



# Former Battle of Britain Site, Coldharbour Road, Gravesend, DA11 8NT

**Planning Supporting Statement (incorporating Statement of Community Engagement)**

November 2022

FRONTIER

**Gillings**  
Planning

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## Project Ref:

FRON1094

## Date of issue:

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# Introduction

1

**1.1** This Planning Statement (incorporating the SCI), prepared by Gillings Planning on behalf of Frontier Estates ('the Applicants'), is submitted in support of an application for full planning permission for a 65-bed care home on land at the Former Battle of Britain Site, Coldharbour Road, Gravesend, DA11 8NT.

**1.2** The description of development for which planning permission is sought is as follows:

*'Construction of a care home (within Class C2), parking, access, hard and soft landscaping and other associated works.'*

**1.3** This Statement provides a planning analysis to demonstrate that the submitted proposals are acceptable in planning terms and in accordance with relevant planning policy and guidance.

**1.4** **Table 1.1** sets out the documents submitted in support of the planning application which should be read alongside this Planning Statement and the plans and drawings are listed within the covering letter for the planning application submission.

**Table 1.1: Schedule of Supporting Documentation**

| Document                                            | Technical Consultant  |
|-----------------------------------------------------|-----------------------|
| Air Quality Assessment                              | Hawkins Environmental |
| Architect Plans                                     | HIA                   |
| Biodiversity Net Gain Metric                        | TLP                   |
| Daylight and Sunlight Assessment                    | Hawkins Environmental |
| Drainage Strategy                                   | Fairhurst             |
| Ground Investigation                                | Applied Geology       |
| Landscaping Plan                                    | TLP                   |
| Noise Assessment                                    | Hawkins Environmental |
| Planning Application Form and Ownership Certificate | Gillings Planning     |
| Preliminary Ecological Appraisal                    | TLP                   |
| Sustainability Report                               | Turley                |
| Transport Statement                                 | RHDHV                 |
| Travel Plan                                         | RHDHV                 |
| TS / AIA / AMS                                      | TLP                   |

**1.5** The remainder of this statement is structured as follows:

- Section 2: Site Location and Description (including Planning History)
- Section 3: Development Proposals
- Section 4: Statement of Engagement
- Section 5: Planning Policy Context
- Section 6: Planning Analysis
- Section 7: The Planning Balance

# Site Location and Description

## 2

### Site and Surrounding Area

**2.1** The application site extends to 0.49ha in area and forms a previously developed site located within the defined urban boundary of Gravesend, Northfleet and Ebbsfleet. The site is located to the east of Coldharbour Road and to the south of New House Lane. It is currently vacant and secured with hoardings along all boundaries.

**2.2** The site was formerly occupied by the Battle of Britain public house which was demolished in 2016 by the previous owner of the site. Frontier Estates have since purchased the site. Prior to Frontier Estates involvement, planning permission was granted for the erection of 20 residential dwellings on the site on the 9th December 2020 under application ref. 20171245.

**2.3** Existing access is from Coldharbour Road, close to the junction with New House Lane. There is a historic pedestrian access along New House Lane which was once served by a set of steps due to the levels difference between the site and the road. There is a bank along the New House Lane boundary with trees close to and on the corner



Image courtesy of Google

of New House Lane and Coldharbour Road. The Beech tree on the corner is protected by a TPO (ref. TPO\_1994\_003).

**2.4** The site is located within Flood Zone 1 and so is at the lowest risk of flooding. It is not within a Conservation Area and there are no Listed Buildings on site. The closest Listed Buildings in the surrounding area are a significant distance from the site.

**2.5** To the south of the site is St Clement's Catholic Church. This comprises a 1.5 / 2 storey detached building accessed from St Clement's Close that operates as a satellite to the main Catholic Church at The Hill Northfleet. To the rear of the church are residential properties at 1 – 12 St Clements Close. These properties are 2-storeys in height and arranged in a back to back layout with a shared parking court in front.

**2.6** On the opposite side of St Clement's Close is the Kent Fire and Rescue Service Thames Side Fire Station. This is an active fire station accessed from Coldharbour Road which includes ancillary office accommodation and a training tower.

**2.7** Further along Coldharbour Road and next to the fire station is the Thameside Ambulance Station. As with the fire station, this is an active ambulance station accessed from Coldharbour Road which also includes ancillary office accommodation.

**2.8** On the opposite side of Coldharbour Road is the large Durdale recreation ground.

**2.9** To the east of the site is Shears Green Infant School and its associated playing field which backs onto the site and extends up to Peckham Road.

**2.10** Further to the north east, is the Lawrance Square Local Centre which provides local facilities for the community.

**2.11** With the exception of these uses, the surrounding area is predominantly residential in character. Residential properties within the surrounding area are typically 2-storeys in height, comprise a mixture of brick and render and include a range of terraced, semi-detached and link-detached properties.

**2.12** The closest bus stops are located along New House Lane and Coldharbour Road and are served by the following:

- No. 305 operated by 1st Bus Stop which provides a connection between Trosley Country Park and Gravesend specifically to serve the Northfleet Girls School and Mayfield Girls School.
- No. 481 operated by Arriva which provides a connection between Riverview and Bluewater Shopping Centre, including Northfleet and Gravesend.
- No. 483 operated by Arriva which provides a connection between Kings Farm and Bluewater Shopping Centre, including Northfleet and Gravesend.
- No. 736 operated by Redwing Coaches which provides a connection between Lower Higham and Temple, including Northfleet and Gravesend.

**2.13** There is a grass verge and footpath outside the site along Coldharbour Road. Along New House Lane is a bank which leads to a footway next to the bus stop.

## Planning History

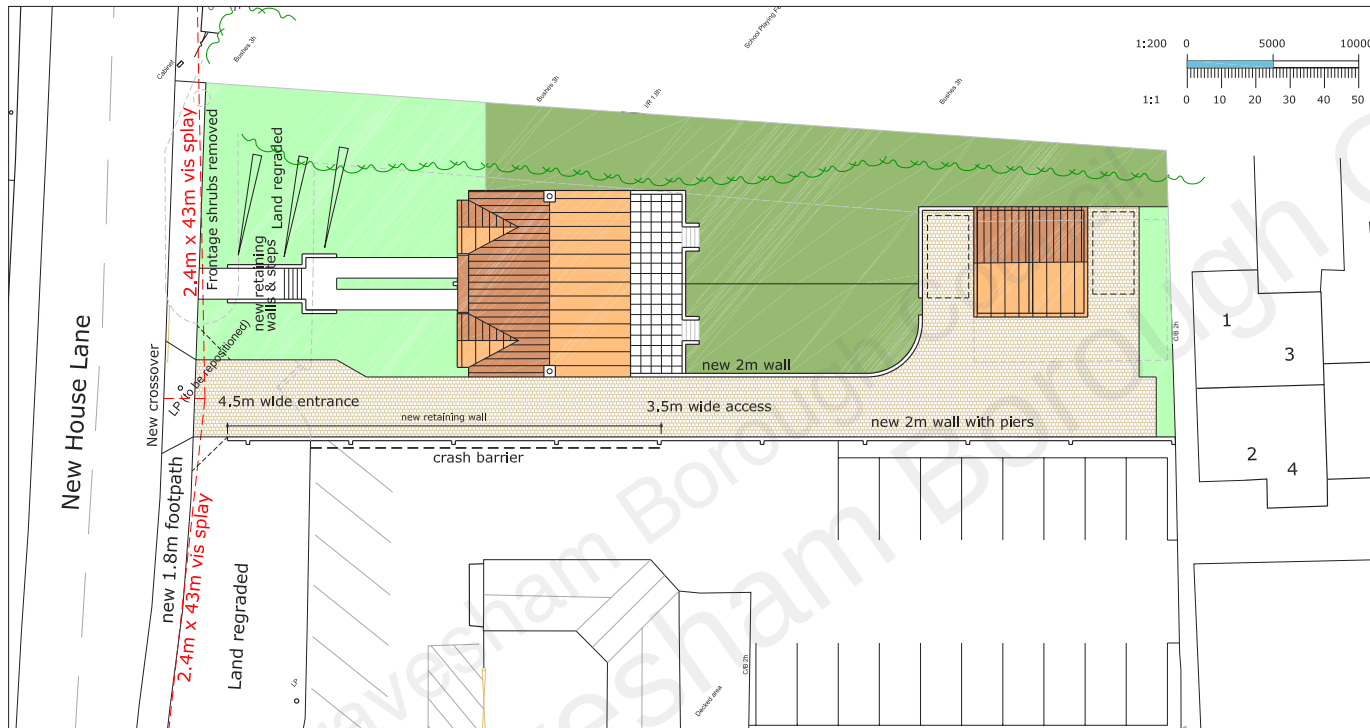
**2.14** Works to a tree covered by a TPO (the Beech tree on the corner of Coldharbour Road and New House Lane) were approved under ref. 20211091 on the 25th October 2021.

