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Transport Statement for McCarthy & Stone Retirement Lifestyles Ltd
GRFC Bowls Club, Church Walk, Gravesend, Kent

November 2022
PL/RS/16623



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1 Introduction

- 1.1.1 DHA has been commissioned by McCarthy & Stone Retirement Lifestyles Ltd to provide transport planning advice in relation to land at the GRFC Bowls Club, off Church Walk, in Gravesend, Kent.
- 1.1.2 This Transport Statement (TS) has been produced in accordance with the Planning Practice Guidance (March 2014).
- 1.1.3 Following this introduction, the TS is structured as follows:-
- Section 2 summarises the existing transport conditions local to the site;
 - Section 3 sets out the development proposals;
 - Section 4 provides an assessment of compliance with transport planning policy;
 - Section 5 looks at the forecast vehicular trip generation of the proposals; and
 - Section 6 provides a summary and conclusion.

2 Existing Transport Conditions

2.1 The Existing Site

- 2.1.1 The current site consists of a bowling green, club house and associated outbuildings located at the northern end of Rectory Field Playing Fields (postcode DA12 2QU). The site was previously in use by GRFC Bowls Club but is currently vacant.
- 2.1.2 The site is located to the south of the A226 Milton Road, approximately 1.0km from the centre of Gravesend and is bounded by Ellerslie to the west and Church Walk to the east. The site location is shown in its local context in Figure 2-1 below.

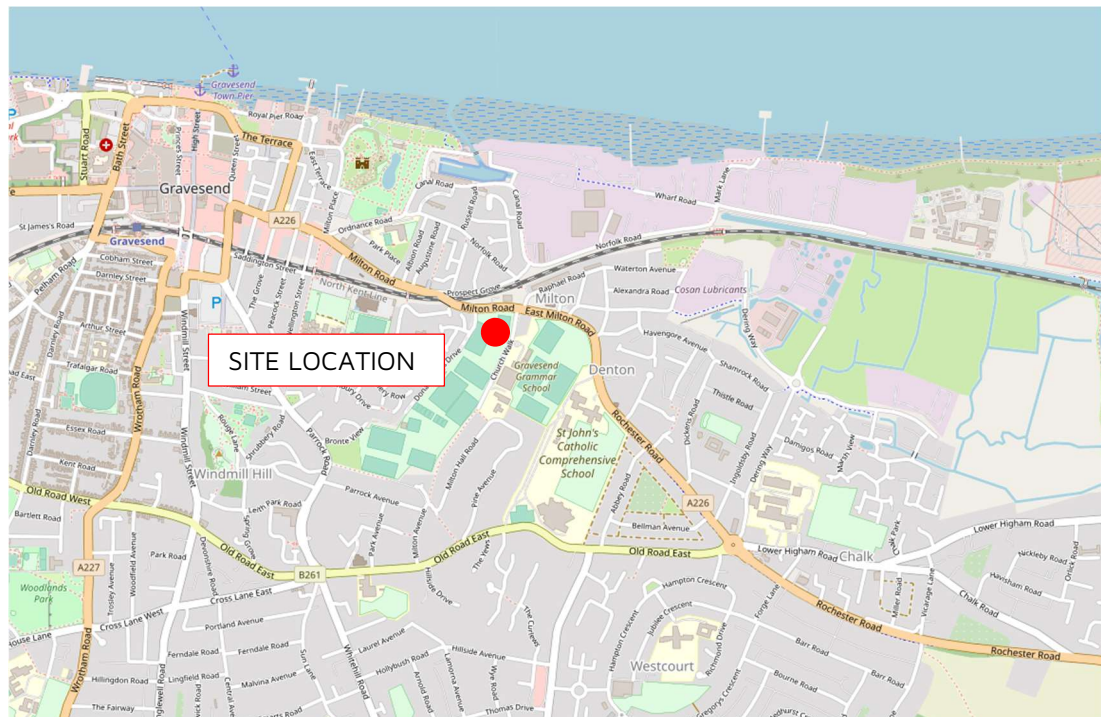


Figure 2-1: Site Location (courtesy of OpenStreetMap.org)

