



PLANNING POLICY STATEMENT

**The Ascot Arms
Central Avenue
Gravesend
DA12 5AW**

Planning Application on Behalf of Avery Healthcare

January 2022

QED Planning Ltd

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Our Ref: 18118

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1. Introduction

- 1.1 This Planning Policy Statement is submitted on behalf of Avery Healthcare Group (Avery) in respect of proposals for land at Central Avenue, Gravesend (formerly occupied by the Ascot Arms Public House) comprising the demolition of the existing structures and redevelopment to provide a new 62-bedroom care home (Use Class C2) together with associated access, car and cycle parking, structural landscaping, and amenity space provision. The new care home will provide 24-hour support and care for the frail elderly, meeting a full range of residential, nursing and dementia care needs, including end of life and palliative services.

Background to the Proposal

- 1.2 By means of background, Avery develop and run industry-leading residential, dementia and nursing care homes and specialist retirement housing schemes. They have a portfolio of 61 elderly communities across the country. They provide care for over 3,800 residents and offer independent living facilities for over 300 people with further developments planned and in progress.
- 1.3 Avery is already an experienced and established care home operator in Kent, with existing schemes including the Adelaide Care Home close to Bexleyheath High Street, Elvy Court Care Home in Sittingbourne, Miramar Care Home in Herne Bay, and most recently, Rivermere Care Home on the outskirts of Sevenoaks. Avery has a further care home in development at Edenbridge that will open later this year (2021), underlining their commitment to providing premium care in Kent.
- 1.4 The land at Central Avenue has been identified to address a pressing local need for elderly care provision and the characteristics of the site lend themselves favourably to the proposed use, being within an established residential area close to local services and amenities. The new care home, which will be registered with the Care Quality Commission, will offer state of the art facilities and will operate to the highest care standards. The building will be of a sustainable design and construction and will be 'future-proofed' to meet on-going care needs and expectations.

Community and Stakeholder Consultation

- 1.5 As summarised in Section 4 of this Statement and in the accompanying Statement of Community Involvement, Avery have engaged in dialogue with the local planning authority, local ward members, Design South East and local residents prior to the submission of this application. The layout and design of the proposed development has evolved to reflect advice received throughout this process.

Scope of Supporting Information

- 1.6 In accordance with the Council's list of local validation requirements, and following the Council's pre-application advice, the application is accompanied by the following drawings and supporting documents:

Drawing AL(9)900 – Site Location Plan
Drawing AL(9)906 – Existing Site Plan
Drawing AL(9)901E – Proposed Site Layout Plan
Drawing AL(1)101C – Proposed Ground Floor Plan
Drawing AL(1)102C – Proposed First Floor Plan
Drawing AL(1)103C – Proposed Second Floor Plan
Drawing AL(1)104C – Proposed Roof Plan
Drawing AL(1)140C – Proposed Elevations Sheet 1
Drawing AL(1)141C – Proposed Elevations Sheet 2
Drawing AL(1)160 – Site Sections
Drawing AL(9)902 – Sun Path Analysis
Drawing AL(9)903 – Proposed Boundary Treatments
Drawing AL(9)904 – Proposed Cycle Stores
Drawing AL(9)905 – Proposed Refuse Store
Drawing AL(1)120 – Proposed Materials Board

Drawings Submitted for Indicative Purposes Only

Drawing AL(1)150 – Artists Impression Sheet 1
Drawing AL(1)151 – Artists Impression Sheet 2
Drawing AL(1)152 – Artists Impression Sheet 3
Drawing AL(1)153 – Artists Impression Sheet 4

Supporting Information

Planning Application and CIL forms – QED Planning
Planning Policy Statement – QED Planning
Statement of Community Involvement - becg
Design and Access Statement – TDC Architects
Landscaping Design Plan - PDP
Landscape Design Strategy - PDP
Care Needs Assessment – Healthcare Property Consultants
Operator Statement – TDC Architects
Waste Management Plan – TDC Architects
Crime Prevention Statement – TDC Architects
Public House Viability Report - James A Baker Surveyors
Tree Survey – Andrew Day Consulting
Tree Report – Andrew Day Consulting
Tree Protection Plan - Andrew Day Consulting
Transport Statement - Bancroft Consulting
Framework for Green Travel Plan – Avery Healthcare
Flood Risk and and Drainage Strategy - Herringtons
BREEAM Pre-Assessment – Scott White and Hookins
Sustainability Report - Harniss Consulting
Phase 1 Land Contamination Study – ASL

Preliminary Ecological Appraisal and Biodiversity Plan – Andrew Day Consultants
Desk Top Archaeological Statement – Souterrain Archaeological Services
Utilities Statement – Harniss Consulting

1.7 The purpose of this planning statement is to appraise the scheme within the context of the allocations that apply to the site and the planning policies set out in the NPPF and the Development Plan.

1.8 The Statement is set out as follows:

- Section 2 describes the site and surroundings
- Section 3 summarises the national and local plan policies relevant to the proposal
- Section 4 outlines the proposed development scheme and the process of pre-application consultation with the local planning authority and its consultees
- Section 5 assesses the scheme in respect of land use, design, residential amenity, highways and environmental matters
- Section 6 draws together the conclusions of the report

2 Site and Surroundings

Site Context

- 2.1 The subject site has an area of approximately 0.4 hectares. It comprises a vacant public house and its associated gardens and parking areas. The site also includes a parcel of land to the south, which is the same ownership, but which is currently managed by the local authority as public open space.
- 2.2 The public house was closed and boarded up in July 2019 and the site has since been vacant.
- 2.3 The existing building is a primarily two storey structure and is constructed of part brick and part rendered walls with a plain tiled pitched roof.
- 2.4 The site is positioned between three roads, Ascot Road to the north, Central Avenue to the east and Aintree Close to the west. The existing building presents a strong frontage to both Ascot Road and Central Avenue.
- 2.5 The site includes an area of car parking for approximately 14 vehicles to the front, accessed from Ascot Road. There is a further access from Aintree Close which is currently blocked off.
- 2.6 To the rear, the site comprises areas of hard standing and overgrown vegetation including some mature trees. Beyond the trees to the south of the existing building is the grassed recreation ground.
- 2.7 On the eastern boundary, outside of the landownership, is an electrical sub-station.

Surrounding Area

- 2.8 The site is located approximately 1.5km to the south of Gravesend town centre and lies within the urban boundary.
- 2.9 The surrounding uses in Ascot Road and Central Avenue comprise mainly two storey semi-detached and terraced residential properties dating from the 1930's. The properties in Aintree Close to the west are more recent, and comprise two storey terraced, semi-detached and detached properties.
- 2.10 To the south of the site lies an area of open green space, known as Central Avenue Open Space, comprising a recreation ground and playground.
- 2.11 Other nearby uses include Whitehall Junior School located approximately 300 metres to the east of the site and Mid Kent Golf Club located approximately 0.5 km to the west.

Accessibility

- 2.12 The site occupies a sustainable location with convenient vehicular access to the A2, which connects to the M25. Gravesend railway station is approximately 1.5 km away providing direct links to London St Pancras. There are various bus stops within walking distance of the site; the closest is on Singlewell Road, a 5-minute walk from the site which is served by the No.455 providing services to Gravesend town centre and railway station. The nearest local shops and services are found on Singlewell Road to the north west of the site and Sun Lane to the south east (both 0.5 km away).