**2.15** Planning permission was granted under ref. 20171245 for the construction of 20 residential properties on the 9th December 2020. This included 6 houses and 14 flats with a new access from New House Lane.



Approved site plan for former housing scheme

**2.16** Planning permission was granted under ref. 20120373 for the erection of a pair of semi-detached 3-bedroom dwellings on the 25th September 2012. This included a new access from New House Lane.



Approved site plan for former housing scheme.

**2.17** Outline planning permission was refused under ref. 20040296 for the erection of 18 flats in the car park of the former pub on the 25th August 2004.

# Development Proposals

3

## Overall Concept

**3.1** This planning application seeks approval for the re-use of this previously developed site through the construction of a 65-bed care home within use class C2. The proposed development is described in full in the Design and Access Statement, which accompanies the planning application, but is set out in broad terms below.

**3.2** The proposed care home will provide high quality accommodation for the elderly, with the capability for all care needs to be met on site. It is likely to be dual-registered, so that it can deliver both nursing and residential care, enabling the provision of dementia-specific care. The 65 bedrooms are single occupancy, exceed CQC standards and all have wetroom provision, something which is required for a care home to be considered as 'market standard'.





## Proposed Use and Layout

**3.3** The care home is designed to respond to differing resident needs and is likely to be occupied by individuals requiring advanced care and, in many cases, end of life care. As such, each floor benefits from lounge and dining space as well as a nurse's office and a drugs store to ensure that residents can access the care that they need. In addition, the home benefits from communal facilities in the form of a café, family room, activity rooms, a hair and beauty salon and a cinema. These provide a variety of environments and experiences to ensure that residents are able to lead a varied and enjoyable life.

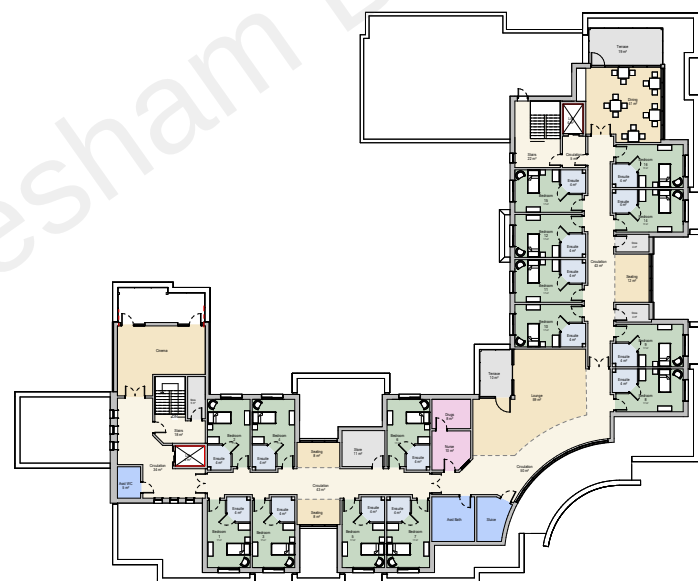
**3.4** Internally, the proposal includes 25 bedrooms at ground floor, 25 bedrooms on the first floor and 15 bedrooms at second floor level.



Ground Floor Plan



First Floor Plan



Second Floor Plan

**3.5** As well as the internal environment, the proposal provides high-quality external amenity space for residents. The residents garden will be located in the centre of the site, positioned behind the building and set away from New House Lane and Coldharbour Road. This area will provide seating and a multipurpose lawn for events and games. Most bedrooms on the ground floor will have individual patios separated by planting and leading to the residents garden. Terraces will be provided throughout to serve as an alternative outdoor amenity space for residents.

**3.6** The proposed facility allows individual residents to receive varying degrees of support and care, which will be provided by the on-site care team that will be present 24-hours a day. The work will comprise shift patterns of c. 22 staff during the day (1 staff member per 3 residents) reducing to c. 13 staff during the evening (1 staff member per 5 residents). The care team will not sleep on site. It is anticipated that the care home will employ c. 70 staff equating to 53 FTE positions.

**3.7** The design approach to the building is for it to be dementia friendly so it will allow for easy navigation both inside and outside ensuring a safe environment. Level access will be provided throughout, to the bedrooms as well as the lounges and dining areas. Lifts will also be provided to all floors to allow easy access for all residents.

**3.8** The proposed care home will take the form of an 'L' shaped building positioned along both Coldharbour Road and New House Lane,

responding to the corner location of the site. The proposed building will be set back from these frontages with a larger set back on the corner to allow for provision of an attractive landscaped edge.

**3.9** A new vehicle access will be provided from New House Lane in a similar location to the access for the approved residential scheme and car parking will be provided in the north eastern corner of the site.

**3.10** The proposals also include the extension of the public footway along New House Lane to connect with the existing footway that begins at the bus stop outside the school playing fields.

## Scale and External Appearance

**3.11** This proposal seeks to effectively utilise a previously developed site within the built-up area of Northfleet.

**3.12** The overall design concept responds to the characteristics of the application site which forms a corner site at the junction of Coldharbour Road and New House Lane. The result is a highly attractive scheme that responds to the commercial requirements of a care home and which will provide an excellent standard of accommodation for residents. Importantly, the proposal makes effective use of the space that is available.

**3.13** Attention has been given to incorporating and addressing comments raised by the Local Planning

Authority at the pre-application stage to ensure that the building is well designed, makes effective use of the site and is an appropriate addition in this location.

**3.14** The overall scale, height and massing of the building has been reduced as much as possible to ensure sympathetic integration with its surroundings whilst still responding to and celebrating the corner location of the site to make effective use of the site and enhance the streetscene.

**3.15** The massing of the building has been broken up through the subtle use of articulation in the elevations, provision of gable features, provision of a corner turning feature and variations within the roof height of the building sections.

**3.16** An interesting and varied palette of materials is proposed including red brick, grey tiles, grey cladding and grey window frames. This will provide visual interest.

**3.17** Importantly, this proposal provides an opportunity to better utilise this site, which is currently vacant and covered by large areas of hardstanding, to develop an attractive corner building in this location.



