

21st November 2023

FRON1055


Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

Former Battle of Britain Site, Coldharbour Road, Gravesend, DA11 8NT – Non-material amendment to planning permission ref. 20221251.

Further to our recent discussions, on behalf of our client Frontier Estates (BB) Ltd, we enclose a S96a application to seek consent for a non-material amendment to the approved care home on the Former Battle of Britain Site, Coldharbour Road, Gravesend, DA11 8NT. This application has been submitted via the Planning Portal under ref. PP-12610047 and in addition to this covering letter comprises:

- Application Form.
- Site Plan as Proposed ref. 2271_00_005, rev. D prepared by Convery Prenty Shields Architects.
- Ground Floor Layout as Proposed ref. 2271_00_100 prepared by Convery Prenty Shields Architects.
- First Floor Layout as Proposed ref. 2271_00_101 prepared by Convery Prenty Shields Architects.
- Second Floor Layout as Proposed ref. 2271_00_102 rev. A prepared by Convery Prenty Shields Architects.
- Basement Layout as Proposed ref. 2271_00_106 rev. A prepared by Convery Prenty Shields Architects.
- North West and South West Elevations as Proposed ref. 2271_00_200 prepared by Convery Prenty Shields Architects.
- North East and South East Elevations as Proposed ref. 2271_00_201 rev. A prepared by Convery Prenty Shields Architects.
- Courtyard Elevations as Proposed ref. 2271_00_202 rev. A prepared by Convery Prenty Shields Architects.
- Design and Access Statement – Summary of Design Changes Version 04 prepared by Convery Prenty Shields Architects.
- Proposed Street Elevations ref. 2271_00_203 prepared by Convery Prenty Shields Architects.
- Landscaping plan ref. 102D prepared by The Landscape Partnership (TLP).

The application fee of £298.00 has been paid via the Planning Portal.

Background and Proposed Non-material Amendments

Planning permission was granted on the 30th June 2023 for the following:

‘Construction of a care home (within Class C2) associated parking, access, drainage, boundary treatments, landscape and other associated works’.

Discussions with Morar Living, the intended operator of the care home, have progressed since the original planning permission was granted and as a result, further amendments are required to ensure the proposed care home meets their operational needs. This is not unusual over the course of a development. We consider these proposed amendments to be non-material and accordingly seek confirmation as such via this S96a application.

The plans submitted with this application with supersede the following approved drawings under ref. 20221251:

- Drawing no. 0102 rev. P10 (Proposed Site Plan)
- Drawing no. 0201 rev. P5 (Proposed Ground Floor Plan)
- Drawing no. 0211 rev. P4 (Proposed First Floor Plan)
- Drawing no. 0221 rev P4 (Proposed Second Floor Plan)
- Drawing no. 0301 rev. P3 (Proposed Elevations)
- Drawing no. 0302 rev. P4. (Proposed Elevations)
- Drawing no. 0303 rev. P2 (Proposed Elevations)
- Drawing no. 0304 rev. P1 (Proposed Street Elevations)
- Drawing no. 0103 – (Site Levels Plan).
- Drawing no. 102C (Landscape Proposals)

The submitted plans and the Summary of Design Changes document provide full detail on the proposed changes. To summarise, this NMA increases the total number of bedrooms from 65 to 75 and this is achieved through internal and external changes including the provision of a basement. The landscaping plan has been amended to accord with the new layout.

Transport Considerations

The 75-bedroom care home would be supported by the approved 27 space car park. 27 spaces was confirmed to accord with the Kent Parking Standards by the Highways Team in their assessment for the original planning application. Information from Royal Haskoning DHV (RHDHV) on this is set out below.

Initial analysis, based on the approved 65-bedroom scheme has been undertaken by RHDHV, to identify the transport impacts based on an updated trip generation assessment and car parking accumulation assessment.

Trip Generation Assessment

Table 1 details the updated travel demand generated by the proposed 75-bedroom care home, using the same assessment methodology and trip rates contained within the TRICS v7.9.1 database, accepted by Kent County Council for the approved 65-bedroom care home.

Table 1: Proposed Development (75-Bed Care Home) Travel Demand (Weekday)

Mode of Travel	Weekday 08:00-09:00			Weekday 17:00-18:00			Weekday 07:00-21:00		
	Arrivals	Depart's	Total	Arrivals	Depart's	Total	Arrivals	Depart's	Total
<i>Vehicles</i>									
Cars	3	2	4	2	4	6	44	46	90
Taxis	0	0	0	1	0	1	3	3	7
LGVs	0	0	0	0	2	2	8	8	17
OGVs	0	0	0	0	0	0	1	1	2
PSVs	0	0	0	0	0	0	0	0	0
Total Vehicles	3	2	4	3	6	9	57	59	115
<i>People</i>									
Vehicle Occupants	4	1	5	4	7	12	71	73	144
Pedestrians	2	2	4	1	2	2	27	29	56

Cyclists	0	0	0	0	0	1	2	2	5
Public Transport Users	2	0	2	0	1	1	9	8	17
Total People	8	4	12	6	10	16	110	112	222

(*figures presented within Table 1 subject to rounding)

The proposed 75-bedroom care home development is anticipated to generate four two-way vehicle trips in the traditional weekday AM peak hour of travel demand and nine two-way vehicle trips in the traditional weekday PM peak hour.