Site Allocations

- 2.13 As set out on the Council's Policies Map (September 2014) the site does not have any specific designations, however, it lies within a Groundwater Source Protection Zone and a Smoke Control area.
- 2.14 The Environment Agency Flood Risk Maps show that the site falls within Flood Zone 1 and is at low risk of flooding.
- 2.15 There are no heritage or landscape constraints relating to the site.
- 2.16 No of the trees on the site are protected by a Tree Preservation Orders (TPO).

Planning History

- 2.17 There are various historic planning applications relating to the former public house use as well as an application for the erection of squash courts which was withdrawn in 1977 (Ref. 19770742). None of these applications is of direct relevance to the current care home proposal.

3 Planning Policy

National Planning Policy Framework

- 3.1 The NPPF (July 2021) sets out the Government's planning policies for England and how these should be applied.
- 3.2 Paragraph 10 of the NPPF sets out a presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives (set out in paragraph 8), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 3.3 Paragraph 62 provides the overarching objective in promoting housing choice stating that: *'The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, **older people**, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'*[our highlighting].
- 3.4 Older people are defined in the NPPF as *"People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs."*
- 3.5 Paragraph 92 advises that planning decisions should aim to achieve healthy, inclusive and safe places that (a) promote social interaction, (b) are safe and accessible and (c) enable and support healthy lifestyles.
- 3.6 With regards to existing social facilities and services, the NPPF states at paragraph 93(c) that planning policies and decisions should guard against the unnecessary loss of valued facilities

and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

- 3.7 Paragraph 99 advises that existing open space and sports land should not be built on unless either (a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements, (b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location or (c) the development is for alternative sports and recreational provision.
- 3.8 With regards to highways, Paragraph 110 states that in assessing specific applications for development, it should be ensured that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users; and
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 3.9 Paragraph 113 requires that all development that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 3.10 Paragraph 120 promotes and supports the development of under-utilized land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained.
- 3.11 Paragraph 126 encourages the creation of high-quality buildings and places stating that: *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'* Paragraph 130 further states that developments should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping (criterion b), sympathetic to local character and history (criterion c), establish or maintain a strong sense of place (criterion d) and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users (criterion f).

National Planning Policy Guidance

- 3.12 The Planning Practice Guidance (PPG) supports the National Planning Policy Framework. The PPG now specifically addresses the need for older people's accommodation in consolidated guidance dated 26 June 2019. In assessing how local authorities should address the need for older person's housing, the PPG states that:

"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of planmaking through to decision-taking." (Paragraph 001)

3.13 The need to provide housing for older people is described in the PPG as 'critical' as people are living longer lives and the proportion of older people in the population is increasing (paragraph 001).

3.14 It is acknowledged that there are different types of specialist housing designed to meet the diverse needs of older people which can include age-restricted general market housing, retirement living or sheltered housing, extra care housing or housing-with-care and residential and nursing care homes (paragraph 010).

3.15 The PPG further states that:

"Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people" (paragraph 006) and that "Innovative and diverse housing models will need to be considered where appropriate" (paragraph 012)

3.16 Having regard to local housing supply, the PPG categorically states that "*Plan-making authorities will need to count housing provided for older people against their housing requirement*", although for residential institutions calculations might be based on the average number of adults living in a household (Paragraph 016).

Local Planning Policy

3.17 Section 38 (6) of the Planning & Compulsory Purchase Act 2004 requires that, when making a determination under the Planning Acts, that determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Local Development Plan against which the proposals for the subject site are to be considered comprises the Gravesham Local Plan Core Strategy and Policies Map (2014) and the Gravesham Local Plan First Review Saved Policies (2014).

3.18 The Core Strategy policies that are relevant to this application comprise the following:

Policy CS01 (Sustainable Development) sets out the presumption in favour of sustainable development contained in paragraph 14 of the NPPF.

Policy CS02 (Scale and Distribution of Development) prioritises development in the urban area as a sustainable location for growth.

Policy CS07 (Economy, Employment and Skills) seeks to enhance opportunities for all local people to access new jobs arising from the Council's employment policies.

Policy CS10 (Physical and Social Infrastructure) supports proposals and activities that protect, retain or enhance existing social infrastructure. Where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.

Policy CS11 (Transport) sets out that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Sufficient parking in new development is to be provided in accordance with adopted parking standards reflecting the availability of alternative means of transport and accessibility to services and facilities.

Policy CS12 (Green Infrastructure) indicates that all green spaces contribute to the green infrastructure network and that the multifunctional network of green spaces will be created, protected, enhanced and maintained. The policy further requires that there be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought.

Policy CS13 (Green Space, Sport and Recreation) indicates that the Council will seek to make adequate provision for and protect and enhance the quantity, quality and accessibility of green space in accordance with an adequate up to date and relevant evidence base.

Policy CS14 (Housing Type and Size) expects new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities. Paragraph 5.10.10 states that sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants.

Policy CS18 (Climate Change) seeks to minimise the impact of development on wastewater drainage systems, advocates the use of Sustainable Drainage Systems where technically and financially feasible and requires all non-residential developments of 1,000 sqm and above to meet the BREEAM "excellent" standards of water efficiency.

Policy CS19 (Development and Design Principles) requires new development to be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design, layout and form of new development should make a positive contribution to the street scene and to the character of the area and safeguard the amenity (including privacy, daylight and sunlight) of its occupants and those of neighbouring properties. Proposals should include details of appropriate hard and soft landscaping, protect and where opportunities arise enhance biodiversity and provide appropriate facilities for the storage and disposal of waste.

- 3.19 The list of relevant saved policies from the Gravesham Local Plan First Review (1994) comprise the following:

Policy T1 (Impact of Development on the Highway Network) requires that all proposed developments be adequately served by the highway network identified on the Proposals Map.

Policy T5 (New Accesses onto Highway Network) states that the formation of new accesses or the intensification of use of existing accesses to the roads forming the highway network shown will not normally be permitted, except where no danger would arise and where a properly formed access can be created in a location and to a standard acceptable to the Local Planning and Highway Authorities.

Policy P3 (Vehicle Parking Standards) requires development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards.

- 3.20 In October 2020 the Council undertook a Regulation 18 (Stage 2) consultation on the Partial Review of the Local Plan Core Strategy (the Site Allocations and Development Management Policies Document). As the Site Allocations and Development Management Policies DPD is still at an early stage and has not been subject to Examination, only limited weight is attached to these policies. However, they do provide a useful direction of travel.
- 3.21 There is no Neighbourhood Plan for the area.
- 3.22 Relevant supplementary planning guidance includes the following:
- Gravesham Residential Layout Guidance SPD2 (2020)
 - Kent Development Contributions Guide
 - Kent Design Guide
 - Kent Vehicle Parking Standards
- 3.23 An assessment of the proposed development against the policies listed above is provided in section 5 of this Statement.