South East Elevation



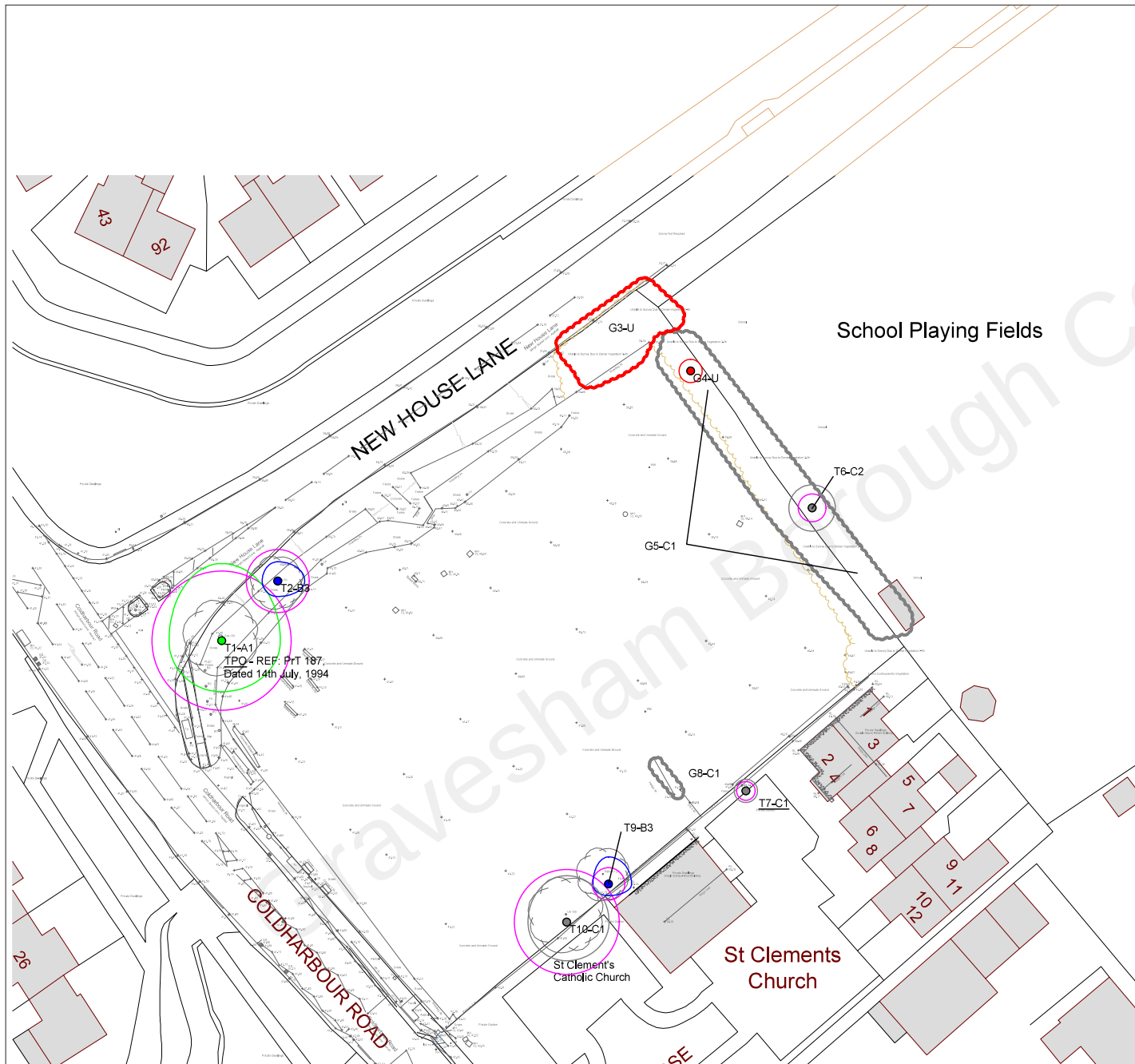
North East Elevation



North West Elevation from New House Lane



South West Elevation from Coldharbour Road



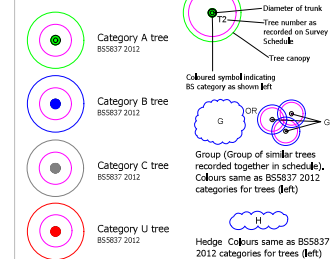
Tree Survey

## Trees, Landscaping and Boundary Conditions

**3.18** A detailed landscaping strategy has been prepared by TLP and accompanies the planning application submission. This shows the proposed layout and general character of the landscaping scheme for the proposed care home. An Arboricultural Impact Assessment and Arboricultural Method Statement prepared by TLP provides further detail on trees.

### Key

#### Tree categories



The above BS categories are judgements of quality and value based on the contribution each tree would be expected to make over a given period of time, categories A, B and C being high, moderate and low respectively. Category U represents trees that, in their current context, should be removed for sound arboricultural reasons. For exact definition of BS categories refer to notes accompanying schedule.

Note: Underlined tree number denotes tree located by eyes. Locations should be checked on site and if necessary drawings amended.

## Trees

**3.19** There are 10 trees / groups of trees / groups of shrubs on site and the accompanying Tree Survey Report, Arboricultural Impact Assessment and Arboricultural Method Statement provides further detail.

**3.20** T1 as referred to in the accompanying report is a Beech tree which is covered by a TPO. A recent application to undertake crown lifting was approved on the 25th October 2021 under ref. 20211091.

**3.21** The majority of trees are to be retained in the proposed scheme.

**3.22** It is proposed to remove a tree and a hedge to accommodate the proposed development. Of these, G3 (Elm) is Category U and G8 (Privet) is Category C1.

**3.23** Other trees which may be affected by the proposed development are:

- T1 (Beech), potentially affected by the construction of a path and boundary railings.
- T2 (Pear), potentially affected by the construction of a path.
- T9 (Silver Birch), potentially affected by the construction of a path.
- T10 (Goat Willow), potentially affected by the construction of a proposed path and utilities. The proposal is to coppice this tree to enable its retention and avoid the collapse of its crown.

**3.24** Pruning work on this tree should be undertaken at an early stage.

**3.25** The sections of path within the root protection area of T1, T2, T9 and T10 will be of 'no-dig' construction. The same applies for the railings within the root protection area of T1 and T2.

**3.26** Tree protection barriers will be erected to protect trees during construction.

## Landscaping

**3.27** The majority of the existing site comprises rough made ground, following the demolition of the former pub and removal of its associated hardstanding areas.

**3.28** The landform is predominantly flat with a steep bank forming the northern boundary along New House Lane. The greatest level difference is in the northern most corner of the site, where there is a c.2m level difference.

**3.29** A large, Category A Beech tree forms a prominent feature within the site, and is a focal point along New House Lane and Coldharbour Road. Vegetation within the site is predominantly located to the boundaries, with an area of scrub in the northern corner of the site. A mixed native species hedgerow forms an effective screen between the site and the school playing fields located beyond the north-east boundary of the site.

**3.30** The site is currently secured by temporary hoarding along its south-western and north-western boundaries. Along the south-eastern boundary, metal railings are located adjacent to the church, and close board fencing adjacent the existing residential properties.

**3.31** The proposals aim to provide an attractive garden setting for the residents, staff and visitors to enjoy, whilst enhancing and strengthening the landscape character of the local setting.

**3.32** There are two access points into the site. A stepped pedestrian path and vehicular access road leads from New House Lane into the car park which is located within the east of the site. A separate pedestrian access without steps is provided off Coldharbour Road, leading along the south-eastern boundary of the site into the car park.

**3.33** Additional native species tree planting is proposed within the car park and around the boundaries of the development, to promote biodiversity net gain, and enhance ecological connectivity. An avenue of native trees is proposed along Coldharbour Road, to provide partial screening of the development and to enhance the character of the road.

**3.34** The majority of bedrooms on the ground floor are to be provided with level access out onto individual patios, separated by planting and leading to circulation footpaths, and communal areas.



**3.35** The café garden is split into two halves, public and private. A public, courtyard style garden is provided adjacent to the car park and lobby access path, with access provided from the café. A central water feature and benches is provided within the space, with low clipped hedgerows and pleached trees providing privacy, and shelter. A private café garden with seating and canopy sail is provided within the central courtyard garden.

**3.36** The central courtyard garden comprises a multi-purpose lawn for events and games with a circular path leading through ornamental planting promoting physical and mental well-being. A 'growing garden' with raised planters is provided forming an activity space for residents.

**3.37** Planting within the car park area aims to create a robust but ornamental setting.

**3.38** A 1.8m timber close board fence is provided along the south-eastern boundary, to provide separation between the existing church and the Site. The metal railings located adjacent to the church car park are to be retained.