2.2 Local Highway Network

- 2.2.1 Milton Road (A226) runs east-west along the site frontage and is subject to a 30mph speed limit at this point. Travelling eastwards, Milton Road becomes East Milton Road from the junction with Raphael Road. It forms part of the Secondary Route Network and provides a direct connection between Gravesend and Strood, where it meets the A2 before crossing over the River Medway. There are a number of local roads that connect to the A2/M2 and avoid Gravesend town centre. Ellerslie is an access road for a small residential estate and the sports club facilities within Rectory Field. Church Walk is the main access for Gravesend Grammar School. The site therefore enjoys ready access to the primary and strategic route networks and thus to a range of local and regional destinations.

2.3 Walking and Cycling Infrastructure

- 2.3.1 Milton Road has footways along both sides with regular street lighting and dropped kerbs at side roads. There is a pelican crossing of Milton Road on the site frontage that connects the bus stops on either side of the road. Milton Road crosses over the North Kent railway line, less than 200m from the site, giving a step-free and relatively gentle pedestrian route into the town centre.
- 2.3.2 Several Public Rights of Way (PRoW) are located close to the site, as shown in Figure 2-2 below. Church Walk connects through to Old Road East and the Windmill Hill area. There are other pedestrian connections such as the stepped footbridge over the railway line near Waterton Park towards the Thames

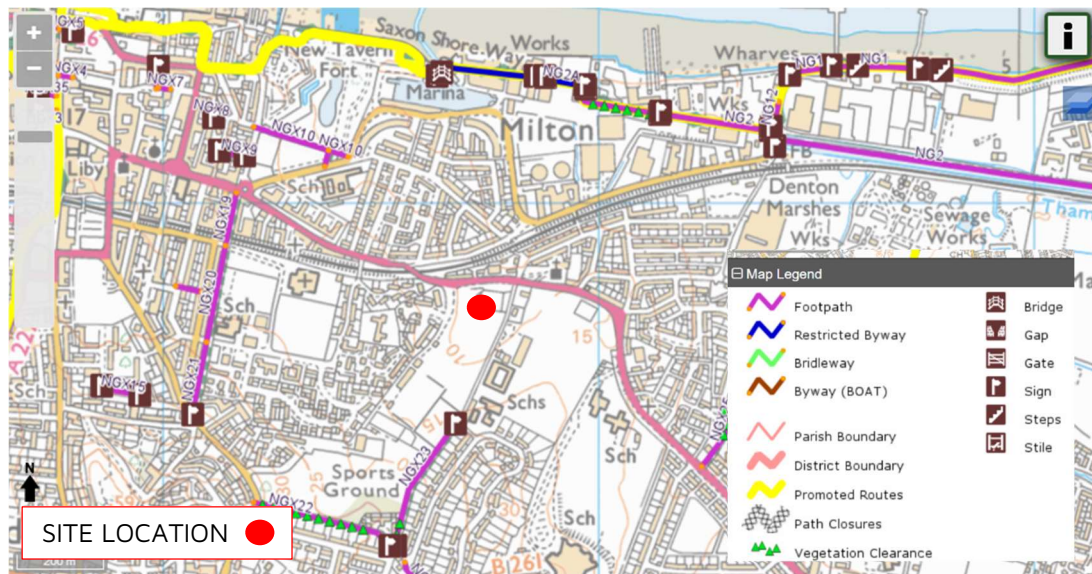


Figure 2-2: Local PRoW Network (courtesy of Kent County Council)

- 2.3.3 National Cycle Route (NCN) 1 is a long-distance cycle route connecting Dover with Scotland. It runs east-west from the Medway Towns alongside the Thames and Medway Canal and then follows Canal Basin onto the promenade, 500m to the north of the site. The route then continues through the Gravesend riverfront area towards Northfleet and Greenhithe. There is also NCN Route 177 that follows the A2 corridor, starting in Rochester and running via Shorne Country Park and the Cyclopark in Springhead where it joins NCN1.



