

**FORMER POLICE STATION,  
SOUTHAMPTON ROAD, LYMINGTON**

**Appeal by Churchill Retirement Living Ltd against the  
decision of New Forest District Council to refuse permission  
to demolish an existing building and erect 32no. Retirement  
Apartments including communal facilities, access, car  
parking and landscaping**

**Planning Ref: 21/10938**

**Appeal Ref: APP/B1740/W/21/3289313**

**Rebuttal**

**Prepared on behalf of New Forest District  
Council**

**2022/6474/RB02**

**April 2022**

## DOCUMENT CONTROL


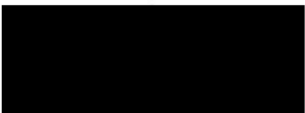
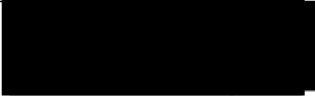
**Project:** Former Police Station, Southampton Road, Lymington  
Appeal by Churchill Retirement Living Ltd against the decision of New Forest District Council to refuse permission to demolish an existing building and erect 32no. Retirement Apartments including communal facilities, access, car parking and landscaping

**Document:**  
Rebuttal

**Client:** New Forest District Council

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## 1 INTRODUCTION

- 1.1.1 RGP is commissioned by New Forest District Council (the Council) to advise on highway and transportation matters in relation to a planning appeal (ref. APP/B1740/W/21/3289313) made against New Forest District Council (NFDC). The Appeal relates to the decision to refuse planning permission (ref. 21/10938) made in June 2021 for development proposals on the site of the Former Police Station, Southampton Road, Lymington, SO41 9GH.
- 1.1.2 The proposed development comprises 32 Retirement Living apartments with communal living spaces and associated car parking.
- 1.1.3 The application was refused (Application Number: 21/10938) in June 2021 with one reason for refusal pertaining to transport and highways (Reason 4) which states: *"The proposal makes insufficient provision for on-site parking to serve the development and inadequate turning on site to enable emergency service vehicles to turn on site and leave in forward gear. The development is likely to lead to additional pressure on on-street parking within the surrounding local area, to the detriment of amenity of the area."*

## 1.2 Background

- 1.2.1 Initial assessment work was prepared by Paul Basham Associates Ltd in June 2021 in support of the planning application, which comprised a Transport Statement (Document ref. 135.0020/TS/2) as part of the original planning submission. Referred to herein as the 'TS'.
- 1.2.2 Following receipt of the Paul Basham Associates Ltd Highways Proof of Evidence (131.0020/PoE/1) referred to herein as the 'PoE', I have the following points.

## 1.3 Site Accessibility

- 1.3.1 Paragraph 3.9 of the PoE states: *'For the Appeal Scheme, the location of the development is considered highly accessible and therefore the role parking needs to play in providing accessibility is reduced.'*
- 1.3.2 The site's accessibility by non-car modes is not disputed in general terms, however, with reference to Paragraph 6.3 of the PoE: *'The typical Churchill Retirement Living unit purchaser is 79 years old'* 1 Retirement Living Explained: A Guide for Planning & Design Professionals, April 2017.
- 1.3.3 Residents of 79 years and older would likely be experiencing emerging frailty, but still able to drive, this I consider would lead to shorter journeys being undertaken via car rather than walking or cycling.

- 1.3.4 The above however, is also different to the typical profile of residents set out within the CRL website. With reference to the Churchill Living Website under the 'Churchill FAQs' that states: "Yes. Anyone can own one of our apartments but only those over 60, or partners of those over 60 who themselves are over 55, can live in the apartment.". Clarification is sought with regards to the average age of CRL residents. Mindful that residency is available from the age of 60, I am of the view that persons of 60-70 years old (with partners perhaps as young as 55) are likely to wish to continue to live independent lifestyles reliant on the use of a private car.
- 1.3.5 Whilst it is considered that some residents would seek continued independence, I also acknowledge that some older residents would experience the onset of mobility constraints as they become older. Further clarification is sought regarding why no disabled parking provision is proposed on site. With reference to APOE-11 Section 5.4: "An increase in the proportion of the population living into advanced old age also impacts on the demands made upon health services. Table Seven projects an increase in the numbers of those experiencing a long-term limiting illness. This shows an overall increase of 42% in those over 65 years of age whose day-to-day activities are limited a lot.". Therefore, I am of the view that disabled parking provision should be provided on site to accommodate persons over 65 years of age whose day-to-day activities are limited a lot.