**3.39** The metal railings located along the north-eastern boundary are to be retained.

**3.40** Along the north-western and south-western boundaries and to the perimeter of the central courtyard, metal railings 1.8m height are proposed to form a secure boundary to the residential gardens. An evergreen hedgerow is proposed to the rear of the railings, to provide screening and privacy to the development.

**3.41** Boundaries will ensure that the site is safe and secure for residents.

**3.42** The proposals include scope to provide public art to honour the former Battle of Britain public house which once occupied the site. This is proposed to be in the form of a decorative railing next to the main entrance and the applicant is open to discussions on this during the lifetime of the application.

## Access, Servicing and Parking

**3.43** A detailed Transport Statement and Travel Plan have been prepared by RHDHV and submitted alongside this application. These provide further information in relation to access, servicing and parking.

**3.44** Existing access is from Coldharbour Road, close to the junction with New House Lane. This will be removed and replaced by landscaping and appropriate boundary treatments.

**3.45** A new access will be provided along New House Lane. This will be in a similar location to the access for the approved residential scheme albeit positioned slightly further to the east along the frontage.

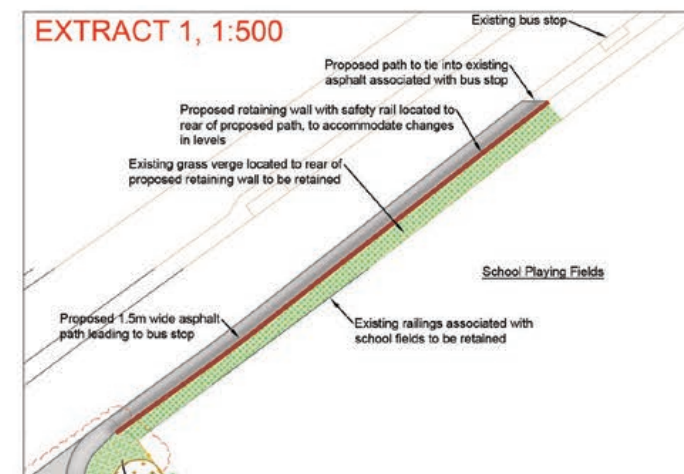
**3.46** Appropriate visibility splays will be provided and will measure 2.4m x 39m to the west and 2.4 x 79m to the east.

**3.47** Vehicle tracking has been undertaken and demonstrates that the proposed site access is suitable for use by refuse collection vehicles,

servicing vehicles and emergency vehicles which are likely to require access to the site. This would allow vehicles to enter and leave the site in forward gear made possible by provision of an on-site turning head adjacent to the service entrance.

**3.48** Pedestrian access will be provided from both Coldharbour Road and New House Lane.

**3.49** The proposals include the extension of the public footway along New House Lane to connect with the existing footway that begins at the bus stop outside the school playing fields. This will be achieved by cutting into the bank along New House Lane and supporting the remaining section with a retaining wall. This footway will extend from the eastern side of the proposed access up to the existing footway at the bus stop. A section of footway will also be introduced on the western side of the proposed access alongside a dropped kerb crossing along New House Lane.



**3.50** 27 car parking spaces including 2 disabled spaces are proposed. An ambulance drop off space is also provided.

**3.51** In order to encourage travel to the site by sustainable modes, a Travel Plan has been prepared and accompanies the application. This seeks to set preliminary targets to reduce vehicular trips to and from the site.

## Drainage

**3.52** A full drainage strategy has been prepared for the site by Fairhurst and should be referred to for full detail. A summary is however, provided below.

**3.53** This document confirms that the site is located within Flood Zone 1 and is therefore, at the lowest risk of flooding.

**3.54** The site is underlain by a layer of made ground of varying thicknesses across the site, with Thanet Sand Formation beneath this. The only deviation from BGS records is the indication that there is potentially a layer of head deposits within the north western corner of the site.

**3.55** Based on the detail provided in the accompanying Ground Investigation, it is anticipated that soakaways would be feasible for on-site drainage. Infiltration testing will however, be required to confirm this. Permeable paving is proposed in the car park with geocellular infiltration blankets underneath to provide an increase in water quality from runoff.

**3.56** The intention is to connect to an existing foul connection that historically served the pub. A drainage trace will be required in order to discover the connection and route. If this is not possible, a new foul connection will be required and will

**3.57** pass through 3rd party land. If this is required, it will be necessary to requisition a sewer to be constructed by Southern Water. This could take the form of a small section of foul sewer into the adopted highway, which will open up the possibility of constructing a foul sewer in the highway by the developer, or a sewer can be requisitioned right up to the site boundary.

**3.58** The proposed drainage infrastructure will be designed to ensure that the proposals do not cause flooding offsite for the 1 in 100 plus 40% climate change rainfall event.

# Statement of Community Engagement

4

**4.1** In accordance with national and local policy and guidance, a full programme of community and stakeholder engagement has been undertaken.

Principal activities included:

- Pre-Application discussions with Gravesham Borough Council (GBC);
- Pre-Application discussions with Kent County Council (KCC) Highways;
- Engagement with Ward Councillors; and
- A community consultation event in the form of a public exhibition.

## Pre-application Discussions

**4.2** In line with Government Guidance on best practice, pre-application discussions were undertaken with planning officers at GBC.

**4.3** A request for pre-application advice was submitted on the 23rd July 2021 under ref. PRE20210313. This included basic massing models but no detailed CGIs.



Original pre-app submission, July 2021

4.4 The first pre-application meeting with the case officer was held on the 10th September 2021. This was a positive meeting which confirmed that:

- There are no issues with regards to the proposed use and nothing to prevent the proposed use coming forwards in this location.
- The layout is the most beneficial regarding the relationship with St Clement's Close.
- The preference is to have the care home provided as a single unit.
- Any scheme should reinforce the street line.
- Consideration should be given to reducing the bulk and mass through provision of rooms in the roof.
- If a 3-storey section is provided on the corner, it needs to be of a higher quality and enhance the area.

4.5 Following the meeting, the design team reviewed the pre-application scheme and amended plans were submitted on the 26th October 2021. These included detailed CGIs which allowed for a better interpretation of the proposals.



Additional images submitted for the pre-app, October 2021

4.6 This amended scheme:

- Relocated bedrooms internally to the ground and first floor from the second floor to allow for the massing to be reduced.
- Included accommodation within the roof served by dormer windows.
- Proposed a more varied roof form including pitched and flat roof sections, gables and hipped sections.
- Provided detailing in the form of projecting bays, recessed terraces, dormer windows and variation in materials to break up the elevations.
- Maintained the layout to reinforce the street line.

4.7 Upon submission of this amended information, further discussions took place with the case officer and the details were shared with Ward Members and Design South East.

4.8 Design South East made suggestions for amendments which are summarised below.

#### ***Design and Visual Impact***

- Consideration should be given to breaking up the mass, introducing more variation in height and creating gaps in the perimeter was suggested.
- Consideration should be given to reconfiguring the development as several smaller buildings connected via covered bridges.
- There is an opportunity to improve the quality of the public realm around the site, providing high quality footpaths and some public amenity.

- The main entrance could be clearer and more celebrated.
- Provision of public art should be considered.
- There is a huge potential for provision of high-quality landscaped features on site and the central communal space is welcomed. Separation with the parking area should be provided and consideration should be given to how this visually relates to the surrounding streets.

#### ***Connections and Highways Considerations***

- Ideally a generous footpath would be provided along New House Lane, connecting the bus stop to the junction of Coldharbour Road and New House Lane.
- Consideration should be given to the provision of two pedestrian accesses, one on Coldharbour Road and one on New House Lane with the main entrance.
- Clarification is required on how emergency services, delivery and refuse collection vehicles will move around the site.

#### ***Other Considerations***

- Consideration should be given to mitigating the impact of noise from Coldharbour Road.
- The design should be driven by sustainability considerations.
- Consideration should be given to opening the café for public use.

4.9 The comments did acknowledge that the submission of further drawings would allow for further understanding of the site and the proposals.