Figure 2-3: Local Cycle Network (courtesy of OpenCycleMap.org)

2.4 Public Transport Infrastructure

- 2.4.1 The closest bus stops to the site are located on Milton Road, approximately 10m from the proposed pedestrian access. A summary of the passenger bus services that call at these stops is provided in Table 2--1 below (school services have been omitted). All passenger bus routes provide a frequent weekday bus service to / from Gravesend town centre and the railway station.

Service No.	Route	Weekday Frequency First/Last Service at Church Road Stop
190 (Arriva)	Gravesend Railway Station – Chalk – Higham – Strood – Rochester – Chatham Waterfront	every 20 mins 05:53/19:20
480/490 Sapphire (Arriva)	Dartford Home Gardens – Bluewater – Swanscombe – Northfleet – Gravesend – Valley Drive/Riverview Park	every 10 mins 04:16/00:36
481 (Arriva)	Riverview Park – Gravesend – Northfleet – Ebbsfleet International – Swanscombe – Bluewater	every 35 mins 06:10/22:20
489 (Arriva)	Denton Lion Garage – Gravesend Barrack Row – Northfleet – New Ash Green – Longfield	1 service per day 15:34

Table 2--1: Local Bus Routes and Frequencies

- 2.4.2 The nearest railway station is Gravesend on the North Kent Line, located approximately 1.2 km from the site. Walking to the station via Milton Road takes 18 minutes, along a fairly direct route. The cycle journey along this route takes 7-8 minutes. There are 280 sheltered cycle parking spaces in the 'Cycle Hub' at the station, which also offers a DIY repair centre and electric bike charging points. There is step-free access to both platforms and step-free interchange between platforms via lifts.

2.4.3 The following Southeastern services operate from the station:-

To London terminals: weekday AM peak

- 3 trains per hour (tph) to London Charing Cross via Sidcup;
- 3 tph to London St Pancras International (part high-speed).

To North/East Kent destinations: weekday AM peak

- 1 tph to Faversham via Medway Towns;
- 1 tph to Ramsgate via Faversham.

2.4.4 The following Thameslink services operate from the station:-

- 2 tph to Luton via London Blackfriars, Dartford & Greenwich.

2.5 Accessibility

2.5.1 The nearest convenience store is a Co-op Food store on Milton Road, approximately 180m from the site, which is open from 07:00 to 22:00 every day (September 2022). Milton Road has local shops along its length, and it takes less than 10 minutes to walk to the edge of the town centre from the site. Gravesend Library is the nearest library, being a 17-minute walk from the site. The nearest Post Office is the Gravesend Delivery Office on Milton Road, an 11-minute walk.

2.5.2 It is noted that there will be no nursing staff on-site; therefore access to health care facilities is an important consideration. There is no direct bus service to Darenth Valley Hospital from the stops on Milton Road, but the hospital can be reached with only one change either at Bluewater or the town centre; the journey time is approximately 45-50 minutes. Gravesend Community Hospital in Bath Street provides services from Kent Community Health NHS Foundation Trust among others and is a 20-minute walk/11-minute bus ride away.

2.5.3 The site lies within the current practice boundaries of five GPs, with Rochester Road Surgery being a 6-minute walk from the site. Two other surgeries/medical centres can be walked in less than 20 minutes. There are four dentists within a 20-minute walk of the site.

2.5.4 As such, it is considered likely that a significant proportion of everyday journeys made from the site will be relatively short distance in nature, in accordance with the National Planning Policy Framework objectives.