4 Development Proposal

- 4.1 Avery propose to redevelop the site by demolishing the existing building and constructing a new 62-bedroom care home (Use Class C2). The home will be registered with the Care Quality Commission (CQC) and will provide 24-hour support and care for the frail elderly, meeting a full range of residential, nursing and dementia care needs, including end of life and palliative services. The home will offer a continuing care pathway, where the long-term needs of residents can be met on one site as their care requirements may change. The average age of residents will be approximately 85 to 90 years. Residents will move into the care home at the point at which their care needs have escalated and when they or their family/carers are unable to address these needs within their own home. The average length of stay of residents in nursing care will be 15 – 18 months and the average length of stay for residents in residential care will be approximately 2 years.
- 4.2 The scheme will be an exemplar in terms of the standard of facilities and the provision of support and care. The care home will exceed the space standards set by the CQC and will incorporate the following facilities and features:
- All bedrooms to be equipped with en-suite bathrooms designed for safety and accessibility.
 - 24-hour on site care provision
 - Spacious communal and amenity spaces incorporating café/bar/lounge, hairdressers, cinema room, activity rooms, lounges, dining spaces and quiet rooms. Many of these facilities are to be opened for use by community groups to integrate the home with the local area and to provide a busy and vibrant atmosphere within the care home.
 - On-site kitchen and laundry
 - Staff facilities including lounge, training area and changing rooms
 - Landscaped amenity areas and sensory gardens
 - Car and cycle parking as well as dedicated spaces for deliveries and ambulance
- 4.4 The positioning and orientation of the new building within the site has been designed to make efficient use of the land whilst responding to the site's topography and the need to minimise the amenity impact on the neighbouring residential properties. The building is arranged in a 'T' shape allowing for a strong frontage to the created adjacent to both of the main road frontages and with parking to the front and a quieter amenity space to the rear.
- 4.5 In taking advantage of its prominent corner plot, and with reference to the height of the existing building on the site, the opportunity is taken to introduce a 2.5 storey building, with the top floor accommodation set largely within the roof space. The articulation of the elevations, together with the treatment of the roof form and the use of a varied palette of high-quality materials, allows for the building to read as a series of distinct elements, thereby breaking up the overall mass.
- 4.6 The building is set back from the boundaries to allow for the retention of the majority of the existing trees on the site, including the those most visible within the public realm along the frontages of Central Avenue and Ascot Road. Within the rear part of the site, some tree loss is

proposed to accommodate the new building, and compensation will be offered in the form of new planting, landscaping and wider tree management.

- 4.7 High quality landscaped spaces will be provided throughout the scheme providing an important amenity space for prospective residents and complementing the setting of the building. The proposed care home gardens extend beyond the existing trees adjacent to the southern site boundary (into that section of the landownership which currently forms part of the adjoining open space) and this space is intended to provide a sensitive transition between the two uses.
- 4.8 Access to the site will be as existing from a reconfigured access point along Ascot Road and will lead to a car parking area at the front of the care home providing spaces for 20 no. vehicles.

Design Evolution

- 4.9 Avery has engaged in detailed consultation with the local authority and other stakeholders prior to the submission of this application and the scheme design has evolved to reflect the comments received. Full details of the community consultation are outlined in the accompanying Statement of Community Engagement. The following analysis focuses on meetings with the local planning authority and its consultees, as well as the significant amendments made to the scheme as a result of these discussions.
- 4.10 A formal pre-application submission was lodged with the Council on 16 March 2020, but matters were subsequently put on hold due to national lockdown restrictions. A revised submission was validated by the Council on 4 August 2020, following which a pre-application meeting was held on site with officers on 18 September 2020. The Council subsequently provided written advice dated 8 October which was informed by comments from Design South East. The advice included the following overarching comments:
- The site is in a highly sustainable location and comprises previously developed land.
 - The principle of the development of this site for a new care home might be acceptable, subject to demonstrating that:
 - the loss of the public house has been fully explored
 - there is a local need for a care home in this location, and
 - the re-use of the existing building is not feasible for this use.
 - Design revisions should be considered in respect of the following:
 - Ensuring that the internal layout has a closer relationship with the external landscaping
 - Creating a greater sense of arrival to the new care home
 - Improving the connection with the adjoining open space
 - Respecting the residential character of the surrounding area
 - A justification should be made for the loss of that part of the site which is currently used for open space.
 - It should be demonstrated that the level of car parking would not result in overspill outside of the site.
- 4.11 In response to the advice received, the applicant prepared a revised scheme which was submitted for consideration by Design South East. This incorporated the following changes:

- Reconfiguring the internal accommodation to relate better to the external space influences;
- Repositioning the building entrance to the junction of the two roads with an enhanced landscape forecourt;
- Amending the boundary treatments to provide a more open aspect to the open space beyond;
- Removing the proposed access from Aintree Close to create a single point of access and egress into the site; and
- Revising the material palette to reflect the immediate surroundings as well as the character of the existing building on the site.

4.12 A formal Panel Meeting with Design South East was held on 13 January 2021 and minutes of the meeting were issued on 27 January 2021. In responding to the design comments received, the applicant has subsequently made the following revisions prior to the formal submission of this planning application:

- 1 Maximising the provision of communal facilities within the entrance lobby to the proposed care home (which are to be made available to the public by prior arrangement)
- 2 Preparing a detailed landscape plan to demonstrate the quality of the amenity spaces to be provided within the site and improving the interface between these and the internal accommodation. The landscape plan also considers the opportunities for enhancing the integration of the site with the adjoining open space.
- 3 Progressing the architectural design to further reference local garden suburb and 'Arts and Crafts' details, materials and character.
- 4 Rationalising the car parking area to the north of the site to enhance the scope for new landscaping adjacent to the care home entrance.
- 5 Ensuring that the inside and outside spaces are intrinsically linked and maximise the number of communal spaces and bedrooms facing the outdoor amenity areas.
- 6 Linked to the above, relocating the back of house uses to the front of the building to maximise the extent of living accommodation that can benefit from the open rear outlook.
- 7 Providing greater breathing space around the building, whilst retaining the necessary bedroom numbers. In achieving this, the building has been pulled slightly further to the western boundary which necessitates a small degree of tree loss.
- 8 Reviewing the elevations so that the scale of built form onto Ascot Road is subservient to that on Central Avenue.
- 9 Revising the design of the entrance area to better celebrate this focal point within the scheme.
- 10 Progressing the detail of the elevations (including the choice of materials and the pattern of fenestration) to ensure the quality of the proposed development.
- 11 Preparing a sustainability and energy strategy to inform the design proposals.
- 12 Enhancing the level of provision for the storage of bicycles.
- 13 Retaining the off-site substation in its current position.

4.13 The pre-application process with officers also provided the opportunity to confirm the scope of information necessary to support the future planning application and to satisfy the Council's validation criteria.

5. Planning Considerations

5.0.1 This section of the Statement assesses the proposal against the relevant Development Plan policies and having regard to the wider strands to sustainable development set out in the NPPF. The key planning considerations, as identified in pre-application discussions with the Local Planning Authority and considered in further detail within this Chapter, comprise the following:

1. The principle of the proposed care home use
2. The loss of the existing public house use
3. The loss of the existing public open space
4. The impact on the visual character of the area (including the impact on existing trees and sustainability) and the impact on the amenity of neighbouring properties
5. The impact on highways
6. The impact on the environment – with reference to sustainability, drainage, ecology and trees

1. The Principle of the Proposed Care Home Use

The Principle of Redevelopment on the Application Site

- 5.1.1 The site lies within a sustainable, predominantly residential area which forms part of the built-up area of Gravesend. Policy CS01 (Sustainable Development) of the Core Strategy notes that the Council will consider planning applications positively, reflecting the presumption in favour of sustainable development as contained in the NPPF. It also notes that the Council will seek to secure development that improves the economic, social and environmental conditions in the area. Core Strategy Policy CS02 (Scale and Distribution of Development) prioritises development in the urban area and promotes regeneration by recycling underused, derelict and previously developed land.
- 5.1.2 The proposal for the subject site will meet the objectives of these policies by regenerating a vacant site within the urban area of Gravesend.
- 5.1.3 Having regard to the proposed care home use, we consider that this will address a wide range of local community needs and will fully accord with the three strands of sustainable development set out in the NPPF – economic, social and environmental. These public benefits are summarized below.