4.10 A follow up discussion with the case officer took place and the formal pre-application response was issued on the 25th April 2022. This confirmed that:

#### ***Principle of Development***

- The site is within the urban area which is considered to be a sustainable location for development.
- There is no objection to the broad principle of development in this location which would bring back into use a vacant site.
- The Council is unable to demonstrate a 5-year housing land supply with delivery substantially below that required by the Housing Delivery Test. The housing delivery element of the local plan is regarded as being out of date and the presumption in favour of sustainable development applies. This means granting permission unless (i) the application of policies in the NPPF protecting areas or assets of particular importance indicate otherwise or (ii) if adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- In determining applications for housing, the Council will apply a weighted balance in favour of granting permission.

### **Design and Visual Impact**

- There is no residential building line along the junction of Coldharbour Road and New House Lane.
- The site is visually prominent in the streetscene.
- The proposal would introduce a 2 – 3 storey building with a variety of roof types immediately alongside the frontage.
- The need for the design and layout for the C2 operation is noted but consideration should be given to further refining the proposal to consider how it could sympathetically integrate with its surroundings whilst also celebrating the sites prominent location.
- A clear reasoning for the design rationale is required in the design and access statement.

### **Highways**

- It is important to demonstrate that safe access can be provided.
- Parking standards for C2 need to be considered, including for cycling, mobility scooters and electric charging.
- There is no footway link to New House Lane adjacent to the access and consideration should be given to introducing a link and to providing pedestrian access from both frontages.

**4.11** The response concluded that further refinement should overcome the points raised in the pre-application response.

**4.12** Section 6 of this planning statement sets out how these points have been addressed in this submission.

## **Highways Pre-application Enquiry**

**4.13** A highways pre-application enquiry was submitted to KCC on the 19th May 2022. A response was provided on the 7th July 2022 and key points can be summarised as:

- The site is a reasonable walking distance from most facilities and bus services.
- The location of the access onto New House Lane is acceptable. The maximum gradient should be reduced from 1:10 to 1:15 to ensure access is acceptable for elderly residents. If possible, steps should be supplemented with a ramp.
- The proposed footpath link is an essential link.
- The provision of 27 spaces is acceptable.
- An ambulance space should be provided primarily for that purpose.
- Trip generation should consider a comparison between the proposed and previous use.
- A travel plan will be required.
- Updated traffic speed surveys are required.
- KCC crash data should be used.

**4.14** Section 6 of this planning statement sets out how these points have been addressed.

## **Engagement with Ward Councillors**

**4.15** A virtual meeting with Councillor Mochrie-Cox was held on the 12th May 2022 to introduce the proposals. Ward Councillors were also invited to and attended the public consultation event.

## **Public Consultation**

**4.16** Following the pre-application discussions, it was agreed with all parties that an exhibition would be the most appropriate way to encourage community involvement with the proposal. A copy of the leaflet can be viewed at **Appendix 1**.

**4.17** As such, an exhibition was arranged for the 4th July 2022 at St Mary's Church of England, Wrotham Road, Gravesend, DA11 7LL. 891 invitations were sent to local residents and other potentially interested parties. An advert was also placed in the Dartford & Gravesend Messenger on Thursday 30th June 2022. A copy of the advert can be viewed at **Appendix 2**.

**4.18** The exhibition comprised boards which set out the background to the proposals and included images of the proposed development. A copy of these exhibition boards can be found at **Appendix 3**.

**4.19** Members of the development team were present at the exhibition, to answer questions from those who attended. A total of 26 people attended the exhibition, including Councillor Mochrie-Cox and Councillor Rolles.

**4.20** Feedback forms were provided at the event and contact details were also provided so that attendees could submit comments at a later date, or ask any further questions. Attendees were asked to submit any further responses by the 15th July 2022 and an online survey was also set up for comments to be provided.

**4.21** A total of 14 responses were received either directly at the exhibition, or afterwards via email or the online survey. Of those responses, 8 supported the proposals (57%), 4 supported the proposals with reservations (29%) and 2 requested further information (14%). No responses objected to the proposals.

**4.22** Of those who responses, and notwithstanding the overall support for the proposals, the main comments raised were as follows:

| Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Response                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Highways</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                   |
| Concerns over access.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | The accompanying Transport Statement confirms that the proposed access is safe. KCC highways also confirmed no safety concerns with this in the recent highways pre-application enquiry.                                                                                                                                                                          |
| Query over whether enough parking is provided for visitors. New house lane is not suitable for parking as it is busy throughout the day.                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Sufficient parking will be provided on site to accommodate the parking demand of the care home. KCC highways also confirmed they are happy with the proposed provision in the recent highways pre-application enquiry. Parking will only be required for staff and visitors as residents will be highly unlikely to be able to drive due to their advanced needs. |
| Query over whether the proposal will generate extra traffic onto New House Lane.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The accompanying Transport Statement confirms that the proposed trip generation is not significant to cause harm to New House Lane.                                                                                                                                                                                                                               |
| <b>Design and Appearance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                   |
| Consideration should be given to provision of a sensory garden.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | The landscaping proposals incorporate measures to enhance physical and wellbeing including a multi-purpose lawn for events and a growing garden with raised planters. It is common for care home operators to also incorporate sensory planting for residents.                                                                                                    |
| Provision of an RAF memorial would be welcomed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | The proposals include scope to provide public art to honour the previous Battle of Britain public house. This is proposed to be in the form of a decorative railing next to the main entrance and the applicant is open to discussions on this during the lifetime of the application.                                                                            |
| 3 storeys is out of context with the local area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The surrounding area is largely 2-storeys but the corner location of the site and the space available provides an opportunity for a 3-storey building. It is considered that the proposed layout and design is appropriate for this location and that it will enhance what is currently a vacant and derelict site.                                               |
| <b>Residential Amenity</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                   |
| Concern over noise and dust associated with construction. There have been ongoing issues with the site since the pub was demolished.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The construction process will be managed appropriately to consider the impact on neighbouring residential properties.                                                                                                                                                                                                                                             |
| Query over whether noise from the school, ambulance station and fire station has been taken into account.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | These have been taken into account and the application is accompanied by a noise assessment which concludes that noise is not a constraint to development.                                                                                                                                                                                                        |
| Disturbance to local residents should be kept to a minimum during construction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | The construction process will be managed appropriately to consider the impact on neighbouring residential properties.                                                                                                                                                                                                                                             |
| <b>Care Provision</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                   |
| Provision of affordable units for local elderly people would be welcomed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | This is at the discretion of the operator who has yet to be determined.                                                                                                                                                                                                                                                                                           |
| <b>Comments in Support</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                   |
| <ul style="list-style-type: none"> <li>The proposal is exactly what the area needs and the care home will be a great asset to the community.</li> <li>This is a very good use for the site with less traffic impact than residential flats.</li> <li>Very impressed and would like a care home in this location.</li> <li>Good to see something benefitting local residents being proposed for this site.</li> <li>Fully support the re-use of this site with a local facility.</li> <li>Hope the Council approves the proposals.</li> <li>The building is attractive and nicely landscaped</li> </ul> |                                                                                                                                                                                                                                                                                                                                                                   |

**4.23** In response to these comments amendments have been made to the proposed scheme. These are outlined in full in section 6.

**4.24** In summary, the applicant has actively engaged with the local community and stakeholders to communicate and develop the proposals. This has met the requirements of the NPPF and the local guidelines, as set out in the Council's SCI. The pre-application engagement has ensured that the local community and key political stakeholders are well-informed of the proposals. Communication with interested parties remains on-going. As such, the applicant considers that the pre-application engagement undertaken with the local community and key stakeholders has been timely, meaningful, and effective.

# Planning Policy Context

5

**5.1** Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning application be made with regard to the Development Plan, unless material considerations indicate otherwise.

**5.2** This is reiterated at paragraph 47 of the National Planning Policy Framework (NPPF), which also makes it clear that the NPPF is a material consideration in decision making.

**5.3** The site is situated within the administrative area of Gravesham Borough Council where the Development Plan comprises the Core Strategy (September 2014) and the saved policies of the Gravesham Local Plan First Review (September 2014).