2.6 Highway Safety

2.6.1 Personal Injury Collision (PIC) data has been obtained from Kent County Council (KCC) for the area surrounding the proposal site for the most recent three-year study period up to 31st March 2022 (both incident plots and reports are included at **Appendix A**).

2.6.2 A total of seven incidents were recorded on Milton Road/East Milton Road, five of which incidents resulted in 'slight' and two in 'serious' injuries.

2.6.3 Only one of the incidents occurred in the vicinity of the site on Milton Road near the junction with Ellerslie. This incident resulted in three 'serious' injuries and

involved a vehicle travelling west which veered on to the opposite side of the road and collided with a second vehicle, which then collided with a parked vehicle. The incident took place just before midnight on New Year's Eve 2021.

- 2.6.4 The second incident that resulted in one 'serious' injury took place approximately 300m to the east of the site, when a vehicle pulled out from Empress Road on to East Milton Road and collided with a pedal cyclist travelling south-east. Two of the 'slight' injury incidents also took place at the junction of Empress Road, with vehicles pulling out and colliding with traffic on East Milton Road.
- 2.6.5 The three remaining 'slight' injury incidents took place between Raphael Road and Elliott Street. One incident involved a vehicle hitting the back of a motor cyclist, another involved a moped rider falling off after failing to navigate a gentle bend and the third involved a vehicle veering on to the opposite side of the road, hitting a second vehicle which then collided with a parked car.
- 2.6.6 The recorded incidents appear to have resulted from road user error, particularly the incident that happened in the immediate site vicinity. It is therefore considered unlikely that the proposed development would materially exacerbate the highway safety record in this location.

3 Development Proposals

3.1 Overview

- 3.1.1 The proposal is for a four-storey, 62-unit retirement living complex with a mix of 33 no. 1-bedroom units and 29 no. 2-bedroom units plus communal living areas and an on-site bistro serving subsidised hot food. The residents will be over 70's 'frail elderly' with limited care requirements and living independently. The proposed site location and layout plans are included at **Appendix B**.

3.2 Access

- 3.2.1 Vehicular access to the site will be from Ellerslie by way of a simple priority junction, 27m to the south of the junction with Milton Road. An initial carriageway width of 6.0m will be provided on entry to the site, running through a parking court with bays on both sides before entering a second parking court. Three disabled parking bays are included in the second parking court, opposite the main building entrance and a further two spaces are capable to being converted to meet possible future demand.
- 3.2.2 The access has 6m kerb radii, with 1.8m wide footways and a pedestrian dropped crossing with tactile paving. The short distance from the access to the junction with Milton Road means that only 2.4 x 25m visibility splays can be achieved. Therefore, a kerb taper is proposed to the bus layby on Milton Road, which will reduce the kerb radii to 8m and encourage lower vehicle speeds of traffic entering Ellerslie from Milton Road. A 4.8m wide dropped kerb emergency access with a gate is proposed to the south of the access to serve the sports fields. The Stage 1 access design is included at **Appendix C**.
- 3.2.3 Pedestrian access to the site is directly from Milton Road, 10m from the aforementioned bus stop, from where a path runs to the north, east and south of the building to reach the main entrance, with a side path on to Church Walk. Access on foot, from the vehicle entrance and parking space to the main entrance, is via the access road.

3.3 Parking

- 3.3.1 A total of 32 unallocated parking spaces will be provided to serve the apartments, of which three will be designed for disabled users. Electric Vehicle (EV) charging facilities will be provided in accordance with Part S of the Building Regulations. Two cycle parking spaces are located in the mobility scooter store, which has capacity for six scooters, along with charging points. An ambulance bay is also provided near the main entrance.

3.4 Site Servicing

- 3.4.1 To ensure that the proposed site layout is accessible to service vehicles, swept path analysis has been undertaken. A refuse vehicle, pantechicon, estate car and fire tender have been assessed. The associated drawings are included at **Appendix D**.