Meeting a Local Need for High-Quality Care Accommodation

- 5.1.4 The proposal will deliver high quality specialist accommodation for older people and will result in a long-term enhancement to care services within the local area, including the provision of dementia care. The new care home will be future proofed to meet best practice standards for care accommodation, will result in a long-term enhancement to the provision of care within the local area and will offer housing choice.

- 5.1.5 We note that the proposed care home will primarily cater for residents over the age of 80 and this is where projected population growth is most pronounced. At a national level, the population aged 85 and over is projected to double from 1.7 million in 2018 to 3.4 million in 2030. To 2038, the 85-89 age group is projected to increase by 89%, the 90-94 age group by 162% and the 95- 99 age group by 216%. In reflecting this demographic crisis, paragraph 61 of the NPPF requires local authorities to reflect the housing needs of older people in planning policies which includes the provision of care home accommodation. The most recent revisions to PPG are more explicit in stating that: *"The need to provide housing for older people is critical as people are living longer lives and the proportion of older people in the population is increasing... Strategic policy-making authorities will need to determine in relation to their plan period the needs of people who will be approaching or reaching retirement as well as older people now."*
- 5.1.6 At a local level, the latest Gravesham Borough Council Strategic Housing Market Assessment, states that; *"The most significant growth is forecast in the age bands over 65. Growth is particularly marked in the 85+ household age band, which is projected to increase by 2,030 householders (144%) over the 25 years from 2012 to 2037."*
- 5.1.7 This change in the population profile results in a greater need for all forms of housing and care provision for older people. At a policy level, CS14 of the Council's Core Strategy similarly notes that there will be a growth in the older population in the Borough over the plan period and supports the provision of specialist and extra care housing.
- 5.1.8 Kent County Council's Accommodation Strategy for Social Care Projects (2019-2021) focuses on preventative services designed to keep people at home longer, but at the same time acknowledges a need to *"Increase provision of nursing and dementia care homes that can support those with complex needs and behaviours that challenge due to Dementia"* and to *"Increase fit for purpose modern care homes and as a result reduce older converted care home provision."* We understand that the Strategy will be refreshed to forecast to 2031 and with the increasing demographic changes for older people this will evidence further need.
- 5.1.9 In further substantiating local care need, Avery have commissioned an independent assessment of demand and supply points which to an existing and future shortage of the local care home provision that is of a market standard. When accounting for all existing provision (nearly all of which is within older stock) and all pipeline provision, the current shortfall within the catchment area (which is defined as a 10-minute drive time of the site) is 333 bedspaces. This figure is projected to increase to 376 bedspaces by 2025. Consideration has also been given to the level of provision within the Gravesham administrative area. The current shortfall of market standard bedspaces is 379 bedspaces, a figure projected to increase to 424 bedspaces by 2025. The latter is the equivalent of 7 care homes of the size proposed on the subject site.
- 5.1.10 It is further noted that there have been very few applications for new care homes in recent years, with the Council's latest published Monitoring Report (2016-2017) indicating that there were no residential care homes completed during this period. Avery's research also outlines a shortage of care homes within the local catchment area that offer specialist dementia services and an under-supply of care home bedrooms with full en-suite facilities. Taking this into

account there is a need for additional care homes within the area to accommodate the growth in the older population.

- 5.1.11 Policy CS14 states that housing for older people should be provided in accessible locations close to services and should not lead to a concentration of facilities. In this regard, the subject site is well served by public transport, local services are easily accessible and there are no existing facilities within close proximity. A new care home in this location will therefore address the Council's spatial planning objectives and will help in delivering a broad mix of social community uses in the area.
- 5.1.12 In light of the above there is a compelling quantitative and qualitative need for the proposed scheme to meet both current and projected need, particularly in respect of dementia care provision. We consider that significant weight should be attached to this public benefit when assessing the overall planning balance.

Housing Supply Benefits

- 5.1.13 The most recent version of the NPPG (June 2019) clearly acknowledges that "...*plan-making authorities will need to count housing provided for older people against their housing requirement*". The proposal will therefore deliver up to 62 new units to the local housing stock and will contribute towards the Council's 5-year housing supply target on a site that has good connectivity to services and sustainable transport.
- 5.1.14 The Council's latest 5-year housing supply assessment (dated January 2021) confirms that the Council only has a 3.27-year supply and that it is therefore unable to demonstrate a deliverable supply of sites for housing against its housing requirement over the next five years from 2020 to 2025.
- 5.1.15 A further benefit of the care home proposal is that it has the potential to free up other sectors of the housing market by releasing much-needed family housing accommodation. Residents moving into care homes often 'downsize' from larger dwellings and the proposal therefore delivers a knock-on benefit across the whole housing chain. This in turn will help to reduce pressure on other sites in the area.
- 5.1.16 In light of the above, it is our view that substantial weight should be accorded to the housing benefits of the proposal when assessing the overall planning balance.

Employment Benefits

- 5.1.17 The proposed care home has the potential to generate significant employment opportunities, including jobs for local people. It is anticipated that the care home will create jobs for approximately 50 staff (full-time equivalent) and approximately 70 jobs overall (including both part-time and full-time positions). As a result of shift patterns, approximately 20 staff would be on site at any one time. Avery expects that the majority of staff would be recruited from within the local area and positive steps will be taken to encourage this.

- 5.1.18 The level of job creation compares very favourably with the former public house use which, when fully operational, is estimated to have provided up to a maximum of 20 jobs overall.
- 5.1.19 In addition, the new facilities will create knock-on employment opportunities, for example, during construction and through associated facilities and services to support the on-going care home operation.
- 5.1.20 Having regard to the overall uplift in job creation, and the importance of employment opportunities in a post-Covid context, it is our view that the proposal meets the Council's employment objectives set out in Policy CS07 and that substantial weight should be accorded to the economic benefits of the proposal when assessing the overall planning balance.

Contributing to a Balanced and Sustainable Community

- 5.1.21 Aside from addressing local community needs through the provision of specialist on-site care, Avery and their operating partners are committed to integrating their schemes into existing local communities. For example, the community rooms within the new care home (including café area, hairdressers and activity rooms) will be available for use by the local public and local community groups by prior arrangement, thereby complementing wider community objectives for the local area. The scheme has been designed such that the communal rooms within the care home are positioned at the front of the care home, within the entrance space, to maximize their accessibility and use. This will, in turn, provide a vibrant atmosphere within the care home, which is a lifestyle benefit to prospective residents.
- 5.1.22 An additional social benefit is that the proposal can help to minimize the costs to health and social services. Residents will primarily be drawn from the local area and the large majority will already be Rugby residents. In providing specialist and dedicated in-house care and support, the new care home can reduce the need for residents (who might have previously lived alone) to call on local healthcare services.

Summary

- 5.1.23 In summary, it is our view that the benefits outlined above attract significant weight and accord fully with the economic, social and environmental strands to sustainable development as outlined in the NPPF. Moreover, the proposal will fully complement the proposed mix of uses within the local area allowing for housing choice and facilitating community interaction. The land is suitable, available and achievable, thereby allowing these benefits to be provided in the short term. It is our view that these planning benefits fully justify the loss of the existing public house on the subject site and lend significant weight in support of the overall planning balance, as considered in further detail below.

