

planning transport design environment infrastructure

Planning Statement in respect of Minor Amendments to scheme approved under application reference 20190756 at Ellenor Hospice, Coldharbour Road, Northfleet, Gravesend, DA11 7HQ.

November 2021- JAC/DRB/13537



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Gravesham Borough Council

1 Introduction

1.1 Purpose of Statement

1.1.1 This Statement has been prepared to accompany a Section 73 Application for amendments to the permission granted pursuant to full planning application 20190756 granted to 'Ellenor Hospice' by Decision Notice dated 23 October 2019 for the erection of a part two storey, part single storey extension to the existing Hospice building along Coldharbour Road in Northfleet.

1.1.2 The full description of development was as follows:

'Expansion and refurbishment of the existing Ellenor Hospice to provide 12 en-suite rooms consisting of a single storey extension at the eastern end to provide 5 single en-suite rooms with amenity space and nurses space together with 7 refurbished rooms within the existing hospice layout; construction of two storey addition on south side for offices, meeting rooms for well-being centre and improved outpatient facilities; provision of ambulance access from Marks Square; alterations and extension to existing car parking layout and provision of external storage and sub-station'.

1.1.3 The planning application remains for the redevelopment and refurbishment of Ellenor Hospice to provide enhanced facilities for its inpatient and outpatient facilities.

1.1.4 This statement accompanies an amended proposal that has been subject of discussions with Mr Shazad Ghani of Gravesham Borough Council. This report is an update of our earlier report, submitted at the time of the original application.

1.1.5 The amendments proposed largely arise due to a need to phase the project due to financial considerations, but also as a result of a need to amend the design to accommodate measures to improve ventilation as a consequence of new Guidance following the Covid pandemic. Further survey work has also identified anomalies in respect of precise ownership areas and as a result, parking has been moved. It is however important to note that no structures have been re-sited.

1.1.6 Therefore, there will now be two main phases of redevelopment to the hospice.

1.1.7 Phase one of the redevelopment proposal includes the refurbishment and extension of the wellbeing unit, amendments to the parking area including parking numbers and configuration. Associated landscaping will also be incorporated into this stage. During this phase, the 15-bedroom capacity will remain.

1.1.8 The remaining phase will include the refurbishment of the existing inpatient unit to provide 12 bedrooms instead of the previous 15-bed facility, now equipped with en-suite facilities.

1.1.9 The new larger bedrooms will improve patient wellbeing, privacy and dignity, providing larger living arrangements than the previously designed rooms.

1.1.10 It remains the case that there is no intention to increase the number of patients because of the expansion. The intention is to provide improved facilities for the

existing patient capacity of the hospice by providing additional bedroom space and privacy via the introduction of en-suite bathrooms to the rooms.

- 1.1.11 The proposal also involves significant improvements to the site ventilation facilities as a result of experience related to the recent Covid pandemic.
- 1.1.12 The space needed for improved filters and mechanical equipment to ensure safe working and the safety of visitors and in-patients has resulted in a need for a small increase in the height of the roof and a small addition to the length of the front office extension. As a consequence, the precise internal layout has altered a little, albeit, the overall useable floorspace is practically identical to what was originally granted. For ease of reference, the increase in GEA/GIA is listed below:
- 1.1.13 The proposal is for an additional 954m² GIA made up of:
- Inpatient Unit Extension - 326m² (single storey);
 - Outpatient Extension (incl plant area)- 531m² (two storey);
 - Services/Storage Outbuilding - 40m² (single storey);
 - Workshop/Storage Outbuilding - 57m² (single storey).
- 1.1.14 In order to accommodate the phasing, an additional Plan is provided that shows the interim landscaping solution.
- 1.1.15 As part of this S73 Application it is necessary to also apply to vary certain Conditions of the Original Decision Notice. This includes the following conditions:

Approved Plans and Particulars

2. The development hereby permitted shall be carried out only in precise accordance with the [following] approved details, plans and specifications.

Archaeology

7. Prior to the commencement of development the applicant, or their agents or successors in title, shall secure and implement: (i) Archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and (ii) Further archaeological investigation, recording and reporting, determined by the results of the evaluation, in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority.

Post Commencement and Pre-Occupation Conditions

Materials

8. Notwithstanding the details shown in the application form, approved drawings or the Design and Access and Planning Statements the

following details including, where appropriate, samples of the external facing materials and finishes for the development shall be submitted to and approved in writing by the Local Planning Authority before any above ground works of the development hereby permitted are commenced: (i) External facing materials and finishes including bricks, roof tiles and cladding; (ii) Joinery details; (iii) External rainwater goods; (iv) Hard surface treatments and finishes to the vehicle parking areas, pedestrian accesses, pathways and gardens areas; (v) Proposed boundary treatments and retaining structures. The development shall be carried out in complete accordance with the approved details prior to the first occupation of any part of the development hereby permitted.

Transportation and Vehicle Parking

Car Parking Provision

10. Prior to the first occupation of any part of the development hereby permitted or in accordance with a timetable to be first agreed in writing by the Local Planning Authority, the area shown on the Proposed Site Plan (Drawing No PO299-RHP-ZZ-XX-DR-PL-A- 1003 Rev P10) as enlarged and altered vehicle parking area and the associated access and turning areas shall be formed, surface drained and marked out, with any necessary resurfacing and draining undertaken, and thereafter shall be kept available at all times for such use, and no development whether or not permitted by the Town and Country Planning (General Permitted Development) Order 2015 (or any provision equivalent to that Class in any statutory instrument replacing, revoking and re-enacting that Order) shall be carried out on that area of land or in such a position.

Electric Vehicle Provision

13. The development hereby permitted shall include the provision of a minimum of 3 electric vehicle charging points within the altered and extended staff and visitor car park within the site and with cabling to enable future charging facilities to be installed for electric vehicles for a further 7 parking spaces; each charging point should be able to accommodate a useable supply of 7kW; such provision shall be implemented prior to the first occupation of any part of the development hereby permitted and therefore permanently retained and maintained.