- 3.4.2 The drawings demonstrate that the site layout can comfortably accommodate these larger vehicle movements, ensuring that accessibility to all properties is maintained and that they can access and egress the site in a forward gear.

3.5 Construction Traffic

- 3.5.1 Site offices and welfare facilities will be located on the construction site. Wheel washing equipment will be provided as necessary for construction phases. Access to the construction site will be secured and operated in accordance with current health and safety legislation. Delivery and construction HGV traffic will be accommodated on the construction site, with no requirement for waiting on the public highway. Daily movements of goods vehicles, in particular, will be timed to avoid peak traffic times.
- 3.5.2 Third-party suppliers and contractors visiting the site will be made aware of the construction access and routeing arrangements at the start of the project. Site management will ensure compliance with construction access arrangements.

4 Transport Planning Policy

4.1 National Planning Policy Framework (NPPF)

4.1.0 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other developments can be produced. The NPPF is a material consideration in planning decisions.

4.1.1 At the heart of the NPPF is a presumption in favour of sustainable development. This is reflected in Section 9 of the document where it is noted that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes. The NPPF advises that in assessing sites, it should be ensured that:-

- a) *"Appropriate opportunities to promote sustainable transport 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;*
- c) *The design of streets, parking areas, other transport elements and the content of associated standards reflect current national guidance, including the National Design Guide and the National Model Design Code*
- d) *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."*

4.1.2 Paragraph 111 states that: *"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or if the residual cumulative impacts on the road network would be severe."*

4.1.3 Paragraph 112 then goes on to note that applications for development should:-

- a) *"Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) *Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*

- e) *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."*

- 4.1.4 Paragraph 113 further states that: *"all developments 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."*

4.2 Planning Practice Guidance (PPG)

- 4.2.0 The PPG was established in 2014 as a supporting resource in conjunction with the NPPF, which is also a material consideration in determining planning applications. With respect to transport, the PPG includes a section titled *'Travel Plans, Transport Assessments and Statements in Decision-Taking'*. This provides general guidance on the process of producing these documents.

- 4.2.1 With regard to the purpose of a Transport Assessment or Statement it is noted that:-

"The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or "severe" impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development."

4.3 Local Transport Plan 4 (LTP4): Delivering Growth without Gridlock 2016-2031

- 4.3.1 LTP4 was prepared by KCC and runs from 2016 to 2031. The Plan includes details on how the County Council will meet its transport ambition for Kent, which is:-

"To deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported".

- 4.3.2 This ambition will be realised through five targeted, overarching policies which will aim to deliver specific outcomes for the county:-

"Outcome 1: Economic growth and minimised congestion

Policy: *Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.*

Outcome 2: Affordable and accessible door-to-door journeys

Policy: *Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.*

Outcome 3: Safer travel

Policy: *Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.*

Outcome 4: Enhanced environment

Policy: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.

Outcome 5: Better health and wellbeing

Policy: Provide and promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality."

- 4.3.3 Within LTP4, KCC outlines Strategic, Countywide and Local strategies for achieving the above outcomes, whilst continuing to promote and deliver 'Growth without Gridlock'.

4.4 Gravesham Local Plan Core Strategy

- 4.4.1 The Core Strategy was adopted by Gravesham Borough Council (GBC) in September 2014 and is the Council's principal document within its Local Plan, setting out the main planning policy objectives for the Borough up to 2028.

- 4.4.2 With regard to transport, Strategic Objective 7 is to:-

"Enhance the Borough's public transport network to serve existing and new neighbourhoods and communities in Gravesend, Northfleet and Ebbsfleet."

- 4.4.3 Policy CS11 states the following:-

"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 will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport and accessibility to services and facilities..."

The Council will seek improvements to walking and cycling facilities and networks in the Borough including provision in new development as appropriate..."

4.5 Gravesham Local Plan First Review (saved policy)

- 4.5.1 Although the adopted Core Strategy replaces a number of the policies contained within the Local Plan (First Review), those which were 'saved' by the Secretary of State will remain applicable in the determination of planning applications.