2. The Loss of the Existing Public House Use

- 5.2.1 The proposed development will result in the loss of the former public house, which ceased trading in July 2019, and which has been vacant since this time. In policy terms, paragraph 92 of the NPPF requires planning policies and decisions to plan positively for the provision of

community facilities and to guard against the loss of valued services, particularly where this would reduce the community's ability to meet its day-to-day needs. This stance is reflected in Policy CS10 (Physical and Social Infrastructure) of the Council's Core Strategy which states that support will be given to proposals and activities that protect, retain or enhance existing social infrastructure (including public houses), or lead to the provision of additional infrastructure which improves community well-being. The policy also states that where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.

- 5.2.2 The Council's emerging Local Plan includes Proposed Policy RE5 which specifically relates to the retention of public houses. This policy requires evidence of viability and marketing if permission is to be granted for any such loss. Whilst no material weight can be attached to the policy at this stage, it provides a useful direction of travel, and the following analysis responds to the criteria set out in this emerging policy.
- 5.2.3 It is our view that the value of the existing (vacant) public house in terms of its social infrastructure contribution is limited. Whilst the public house is located to serve the surrounding residential area, it is evident that when it was previously operational, efforts to continue trading the public house as a viable business failed, notwithstanding a significant refurbishment and favourable rental terms.
- 5.2.4 It is noted that in 2020 a nomination was made to list the premises as an Asset of Community Value (ACV). The freeholder of the site, the Red Star Pub Company, submitted an objection to the ACV nomination which made the following points which are pertinent in respect of the Council's planning policy position:
- Since 2016, six separate operators have occupied the Ascot Arms, none of whom have been able to make the public house profitable.
 - The last management arrangement was provided at zero rent and, despite this, the operator was again unable to make the pub profitable.
 - There are 10 existing pubs within a 1-mile radius of the site that provide trade competition.
 - The site has been actively marketed since January 2020 and no viable bids for public house use have been received.
 - In light of the above, the Ascot Arms is not commercially viable as a public house and therefore cannot realistically be expected to further the social interests of the local community as a public house.
- 5.2.5 The Council concluded its assessment on 20 April 2020 stating that the site "...is *not currently used for a purpose which furthers the social wellbeing or social interest of the local community and it is unlikely that it could be used in a way which furthers the social wellbeing or social interests of the local community in the next five years.*" This conclusion provides a clear statement from the Council in respect of the future viability of a public house on this site.
- 5.2.6 By means of a further assessment, Avery have commissioned an independent viability report to review the scope for re-instating a public house use on the subject site. This report

accompanies the planning application and draws the following conclusions in respect of the 'viability' and 'alternative provision' clauses set out in Policy CS10:

- Notwithstanding a £250,000 refurbishment in 2015, the pub has since been managed by six tenants, each of whom failed to make it work.
- The pub has a very poor trading history and barrellage declined by circa 60% from 2016 until 2018.
- A comprehensive marketing strategy commenced in January 2020. Interest was predominantly received for alternate uses and the marketing agents did not receive any offers from public house operators.
- The trading format and location of the pub does not meet the requirements of public house operators.
- There is a substantial amount of licensed competition in the locality which would deter interest for public house use.
- A commercial decision by the owners to dispose of the site (notwithstanding a substantial £250,000 refurbishment in 2015) suggests it is not a viable operation.
- The loss of this pub would not be detrimental to the local area due to the vast amount of other public houses located nearby - 8 public houses within a circa 1.5-mile radius of the site. This includes a good provision of public houses in the centre of Gravesend, which are easily accessible from the site, as well as the following public houses that serve the residential neighbourhoods surrounding the site:
 - The Echo, Old Road East – approximately 0.7 kilometres (9-minute walk) away
 - The Bat and Ball Public House, Wrotham Road – approximately 1 kilometre away (15-minute walk)
 - Beefeater Woodlands, Wrotham Road – approximately 1 kilometre (13-minute walk) away; and
 - Toby Carvery Gravesend, Coldharbour Road – approximately 1.2 kilometres (20-minute walk) away.
- The impacts of Covid are very likely to have a further negative impact on the already struggling public house sector.

5.2.7 As well as considering the existing community facility, it is noted that Core Strategy Policy CS10 lends support to proposals which will result in the provision of additional social infrastructure which improves community well-being. In this case, the proposed development will provide an alternative form of community use in the form of a care home meeting locally identified needs and offering care and support services to the local elderly population. As noted above, the proposal will address other housing, social and economic objectives and Avery is committed to integrating their new care homes into local communities and opening the communal spaces for use by the local public. More specifically, any function previously offered by the public house in providing a space for local community groups can potentially be re-engaged through the new use.

5.2.8 In summary, it is our view that the loss of the former public house can be fully justified when considered against the viability and marketing analysis provided within this submission and in the context of the significant benefits of the proposed replacement care home use.

3. The Loss of the Existing Public Open Space

- 5.3.1 The existing land ownership includes a small area of amenity land (beyond the existing trees and the southern fence line) that has in recent years formed part of the adjoining public open space. The land is laid to grass and, whilst not providing any specific function, it is accessible to the public for informal recreation and dog walking. The land in question has an area of approximately 790sqm and comprises less than 10% of the wider area occupied by the Central Avenue public open space.
- 5.3.2 Given the recent use of the land, and notwithstanding the fact that it falls outside of the Council's ownership, it is acknowledged that an assessment needs to be made to support its incorporation into the care home gardens.
- 5.3.3 National policy, set out in paragraph 97 of the NPPF, states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless (a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or (b) the loss resulting would be replaced by equivalent or better provision in a suitable location; or (c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. At a local level, Policy CS12 (Green Infrastructure) indicates that the network of green spaces in the Borough are to be protected, enhanced and maintained, while Policy CS13 seeks to enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.
- 5.3.4 Having regard to Policy CS13, the most recent evidence base comprises the Gravesham Open Space Assessment Report (April 2016), the overriding conclusion of which is summarised at paragraph 5.8.3 of the Core Strategy and which states that *"...the overall amount of all types of green space in the Borough is sufficient for the needs of the existing population."* The Report concludes that amenity greenspace is evenly spread across the Borough and that a five-minute walk time provided a good level of coverage across the area. At the same time, the report found that improvements to the quality of all types of green space are required in certain cases.
- 5.3.5 The Central Avenue Open Space is identified in the Assessment as having a quality score of 42.9% and a value score of 38.9% for amenity greenspace, and similar scorings for its use for provision for children and young people. The assessment shows it is below the stated threshold for quality (dated/tired in appearance) and marginally above the threshold for value (which is derived largely as a result of the visual amenity that the open land provides).
- 5.3.6 The proposals for the subject site will not compromise the visual amenity of the open space or have any urbanizing impact on it. The land will be retained as open space; but rather than being publicly accessible it will instead provide an active amenity function for prospective care home residents, many of whom will already live in the local area. In policy terms, the proposal will not result in a material reduction of the size of the retained public open space and the land to be incorporated into the care home will not be 'built-on'. Its alternative use as active

amenity space for care home residents is therefore considered to outweigh the very limited use of the space at present.

