

TECHNICAL NOTE			VELOCITY
Client	Building Construction Partnership		Page No. 1 of 5
Project	Dene Holm, Northfleet, Gravesend, Kent		Project No. 25/220
Subject	Response to Highways Comments		Document No TN01
Prepared By	AM	Checked and Authorised By ML	Date SEP 2026

1 INTRODUCTION

1.1 NOTE PURPOSE

- 1.1.1 This technical note has been produced to respond to Highways comments (dated 30th July 2026) received from Kent County Council (KCC) in relation to the redevelopment proposals for Dene Holm House (application reference GB/20260153), located in Northfleet.
- 1.1.2 The proposals are for the demolition of the existing care home and the erection of a replacement 60-bedroom care facility together with six rehabilitation apartments.
- 1.1.3 This note sets out each of the comments received from Highways and is then followed by Velocity's response in green.

1.1 SITE LOCATION AND SUSTAINABILITY

- 1.1.1 The site is located in a relatively sustainable location, within walking distance of local amenities and services and with access to nearby bus stops served by regular public transport services. Given the nature of the proposed development, it is anticipated that the majority of trips will be associated with staff, visitors and servicing activity.
- 1.1.2 It is appropriate that a Travel Plan is secured by condition to encourage staff to travel by sustainable modes where possible.
- 1.1.3 **Noted and agreed**
- 1.1.4 Whilst not a highway safety issue, consideration should be given to simplifying the internal pedestrian routes within the site. A more direct footway layout may be beneficial for future residents, many of whom may have reduced mobility.

1.2 SITE ACCESS

DENE HOLM ROAD

- 1.2.1 The proposed development will be served by a new access from Dene Holm Road in broadly the same location as the existing access, with the existing egress arrangement being permanently closed.
- 1.2.2 The proposed access is acceptable in principle, however, the works within the public highway will require the applicant to enter into a Section 278 Agreement with Kent County Council Highways and Transportation
- 1.2.3 **Noted**
- 1.2.4 Visibility splays measuring 2.4m x 43m have been demonstrated and are appropriate for the posted 30mph speed limit. These splays should be maintained thereafter, with no obstruction exceeding 0.6m in height above carriageway level.
- 1.2.5 **Noted and agreed**



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1.2.6 Pedestrian visibility splays measuring 2m x 2m should also be provided on both sides of the access. These should be drawn behind the back edge of the footway and maintained free from obstruction exceeding 0.6m in height

1.2.7 **Noted, these pedestrian visibility splays have been added to the updated drawing (Drawing 25-220-SK-008), provided at APPENDIX A, for reference.**

TENSING AVENUE

1.2.8 It is proposed to retain the existing access from Tensing Avenue to serve the ambulance bay, cycle parking and refuse storage area.

1.2.9 Concerns are raised regarding the suitability of this arrangement. Insufficient information has been provided to demonstrate that ambulance access, refuse collection activities and cycle parking can operate safely and efficiently without conflict between users.

1.2.10 **The comment is noted, given the low frequency of ambulance visits and refuse collection, the potential for conflict between these different users is expected to very low. Regardless of this, the cycle parking has been moved away from the bin store and ambulance bay, and is now located off of the servicing area, towards the delivery entrance (as shown in the revised layout plan provided at APPENDIX B).**

1.2.11 **This arrangement will allow cyclists to enter the site and be clear of these other activities before dismounting their bicycle and then storing their bike.**

1.2.12 A Traffic Regulation Order (TRO) is proposed to introduce waiting restrictions on Tensing Avenue between 07:00 and 17:00. Whilst noted, the applicant should be aware that the implementation of a TRO cannot be guaranteed through the planning process. Consequently, the development should not be reliant upon the introduction of waiting restrictions in order to operate acceptably.

1.2.13 The applicant should therefore explore alternative arrangements for ambulance servicing, refuse storage and collection.

