hill underground station, and close to local facilities the site is not highly accessible. Whilst the site is outside the GLA boundary the site's PTAL would be 1 which indicates a 'very poor' level of access to Public Transport from the site.

The occupiers of development will not be as readily able to use public transport as occupiers of general market units. Some will have health issues which will make public transport less attractive as a means of transport. The ownership and use of a car provides important independence for some occupiers and restricting parking does not deliver the same public benefits as it does for general market housing.

The occupiers of the development do not travel in the same way as general market housing occupiers. Grange Hill Underground Station connects the site well with Central London, but residents will be retired and commuting into Central London is unlikely to be a regular occurrence. Occupiers will have more complex and less predictable travel patterns based around leisure, family and health needs. These travel patterns are less well served by public transport and so car ownership is therefore more important to avoid social isolation or having some occupiers marooned from their various networks and interests. For example,

while a block of flats in this location could rely on underground connections into Central London as the most frequent journey for commuters, occupiers of this development will be more frequently visiting relatives in suburban locations or travelling to the GP or hospital.

For this type of development higher levels of car ownership do not equate to higher levels of car use. The provision of parking spaces is more closely linked to car storage rather than car usage, with the knowledge of the car being available for the residents should they wish to make an infrequent journey to visit friends or for personal business or health reasons should public transport not be appropriate. The ownership of a car provides an important psychological feeling of independence, even if the car is not used as often.

Several studies have been undertaken regarding car immobility and its effect on the elderly, which are summarised below:

A1.1 Health Implications

- ‘The relationship between health and driving is summarised in Driving Cessation and Health Trajectories in Older Adults’ (Jerri D. Edwards, George W. Rebok,³ David L. Roth⁴. (2009) who state that “The transition to driving cessation is associated with health declines for older adults as measured by several indicators. Additionally, general health declines more sharply following driving cessation. These findings highlight the importance of interventions to sustain driving mobility among older adults.”
 - ‘The Elderly and Mobility: A Review of the Literature’ (Kostyniuk & Shope 1998) states that “Most importantly, losing a license can be associated with an increase in depression, loss of confidence and status and in extreme cases even early death.”
 - Clearly the health of residents is affected by their ability to maintain an independent lifestyle for as long as possible and owning a car plays an important factor in their health.

A1.2 Mature and Premature Driving Cessation

- ‘Examining the process of driving cessation in later life’ (Charls B. A. Musselwhite and Ian Shergod. (2013)) looks at the impact of driving cessation which states:
- “Across the participants in this study, those who appeared most satisfied after ceasing to drive were those who had been ‘long-term’ planners and self-reported subjective quality of life beyond the car is maintained when meticulous planning, especially through gathering of information, takes place.” And that “the participants who had to give-up driving immediately, with no time for contemplation or trialling other transport, clearly found no longer driving hugely debilitating and were finding it very difficult to adapt and cited having a worse quality of life as a result.”
- Driving cessation due to lack of parking options can have more devastating effects to people because it can be considered a sudden event which people may not have

prepared or planned for it. Clearly forcing residents to give up a car before they are ready may impact on their health and independence.

A1.3 Difficulties In Accessibility Resulting from Driving Immobility

- The elderly can face challenges when choosing public transport, with the most frequent barriers being outlined below:
 - Personal security in evening & night
 - Public transport running late
 - Having to wait
 - Difficulties carrying heavy loads
 - The possibility of cancellations
 - Behaviour of some passengers
 - Lack of cleanliness
 - Having to be out in bad weather
 - Having to change transport
 - Difficulties travelling where they want to
- Older residents can feel a burden to their family for required trips especially if the distances between members are long. The availability of a car for at least one member of an elderly couple would create more convenient living conditions.

A1.4 Car Ownership and Older People in Specialised Accommodation

- ‘Better planning for car ownership and well-being in old age’ produced by the Housing Learning and Improvement Network (LIN) in 2016 states that “there is little published evidence about car ownership and use among older people living in Extra Care accommodation for example.” It goes on to review car ownership in specialised accommodation, stating that:
 - “Staff numbers were significant in estimating parking needs and all schemes reported that parking spaces provided were often full.
 - When considering what level of car ownership may be anticipated attention should be paid to the profile of intended residents, both at first occupation and subsequently, bearing in mind the evidence reviewed here about the practical and psychosocial significance of car ownership for people into advanced old age.”
 - Clearly applying an arbitrary number is not appropriate given the evidence-based approach the TA has put forward which takes into account both car ownership for the elderly, as well as staff and visitors.

A2 Summary

‘Mediators of the Association between Driving Cessation and Mortality among Older Adults’ (J Aging Health. (2013)) states that “Transport can be seen as having direct impacts on the long-term overall goals of high well-being and good health, but it also impacts on other areas – economic, social and environmental systems – which in turn determine well-being.”

‘Examining the process of driving cessation in later life’ (Charls B. A.Musselwhite and Ian Shergod. (2013)) states that “Driving a car helps fulfil utilitarian needs to a maximum and without a car, affective and aesthetic needs would not be met. As people give-up driving, they rely on either public transport or other people for help with their travel. This reduces the fulfilment of many affective and aesthetic needs, and participants discussed how this reduced their own perceptions of quality of life. Hence, it can be seen that a lack of mobility, perhaps even if accessibility is fine, can contribute to depression”.

‘Better planning for car ownership and well-being in old age’ produced by the Housing Learning and Improvement Network (LIN) states that: “Measures that seek to reduce emissions by reducing car use have often been pursued without adequate regard for the other issues that surround the choices people make in relation to car ownership and use,” as noted by Lucas K & Jones P (2009) ‘The Car in British Society, RAC Foundation’ which states that “Current policy debates on the need to reduce car use in order to meet the recently announced CO2 emission targets (Climate Change Act 2008) do not fully consider the impact that this might have on people’s lifestyles and livelihoods, especially those who have limited travel alternatives.”

‘Better planning for car ownership and well-being in old age’ goes onto say that “Car ownership carries powerful significance for older people and loss of the status of car owner carries the risk of negative consequences in self-image, self-confidence and mental well-being. Whilst car ownership among older people has been shown to decline as they age, the sudden or premature enforcement of such a change will be viewed negatively by older people and may dissuade them from making an appropriate and timely move to more suitable accommodation.”

The above provides an overview of the issues facing car ownership and for the elderly and supports an appropriate level of car parking which allows residents to gradually reduce car ownership when they are ready and comfortable to do so.

Whilst accepting the uses within the standards are not an exact fit, the application seeks to strike the right balance between complying with parking policy, which was previously accepted by both ECC and EFDC as complying with the adopted policy and meeting the needs of the residents. No significant changes to that policy has occurred which warrants such a significant reduced in parking as requested by EFDC.

It is considered that the application (accepting a reduction to 85 spaces) strikes the right balance between complying with parking policy and acknowledging and facilitating a gradual change in people’s lives and their requirements for car ownership.

Essentially allowing residents step away from car ownership on their own terms allows them to cope better with a planned transition rather than being forced to because of inadequate parking for example. By providing parking for incoming residents, the proposed scheme can assist tenants from an early stage in making a positive transition to a car-free life as part of an overall positive and planned transition into a different way of living in older age.

Higher car ownership levels will have less of an impact on air quality for this form of development than for a general market development. Residents will happily walk in to Chigwell to visit local shops, where able, but they still need cars for less accessible locations. The provision of a car ensures independence for residents and while they do not need to use it as often as a family or young couple, the option does ensure that they become less socially isolated.