- 5.3.7 The incorporation of the land into the proposed care home site was considered by the Council's consultees during pre-application discussions. The Horticultural Services officer stated that, whilst it is important for all open space to be protected as far as reasonably practical, *"In this instance however, the area isn't hugely significant and doesn't really add much in terms of amenity value to the site as a whole so wouldn't be a huge loss. The issues for me are that the public perception will be that we are selling off open space and that this is another example of the piecemeal erosion of open space that's now happening in the Borough."* The Council's Leisure and Resilience Manager similarly raised no objection to the principle of the proposal, but added that: *"...it is anticipated that some form of agreed off-set improvements (and/or contribution) will need to be included as part of the planning process/sign-off to the adjacent amenity area for the benefit of the wider community."*
- 5.3.8 In responding to this pre-application advice, Avery notes that this is not land being sold-off by the Council, but that it is instead third-party land being brought back into a more productive open space use. In terms of improvements to the wider open space, any such proposal would need to satisfy the necessary section 106 tests and to be necessary, directly related to and reasonably related in scale to the proposed development. In this case the proposed landscaping of this space, the introduction of new tree planting, the incorporation of sensitive boundary treatments and a programme of tree management, will enhance the overall quality and backdrop of the retained open space. These landscaping measures will deliver important improvements without the need for further contributions.

4. Design, Amenity and Landscape Considerations

The Principle of the Proposed Demolition

- 5.4.1 The existing building on the site is not listed nor is it within a conservation area. As such there is no statutory protection from demolition. Notwithstanding the fact that the building has previously offered a community function to the local area, it not considered to be of any specific architectural importance, and it has been subject to significant and unsympathetic alterations over the years. Moreover, the building makes no meaningful contribution to the distinctiveness of the street scape or the local area. For these reasons, the building is not considered to be a non-designated heritage asset.
- 5.4.2 Moreover, the conversion of the building is not well suited to the proposed care use. The internal arrangement of the accommodation, the change in levels within the building and the inability to provide rooms either side of a central corridor do not lend themselves to the provision of care in accordance with modern user requirements and expectations.
- 5.4.3 In light of the above, we consider the principle of the proposed demolition to be acceptable subject to the quality of the proposed replacement buildings.

Design Approach

- 5.4.4 The overall design of the scheme has been informed by the local context and the need to create a high-quality, safe and inclusive living environment as set out in policy CS19. As outlined in Chapter 4 above, Avery has worked positively with the Council at the pre-application stage and the design has been revised substantially in response to the comments received. It is our opinion that the proposal will deliver a high-quality development that responds to the character of the area whilst delivering the public benefits outlined above. The overall design objectives are to achieve the successful integration of the building into its surroundings, to deliver an attractive development that respects amenity interests, to provide landscaped spaces that are usable, safe and enjoyable and to ensure that proposals meet the principles of inclusive design.

Layout and Orientation

- 5.4.5 The layout of the scheme responds to the following design objectives:
- To create a strong and positive frontage to both Ascot Road and Central Avenue and to offer clear surveillance of the street, thereby providing a safe and secure environment for all.
 - To provide a building line along each of the site's frontages that aligns comfortably with its neighbours.
 - To retain as many as possible of the existing trees along both the Central Avenue and Ascot Road boundaries in order to maintain the character of the existing street scene and to soften the overall impact of the development.
 - To retain good-sized separation distances to all sides, thereby creating a sense of spaciousness around the new building. This is achieved through a T-shaped footprint, creating a strong building line to Central Avenue and creating new spaces to the north for car parking and site access arrangements and to the south and west for landscaping and amenity space provision.
 - To rationalise the access arrangements; this is achieved by retaining the existing means of access from Ascot Road and blocking up the secondary access from Aintree Close.
 - To provide the entrance to the care home on the corner of the two road junctions, thereby creating a legible means of access to the new care home and a clear sense of arrival from the street.
 - To provide car parking in a convenient location outside the entrance to the care home set within new and existing landscaping.
 - To create a good-sized 'courtyard' garden to the rear of the building with a southerly outlook and to retain the mature trees in the rear garden area that provide a backdrop to

the adjoining open space. This space is to complement other landscape and amenity areas around the building.

- To incorporate the open space beyond the existing tree belt as part of the care home garden.
- To orientate the internal accommodation so that this maximizes the outlook from communal rooms, bedrooms and garden areas towards the new landscape spaces within the site and the new amenity green space to the south. As advocated by Design South East, the submitted scheme fully addresses the relationships between private, communal and public places both within the building and in relation to its wider landscape.
- To position the servicing area in the western part of the site, away from the main care home entrance, in order to reduce any potential vehicle conflicts and to minimize disturbance to prospective residents.
- To protect existing trees within the rear part of the site as far as possible and to set the new building within new areas of landscaping.
- To achieve an appropriate visual relationship between the care home and the neighbouring houses including the retention and enhancement of existing boundary planting. Further details are set out in paragraphs 5.4.12 to 5.4.17 below.

Scale and Massing

- 5.4.6 The relevant Local Plan policies seek to ensure that the height and massing of new development does not impact upon the key visual characteristics of the local area. The site's visual character is in this case largely informed by the existing building currently on the application site (which extends to the equivalent of three storeys in height) and the largely two storey residential development in immediate area (within which the properties on Central Avenue are set at a higher floor level than the subject site).
- 5.4.7 Having regard to this context, as well as the prominent position of the application site on the corner of Ascot Road and Central Avenue, the approach is to make the best use of the land by incorporating three floors within a two and a half storey building, where the top floor windows are set within the roof slope.
- 5.4.8 As shown on the application drawings, reference is taken from the eaves' lines of the existing building on the site and those of the surrounding properties to ensure that the scheme creates a sense of continuity. The roof of the care home building extends from the eaves line to the main ridge, such that the highest parts of the building are set back from the boundaries. The ridge line is varied and, although in parts it is approximately 1.75 metres higher than that of the existing building, in other parts it drops below the existing building height.
- 5.4.9 The treatment of the elevations and the roof forms serves to break up the overall massing and visual impact of the building. Design measures include the use of a staggered roof line

(dropping in height at the care home entrance), the provision of a series of gable projections and accompanying setbacks and a variety in the palette of materials. In this way, the building would read as a series of inter-linking elements which form part of a coherent whole. The scheme will also retain existing vegetation and will supplement this with new planting and landscaping to help reduce the scale of the care home and to soften the elevations. Overall it is considered that views of the building will read as a series of stepped and varied elevations which are softened by boundary hedging and enhanced planting.

Appearance

- 5.4.10 The design approach is to deliver a modern interpretation of traditional buildings and to ensure that the architectural quality of the building reflects its prominence at the junction of the two roads.
- 5.4.11 The proposed building will incorporate a high-quality palette of materials including a stock red brick, elements of render, feature brickwork panels, tudor boarding, aluminum windows and doors and a tiled roof. A sense of identity and distinctiveness is provided through the treatment of these materials, with the brickwork spanning the entire ground floor of the building and lighter/contrasting materials being introduced for key sections of the upper floors. Other architectural features within the building, which have advanced in response to pre-application discussions, include the following:
- Ensuring that the entrance to the care home reflects its prominent location. This is achieved through the use of a distinct single storey element, with a projecting canopy roof.
 - Incorporating suitable glazing on the flank elevations of the building in order to balance the need to offer visual interest and to protect residential amenity.
 - Achieving a coherent rhythm to the positioning of the windows, whilst still allowing for variations in the height of the sills to provide interest and to reflect operational requirements. Full height glazing is proposed at key sections of the façade, including the communal areas, where they offer excellent daylight and sunlight provision for residents.
 - Further reflecting 'Arts and Crafts' details within the design including the incorporation of chimneys, the use of the red brick bands within the elevations and the introduction of panelling to the gable roof elevations.