Ecology and Biodiversity

Ecology Mitigation

14. The development hereby permitted shall be carried out in strict accordance with the precautionary measures, conclusions, recommendations, and mitigation works and habitat enhancement as detailed in the submitted Preliminary Ecological Appraisal (Phlorum, December 2018) including the provision upon completion

of the works for bird boxes to be installed to encourage breeding birds on site and landscaping and planting to comprise of a high proportion of native species and to be of local provenance where possible.

Landscaping and Trees

Soft Landscaping Scheme

16. Notwithstanding the landscaping details accompanying the application as shown in the approved drawings or as set out in the Arboricultural Survey Report by Phlorum Limited February 2019 and Arboricultural Impact Assessment by Phlorum Limited July 2019 and prior to the first occupation of any part of the development hereby approved, full details of the proposed soft landscaping shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include the type and species of planting to be carried out, to include their quantity and size as well as arrangements for aftercare. Thereafter the approved soft landscaping scheme shall be carried out in full during the first available planting season following first occupation of any part of the development hereby approved. Any trees or plants that die, are damaged, removed or become diseased within five years from the date that the development is first brought into use shall be replaced with trees or plants of a similar size and species during the next available planting season.

1.1.16 Changes in summary:

- The extended building fronting Coldharbour Road has an amended design comprising a flared gable extension and fenestration to increase the ridge height and length of the services area to enable improved "covid appropriate" ventilation systems. Other minor amendments to this building are set out within the drawings pack.
- Amendments to the parking layout and provision
- Plant enclosure has widened by approx. 1150mm. This allows space to accommodate the ventilation plant.
- Plant /fire escape door changed to a double leaf (large and slave leaf), providing approx. 1200mm clear opening when both leaves are open.
- Path width between plant enclosure and retaining wall is reduced to 1600mm clear.
- 'Ramp' lengthened and graded to approx. 1:21 so that it is no longer classed as a 'ramp' (building regs), but as a footpath. To avoid the need to remove any additional trees at the base of the ramp, we have needed to extend the path at the Coldharbour Road end, which requires the introduction of another landing.

- Services/storage outbuilding layout and door arrangement updated to accommodate new electric equipment.
- Substation detached from the stores and re-located to the north west corner of the car park as a GRP enclosure.
- External Tap and gully positions added; 1no. to the Workshop deck and 1no. to the end of the services/storage outbuilding (adj to Store S4). Workshop extended to accommodate ancillary functions.
- Plant area and refuse store floor gullies indicated.
- Workshop size/layout and position has changed.
- Standalone covered cycle store (was originally in services outbuilding).
- New oxygen store and smoking shelter.
- Retained gas inlet cupd (previously noted as relocated).
- Knee rail to denote Hospice ownership boundary on Coldharbour road added.
- New AOV rooflight added to plant.
- Part obscure glazing added to the Coldharbour Road first floor office windows.
- New enlarged window to an existing room fronting the car park.
- Number of new rooflights to the existing building reduced.
- Perimeter fence and ground levels updated to match recent survey information.

1.1.17 In addition, services and drainage requirements have led to a need to amend the landscaping of the scheme. Certain trees will need to be removed as identified on the submitted plans. In addition, an amended planting scheme that allows for the phasing of the development has been submitted, along with minor changes to reflect the amended layout.

1.2 Supporting Documents

1.2.1 This Section 73 Application (incl. Design and Access Statement) is supported by the following documents.

Previously Submitted Documents	Reference	Author
Arboricultural Survey Report	8414	Phlorum Limited
Archaeological Desk-Based Assessment	-	SWAT Archaeology
Environmental Noise Survey	18/0538/R1	Cole Jarman
Tree Survey	429/011	Studioengleback
Travel Plan	-	GTA Civils & Transport

Document Title	Reference	Author
Application Form	-	DHA Planning

Arboricultural Impact Assessment, Method Statement and Tree Protection Plan	8414 Rev 05	Phlorum Limited
Drainage Strategy	FAH-00-XX-DR-C-0010 P3	Fairhurst
Landscape Masterplan- Phase 1	LLD2470-LAN-DWG-010 Rev 04	Lizard Landscape Design and Ecology
Preliminary Ecological Appraisal	8414 Rev 01	Phlorum Limited
Transport Statement	7110A Rev D	GTA Civils & Transport

1.2.2 The following plans also form part of the S.73 Application.

Type	Document Title	Author
Existing Plans	• P0299-RHP-ZZ-XX-DR-PL-A-1002-S2-Existing_Site_Plan-P4 • P0299-RHP-ZZ-GF-DR-PL-A-2000-S2-Existing_Ground_Floor_Plan-P3 • P0299-RHP-ZZ-01-DR-PL-A-2001-S2-Existing_First_Floor_Plan-P3 • P0299-RHP-ZZ-XX-DR-PL-A-2002-S2-Existing_Roof_Plan-P3 • P0299-RHP-ZZ-XX-DR-EL-A-2100-S2-Existing_Elevations-P3	RHP
Proposed Plans	• P0299-RHP-ZZ-ZZ-DR-A-1000-S2-Location Plan-P4 • P0299-RHP-ZZ-ZZ-DR-A-1001-S2-Block Plan-P3 • P0299-RHP-ZZ-XX-DR-PL-A-1003-S2-Proposed_Site_Plan-P13 • P0299-RHP-ZZ-XX-DR-PL-A-1005-S2-Proposed_Site_Plan-Phase 1- P3 • P0299-RHP-ZZ-GF-DR-PL-A-2003-S2-Proposed_Ground_Floor_Plan-P9 • P0299-RHP-ZZ-01-DR-PL-A-2004-S2-Proposed_First_Floor_Plan-P8 • P0299-RHP-ZZ-XX-DR-PL-A-2005-S2-Proposed_Roof_Plan-P6 • P0299-RHP-ZZ-XX-DR-PL-A-2006-S2-Service_Stores_and_Workshop-P5 • P0299-RHP-ZZ-XX-DR-EL-A-2101-S2-Proposed_Elevations- P8 • P0299-RHP-ZZ-XX-DR-SE-A-2201-S2-Proposed_Sections- P6 • P0299-RHP-ZZ-XX-DR-A-2103-S2-Proposed_Street_Elevations-P3 • P0299-RHP-ZZ-XX-MR-A-9200-S2-3D Views-P3	RHP

1.3 Project Background

- 1.3.1 Ellenor provides palliative and end of life services to patients of all ages and families facing limiting illness in North Kent and to children and young people in Bexley, from this site for more than 25 years.
- 1.3.2 The Hospice delivers personal, emotional and holistic care through a multidisciplinary team of nurses, doctors, counsellors, physiotherapists, therapists, spiritual leaders and a range of volunteers.