1.2.14 **The point raised relating to the TRO is noted. The preference is still to proceed with the TRO, however should for some reason it not be deliverable, the site is still accessible without its implementation.**

1.2.15 **Additional plans have been prepared to demonstrate this, they are as follows:**

- ⊙ **Drawing 25-220-SK-009 (provided at APPENDIX C) shows that a delivery vehicle (7.5t box van) can access the delivery and servicing area, should there be no single yellow lines to prevent parking opposite the access. The vehicle can successfully access and egress the site in forward gear under these conditions.**
- ⊙ **Similarly, Drawing 25-220-SK-011 (provided at APPENDIX D) shows that an ambulance can access the ambulance bay, entering and exiting in forward gear, even if the TRO does not come forward.**

1.2.16 **On the basis of the above this aspect of the site is not reliant on the TRO being delivered.**

1.2.17 Swept path analysis should be provided for an 11.4m refuse vehicle demonstrating safe access to, manoeuvring within and egress from the site. The analysis should demonstrate that refuse collection can be undertaken without reliance on the proposed TRO.



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- 1.2.18 The plan provided at APPENDIX E (Drawing 25-220-SK-010) shows that a 11.4m refuse vehicle is able to pull up outside the servicing access and have the refuse bins wheeled to the rear of the vehicle for collection (9m drag distance from the collection point). The site management team will be responsible for bringing the bins out of their store and putting them away again after each refuse collection.
- 1.2.19 In addition, the cycle parking and refuse storage should be separated from the ambulance bay to ensure that access to these facilities is not impeded when the ambulance space is occupied.
- 1.2.20 As previously discussed, the cycle parking store has been relocated in order to ensure the safe operation of the delivery and servicing area. Given the infrequent nature of both ambulance call outs and refuse collection it is very unlikely that these activities will overlap.

1.3 REHABILITATION APARTMENT ACCESS

- 1.3.1 A separate access is proposed from Tensing Avenue to serve six parking spaces associated with the rehabilitation apartments.
- 1.3.2 Given the limited number of parking spaces served by this access, the proposed bellmouth arrangement appears excessive. A standard vehicle crossover arrangement is likely to be more appropriate.
- 1.3.3 Whilst visibility splays measuring 2.4m x 43m have been demonstrated, pedestrian visibility splays measuring 2m x 2m should also be provided on both sides of the access.
- 1.3.4 These points are noted, the rehabilitation apartment access has been revised to a standard vehicle crossover, as requested. This is shown on Drawing 25-220-SK-008, which is provided at APPENDIX A, for reference.
- 1.3.5 This plan has also been updated to include 2m x 2m pedestrian visibility splays, in addition to the 2.4m x 43m visibility splays previously provided.
- 1.3.6 For information Drawing 25-220-SK-001 has also been updated to demonstrate that the swept path analysis of the revised access to the rehabilitation apartments continues to work. This plan is provided at APPENDIX F.

1.4 TRIP GENERATION

- 1.4.1 TRICS data has been submitted to assess the likely trip generation associated with the proposed development.
- 1.4.2 The assessment indicates that the development would result in only a marginal increase in vehicle movements when compared with the existing lawful use of the site, with increases limited to approximately two to three two-way vehicle trips during both the AM and PM peak hours.
- 1.4.3 I am satisfied that the submitted assessment demonstrates that the traffic impact of the proposal would not be severe and would not result in a material impact on the operation of the local highway network.
- 1.4.4 Noted and agreed

1.5 PERSONAL INJURY COLLISION RECORD

- 1.5.1 The submitted collision analysis indicates that recorded injury collisions are dispersed across the wider highway network and are concentrated around nearby junctions. No recorded injury collisions are identified at the site access.



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1.5.2 Whilst no immediate highway safety concerns are identified from the information submitted, the full collision records should be provided for review, in order to verify the conclusions presented within the Transport Statement.

1.5.3 This point is noted. The collision data analysis has been undertaken based on publicly available personal injury collision records obtained from CrashMap.

1.6 PARKING

1.6.1 Kent Vehicle Parking Standards recommend one car parking space per resident staff member, one space per two non-resident staff members and one visitor space per six residents.

1.6.2 The Transport Statement demonstrates that the proposed provision of 25 parking spaces accords with these standards and is therefore considered acceptable.

1.6.3 The inclusion of two accessible parking spaces is welcomed; however, the applicant may wish to review the level and location of accessible parking provision, particularly in relation to the rehabilitation apartments, given the nature of the proposed use.

1.6.4 The comment relating to the parking provision is noted, an additional accessible bay has been provided within the car park for the rehabilitation apartments, this is demonstrated on the updated layout plan provided at APPENDIX B.