Residential Amenity

- 5.4.12 The proposal seeks to protect the amenity of nearby residents in terms of privacy, daylight/sunlight and sense of enclosure through the siting and orientation of the buildings and the use of intervening landscaping. The key aspect to this is in positioning the new building centrally within the site in order to retain good separation distances to the houses to the north, east and west and, where closest to its neighbours, to orientate the building to minimise the scope for directly facing windows.

- 5.4.13 To the north, there will be a minimum of 20 metres between the care home and the side elevation of the nearest properties at no. 76 Central Avenue. This property contains no windows to habitable rooms within its flank elevation. The element of the new care home facing the properties in Ascot Road to the north is set back by approximately 40 metres.
- 5.4.14 To the east, the nearest facing windows will be over 25 metres from the front elevations of the properties in Central Avenue, with existing boundary planting occupying the intervening space.
- 5.4.15 To the west, the flank elevation of the proposed care home (which contains no windows to habitable rooms) is set back 20 metres from the nearest property in Aintree Close, which itself has a side elevation facing the application site.
- 5.4.16 In each case, the separation distances that have been achieved mitigate against any material harm in respect of overlooking, loss of privacy, sense of enclosure and daylight/sunlight. Moreover, the distances exceed the 21-metre guideline for facing windows set out in the Council's SPG2 relating to Residential Layout Guidelines.
- 5.4.17 Having regard to noise and disturbance, the proposal is considered to offer a benefit compared to the previous lawful use, replacing a public house (which has the potential to be used until late at night) with a more domestic care home scheme. The servicing areas are positioned discretely within the site, car parking movements will be restricted to staff shift changeovers (no later than 8pm at night) and a series of measures will be implemented through a Travel Plan to allow for the effective management of vehicular activities within the site.

Inclusive and Secure Design

- 5.4.18 The scheme has been designed to be flexible to the changing care needs of prospective residents and will be an exemplar in terms of the standard of facilities and the provision of support and care. Through the detailed design of the accommodation and the provision of care and support, the proposal will allow frail elderly residents, often with dementia, to remain as independent and active as possible and to interact with others. As set out in further detail in the accompanying Design and Access Statement, particular consideration has been given to ensuring that the internal and external spaces within the scheme work together (enhancing the use of the garden areas and maximizing the outlook onto them) and that, as advocated by Design South East, they prioritize quality of life accounting for sociability, interaction, sunlight, views and outlook. At the same time the scheme is designed to ensure resident safety and the development will meet best-practice secure by design principles.

Trees and Landscaping

- 5.4.19 There are several trees adjacent within the site and the proposed development allows for the incorporation of these trees into a wider landscaping scheme.
- 5.4.20 To facilitate the new care home development it is, however, necessary to remove a total of 7 individual trees within the site as well as one tree group. The details are set out in the accompanying Arboricultural Report and Tree Constraints Plan. It is concluded that the

majority of these are low quality and that new trees can be planted to compensate for their removal that will be better suited to the location and have space to develop into landscape features of the future. Each of the retained trees will be protected both during construction and following the occupation of the care home to ensure their long-term retention.

5.4.21 The following aspects of the approach towards the on-site trees are noted:

- The scheme allows for the long-term protection of the mature trees adjacent to the two main frontages. The new building is set back sufficiently from these trees to allow them to flourish, and for prospective care home residents to benefit from their shading effects in the summer months.
- The mature trees in the rear (south) part of the site are also to be retained in order to retain the visual screen that they provide as a backdrop to the adjoining park.
- Within the western part of the site, a modest degree of tree loss is considered necessary to facilitate the proposed development. This approach stems from pre-application discussions in which the applicant was advised to maximise the extent to which the care home accommodation in the rear part of the site utilises views onto the new amenity spaces as well as to provide a sufficient breathing space around the building. .
- A site-wide arboricultural maintenance strategy is proposed to secure the long-term health of the existing trees and vegetation.

5.4.22 At the same time, the scheme incorporates good-sized landscaped amenity spaces including opportunities for the planting of new trees, shrubs and flowers to enhance seasonal interest and ecological net gain. The landscaping approach has progressed in parallel with the design of the building to maximise the active and visual amenity provided by the new garden areas. The new landscape areas will soften the overall impact of the development and the orientation of the buildings maximises views from the communal rooms and bedrooms within the care home towards them.

5.4.23 The main amenity space is positioned in the southern part of the site, where it enjoys a sunny and open aspect towards the adjoining recreation ground. This 'courtyard' garden provides opportunities for sensory planting, raised beds, activity places, bench seating and socialising. A number of communal rooms within the care home, at all floor levels, have been positioned to face onto this shared amenity space. The gardens then extend beyond the existing trees to provide a more open amenity area, incorporating opportunities for sitting and wandering; this takes the form of a 'middle space' between the more formal care home gardens and the open vista of the adjoining park.

5.4.24 Throughout the scheme boundary treatments will be sensitive to the context and will comprise a mix of hedgerows, metal railings and timber fencing, allowing for permeability between the site and its surroundings where appropriate.

5. The Impact on Highways

Access

- 5.5.1 As noted above, the proposed development would be served by a newly configured access located in the same position as the existing access from Ascot Drive. To rationalise the access arrangements, the proposal also incorporates the stopping up of the secondary access from Aintree Close. The width of the realigned access road will be 6 metres allowing for two vehicles to comfortably pass. The Transport Statement supporting this application demonstrates how the access arrangements will provide safe access and egress for all users including emergency/refuse vehicles.

Traffic Generation

- 5.5.2 As outlined in the Transport Statement, the level of traffic generation from the proposed care home use is not considered to give rise to any material impact on the road network in terms of capacity or highways safety. Indeed, there would be a significant reduction in traffic when compared with what might have been generated by the former public house use. This is equivalent to 69 fewer movements per day and, as such, the proposed care home use delivers a significant transport benefit. While there will be a small increase in traffic in the morning hours (noting that the public house would not have been open at this time), the timings of staff changeovers for the care home can be staggered to minimize any impact at this time.

Car Parking

- 5.5.3 With regards to car parking, provision is made for a total of 20 vehicle parking spaces (which includes disabled bays and electric vehicle charging points as well as a dedicated turning and delivery. Further provision is made for 10 cycle parking spaces.
- 5.5.4 The level of provision is entirely appropriate for the nature of the proposed use and having regard to the operator's experience from other facilities in a comparable location. No residents will own cars and provision is therefore required only for staff and visitors. There are no resident staff and in a highly sustainable location such as this, it is anticipated that no more than 50% of staff would travel in their own cars. Based on approximately 20 staff on site at any one time (and allowing for staggered shift changeovers), approximately half of the proposed spaces may be required for staff, with the remainder being available for visitors. The applicant's parking accumulation data indicates that there would be a maximum demand for 17 car parking spaces overall.
- 5.5.5 Having regard to the Kent Vehicle Parking Standards (set out in SPG4), provision is required for 1 car parking space per 2 members of non-residential staff and 1 space for every 6 care home bedrooms for visitors plus 1 space for an ambulance. For the proposed 62-bedroom care home, with up to 20 staff on site at any one time, the standards require a total of 20 car parking spaces. The proposal therefore adheres entirely with these standards. With regard to ambulance provision, although a parking bay has not been designated for use by ambulances, the vehicle tracking exercises that have been carried out indicate that an ambulance can drive

into the site, park safely and manoeuvre out again without impediment. The same applies to any other service vehicles such as deliveries that would enter the site. In terms of cycle parking, SPG4 states that a minimum of "1 space per 10 beds" should be provided. The scheme includes a cycle storage area that will accommodate the 20 cycle stands for staff and visitors.