- 4.5.2 Policies T1 to T3 are in accordance with general policy outlined by the Local Highway Authority with respect to the use of the highway network. These are set out as follows:-

"Policy T1: The Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments

are adequately served by the highway network identified on the Proposals Map.

Policy T2: The Local Planning and Highway Authorities will seek to channel all traffic travelling through Gravesend on to the primary road network and to channel traffic between and within residential, industrial and principal business districts of the Borough onto the district distributors.

Policy T3: The Local Planning and Highway Authorities will not normally permit any proposed development that generates significant volumes of commercial vehicle traffic, if it is not well related to the primary and district distributor network."

4.5.3 In addition, **Policy T5** relates to the formation or intensified use of an access to the main highway network as identified on the Proposals Map, stating that this would not usually be permitted unless it can be demonstrated that there would be no safety implications and that the access is designed to a suitable standard which is acceptable to the Local Planning and Highway Authorities.

4.5.4 **Policy P3** states that the Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, unless justified as an exception. It also states that all vehicle parking provision should normally be made on the development site.

4.6 Parking Policy

4.6.1 GBC's adopted parking policy is taken from the Kent and Medway Structure Plan: Supplementary Planning Guidance 4 (SPG4, 2006). This outlines the maximum parking standards required for Land Use Class C2 Residential Institutions, which are as follows:-

Maximum Vehicle Parking Standards

	Goods Vehicles	Car Parking	
		Employees	Residents/visitors
Nursing/Residential Care Homes	Minimum of 1 space for an Ambulance (see Note 1)	1 space per resident staff + 1 space per 2 other staff	1 space per 6 beds or residents
Hospitals & Hospices	See Notes 1 & 2	1 space per 2 staff	2 spaces per 3 beds
Residential Schools, Colleges or Training Centres	See Note 1 & 3	1 space per resident staff + 1 space per 2 other staff	1 space per 15 students
Notes:	1. Adequate facilities should be provided to enable delivery vehicles to park and manoeuvre clear of the public highway. 2. Sufficient ambulance bays and/or parking should be provided to meet the operational needs of the development. Exact details should be agreed with the Local Planning Authority. 3. At special schools there is a need to include appropriate additional spaces for ambulances, taxis and coaches		

Table 4-1: Excerpt from SPG4 Maximum Vehicle Parking Standards for Residential Institutions

4.6.2 Cycle parking requirements are also set out in SPG4. The minimum requirement for Extra Care Accommodation is one space per ten beds, as confirmed in Table 4-2 below.

Minimum Cycle Parking Standards

Hospitals & other residential institutions offering a level of care	1 space per 10 beds
Residential schools, colleges & training centres	1 space per 5 students

Table 4-2: Excerpt from SPG4 Minimum Cycle Parking Standards for Extra Care Accommodation

- 4.6.3 Approved Document S of The Building Regulations 2010 outlines the infrastructure required for the charging of Electric Vehicles (EVs). This approved document is part of the 2021 edition of the Regulations and took effect in June 2022.
- 4.6.4 Requirement S1 outlines the guidance for the erection of new residential buildings:-
- "(1) A new residential building with associated parking must have access to electric vehicle charge points as provided for in paragraph (2).*
- (2) The number of associated parking spaces which have access to electric vehicle charge points must be -*
- (a) the total number of associated parking spaces, where there are fewer associated parking spaces than there are dwellings contained in the residential building; or*
- (b) the number of associated parking spaces that is equal to the total number of dwellings contained in the residential building, where there are the same number of associated parking spaces as, or more associated parking spaces than, there are dwellings."*
- 4.6.5 A storage area for mobility scooters and bicycles will be provided within the ground floor of the building by the main entrance, with direct step-free access to the outside and internally. There is space for six scooters and two bicycles and charging points will be provided.
- 4.7 Policy Compliance**
- 4.7.1 The proposed development is seen to comply with all levels of transport planning policy. The NPPF accepts that levels of access by sustainable travel modes will reflect the setting of the site and given that the proposal site is within walking distance of a number of everyday services and facilities, it is considered that it has good accessibility.
- 4.7.2 With respect to local policy, the proposed development traffic impacts are not considered to be 'severe', as demonstrated in Section 5 of this report. The site is considered to be suitable to accommodate the proposed development in terms of highway design and safety implications. A review of the local highway safety record has found that the development proposals are unlikely to materially exacerbate any pre-existing highway safety concerns.