1.6.5 Electric Vehicle charging infrastructure should be provided in accordance with current Building Regulations requirements.

1.6.6 Noted, the updated site layout (provided at APPENDIX B) shows that electric vehicle charging provision has now been included, as per the current building regulations. In terms of active provision, a charging point will be provided outside the main entrance and will provide power to one accessible bay and one standard parking bay.

1.6.7 For passive provision the infrastructure for a further two bays will be provided at the southern end of the main car park. A further two bays will be provided with passive provision within the rehabilitation apartments car park.

1.6.8 Whilst provision has been made for ambulance parking, the suitability of the proposed location should be reviewed for the reasons outlined above.

1.6.9 As previously discussed the location of the cycle parking has been changed, in order to improve the suitability of the ambulance parking bay location. The location is considered to be appropriate and is unlikely to result in any conflicts with other site users.

1.6.10 Given the required dimensions for such a bay, were it to be relocated to elsewhere in the site it would likely result in a reduction to the number of standard parking bays, which would create a disbenefit to the overall scheme.

1.7 CYCLE PARKING

1.7.1 Cycle parking should be provided at a minimum rate of one space per 10 beds. The proposed provision of 10 cycle parking spaces is therefore acceptable in principle. Details should be provided to demonstrate that the cycle parking is secure, covered and conveniently located for staff and visitors.



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- 1.7.2 Noted, the cycle parking will be provided in a secure and covered store. Staff will be made aware of its location and how to access it upon employment. Visitors will be guided as to its location and assisted with accessing the store, if required. Signage advising on its location will also be erected.



APPENDIX A

DRAWING 25-220-SK-008-D





EXISTING ACCESS

2.4x43.0m VISIBILITY SPLAY

2.0x2.0m PEDESTRIAN
VISIBILITY SPLAYS

2.4x43.0m VISIBILITY SPLAY

2.0x2.0m PEDESTRIAN
VISIBILITY SPLAYS

8.2m DRAG DISTANCE

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VELOCITY

Drawing Status S2 - FOR INFORMATION		Project Title DENHOLM, NORTHFLEET, GRAVESHAM					
Client BCP Building Construction Partnership Supporting the Core Industry since 2001		Drawing Title SITE ACCESS VISIBILITY SPLAYS					
Architect RDT ARCHITECTS		Scale @ A1 1:250	Date 18/09/25	Designed/Drawn BKM	Checked CWP	Approved CWP	
Project Ref 25-220		Drawing Number 25-220-SK-008				Rev D	

APPENDIX B

UPDATED SITE LAYOUT PLAN

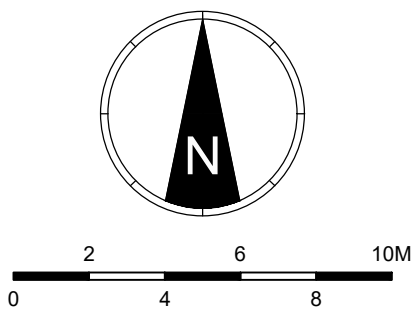


PROPOSED SITE PLAN

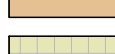
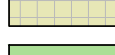
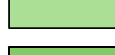


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KEY:	
	SITE BOUNDARY
	SITE AREA = 1.15 ACRES / 0.47 HECTARES
	EXISTING TREES
	<u>PROPOSED TREES</u>
	<u>PROPOSED BUILDINGS</u>
	<u>ROAD - TARMAC COLOUR BLACK</u>
	<u>PARKING SPACES</u>
	<u>FOOTPATH - RESIN BOUND (BUFF COLOUR)</u>
	<u>PATIO - PROPOSED FLAG PAVING</u>
	<u>LAWN</u>
	<u>BANKING</u>
	<u>FENCE</u>
	<u>LAND AREA ASSIGNED TO ALTERNATIVE TITLE PLANS AS PER DEEDS</u>
	<u>RETAINING WALL</u>
	<u>PROPOSED LEVELS</u>
	
	<u>EXISTING LEVELS</u>
	
	<u>PEDESTRIAN VISIBILITY SPACES</u>
	<u>ACTIVE VEHICLE CHARGING POINT</u>
	<u>1 POINT SERVING 2 SPACES</u>
	<u>PASSIVE PROVISION FOR VEHICLE CHARGING POINT</u>