- 5.5.6 Without prejudice to the parking assessment set out above, it is important to note that in catering for atypical events (such as an annual garden party) there are no parking restrictions on the surrounding roads and there is generally a surplus of on-street provision.
- 5.5.7 As well as meeting the necessary parking standards, Avery have also prepared a Framework Travel Plan for the care home use to outline the strategies and measures that would be implemented to discourage single occupancy car use and to promote sustainable travel. These measures include:
- The provision of information concerning safe pedestrian and cycle routes to the site
 - The provision of shower, changing and locker facilities
 - The provision of secure cycle parking facilities
 - The prominent display of up-to-date public transport information in communal areas
 - Encouragement of car sharing schemes
 - Advertising the health benefits of walking and cycling through promotional material
 - Reviewing working hours to coincide with public transport provision
 - Monitoring success against benchmark travel surveys undertaken when the care home is first fully occupied
- 5.5.8 To restrict the possibility of off-site car parking and to protect the amenities of the area the applicant accepts a condition that all the proposed car parking spaces be made available prior to occupation of the new home.
- 5.5.8 Overall, we consider that the proposal will satisfy the objectives of Local Plan Policy CS11 as well as saved policies T1, T5 and P3 which seek to prioritize sustainable modes of transport and which assesses car parking in accordance with the Kent Parking Standards.

5. The Impact on the Environment

Flood Risk and Drainage

- 5.6.1 A Surface Water Drainage Strategy has been prepared to support this planning application and to demonstrate compliance with Policy CS18. This concludes that the risk of flooding from all sources to the application site is low. This remains the case even when taking into account the effects of climate change.

Sustainability and Energy Efficiency

- 5.6.2 Avery is committed to promoting sustainable developments and in accordance with the objectives of Policy CS18 a sustainability strategy has been prepared to demonstrate how the

proposal will minimise carbon emissions. This Strategy adheres to the “Be Lean, Be Clean, Be Green” energy hierarchy and considers the opportunities for enhanced building fabric performance, energy efficient heating and cooling and the use of low carbon and renewable technologies.

- 5.6.3 In further responding to the Council’s sustainability objectives, the scheme will meet the best possible BREEAM standard of water efficiency. Whilst not a policy requirement, the applicant also commits to meeting an overall BREEAM rating of “very good” as set out in the accompanying BREEAM Pre-Assessment. The Council’s policies seek an ‘Excellent’ rating in the BREEAM ‘Water’ Category. This is not considered feasible in the context of a care home development on the basis that restricted flow rates would have an impact on the performance of washing facilities and would not align with the high level of health and wellbeing of the residents and grey water feeding internal appliances are resisted by due to the risk of contamination within the home.

Ecology

- 5.6.4 A Preliminary Ecological Impact Assessment has been prepared to support the planning application. This indicates that the existing building offers low roosting potential for bats and that the habitats on site have negligible to low ecological value. As such, no biodiversity loss from the proposed development is anticipated and no further survey work is required.
- 5.6.5 At the same time the proposal includes the potential for biodiversity enhancements including the planting of native species and the provision of bat boxes and log piles. In light of this, the scheme is considered to accord with the biodiversity objectives set out in Policy CS12.
- 5.6.6 By virtue of the nature of the proposed use of the care home by the frail elderly, and noting the absence of any staff accommodation, the scheme will not have an adverse impact on the North Kent Ramsar Sites or Special Protection Areas and no mitigation is considered necessary.

Land Quality

- 5.6.7 A desk-top contamination report has been prepared to support this planning application. The conclusion is that the risks identified associated with contamination and hazardous ground gas are low and can be mitigated by physical barriers including cover systems, gas and potentially hydrocarbon resistant membranes and contaminant resistant water supply pipes.

Archaeology

- 5.6.8 A desk top archaeological assessment has been prepared in support of the application. This confirms that any archaeological remains are likely to be of local importance and are not an overriding constraint to development (which could be mitigated by an appropriately worded planning condition if considered necessary).

Planning Obligations

- 5.6.9 Considering the range of on-site communal facilities and the limited mobility of prospective residents, the applicant does not consider that the proposed care home development would result in any undue pressure on local services that would give rise to the need for planning obligations.

Gravesend Borough Council

6. Conclusions

- 6.1 The proposed development of this sustainable site represents a carefully considered scheme that is in accordance with the NPPF policies on sustainable development. It comprises the development of a new care home on previously developed land within the built-up area of the main settlement in the Borough. The site is well served by local facilities and the proposal will fully complement the mix of uses in the locality.
- 6.2 The proposal will deliver significant planning benefits including:
- Providing an exemplar in terms of standard of facilities and the provision of support and care. The care home will be registered with the Care Quality Commission, providing 24-hour support and care for the frail elderly and meeting a full range of residential, nursing and dementia care needs
 - Delivering care accommodation to meet a recognised and growing need in Gravesend, while increasing housing choice in the community
 - Providing jobs for local people, including both part-time and full-time positions
 - Creating savings to the taxpayer – having dedicated care reduces bed blocking and reliance on hospital services
 - Stimulating the local property market by releasing much-needed family homes when residents 'downsize', as well as smaller homes for first-time buyers further down the housing chain
 - Contributing to the Council's five-year housing land supply (for which there is currently a significant shortfall)
 - Providing facilities for use by the local community, including a café and facilities/activity rooms bookings by local groups
- 6.3 It is not considered viable to reinstate the former public house use and, in any event, there is alternative provision elsewhere within the locality. By contrast the proposed care home use will deliver the range of well-being and community benefits outlined above, including the use of shared facilities by the local elderly population.
- 6.4 The incorporation of the land that has most recently been used as open space will not compromise wider recreational or visual amenities and will instead be brought into an active garden use for prospective care home residents.
- 6.5 The design, scale and layout of the proposed development seeks to respond positively to the site context. The buildings are to use good quality materials, the elevations are to be treated sensitively to break up the form of the development and building heights provide an appropriate balance between the site context and policy aspirations to make the best use of available land. The existing vegetation and trees on the site boundaries are to be retained as far as possible and the new buildings will be set within attractive new landscaping and open space provision. For these reasons we consider that the scheme will be a positive addition to the local area and will respect the character of the surrounding built form.

- 6.6 The positioning and orientation of the buildings respects the amenity of neighbouring properties as well as creating a high-quality living environment for prospective residents and occupiers.
- 6.7 The proposal retains a safe and convenient means of access from Ascot Road and the level of car parking is appropriate to the proposed use and in compliance with the Kent car parking standards. Furthermore, the level of traffic generated by the proposed use will be significantly reduced when compared with the existing public house use.
- 6.8 All other environmental matters relating to drainage, ecology, noise, archaeology and sustainability have been addressed in full within the technical documents accompanying this submission or can be adequately addressed by means of planning condition.
- 6.9 The applicant has engaged in detailed pre-application discussions with the local planning authority, local stakeholders and the community and the design has evolved substantially to reflect the comments received.
- 6.10 In summary we believe that the proposal comprises sustainable development and accords with the policies set out in the Council's Development Plan. As such, we respectfully request that the Council approve the submitted application.