- 1.3.3 Ellenor provide clinical and wellbeing services for adult patients in North Kent in an outpatient setting, through an existing 15 no. bedded inpatient ward, and out in the community in the patient's home or care home.
- 1.3.4 There are two adult community teams: 'The Hospice at home' for people in their own homes and the 'Care Home Support team' for people in care and nursing homes. Children's services include a respite service for parents/carers; cancer care for children so they can receive chemotherapy in their own homes and a range of clubs and activities.
- 1.3.5 The purpose of this application is to improve the existing facilities in the Hospice, to improve patient care and dignity, together with improvements to existing staff accommodation (day care, offices etc.).

2 Site and Surroundings

2.1 Application Site

- 2.1.1 The application site comprises a parcel of land extending to 0.2 hectares, which is located to the north of Coldharbour Lane and south of Marks Square, approximately 2km south of Gravesend town centre.



Figure 1: Site Context (Courtesy of Google Earth).

- 2.1.2 The site comprises Ellenor Hospice as well as a part single storey and part two storey brick building located within landscaped gardens, which is accessed off Coldharbour Road with rear access to Marks Square.
- 2.1.3 There is an existing 30no. space car park to the west of the Hospice building.
- 2.1.4 The original building was constructed in 1992 with further alterations and additions over the years.
- 2.1.5 The site is within the urban area of Gravesend and Northfleet, within flood zone 1 (least likely to flood).

2.2 Surrounding Area

- 2.2.1 The site adjoins existing two-storey semi-detached housing to the north in Marks Square and Lanes Avenue, in what is a broadly suburban area.
- 2.2.2 To the south of the application site, and accessed by the roundabout in Coldharbour Road, is a large Morrison's supermarket which has a petrol filling station within the north east corner of the supermarket site.
- 2.2.3 To the east and north east of the site is a new housing development following a Bovis/ Persimmon development, which extends to 17.46 hectares (respectively application reference 20141214 and 20180041).

- 2.2.4 To the south east, on the south side of Coldharbour Road, is an developed field which was subject to outline planning permission with all matters reserved for the erection of offices, workshops and light industrial units (20160721).
- 2.2.5 The area bounding the site to the north beyond the site carpark is occupied by Packham Road and Boucher Drive, both of which are accessible from Coldharbour Road. Beyond this are rows of semi-detached residential properties extending northwards along Boucher Drive.
- 2.2.6 There is a bus service (no. 306/308) from Sevenoaks to Bluewater via Meopham and Gravesend, which runs along Coldharbour Road and into the Morrison's supermarket access before returning along Coldharbour Road to re-join Wrotham Road. This is an hourly service outside peak times on Monday to Saturday.

2.3 Planning History

- 2.3.1 The following table sets out the planning history relating to the application site, which has been sourced from Gravesham Borough Council's online public access database.

Reference No.	Description	Decision and Date
19480955	Construction of Council Estate, Roads, Sewers and erection of dwelling houses and other amenities.	Withdrawn
19890756	Outline application for the erection of hospice.	Withdrawn
19890757	Display of 2 no. non-illuminated hoardings on the Coldharbour Road frontage.	Withdrawn
19900081	Erection of part single storey part two storey building to form a 10-bed ward Hospice with ancillary day care facilities, associated parking for 25 cars and landscaping and formation of a vehicular access onto Coldharbour Road.	Permitted 26/03/90
19900582	Display of a non-illuminated 'v' shaped free-standing signboard fronting Coldharbour Road.	Advert consent 10/09/90
19990107	Erection of a gazebo in the garden.	Permitted 31/03/99
20010073	Erection of single storey rear extension to form store, nurses rest room and enlarged mortuary and extension under the existing front entrance canopy to form enlarged reception area.	Permitted 28/03/01
20020932	Erection of single storey rear extension to form nurses' room, storage room and an enlarged refrigeration room.	Permitted 30/12/02
20030791	Erection of extension to canopy on main entrance and a conservatory on the south eastern elevation.	Permitted 05/11/03
20040111	Erection of single storey extension to and conversion of existing stores to form two conference rooms, reception area and WC accommodation.	Certificate granted 13/04/04
20040846	Stationing of a portacabin on the Marks Square elevation to be used for training, meeting and lecture facilities.	Permitted 24/11/04
20050572	Change of use of part of the Northfleet Old People's Day Centre into a Doctor's surgery, waiting room, nurses' room and ancillary offices.	Permitted 12/08/05
20061060	Erection of a two storey extension on western side elevation to form a lift shaft and construction of an open canopy at the main entrance.	Permitted 22/01/07