This equates to approximately one vehicle movement, on average, every 6½ to 15 minutes during the weekday AM and PM peak hours.

Over a day (07:00-21:00), a two-way total of 115 two-way vehicle movements to/from the Site are forecast (57 arrivals and 59 departures).

Net Traffic Impact

In determining the impact of an uplift of 10-bedrooms on the approved scheme, Table 2 sets out the net traffic impact.

Table 2 includes the trip attraction assessments associated with the Site's approved 65-bedroom scheme with the proposed 75-bedroom scheme, indicating the net change in total vehicle trips in the associated weekday AM and PM peaks periods of traffic demand.

Table 2: Net Traffic Impact – Total Vehicle Trips

Mode of Travel	AM Peak			PM Peak		
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
Consented Care Home Development (65 bedrooms)	3	1	4	3	5	8
Proposed Care Home Development (75 bedrooms)	3	2	5	3	6	9
Net Difference – between consented 65-bedroom and 75-bedroom proposed development	0	1	1	0	1	1

(*figures presented within Table 2 subject to rounding)

In summary, Table 2 demonstrates that the proposed development (75-bedrooms) would result in an almost identical level of travel demand to the Site's approved 65-bedroom care home.

The proposed 75-bedroom care home development would generate +1 and +1 additional total vehicle trips in the AM and PM peak hours respectively, when compared with the approved 65-bedroom development scheme.

Car Parking Assessment

To establish whether the level of car parking provision is sufficient to cater for the demands of the development, an updated car parking accumulation assessment has been undertaken.

Table 3 details a comparison between the approved 65-bedroom scheme and the proposed 75-bedroom care home scheme, with the same level of car parking, calculated from car arrival / departure data using the TRICS data.

Table 3: Car Parking Assessment

	Consented 65-bedroom development / 27 car parking spaces				Proposed 75-bedroom development / 27 car parking spaces			
Time Period	Arrivals	Departures	Occupied Spaces	% Occupied (27 Car Parking Spaces)	Arrivals	Departures	Occupied Spaces	% Occupied (27 Car Parking Spaces)
Initial	-	-	7	24%	-	-	7	24%
07:00-08:00	3	2	7	26%	3	2	7	27%
08:00-09:00	2	1	8	30%	4	2	8	31%
09:00-10:00	4	2	10	36%	4	3	10	38%
10:00-11:00	4	2	11	40%	3	4	12	43%
11:00-12:00	3	4	10	36%	3	3	10	38%
12:00-13:00	3	2	10	38%	6	2	11	40%
13:00-14:00	5	2	13	50%	3	6	14	54%
14:00-15:00	3	5	12	43%	3	5	12	45%
15:00-16:00	3	4	10	38%	2	6	11	40%
16:00-17:00	2	5	6	24%	2	4	6	24%
17:00-18:00	2	3	5	20%	2	2	5	19%
18:00-19:00	2	1	6	20%	2	3	5	20%
19:00-20:00	2	2	5	20%	2	3	5	19%
20:00-21:00	2	2	5	19%	3	2	5	18%

Based on the trip rates generated for cars, the assessment establishes that up to 14 cars can be expected to park at any one time in association with the 75-bedroom development. This equates to an increase of one additional car parked within the approved 27 space car park, equating to a slight increase from 50% to 54% of the car parking capacity during peak demand. Based on the approved 27 car parking spaces,

this minor increase can be accommodated whilst still providing spare capacity for 13 vehicles. As per the approved 65-bedroom scheme, it is recognised that this assessment may not take account of brief periods during shift changeover times when staff arrive on-site before the previous shift is finished. The above analysis is considered to be a reasonable forecast for the purposes of this study as the sites assessed in TRICS would also have staff shifts similar to that of the approved scheme.

It is considered that the 27 car parking spaces, as previously approved for the 65-bedroom care home, would continue to provide sufficient and appropriate levels of car parking to meet the anticipated car parking demand, for the proposed 75-bedroom care home.

Summary on Transport Considerations

In summary, the trip generation and car parking accumulation assessments demonstrate that the updated development proposals would not result in a material impact on the operation of the local highway network. Furthermore, as presented in Table 2, the revised 75-bedroom care home development would generate +1 and +1 additional total vehicle trips in the AM and PM peak hours respectively, when compared with the approved 65-bedroom scheme. The car parking accumulation assessment identifies that one additional vehicle could be parked within the car park, representing an increase from 13 vehicles to 14 vehicles being parked within the 27 space approved car park.

As a result, it is considered that the revised development proposals, for an uplift of 10-bedrooms, would result in a negligible impact on the operation of the local highway network, when compared to previously approved 65-bedroom development.

Landscaping

This application is accompanied by an updated landscaping plan. The amendments proposed are non-material in terms of trees, ecology and BNG.

Amenity

The additional windows proposed at first floor level, serving additional bedrooms, have been sited so that they are a sufficient distance from the closest residential properties in St Clements Close. It is noted that there are no habitable room windows within St Clements Church.

Summary

The changes proposed to the building are non-material and result from further detailed design as discussions with Morar Living have progressed and these changes will ensure that the building accords with their operational requirements.

I trust the enclosed reflects our discussions and look forward to receiving confirmation that the application has been registered. Should you require any further information at this stage, please do not hesitate to contact me and my colleague Kate Chapman using the details below.

Yours Sincerely



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