PL03	MINOR AMENDMENTS	LAG	18.08.26
PL02	UPDATED TO HIGHWAYS COMMENTS	LAG	12.08.26
PL01	PLANNING ISSUE	LAG	14.01.26
REV	DESCRIPTION	BY	DATE

PLANNING

CLIENT _____

**BUILDING CONSTRUCTION
PARTNERSHIP**

PROJECT

DENE HOLM, NORTHFLEET, GRAVESHAM,
DA11 8JZ

DRWG TITLE

PROPOSED SITE PLAN

PROJECT	ORIGINATOR	ZONE	LEVEL	TYPE	DIS	NUMBER
1485PL	RDT	ZZ	XX	DR	A	1100
STATUS - SUITABILITY DESCRIPTION						
DRAWN BY		DATE	SCALE	CHECKED BY		
JV		JAN 26	1:200	CC		
RDT PROJECT REF.			PAPER SIZE	REVISION		
1485			A1	PL03		

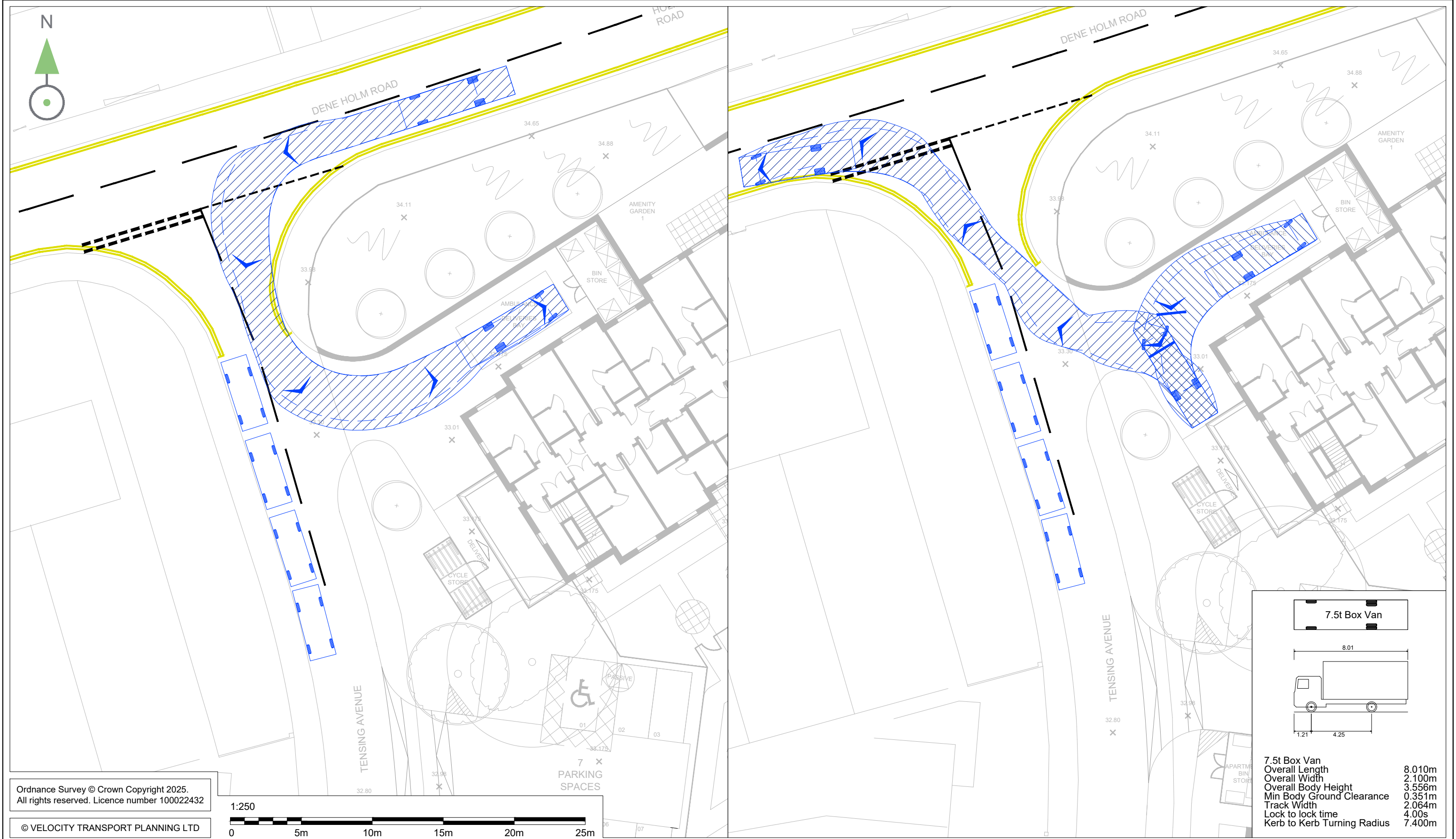


APPENDIX C

DRAWING 25-220-SK-009-D



P:\0-25\25-220 Dene Holm - Northfleet - Gravesend\02 TECHNICAL\B DWGS\1. CAD\DWGS\25-220-SK-009-7.5t Rigid Vehicle Access (FWD).dwg (009) Plotted on: Aug 18, 2026 - 5:53pm by Izakula



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S2 - FOR INFORMATION		DENE HOLM, NORTHFLEET, GRAVESEND										
Client		Drawing Title										
BCP Building Construction Partnership Supporting the Care Industry since 2001		7.5 TONNE RIGID VEHICLE SWEEP PATH ANALYSIS										