20070674	Erection of single storey extension on the eastern corner to provide three additional patient bedrooms.	Permitted 18/09/07
20080593	Retention of portacabin providing training, meeting and lecture facilities.	Temporary permission granted 10/09/08
20100006	Erection of single storey extensions to form day therapy room, dining room and sacred space.	Permitted 04/03/10
20100657	Application for non-material amendment to planning permission reference number 20100006 relating to the erection of single storey extensions, for the amendment of the external materials from zinc cladding to render, omission of the grass roof and details of an amended landscaping scheme.	Approval of non-material amendment 12/10/10
20100858	Erection of a smoking shelter.	Permitted 09/11/10
20110671	Renewal of temporary planning permission reference number 20080593 for retention of the portacabin providing training, meeting and lecture facilities.	Granted temporary permission 25/08/11
20130761	Installation of externally mounted chiller unit at the rear.	Permitted 23/09/13
20130944	External illumination of existing 'V' shaped sign on grass verge outside hospice.	Advert consent granted 22/01/14
20140488	Retention of a portacabin to provide training, meeting and leisure facilities.	Permitted 01/08/14
20150136	Display of two illuminated signs at the entrance and one illuminated sign on the wall.	Advert consent granted 01/05/15
20170643	Retention of an existing portacabin and siting of 1 no. portacabin – both for a temporary three-year period.	Temporary permission granted 29/08/17
20190756	Expansion and refurbishment of the existing Ellenor Hospice to provide 12 en-suite rooms consisting of a single storey extension at the eastern end to provide 5 single en-suite rooms with amenity space and nurses space together with 7 refurbished rooms within the existing hospice layout; construction of two storey addition on south side for offices, meeting rooms for well-being centre and improved outpatient facilities; provision of ambulance access from Marks Square; alterations and extension to existing car parking layout and provision of external storage and sub-station.	Permitted 23/10/2019 (subject of this Section 73 application)

3 The Proposed Development

3.1 Introduction

3.1.1 This Statement has been prepared to accompany a Section 73 Application for amendments to the permission granted pursuant to full planning application 20190756 granted to 'Ellenor Hospice' by Decision Notice dated 23 October 2019 for the erection of a part two storey, part single storey extension to the existing Hospice building along Coldharbour Road in Northfleet.

3.1.2 The full description of development was as follows:

'Expansion and refurbishment of the existing Ellenor Hospice to provide 12 en-suite rooms consisting of a single storey extension at the eastern end to provide 5 single en-suite rooms with amenity space and nurses space together with 7 refurbished rooms within the existing hospice layout; construction of two storey addition on south side for offices, meeting rooms for well-being centre and improved outpatient facilities; provision of ambulance access from Marks Square; alterations and extension to existing car parking layout and provision of external storage and sub-station'.

3.2 Summary of Proposal

3.2.1 A Section 73 application is being submitted due to a number of changes arising since the original approval was gained. This includes revisions to parking as well as landscaping.

3.2.2 Outlined below is the full list of changes the proposal seeks, which would be made possible by varying Condition no. 2, 7, 8, 10, 13, 14 and 16.

- The extended building fronting Coldharbour Road has an amended design comprising a flared gable extension and fenestration to increase the ridge height and length of the services area to enable improved "covid appropriate" ventilation systems. Other minor amendments to this building are set out within the drawings pack.
- Amendments to the parking layout and provision
- Plant enclosure has widened by approx. 1150mm. This allows space to accommodate the ventilation plant.
- Plant /fire escape door changed to a double leaf (large and slave leaf), providing approx. 1200mm clear opening when both leaves are open.
- Path width between plant enclosure and retaining wall is reduced to 1600mm clear.
- 'Ramp' lengthened and graded to approx. 1:21 so that it is no longer classed as a 'ramp' (building regs), but as a footpath. To avoid the need to remove any additional trees at the base of the ramp, we have needed to extend the path at the Coldharbour Road end, which requires the introduction of another landing.

- Services/storage outbuilding layout and door arrangement updated to accommodate new electric equipment.
- Substation detached from the stores and re-located to the north west corner of the car park as a GRP enclosure.
- External Tap and gully positions added; 1no. to the Workshop deck and 1no. to the end of the services/storage outbuilding (adj to Store S4). Workshop extended to accommodate ancillary functions.
- Plant area and refuse store floor gullies indicated.
- Workshop size/layout and position has changed.
- Standalone covered cycle store (was originally in services outbuilding).
- New oxygen store and smoking shelter.
- Retained gas inlet cupd (previously noted as relocated).
- Knee rail to denote Hospice ownership boundary on Coldharbour road added.
- New AOV rooflight added to plant.
- Part obscure glazing added to the Coldharbour Road first floor office windows.
- New enlarged window to an existing room fronting the car park.
- Number of new rooflights to the existing building reduced.

Perimeter fence and ground levels updated to match recent survey information.

- 3.2.3 In addition, services and drainage requirements have led to a need to amend the landscaping of the scheme. Certain trees will need to be removed as identified on the submitted plans. In addition, an amended planting scheme that allows for the phasing of the development has been submitted, along with minor changes to reflect the amended layout.
- 3.2.4 These changes will be enacted during a two phase development, which comprises:
- Phase 1: wellbeing extension, refurbishment and externals; and
 - Phase 2: reconfiguration of bedrooms and related extension works.
- 3.2.5 The priority phase for the Hospice is Phase 1, specifically the Wellbeing refurbishment and extension, parking, access (new ambulance access to the rear from Mark's Square) and landscaping.
- 3.2.6 For ease of reference, Phase 1 works on the diagram below:

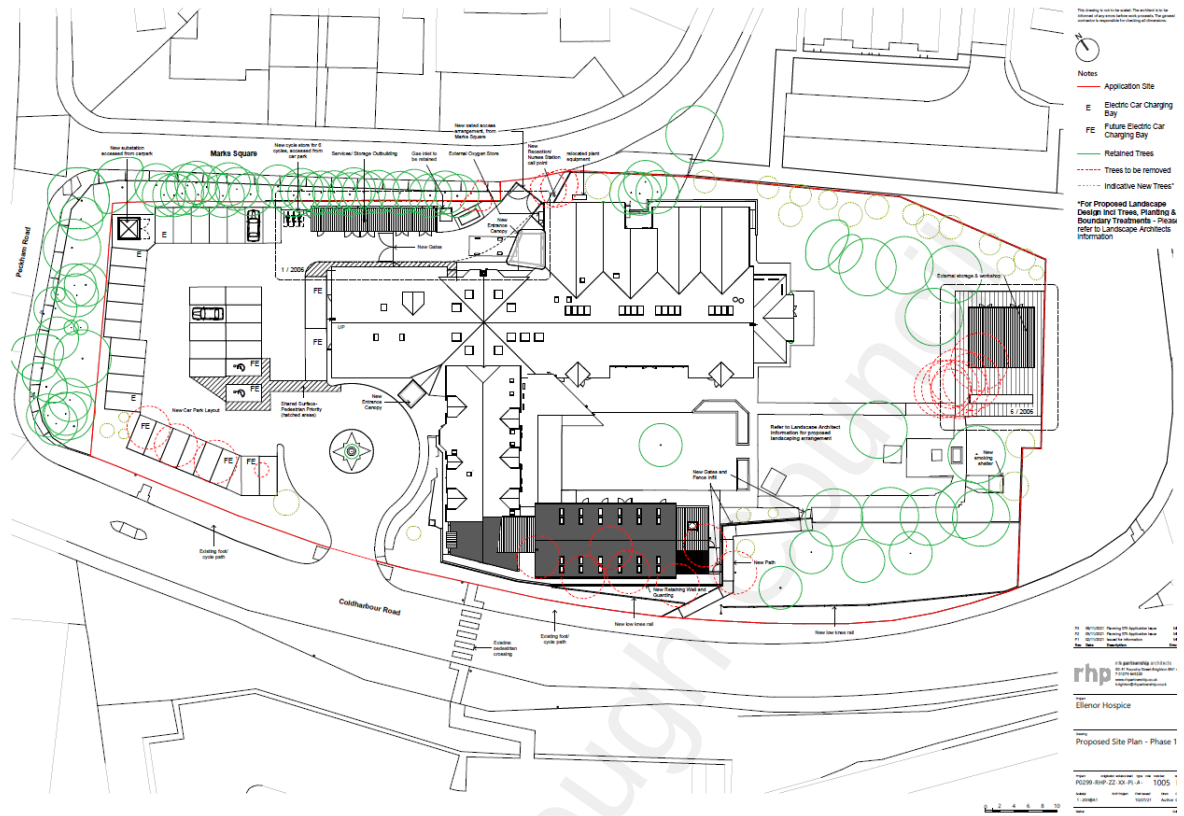


Figure 2: Proposed Site Plan- Phase 1 (Courtesy of rhp partnership architects).

3.2.7 The remainder of the works (Phase 2) will comprise reconfiguration of bedrooms and related extension works.

3.3 Additional Information

3.3.1 The proposal includes 35no. car parking spaces, 2no. disabled spaces, and an additional 1no. minibus and 1no. shop van parking spaces. This represents a net improvement for on-site parking which therefore does not increase stress on parking to the surrounding roads. Provision for Electric Vehicle charging points has been accounted for.

3.3.2 Refuse and emergency service vehicles will serve the site as per the existing arrangements. The access at the rear is to be improved as part of the development proposal to provide entry for ambulances and hearses from Marks Square. Tracking demonstrates that this will also provide additional/ alternative access for a fire tender, with egress being through the car park to the existing access onto Coldharbour Road.

3.3.3 The site is well located to encourage staff and patients (where practical) to take advantage of the bus services, and the railway station in order to travel to and from Ellenor Hospice.

4 Design and Access

4.1 Introduction

- 4.1.1 In line with the validation requirements of Gravesham Borough Council, a short Design and Access Statement is outlined below to accompany the Section 73 application.

4.2 Use

- 4.2.1 The existing building(s) Gross Internal Area totals approximately 1722m², which is made up of:

- The main building (combination of single and two storeys): 1560m²
- The portakabin outbuilding: 78m²
- The ancillary outbuildings to the rear (2no.): 68m²
- Sheds (2no.): 16m²

- 4.2.2 Areas that will be demolished to make way for the new development, totals: 227m² and comprises:

- Parts of the main building – existing Coldharbour road end gable (lift) and conservatory (combination of single and two storeys): 65m²
- The portakabin Outbuilding: 78m²
- The ancillary outbuildings to the rear (2no.): 68m²
- Sheds (2no.): 16m²

- 4.2.3 The proposal is for an additional 954m² GIA made up of:

- Inpatient Unit Extension - 326m² (single storey);
- Outpatient Extension (incl plant area)- 531m² (two storey);
- Services/Storage Outbuilding - 40m² (single storey);
- Workshop/Storage Outbuilding - 57m² (single storey).

- 4.2.4 The accommodation requirements can be broadly defined across three areas of the Hospice - The Green, Outpatients and Inpatient Unit (IPU). The Outpatient and IPU consist of both refurbishment and extension, whereas the Green is to be refurbished to achieve an improved, more welcoming and uplifting entrance to the Hospice.

4.3 Amount

- 4.3.1 This proposal does not amend the amount or scale of development materially compared to the "host" permission.

4.4 Layout

- 4.4.1 The proposals have been developed on the basis of appropriate co-location with existing services offered by the Hospice. Therefore, the new and improved Outpatient accommodation forms an extension to the existing Outpatient wing and the new IPU bedroom accommodation forms an extension to the existing IPU.
- 4.4.2 This co-location has therefore dictated the distribution of accommodation on the site, with the Outpatient extension facing Coldharbour Road and the single storey IPU extension located to the quieter rear of the site with direct access to the Hospice gardens.
- 4.4.3 Drawing works have been provided on the following pages to compare the extant permission against the proposal.

Comparison of Layout and Elevations between Extant Permission and Proposed

Layout

4.4.4 The extant permission proposed the following layout:



Figure 3: Layout of Extant Permission (Courtesy of application reference 20190756).

4.4.5 The S73 scheme proposes the following layout:



Figure 4: Layout of Proposal (Courtesy of rhp partnership architects).