- 4.7.3 As detailed above, for the 62 units, a total of 32 parking spaces will be provided, which will include three spaces for disabled people, a further two spaces that can be converted to disabled bays in response to possible future demand, and an ambulance bay. This level of provision is seen to accord with the maximum standards detailed above and the needs of the site, as be detailed in the following section. Two cycle parking spaces will be provided, and EV charging facilities are to be developed in accordance with Part S of the Building Regulations.

5 Trip Generation and Transport Impacts

5.1 Overview

- 5.1.1 This section outlines the methodology employed to calculate the likely vehicle trip generation of the proposed development. It also considers the principal transport impacts that could arise from the proposals.

5.2 Proposed Development Vehicle Trip Generation

- 5.2.1 The vehicle trip generation of the proposed development has been calculated with reference to the national TRICS trip rate database using the '02 - Residential Institutions' land use and the 'F - Care Home (Elderly Residential)' category. Only TRICS survey sites outside of London, in England, Scotland and Wales, have been considered, with a range of dwelling numbers in 'Edge of Town Centre' and 'Suburban Area' locations to provide a suitably large and representative dataset. Weekday periods were assessed to provide a robust consideration of the peak trip generation periods. A summary of the resulting TRICS trip rates is provided below in Table 5-1. Please note that any apparent inaccuracies in the totals are due to rounding to whole numbers in MS Excel.

- 5.2.2 The full TRICS report for this assessment is included at **Appendix E**.

Period	Arrivals	Departures	Total
AM Peak (0800-0900)	0.076	0.048	0.124
PM Peak (1700-1800)	0.062	0.112	0.174
Daily (0700-1900)	0.898	0.853	1.751

Table 5-1: TRICS Trip Rates – Care Home – Elderly Residential

- 5.2.3 These trips have been factored against the total number of units proposed for the site, as shown in Table 5-2 below.

Period	Arrivals	Departures	Total
AM Peak (0800-0900)	7	4	11
PM Peak (1700-1800)	4	8	12
Daily (0700-1900)	82	77	159

Table 5-2: Total Trip Generation – Care Home – Elderly Residential (91 residents)

- 5.2.4 It is noted that a total of 158 vehicle trips could be expected to and from the proposed development during the 12-hour weekday period. Of these, eleven trips are expected to take place in the AM peak hour and 12 trips in the PM peak hour. Overall, this would equate to 13 movements per hour across the 12-hour day, or approximately one movement every five minutes on average, which is not considered to represent a significant or 'severe' highway impact in accordance with Paragraph 111 of the NPPF.

5.3 Transport Impacts

- 5.3.1 This section summarises the potential transport impacts of the proposed development, principally with respect to parking. GBC Highways suggest that car parking provision would be something in the region of 62 spaces for the flats and 9 more for the staff, since they consider the development to be 62 flats with an additional requirement for staff. The applicant considers that the proposed development is Class C2 Extra Care Accommodation and therefore the parking provision should be 15 spaces for residents (1 space per 6 beds or residents as per SPG4) and three spaces for staff (1 space per resident staff and 1 space per 2 other staff).
- 5.3.2 Research¹ conducted for McCarthy Stone (the end user of the proposal) by Dr Allan J Burns Traffic and Transportation Consultant recommends a provision of 0.52 spaces per apartment (based on an average 30% of 2-bedroom apartments) which is met by the proposed parking provision. It also states that other factors to be taken into account are the accessibility of the site and the level of car ownership of residents imposed by McCarthy Stone's parking permit scheme, both of which are pertinent in this case.
- 5.3.3 A review of car ownership for those aged 65+ has also been made for the Middle-Layer Super Output Area (MSOA) in which the site is located (Gravesham 011). Table 4-2 shows that 29% of those aged 65+ that are resident in the local area have no car or van in their household, compared to 7-9% for all other age ranges. Only 22% of those aged 65+ have 2 or more cars or vans in their household, compared to the average of 50% for the local area.