Architect		Project Ref		Rev								
RDC ARCHITECTS		25-220		D								
		Drawing Number										
		25-220-SK-009										
		Scale @ A3		Date								
		1:250		18/09/25								
		Designed/Drawn		Checked								
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APPENDIX D

DRAWING 25-220-SK-011-A



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A	18/08/26	FIRST ISSUE	IZ	AM	AM
Rev	Date	Description	Drn	Chk	App

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Drawing Status
S2 - FOR INFORMATION

Client
BCP Building Construction Partnership
Supporting the **Care Industry** since 2001

Architect
RDC ARCHITECTS

Project Title DENE HOLM, NORTHFLEET, GRAVESEND				
Drawing Title AMBULANCE VEHICLE SWEPT PATH ANALYSIS				
Scale @ A3 1:250	Date 18/08/26	Designed/Drawn IZ	Checked AM	Approved AM
Project Ref 25-220	Drawing Number 25-220-SK-011			Rev A

APPENDIX E

DRAWING 25-220-SK-010-A



P:\0-25\25-220 Dene Holm - Northfleet - Gravesend\02 TECHNICAL\B DWGS\I. CAD\DWGS\25-220-SK-010-Refuse Vehicle SPA Option 02.dwg (010) Plotted on: Aug 19, 2026 - 3:30pm by IZakula