Elevations

4.4.6 The extant permission proposed the following elevations:

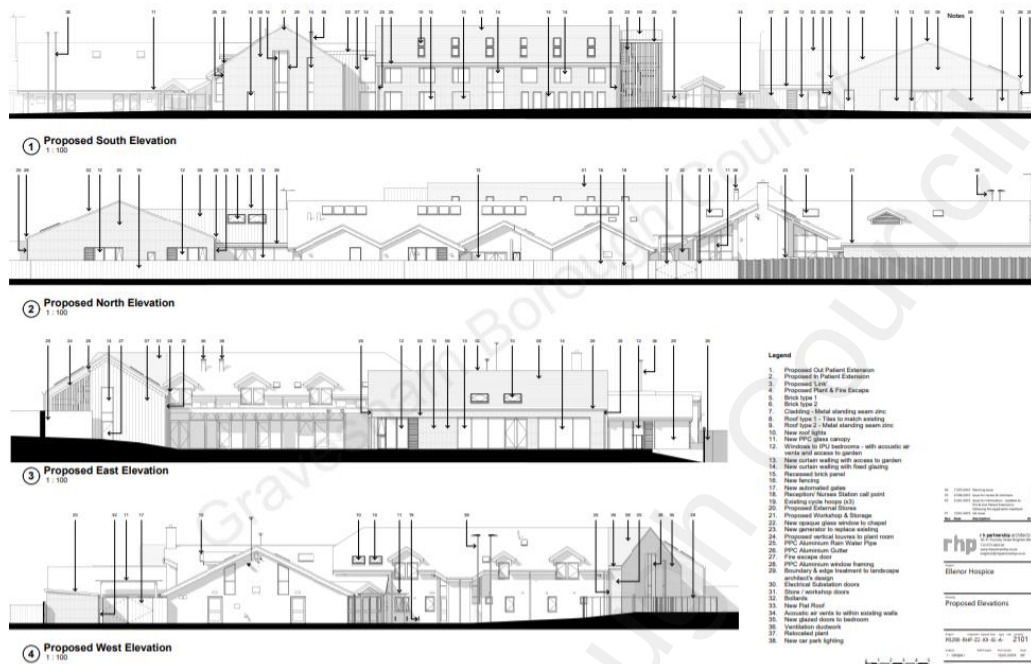


Figure 5: Elevations of Extant Permission (Courtesy of application reference 20190756).

4.4.7 The S73 scheme proposes the following elevations:

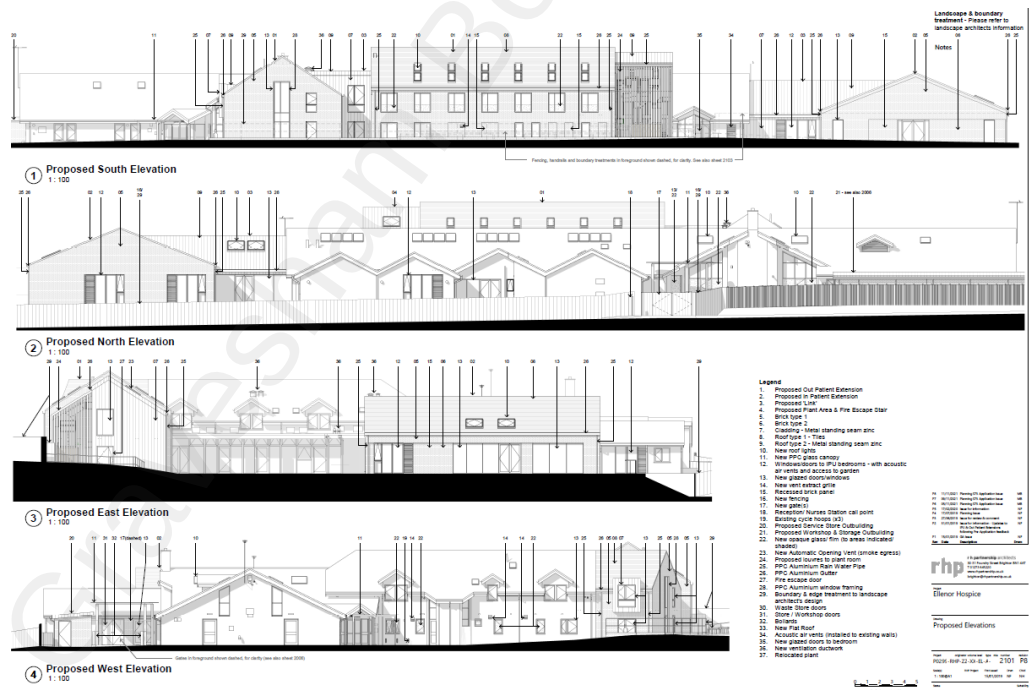


Figure 6: Elevations of Extant Permission (Courtesy of rha partnership architects).

4.5 Scale

- 4.5.1 The proposed extensions respect the existing massing; Outpatients being two storeys, the IPU (Inpatient Unit) single storey. The siting of the extensions have been determined by the appropriate adjacency to existing accommodation.
- 4.5.2 Following receipt of DSE's initial comments, the scheme proposals were amended such that the flat-roofed arrangement to the Outpatients was replaced by a pitched roof. The DSE's opinion was that this better aligned with the character of the host building.
- 4.5.3 The revised pitched roof arrangement relates to the existing building more successfully with the extensions being considered more appropriate to the setting. However, further design development has been undertaken in relation to the proximity of the Outpatient extension to Coldharbour Road. The proposals now provide for a wider strip of the verge to be retained. This has been achieved by reducing the footprint of new accommodation extending towards Coldharbour Road whilst increasing the length of the extension running parallel to the road.
- 4.5.4 Other amendments to the scheme have involved the "squaring off of the gable and introduction of a dormer.
- 4.5.5 Street scenes are provided and we are satisfied that the design amendments represent an improvement to the scheme

4.6 Landscaping

- 4.6.1 The proposed landscape vision has formed an important part of the design process, with an emphasis being placed on creating an outside space that is suitable for all ages - children, teenagers, elderly etc. It has also been important to create areas which are accessible for both wheelchairs and beds.
- 4.6.2 As such the proposed landscape vision below has been created, which seeks to create a high quality environment for patients, visitors and staff to enjoy. Courtyard style landscape garden areas have been incorporated to enable privacy.
- 4.6.3 Amendments to the scheme are proposed due to the minor amendments to the car park, extensions and necessary infrastructure works.
- 4.6.4 Native tree planting and soft landscaping has been proposed. As well as planting to the site boundaries to further soften the appearance of the proposed works.