**5.4** Emerging documents comprise the Local Plan Core Strategy Partial Review and Site Allocations (October 2020) and the Draft Development Management Policies Document (October 2020).

**5.5** The main planning policy considerations pertinent to the proposed development are considered below.

## Core Strategy (September 2014)

**5.6** The site is not subject to any designations according to the adopted local plan.

**5.7** This notes that Coldharbour Road and New House Lane are both local distributor roads (dashed line). It also notes the key site to the east (pink shading) and the local centre to the north east (purple star).

**5.8** The following adopted policies are considered to be relevant.

**5.9 Policy CS01 (Sustainable Development)** advises that planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise. The Council will take a positive approach when considering development proposals that reflects the presumption in favour of sustainable development in the NPPF. Where there are no policies relevant to the application or relevant policies are out of date, the Council will grant permission unless:



Extract from local plan proposals map

- 'Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted'.

**5.10 Policy CS02 (Scale and Distribution of Development)** seeks to provide at least 6,170 new dwellings. Currently, a rate of at least 363 dwellings per year applies between 2019 / 2020 – 2023 / 2024. Development within the urban area is prioritised as it is the most sustainable location. This will be achieved including by:

*'Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites in the Opportunity Areas of Northfleet Embankment and Swanscombe Peninsula East, and Gravesend Riverside East and North East Gravesend to create new residential neighbourhoods and employment areas.'*

*'Bringing forward a range of suitable sites in other parts of the urban area for residential and employment development, including Land at Coldharbour Road Key Site.'*

**5.11** The supporting text notes that Gravesend / Northfleet / Ebbsfleet, i.e. the urban area is the first-tier settlement in the borough and the location which is considered to be most sustainable.

**5.12 Policy CS21 (Land at Coldharbour Road Key Site)** seeks to secure a mixed used development including 500 dwellings, open space, community facilities, office and light industrial.

**5.13 Policy CS07 (Economy, Employment and Skills)** seeks to secure new employment floorspace.

**5.14 Policy CS10 (Physical and Social Infrastructure)** expresses support for proposals and activities that protect, retain or enhance

existing physical and social infrastructure or provide additional infrastructure that improves community wellbeing. Where new development leads to a need for improved physical or social infrastructure, contributions will be sought.

**5.15 Policy CS11 (Transport)** requires development to mitigate its impact on the highway and public transport network. Sufficient parking should be provided in new development in accordance with adopted standards. Improvements to walking and cycling facilities and networks will be sought.

**5.16 Policy CS12 (Green Infrastructure)** seeks to secure a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors. Adverse impacts on priority habitats or species should be avoided on development sites and opportunities to enhance biodiversity will be encouraged.

**5.17 Policy CS14 (Housing Type and Size)** seeks to secure a mix of housing including provision of sheltered housing and extra care housing for people with special needs on suitable sites in locations with access to a range of services.

**5.18** The supporting text notes that the concentration of residential institutions should be controlled to protect local character.

**5.19 Policy CS15 (Housing Density)** advises that sites will be developed at a variety of densities depending on their location and accessibility to public transport. Proposals are required to make effective use of land.

**5.20 Policy CS18 (Climate Change)** directs development to areas at the lowest risk of flooding and seeks to ensure the impact of drainage from new development is minimised. This includes a requirement that surface water run off from new development has no greater adverse impact than the existing use. The use of sustainable drainage systems where technically and financially feasible is also encouraged. Regarding water demand, this policy seeks to ensure that non-residential developments of 1000 sq. m or more meet the BREEAM Excellent standard for water efficiency and include provision for the collection of rainwater. Regarding carbon reduction, this policy seeks to support proposals which lead to a reduction in the carbon footprint.

**5.21 Policy CS19 (Development and Design Principles)** seeks to ensure that new development is visually attractive, fit for purpose and locally distinctive. Development is required to:

- Conserve and enhance the character of the local built, historic and natural environment.
- Integrate well with the surrounding local area and meet anti-crime standards.
- Incorporate sustainable construction standards.
- Be adaptable to changing lifestyles.
- Use the collaborative approach in Building for Life 12 and in Kent Design guidance to ensure a positive contribution to the streetscene is made. This will include taking account of scale, height, building lines, layout, materials and architectural features of adjoining buildings. Consideration of wider context including strategic views and site topography is also required.

- Be located to safeguard the amenity of its occupants and neighbours including privacy, daylight and sunlight. Adverse impact from noise, air, odour, light pollution and land contamination should also be avoided.
- Be accessible to all members of the community.
- Include hard and soft landscaping and public art.
- Provide appropriate levels of public and private amenity space.
- Provide car parking that is well related to the area it serves.
- Enhance biodiversity and deliver environmental enhancements where opportunities arise.
- Take opportunities to build in resilience to climate change.
- Provide appropriate facilities for the storage and recycling of waste.
- Create a safe and secure environment.

**5.22 Policy CS20 (Heritage and the Historic Environment)** places high priority on the preservation, protection and enhancement of heritage and the historic environment.

## Saved policies of the Gravesham Local Plan First Review (September 2014)

**5.23 Policy H6** relates to provision to meet special housing needs and advises that the Council will support in principle, proposals from housing associations, the private sector and other

organisations. It advises that for residential hostels and homes, clusters will be avoided to ensure harm to character doesn't occur.

**5.24 Policy T1** advises that the impact on the transport network will be assessed in proposals for new development.

**5.25 Policy T5** advises that new accesses or the intensification of accesses to the highway network will be permitted where no danger will arise and where a properly formed access can be created in a location and to a standard that is acceptable to the local planning and highway authorities.

**5.26 Policy P3** requires provision for vehicle parking in accordance with Kent CC Vehicle Parking Standards as interpreted by Gravesham Borough Council unless justified as an exception. All parking should be provided on the development site.

## Regulation 18 Stage 2 Consultation

**5.27** Regulation 18 Stage 2 consultation was undertaken in October 2020 in response to a review of the adopted Core Strategy which indicated that there is a need to update the following policies:

- Local Plan Core Strategy Policy CS02: Scale and Distribution of Development,
- Local Plan Core Strategy Policy CS07: Economy, Employment and Skills and
- Local Plan Core Strategy Policy CS08: Retail, Leisure and the Hierarchy of Centres

**5.28** This consultation included Part 1: Local Plan Core Strategy Partial Review and Site Allocations (October 2020) and Part 2: Draft Development Management Policies Document (October 2020).

**5.29** Submission of these documents for examination was targeted for October 2021 but there have been no updates since this stage 2 consultation.

## Part 1: Local Plan Core Strategy Partial Review and Site Allocations (October 2020)

**5.30** This document notes the following:

- The Borough's population aged 65-84 will increase by 25% between 2018-36, while those 85+ will increase by 50% during the same period.
- An increase in those over 65 and therefore those in retirement will increase demand for goods and services linked to meeting the needs of older people, e.g. handy person services, garden maintenance, cleaning, cooking, health services, social care, specialist housing, etc.
- The 2018 based Household Projections identify that the number of households in the Borough will increase by 2% between 2020-2036, with the greatest increase in household growth being attributable to older (65+) person households (26.5%).
- Given the increase in older person households, especially those aged 85+, there will be an increased need for sheltered housing and care home provision in the Borough over the plan period (2036).

- The Council are looking to revise the settlement hierarchy but the urban area of Gravesend and Northfleet will still form the top tier and the main focus for development.

## Regulation 18 Stage 2 Consultation Part 2: Draft Development Management Policies Document (October 2020).

**5.31** This document includes development management policies and asks for views on these.

**5.32** Relevant policies are set out below but it is noted that these are at an early stage and have not been through the examination process.

**5.33 Proposed Policy INF 2 (Transport Design Principles)** includes a focus on walking, cycling and public transport and requires consideration of people with disabilities and reduced mobility. It notes that provision should be made for the safe and efficient delivery of goods, access for service and emergency vehicles and the requirements of plug in and other ultra-low emission vehicles.