#### **1.4 Proposed Parking Provision in the Context of Car Ownership Data**

- 1.4.1 Paragraph 6.10 of the PoE states: 'Furthermore, the Planning Committee Report for the Appeal Site states 'Whilst the proposed development would provide 12 no, car parking spaces for residents...and is therefore significantly less than the standards set out in the SPD, it is material to the consideration of the proposals that the site of the proposed development is located within an inherently sustainable location close to Lymington town centre with its wide range of services and facilities, accessible via a generally flat and level walk, and there are a good range of public transport links within and beyond the locality and surrounding area. In this respect it is considered that, by reason of the particularly sustainable Location of the proposed development, a reduced level of on-site parking provision can be considered acceptable in this case' (paragraph 7 of page 11).
- 1.4.2 Paragraph 6.12 of the PoE states: 'Furthermore, CRL parking provision has recently been tested at two Appeals in Oxted (APP/M3645/W/19/3242672) and Paddock Wood (APP/M2270/W/3225289).'
- 1.4.3 With reference to Appeal Decision APP/M3645/W/19/3242672, Section 16 states: 'Although raised as a concern, no empirical evidence was provided by the Council to demonstrate that car ownership levels in the vicinity of the appeal site would be likely to give rise to significantly different parking demand from the other sites, for example by a breakdown of car ownership by age group.'

- 1.4.4 I have gathered and provided empirical evidence that compared each of the CRL schemes referred to within Table 1 of the PoE, Section 6.8 and 6.9 of the PoE and Table 8 of the TS in order to provide a breakdown of car ownership by age group.
- 1.4.5 **Figure 1.1** below summarises the Census Car Ownership data for each site reporting the percentage of persons aged 65 and above owning 1 or more vehicles. The full census car ownership datasets are contained within **Appendix A**.

Site	Output Area	Percentage of persons aged 65 and above owning 1 or more vehicles	Parking Provision per unit
Appeal Site	New Forest 017	81%	0.37
Herbert Lodge, Hythe	New Forest 009	80%	0.35
Knights Lodge, North Close, Lymington	New Forest 017	81%	0.41
Kings Edgar Lodge, Ringwood	New Forest 012	58%	0.36
Church Lane, Oxted	Tandridge 006	76%	0.38
Commercial Road, Paddock Wook	Tunbridge Wells	66%	0.39
Saffron Lodge, Saffron Walden	Uttlesford 002	67%	0.35
Nicholls Lodge, Bishop's Stortford	East Hertfordshire 007	37%	0.34

**Figure 1.1: CRL Site Census Car Ownership Comparison**

- 1.4.6 As set out in **Figure 1.1** above, the Appeal Site is situated in an area of far higher car ownership amongst the over 65 age group than the other sites made reference to within the PoE.
- 1.4.7 I therefore consider the argument that the consented schemes referenced within the PoE in order to justify the low parking provision to be weakened by the fact the appeal site is in a far higher car ownership area.

## 1.5 Parking Quantum

- 1.5.1 Paragraph 8.4 of the PoE states: *'In order to understand likely parking demand for the Appeal Scheme, CRL's independent research has been reviewed and considered, as per the Transport Statement submitted as part of the planning application.'* The surveys referred to (Appendix H of the TS), were undertaken during neutral weekday (Tuesday and Wednesday) between 07:00-21:00. The results of the survey are not questioned however a parking survey for a residential use (with reference to the Lambeth methodology) would typically be undertaken overnight to best ensure residents are home.