4.7 Appearance

- 4.7.1 The existing Hospice building is predominantly faced in brickwork under roof tiles. It is proposed that these materials are echoed in the proposed extensions.

4.8 Access

- 4.8.1 The principle vehicle and pedestrian access from Coldharbour Road will be maintained with no adjustments proposed.

- 4.8.2 The access from Mark's Square, currently dedicated to undertakers' vehicles, is proposed to be increased in width to provide an additional point of drop-off for those patients arriving by ambulance. Patients will be transferred to the IPU from the ambulance under cover of a new glazed canopy via a newly formed door distinct from the undertakers' access.
- 4.8.3 The arrangement offers a significant improvement in terms of patient dignity and patient choice over the current arrangement which requires all patients, no matter their state of health, to be brought through The Green to access the IPU.
- 4.8.4 Both undertakers' vehicles and ambulances will egress the site via the car park and principal existing entrance onto Coldharbour Road.

5 Planning Policy Framework

5.1 Overview

- 5.1.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, the determination of development proposals should be made in accordance with the relevant policy provisions of the statutory Development Plan, unless material considerations indicate otherwise.
- 5.1.2 For the purposes of this application, the Development Plan for Gravesham comprises:
- Gravesham Local Plan Core Strategy (September 2014); and
 - Remaining Saved Policies of the Local Plan First Review (1994).
- 5.1.3 There are several other planning policy documents which are of some relevance to the consideration of planning applications and are material considerations, including national planning advice and guidance in the National Planning Policy Framework (NPPF), the National Planning Practice Guidance (NPPG), and supplementary planning guidance
- 5.1.4 This section of the statement therefore highlights the aspects of the Development Plan and NPPF that are relevant to this application, as well as any other key material considerations.

5.2 Gravesham Local Plan Core Strategy (September 2014)

- 5.2.1 The Core Strategy sets out the Council's spatial vision and strategic objectives for the Borough to 2028 and the policies which will deliver them. It identifies the main areas where major change is likely to take place and allocates sites which are key to achieving the strategy.
- 5.2.2 The application site is shown as being within the urban area, adjoining a key site to the east in the Gravesham Local Plan Policies Map. The site is not protected by any specific designations.
- 5.2.3 The most relevant policies from the adopted Core Strategy in relation to this development are as follows:

No.	Policy Reference	Description
1	CS01	Sustainable Development
2	CS02	Scale and Distribution of Development
3	CS10	Physical and Social Infrastructure
4	CS11	Transport
5	CS12	Green Infrastructure
6	CS18	Climate Change
7	CS19	Development and Design Principles
8	CS20	Heritage and the Historic Environment

5.3 Gravesham Local Plan First Review 1994

- 5.3.1 The Gravesham Local Plan First Review was originally adopted in November 1994.
- 5.3.2 A substantial number of policies of the Gravesham Local Plan First Review were saved by a Direction dated 25 September 2007 of the Secretary of State under paragraph 1 (3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004 as transitional arrangements pending adoption of the Core Strategy.
- 5.3.3 Saved policies contained in the Gravesham Local Plan First Review should still be accorded significant weight, albeit that the weight accorded should be greater where policies are consistent with the National Planning Policy Framework (NPPF, paragraph 215).
- 5.3.4 The following remaining saved policies are relevant to the consideration of this application:

No.	Policy Reference	Description
1	T1	Impact of Development on the Highway Network
2	T5	New access onto Highway Network
3	P3	Vehicle Parking Standards

5.4 National Planning Policy Framework

- 5.4.1 The NPPF was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied.

Achieving Sustainable Development (Section 2)

- 5.4.2 **Paragraph 7** states:

'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.'

- 5.4.3 The overarching principle of the NPPF is a clear presumption in favour of sustainable development. **Paragraph 8** states the three dimensions which are interdependent and need to be pursued in mutually supportive ways:

- 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 well-*

designed, beautiful and safe built places, 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 enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

5.4.4 **Paragraph 10** states:

*'So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development**.'*

5.4.5 It is noted in **paragraph 9** that:

*'Planning policies and decisions should play an active role in guiding development towards sustainable solutions, **but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.**'*

5.4.6 **Paragraph 11** states: (edited)

'Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - I. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'**

5.4.7 **Paragraph 14** states:

'In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- (a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;*

- (b) *the neighbourhood plan contains policies and allocations to meet its identified housing requirement;*
- (c) *the local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and*
- (d) *the local planning authority's housing delivery was at least 45% of that required over the previous three years.'*

Decision-making (Section 4)

- 5.4.8 **Paragraph 38** describes how Local Planning Authorities should approach decisions on proposed development in a positive and creative way:

'They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.'

- 5.4.9 **Paragraph 47** states that:

'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.'

- 5.4.10 **Paragraph 55** outlines that Local Planning Authorities should consider:

'whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.'

'Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.'

Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.'
(**Paragraph 56**).

Promoting healthy and safe communities (Section 9)

- 5.4.11 **Paragraph 93** states:

'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space,*

cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

c) 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;

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.'

Promoting sustainable transport (Section 9)

5.4.12 **Paragraph 111** states:

'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

Achieving well-designed places (Section 12)

5.4.13 **Paragraph 134** states:

'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'

5.5 National Planning Practice Guidance (NPPG)

5.5.1 On the 6th of March 2014 a new web-based resource for Planning Practice Guidance was launched. It supports and clarifies areas in the NPPF and replaces a substantial list of guidance documents published from 1978-2013.

5.5.2 It contains guidance on assessing housing need; design; public consultation; open space provision in new development; travel plans, transport assessments and statements in decision-taking; health and wellbeing; water supply, wastewater

and water quality; light pollution; determining a planning application; the use of planning conditions and viability, amongst other things.