**5.34 Proposed Policy INF3 (Understanding and Mitigating Transport Impacts)** requires development proposals to meet their transport needs in a sustainable manner. It notes that sufficient parking should be provided for new developments in accordance with the Council's adopted standards and that proposals resulting in an unacceptable highway safety impact will not be permitted.

**5.35 Proposed Policy INF 4 (New Accesses and Junctions)** requires all new accesses and junctions to be sited appropriately having regard to the levels of development, traffic and types of vehicle that are likely to use them. New accesses should accord with relevant highway design, construction and safety standards; provide sufficient manoeuvring space so vehicles can enter and leave the site in forward gear and; not result in an unacceptable impact on the highway network.

**5.36 Proposed Policy INF 5 (Electric Vehicle Charging Points)** requires a single bay and charging point for electric vehicles for schemes proposing less than 50 parking bays.

**5.37 Proposed Policy GI 4 (Trees, Hedgerows and Woodland)** advises that development should be designed to retain trees, hedgerows and woodland that contribute positively to the amenity of a site and the surrounding area. Where proposals resulting in the loss of trees, hedgerows or woodland are approved, conditions will be imposed to require a final landscaping scheme to be submitted.

**5.38 Policy GI 6 (Biodiversity)** advises that proposals should seek to secure measurable net gains for biodiversity. Applications resulting in significant harm to biodiversity will not be permitted unless material considerations indicate otherwise. All new dwellings within a 6m radius of the outer boundary of the Thames Estuary and Marshes Ramsar / SPA will be required to mitigate the potential cumulative impact on the designated area through the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) or

as an alternative legally binding mechanism unless otherwise justified as an exception.

**5.39 Policy FW 1 (Managing Water Quality)** advises that proposals that enhance water quality will be supported.

**5.40 Policy FW 2 (Managing water supply in new development)** advises that major development proposals will need to demonstrate that there will be an adequate water supply to serve the development. Proposals for all non-residential developments of 1,000 sq. m or more must be designed to meet the BREEAM Excellent standards for water efficiency unless justified as an exception.

**5.41 Policy FW3 (Managing Flood Risk)** advises that applications will be assessed in accordance with national policy and guidance on flood risk.

**5.42 Policy FW 4 (Managing Waste Water Drainage)** advises that a presumption will be applied that all new developments requiring discharge of waste water should do so to a public sewer to be treated at a public treatment works operated by a water company, unless it is not feasible to do so on grounds of cost or practicality. Where alternative means of dealing with waste water are proposed, this will only be permitted where it is demonstrated that this is not feasible and that there are no adverse impacts on the water environment, amenity or highway network. Major development proposals will be required to demonstrate that there will be adequate waste water capacity to serve the development.

**5.43 Policy FW5 (Managing Surface Water Drainage)** advises that the Council will require the use of sustainable drainage within developments where appropriate. In the case of major development, there is a presumption that sustainable drainage systems will be used to manage surface water run off unless this is not feasible. In all cases, the Council will require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use.

**5.44 Proposed Policy AM 1 (Air Quality)** requires an air quality assessment for all proposals which are in areas of poor air quality.

**5.45 Proposed Policy AM 2 (Contaminated Land)** requires a contaminated land assessment for proposals on sites which may be affected by contamination.

**5.46 Proposed Policy AM 4 (Sunlight and Daylight within New Development)** advises that new development should ensure that there are adequate levels of daylight and sunlight for occupants of the development and neighbouring properties. It notes that the Council will apply a flexible approach where a proposal optimises the use of the site with public benefits weighed against any resulting deficiency in daylight or sunlight.

**5.47 Proposed Policy AM5 (Noise and Vibration)** requires a noise assessment for proposals on sites which may be affected by noise.

**5.48 Proposed Policy DES3 (Tall and Bulky Buildings)** sets design criteria for larger buildings requiring an assessment of:

- Topography.
- The existing urban grain including scale, form and massing.
- Any existing public or private open spaces.
- Any significant views.
- Existing landmark buildings and their significance.
- Overshadowing and reduction of daylight and sunlight.
- Permeability and the ability to move within the public realm on foot or by cycle.
- The amenity and security of adjoining residential and other buildings regarding overlooking or other impacts.

**5.49** It notes that the design of tall buildings should consider how they relate to the public realm at ground level.

**5.50 Proposed Policy HER1 (Development Involving Heritage Assets)** requires proposals to protect, conserve and enhance the historic environment of the borough.

## Other Material Considerations

**5.51** The following documents also form material considerations of relevance to this application:

- National policy (primarily set out in the National Planning Policy Framework and Planning Practice Guidance).
- Additional guidance contained in Supplementary Planning Documents (SPD) and other guidance.

### National Planning Policy Framework

**5.52** [The National Planning Policy Framework ("NPPF") was originally published in March 2012, revised in July 2018 and updated in February 2021, June 2019 and most recently in July 2021. It is a material consideration in planning decisions.

**5.53** The purpose of planning is to contribute to the achievement of sustainable development and **Paragraph 8** outlines the three overarching objectives of this:

- *'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;*
- *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 places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

- An environmental objective – to protect 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’.

**5.54 Paragraph 9** advises that these three objectives are interdependent and should not be treated in isolation in consideration of planning issues. Clearly, this includes making provision for the older generation, as a key part of any healthy community.

**5.55 Paragraph 10** establishes that at the heart of the NPPF is a presumption in favour of sustainable development and **Paragraph 11** sets out that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking, this means:

*‘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:*

- 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*
- 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”.*

**5.56 Chapter 4 (Decision Making)** advises that local planning authorities should approach decisions on proposed development in a positive and creative

way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers should seek to approve applications for sustainable development where possible.

**5.57 Paragraph 39** encourages early engagement as this has the potential to improve the efficiency and effectiveness of the planning application system.

**5.58 Paragraph 47** confirms that applications should be determined in line with the existing development plan, unless material conditions indicate otherwise.

**5.59 Paragraph 55** advises that the use of planning conditions (and obligations) should be considered for development that would otherwise be unacceptable. **Paragraph 57** goes on to confirm that planning obligations can only be used where they are necessary, directly related and fairly and reasonably related to the development.

**5.60 Chapter 5** relates to the delivery of a sufficient supply of homes and emphasises the Government’s objective to significantly boost the supply of homes.

**Paragraph 62** advises that the size, type and tenure of housing for different groups (including older people) should be assessed and reflected in planning policies.

**5.61 Paragraph 69** advises local planning authorities to support the development of windfall sites through policies and decisions giving great weight to the provision of housing on suitable sites within existing settlements for homes.

**5.62 Chapter 6 (Building a strong, competitive economy)** seeks to support economic growth and productivity accounting for local needs and wider opportunities and considering the needs of different sectors.

**5.63 Chapter 8 (Promoting healthy and safe communities)** seeks to deliver healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles. Local authorities should guard against the unnecessary loss of local services to enhance the sustainability of communities and residential environments. An integrated approach to the location of housing, economic uses and community facilities and services should be adopted.

**5.64 Chapter 9 (Promoting sustainable transport)** seeks to ensure that transport matters are considered at the earliest stages of development.

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

**5.65 Chapter 11 (Making effective use of land)** gives substantial weight to the value of using suitable brownfield land. **Paragraph 120** notes that policies and decisions should promote and support the development of under-utilised land and buildings especially where it would help to meet identified needs for housing and where land supply is constrained.

#### 5.66 Chapter 12 (Achieving well-designed places)

advises that the creation of high-quality buildings and places is fundamental to the planning and development process.

#### 5.67 Chapter 14 (Meeting the challenge of climate change, flooding and coastal change)

seeks to secure a transition to a low carbon future ensuring that climate change adaptation, flood risk and coastal change is considered in new development.

#### 5.68 Chapter 15 (Conserving and enhancing the natural environment)

seeks to contribute to and enhance the natural and local environment, protect and enhance habitats and biodiversity and consider ground conditions and pollution.