- 1.5.2 Furthermore, it is anticipated that CRL residents would receive visitors, with reference to the proposed Guest Suite on the ground floor. Overnight visitors would, in my view, be more likely at weekends as younger relatives of residents would likely be of working age. Consequently, a weekend survey may yield different results and demonstrate that a higher parking provision is required to meet visitor parking demand at weekends.
- 1.5.3 Section 6.18 of the PoE explains: *'The Appeal Site is located some 380m to the northwest of Lymington High Street where public car parking is available including that at St Thomas St Car Park and Town Quay Car Park which would be suitable for visitors, with the latter a circa 6 minute walk (480m) from the Appeal Site. Should any additional parking demand be required there are plentiful opportunities for safe parking which would not result in a detrimental affect to the amenity of the area.'*
- 1.5.4 I agree that approx. 400m is a comfortable walk distance for an able-bodied person, however, I question whether visitors (including overnight visitors) would pay to park approx. 400m away from the site when free on-street parking is available on Queen Elizabeth Avenue. Consequently, dedicated visitor parking provision should be provided on-site as part of the proposals.

## **1.6 Concluding Remarks**

- 1.6.1 Overall, I have concluded that despite the site's level of accessibility shorter journeys would still be undertaken by private car.
- 1.6.2 The appeal site is located in a much higher area of car ownership among the over 65 age group, with reference to census data, than the other CRL schemes referenced as justification for a low parking provision.
- 1.6.3 Whilst public car parks are available in Lymington Town, I consider that visitors would likely park on-street as the most convenient location when visiting residents.
- 1.6.4 Therefore, I consider the decision by NFDC to refuse the scheme on highway impact grounds to be correct.



## **APPENDIX A**



**LC4109EW Car or van availability by sex by age**  
ONS Crown Copyright Reserved [from Nomis on April 2022]

population All usual residents in households  
units Persons  
date 2011  
area type 2011 super output areas - middle layer  
area name E0200 787 : New Forest 006 Hulse 1 Lodge, Hythe  
sex All persons

Age	%						
	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Age	7,372	691	2,610	01	9	36	55
Age 0 to 15	1,035	68	291	676	7	28	65
Age 16 to 2	623	3	129	51	7	21	72
Age 25 to 3	582	176	362		8	30	62
Age 35 to 9	1,08	61	37	573	4	27	69
Age 50 to 6	1,639	61	528	1,050	4	32	64
Age 65 and over	2,085	1	112	529	20	55	25

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

**LC4109EW Car or van availability by sex by age**  
ONS Crown Copyright Reserved [from Nomis on April 2022]

population All usual residents in households  
units Persons  
date 2011  
area type 2011 super output areas - middle layer  
area name E02006 33 : Tandridge 006 26 and 28 Church Lane, Oxted  
sex All persons

Age	%						
	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Age	9,226	627	3,032	5,567	9	41	76
Age 0 to 15	1,850	63	600	1,187	6	58	115
Age 16 to 2	757	3	155	599	7	25	90
Age 25 to 3	710	5	287	399	9	49	69
Age 35 to 9	2,027	87	680	1,260	6	48	89
Age 50 to 6	1,936	56	50	1,30	3	27	87
Age 65 and over	1,916	32	860	732	16	41	35

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

**LC4109EW Car or van availability by sex by age**  
ONS Crown Copyright Reserved [from Nomis on April 2022]

population All usual residents in households  
units Persons  
date 2011  
area type 2011 super output areas - middle layer  
area name E02005162 : Tunbridge Wells 001 26-38 Commercial Road, Paddock Wood  
sex All persons

Age	%						
	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Age	10,670	895	3,786	5,989	12	51	81
Age 0 to 15	2,167	139	760	1,268	13	73	123
Age 16 to 2	1,010	62	217	735	10	40	118
Age 25 to 3	1,095	87	2	58	15	73	100
Age 35 to 9	2,58	117	788	1,553	8	56	110
Age 50 to 6	2,150	125	706	1,319	8	43	80
Age 65 and over	1,756	365	861	530	18	41	25

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

**LC4109EW Car or van availability by sex by age**  
ONS Crown Copyright Reserved [from Nomis on April 2022]

population All usual residents in households  
units Persons  
date 2011  
area type 2011 super output areas - middle layer  
area name E0200 790 : New Forest 012 King Edna Lodge, Ringwood  
sex All persons