5.6 Supplementary Planning Guidance

5.6.1 The Council has adopted a number of Supplementary Planning Guidance documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

5.6.2 The following documents are relevant to the proposal:

- Kent Design Guide (SPG 5 published December 2005, adopted July 2006);
- Kent Vehicle Parking Standards (SPG 4 published in 2003 and adopted in 2006); and
- Vehicle Accesses on Classified Highways (SPG6 November 1992).

6 Planning Assessment

6.1 Introduction

- 6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

6.2 The Principle of Development

- 6.2.1 The principle of development was established as per application reference 20190756, under Policy CS02 and CS10. Further details are outlined below.
- 6.2.2 The Hospice, which is well established and provides an essential service to the local community, is within the urban boundary of Gravesend which is covered by Policy CS02 of Gravesham Core Strategy which, amongst other things, supports the development of services and facilities to support and benefit the existing local communities. In this case the proposed extension to the Hospice will help to improve patient care and dignity as well as improve existing staff accommodation.
- 6.2.3 Policy CS10 states that 'Support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure, or lead to the provision of additional infrastructure that improves community well-being'. The proposed improvements to this invaluable facility seek to improve the layout of the existing building and respond to the changing nature of care and therapies offered at the hospice. The site is currently in use as a hospice and the alterations will facilitate the continued use of the premises and make effective use of the 'built up' part of the site.
- 6.2.4 At a national level, section 8 of the NPPF makes it clear that planning decisions should, amongst other things, 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. It also seeks to ensure that established facilities and services are able to develop and modernise and are retained for the benefit of the community. The proposed scheme fully accords with this and will allow

6.3 Proposed Minor Material Amendments

- 6.3.1 This section will outline the minor material amendments to planning permission reference 20190756, why they are necessary, and the Conditions in which they will affect.

Amendments to "office" extension to facilitate increased ventilation requirements and boundary constraints.

- 6.3.2 The scheme has been amended principally due to a need to accommodate improved ventilation systems arising from experience of Covid. In addition, a boundary check has revealed the need for a minor re-siting due to the Hospice's requirement for additional space. This has led to a rationalisation of the southern corner to provide an improved gable design. A dormer window is proposed to add interest, with a small increase in the ridge height and length to allow for the increased ventilation requirements.

Plant enclosure has widened by approx. 1150mm

- 6.3.3 This has been amended to allow space for the steel frame to clear the plant and walls/louvres. The increased area is to accommodate the additional plant associated with the revised, post-covid, ventilation strategy.
- 6.3.4 Therefore, the Applicant intends to widen the plant enclosure by approximately 1150mm. This, as other changes to the built form will require amendment of the wording of condition 2.

Plant/ fire escape door changed to a double leaf (large and slave leaf)

- 6.3.5 This has been amended to provide an approximately 1200mm clear opening when both leafs are open. This element that will not materially affect the proposal but will allow for easy movement of good/ people in the event of a fire.
- 6.3.6 Therefore, the Applicant intends to change the plant/ fire escape door to a double leaf door.

Path width between plant enclosure and retaining wall is reduced to 1600mm clear

- 6.3.7 This has been amended to accommodate boundary restrictions. This element that will not materially affect the proposal in visual terms.

'Ramp' lengthened and graded to approximately 1:21 so that it is no longer classed as a 'ramp', but as a footpath

- 6.3.8 This has been amended to classify the ramp as a footpath and avoid the removal of additional trees. This was an element that was only considered to affect the proposal once Building Regulation drawings were carried out.

Services/storage outbuilding layout and door arrangement updated

- 6.3.9 This has been amended to accommodate a new electric store. This was an element that was only considered to affect the proposal once Building Regulation drawings were carried out.

Substation relocation

- 6.3.10 This has been amended to improve the relationship of the works to existing trees.
- 6.3.11 The location of the substation has changed. It is now detached and remote from the outbuilding and appears as a GRP enclosure in the north west corner of the site.

External Tap and gully positions added; 1no. to the Workshop deck and 1no. to the end of the services/storage outbuilding (adjacent to Store S4)

- 6.3.12 This has been amended to add external tap and gully positions which are necessary for site operation.

Plant area and refuse store floor gullies indicated

- 6.3.13 This has been amended to add gullies to the plant area and refuse store, which is required for to provide good quality drainage.

Car parking.

- 6.3.14 There are minor changes to the access and parking layout (due to boundary/ownership confirmation) as set out in the Transport Statement. The level of parking remains acceptable, with a new minibus space providing benefits for shared trips. In the circumstances, this is an overall improvement to the current situation. In terms of the amended layout, the scheme will operate satisfactorily.

7 Conclusion

7.1 Summary

- 7.1.1 The amendments proposed in this scheme arise in view of changes to ventilation arising from experience of the Covid situation, from Building Regulation requirements and further investigation regarding drainage and servicing requirements. In addition, further checks in respect of boundaries has resulted in minor amendments.
- 7.1.2 Overall, the proposal seeks to improve the layout and operation of the existing Hospice building including ventilation requirements.
- 7.1.3 Phasing is also required due to financial considerations.
- 7.1.4 The amended scheme will improve the layout, appearance and usability of the building and, importantly, the experience for those visiting the Hospice. It will also enable the Applicant to maximise use of the site in an appropriate manner and to continue to develop facilities for patient care to the benefit of the wider community.
- 7.1.5 Furthermore, the proposed minor amendments respond to Building Regulations as well as the specialised ventilation needs of those being cared for and working at Ellenor Hospice. A suite of detailed technical assessments and reports have informed the application and demonstrate that it will not give rise to any significant environmental, transport, or other impacts.
- 7.1.6 Overall, given the context of the site, the proposal is deemed to be acceptable and in accordance with the relevant policies from the Development Plan and the other material considerations. It should thus benefit from the presumption in favour of sustainable development, in accordance with Paragraph 11 of the NPPF.

7.2 Conclusion

- 7.2.1 Taking all the above into account, we respectfully request that an amended Planning Permission be granted and conditions on the host permission varied accordingly.
- 7.2.2 Any queries please do contact john.collins@dhaplanning and dan.blake@dhaplanning.co.uk