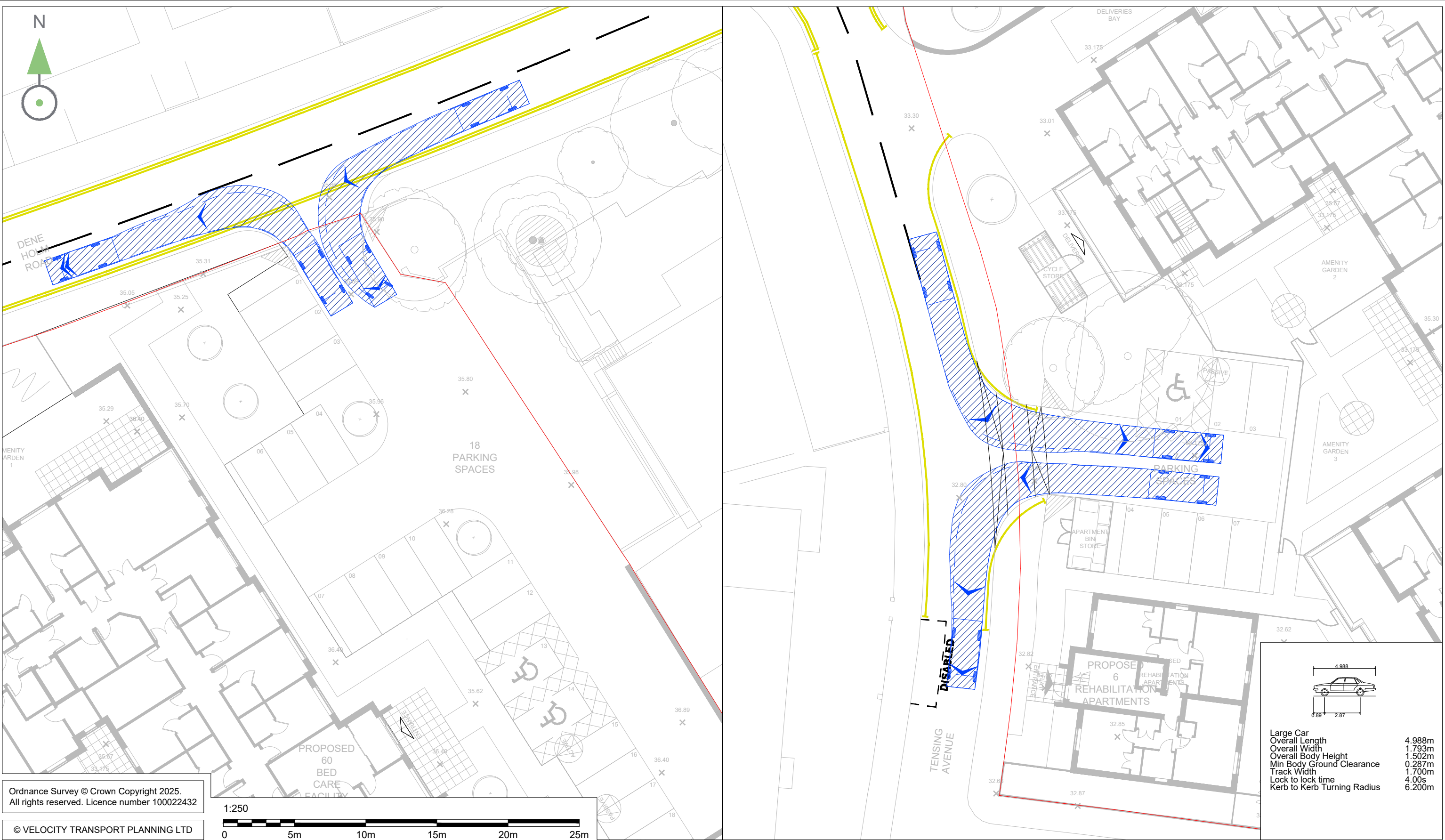
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						Client BCP Building Construction Partnership Supporting the Care Industry since 2001		Drawing Title REFUSE COLLECTION VEHICLE SWEPT PATH ANALYSIS OPTION 02											
						Scale @ A3 1:250		Date 19/08/26	Designed/Drawn IZ	Checked AM	Approved AM								
						Architect RDC ARCHITECTS		Project Ref 25-220	Drawing Number 25-220-SK-010					Rev A					
A	19/08/26	FIRST ISSUE	IZ	AM	AM														
Rev	Date	Description	Drn	Chk	App														

APPENDIX F

DRAWING 25-220-SK-001-D



P:\0-25\25-220 Dene Holm - Northfleet - Gravesend\02 TECHNICAL\B DWG\SI. CAD\DWG\SI\25-220-SK-001-Site Access Swept Path Analysis - Large Car.dwg (001) Plotted on: Aug 18, 2026 - 5:22pm by IZakula



D	18/08/26	UPDATED SITE LAYOUT	IZ	AM	AM
C	22/01/26	UPDATED SITE LAYOUT	CI	ML	ML
B	18/09/25	UPDATED SITE LAYOUT	BKM	CWP	CWP
A	09/09/25	FIRST ISSUE	BKM	TW	TW
Rev	Date	Description	Dnn	Chk	App

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Drawing Status
S2 - FOR INFORMATION

Client
BCP Building Construction Partnership
Supporting the **Care Industry** since 2001

Architect
RDC ARCHITECTS

Project Title
DENE HOLM, NORTHFLEET, GRAVESEND

Drawing Title
SITE ACCESS
SWEPT PATH ANALYSIS OF A LARGE CAR

Scale @ A3 1:250	Date 09/09/25	Designed/Drawn BKM	Checked TW	Approved TW
Project Ref 25-220	Drawing Number 25-220-SK-001			Rev D