Age	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Age	9,822	11%	39%	50%
Age 0 to 15	1,906	8%	41%	51%
Age 16 to 24	1,110	8%	28%	63%
Age 25 to 34	1,184	9%	39%	52%
Age 35 to 49	2,203	8%	38%	54%
Age 50 to 64	1,876	7%	36%	57%
Age 65 and over	1,543	29%	49%	22%

Table 5-3: Car Ownership by Age in MSA Gravesham 011
(Source: Census 2001 - Table LC4109EW)

- 5.3.4 Since car ownership declines with age and the average age of residents in this type of development is over 70 years old, it is envisaged that those who do not own a car will be higher than 29%. Residents are classed as the 'frail elderly', which have the support of a warden or other staff. It will also be the case that a limit of one car parking space per apartment would be applied for those residents who do own a vehicle, which will be enforced by the aforementioned permit system.

¹ Dr Allan J Burns (2016), *Assisted Living Developments: Report on Transport Impact and Parking Provision*

- 5.3.5 Similarly for cycle parking, since future residents will have an average age of over 70 years old, they will be less likely to cycle than those in unrestricted housing and therefore there is provision for two bicycles in the mobility scooter store.
- 5.3.6 For staff parking, there will be a mix of full and part-time staff which broadly equates to between 14 and 17 full-time equivalent posts. Generally, there would be 5-7 members of staff on-site during the busiest part of the day and 1-2 staff to cover the night shift. McCarthy Stone aim to employ staff from the local area, who would be encouraged to use sustainable forms of transport to get to the site; therefore no allocated staff parking is proposed. In view of the highly-accessible edge-of-town-centre location of the site, this is considered entirely appropriate and in accordance with national and local planning policy.

6 Summary and Conclusion

- 6.1.1 This Transport Statement has been prepared on behalf of McCarthy & Stone Retirement Lifestyles Ltd in support of the proposed retirement living complex at the site of the GRFC Bowls Club in Gravesend, Kent.
- 6.1.2 The proposed development comprises the construction of 62 no. 1 and 2- bedroom residential units, with a new access from Ellerslie.
- 6.1.3 Following a review of national and local transport planning policy, no conflicts are envisaged. The site is adjacent to local bus stops with regular services to Gravesend town centre and other local and regional destinations. A convenience store is situated less than 200m from the site and there is a range of health and community services in the local area. Future residents will therefore have the opportunity to undertake everyday journeys by non-car means.
- 6.1.4 The review of Personal Injury Collision data contained in this report confirms that the proposed development should have no material adverse impacts in this regard.
- 6.1.5 The proposed level of on-site vehicle and cycle parking accords with the locally-applied maximum standards, the highly accessible urban location of the site and the vehicle ownership and usage characteristics of residents with an average age of 70+ years old.
- 6.1.6 It has been demonstrated that the proposed development has the capacity to generate approximately 158 vehicle trips across the 12-hour weekday period (0700-1900), equating to approximately 13 movements per hour on average. It is not considered that this represents a 'severe' impact with reference to Paragraph 111 of the National Planning Policy Framework.
- 6.1.7 Given the above, it is concluded that the proposed development should not have any adverse transport impacts and therefore there should be no sound transport-based objections to the planning application.