Age	%						
	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Age	2,570	917	2,870	3,783	12	39	51
Age 0 to 15	1,350	88	507	755	9	49	73
Age 16 to 2	757	7	199	8	12	32	78
Age 25 to 3	712	58	252	32	10	43	74
Age 35 to 9	1,612	102	513	997	7	36	71
Age 50 to 6	1,11	11	519	781	7	32	48
Age 65 and over	1,695	81	880	33	23	42	16

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

**LC4109EW Car or van availability by sex by age**  
ONS Crown Copyright Reserved [from Nomis on April 2022]

population All usual residents in households  
units Persons  
date 2011  
area type 2011 super output areas - middle layer  
area name E0200 592 : Uttlesford 002 Saffron Lodge, Saffron Walden  
sex All persons

Age	%						
	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Age	11,930	1,550	710	5,610	21	64	77
Age 0 to 15	2,260	185	886	1,189	18	86	115
Age 16 to 2	1,206	1	367	695	23	59	112
Age 25 to 3	969	102	309	578	16	50	93
Age 35 to 9	2,622	167	1,028	1,07	13	73	100
Age 50 to 6	2,31	186	891	1,237	11	54	75
Age 65 and over	2,085	676	1,029	380	32	49	18

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

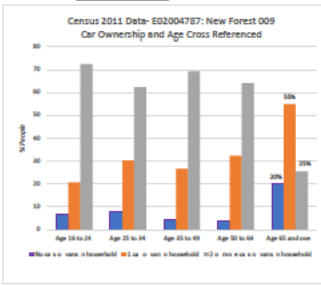
**LC4109EW Car or van availability by sex by age**  
ONS Crown Copyright Reserved [from Nomis on April 2022]

population All usual residents in households  
units Persons  
date 2011  
area type 2011 super output areas - middle layer  
area name E0200 88 : East Hertfordshire 007 Northols Lodge, Bishop's Cleeve  
sex All persons

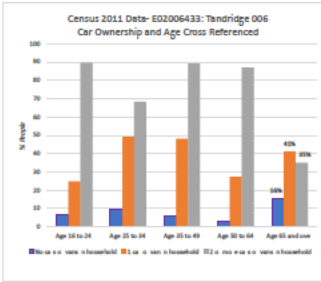
Age	%						
	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Age	9,79	1,323	3,998	73	18	54	61
Age 0 to 15	1,970	157	82	989	15	80	96
Age 16 to 2	969	102	309	578	16	50	93
Age 25 to 3	1,579	227	739	613	39	127	105
Age 35 to 9	2,35	226	963	1,216	16	68	88
Age 50 to 6	1,582	12	562	878	9	34	54
Age 65 and over	1,239	69	601	169	22	29	8

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

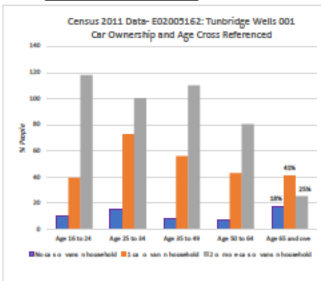
**Hubert Lodge, Hythe**



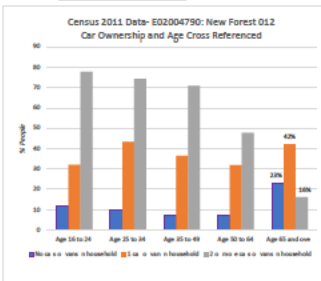
**Church Lane, Oxted**



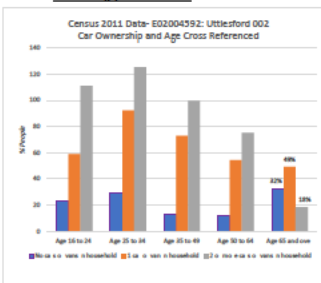
**Commercial Road, Faddock Wood**



**King Edgar Lodge, Ringwood**



**Saffron Lodge, Saffron Walden**



**Nicholls Lodge, Bishop's Stortford**