#### 5.69 Chapter 16 (Conserving and enhancing the historic environment)

advises that in determining proposals that affect heritage assets, authorities should describe the significance or any heritage assets affected, including their setting with the level of detail required proportionate to the assets importance.

### Planning Practice Guidance (PPG)

5.70 On 6 March 2014, the Department for Communities and Local Government ("DCLG") launched the Planning Practice Guidance web-based resource.

### Housing for Older People

5.71 There is a specific section of the PPG that addresses housing for older and disabled people and **Paragraph 001** (Reference ID: 63-001-20190626)

states that: *'The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing'*. This paragraph continues by stating: *'Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems'*.

5.72 The PPG confirms that *'...The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people'* (**Paragraph 003**, Reference ID: 63-003-20190626).

5.73 **Paragraph 006**, Reference ID: 63-006-20190626 also notes that *'Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older...people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period'*.

5.74 **Paragraph: 007**, Reference ID: 63-007-20190626 advises that local planning authorities can include provision of housing for older people in their annual monitoring reports.

5.75 The PPG goes on to note (at **Paragraph 012**, Reference ID: 63-012-20190626) that *'Plans need to provide for specialist housing for older people where a need exists'*.

5.76 **Paragraph 013**, Reference ID: 63-013-20190626 notes that: *'It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing'*.

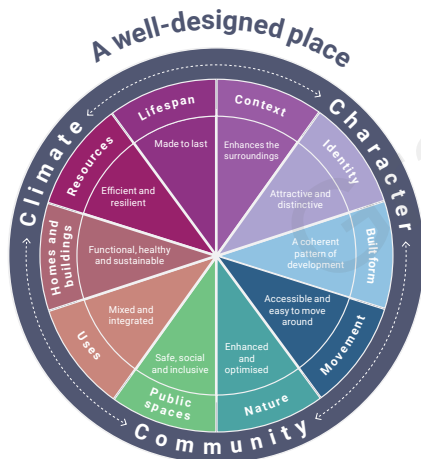
5.77 **Paragraph 016**, Reference ID: 63-016-20190626 advises decision makes to consider the following when assessing applications for specialist housing for older people: *'Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people. Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need'*.

5.78 **Paragraph 016a**, Reference ID: 63-016a-20190626 advises plan making authorities to count housing provided for older people in their housing requirement.

**5.79 Paragraph 019**, Reference ID: 63-019-20190626 advises that the characteristics of a dementia friendly community include:

- 'Easy to navigate physical environment
- Appropriate transport
- Communities shaped around the views of people with dementia and their carers
- Good orientation and familiarity
- Reduction in unnecessary clutter
- Reduction in disorienting visual and auditory stimuli'.

**5.80** In the PPG Housing supply and delivery chapter, **Paragraph 035** (Reference ID: 68-035- 20190722) advises that housing for older people including Class C2 residential institution can be included within the housing land supply, based on the amount of housing released as a result. The Housing Delivery Test Measurement sets a ratio of 1.8 for communal households, including residential institutions.



## National Design Guide

**5.81** The National Design Guide was published by the Ministry of Housing Communities and Local Government. It builds on the guidance set out in the NPPF and its accompanying Guidance, and outlines the Government's priorities for well-designed places in the form of ten characteristics. As follows:

## Supplementary Planning Documents and Guidance

**5.82** The following Supplementary Planning Documents (SPD) and guidance have been considered in developing the submitted proposals:

- KCC Development Contributions Guide (March 2007)
- Kent Design Guide (except the supplementary guidance on residential parking)
- SPG2: Biodiversity Conservation (July 2006)
- SPG4: Kent Vehicle Parking Standards (July 2006)

## KCC Development Contributions Guide (March 2007)

**5.83** This document provides the methodologies and calculations for contributions and notes that contributions will be considered on a site by site basis.

## Kent Design Guide (except the supplementary guidance on residential parking)

**5.84** This document is intended to provide a starting point for good design whilst still allowing for creative and innovative approaches.

## SPG2: Biodiversity Conservation (July 2006)

**5.85** This document provides guidance on what biodiversity is, why it needs to be considered, how it can be considered through the development process and who can help planners and developers further consider biodiversity in the development process.

## SPG4: Kent Vehicle Parking Standards (July 2006)

**5.86** This document sets out vehicle parking standards.

# Planning Analysis

6

**6.1** This section analyses the suitability of the proposed development in the context of local and national planning policy. Reference is made within this section to assessments within technical reports that have been submitted in support of the planning application.

## Principle of Development

**6.2** This section sets out how the proposed development is acceptable in principle in terms of location and use and includes consideration of the following:

- Location of the site;
- Land use;
- Housing land supply; and
- Provision of older persons accommodation.

### Location of Site

**6.3** With regards to the adopted local plan policies, policy CS02 relates to the scale and distribution of development within the borough with priority given to the urban area as a sustainable location. The site is located within Northfleet which, along with



Gravesend and Ebbsfleet, forms the defined urban area and a first-tier settlement. As such, the site is located within one of the most sustainable parts of the borough with access to a wide range of services, facilities and public transport and is a location where development is directed in general terms. This has been confirmed within the pre-application response.

## Land Use

6.4 Policy CS02 also promotes the redevelopment of derelict and previously developed land in the urban area. Policy CS15 further requires the effective use of land. The site was formally occupied by the Battle of Britain public house which was demolished in 2016 by the former site owner. The site has remained vacant since this time. Frontier Estates purchased the site and have since undertaken regular maintenance to keep it in a tidy condition. Redeveloping previously developed land is an inherently sustainable approach to development. This proposal offers a significant opportunity to bring back into use this vacant site with a use that will meet an identified demand for care accommodation as discussed later in this section. The proposal seeks to effectively reuse the site whilst respecting the character and layout of the area and surrounding uses, as is addressed further in this section.

6.5 The principle of re-developing of the site has also been established through the granting of planning application ref. 20171245 in 2020 for 20 residential units. The approved scheme indicates that the principle of developing the site

is acceptable and the pre-application response welcomed the proposals to bring a vacant brownfield site back into effective use.

## Housing Land Supply

6.6 Policy CS02 of the Core Strategy sets out the Boroughs objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for at least 6,170 new dwellings during this period. At present, the Local Authority is unable to demonstrate a 5-year housing land supply, currently standing at 3.27 years. The Council also scored 57% in the 2021 Housing Delivery Test. As the delivery of housing is less than 75% of what is required by the Housing Delivery Test, the Council are subject to the presumption in favour of sustainable development and paragraph 11 (d) of the NPPF applies. This advises that:

*'Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless:*

- i *The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type of distribution of development in the plan area; 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.'*

6.7 As such, when determining planning applications involving uses such as this, the Local Authority should apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposal when evaluated against development plan policy. This was confirmed by the Council in their pre-application response.

6.8 With respect to the contribution of this proposal towards the housing shortfall, the NPPG advises that Local Planning Authorities can count housing provided for older people, including uses within Class C2, as part of their housing land supply (Paragraph 035, Reference ID 68-035-20190722). Based on the Housing Delivery Test calculation, which applies a 1.8 ratio for communal accommodation including care homes, the proposed 65-bed care home would provide for the equivalent of 36 new dwellings in the borough and given the current 5-year housing land supply position, this is of particular importance and should be assigned significant weight.

## Provision of older persons accommodation

6.9 Policy CS14 seeks to secure a mix of housing types and particularly establishes support for C2 uses including sheltered housing and extra care housing on suitable sites in areas with access to a range of services that provide for the future needs of occupants. This includes provision of care homes for elderly people who have more advanced needs and who require more advanced care.

**6.10** The Gravesham Borough Council Strategic Housing Market Assessment, states that:

*'The most significant growth is forecast in the age bands over 65. Growth is particularly marked in the 85+ household age band, which is projected to increase by 2,030 householders (1447%) over the 25 years from 2012 2037.'*

**6.11** This change in the population profile results in the greater need for all forms of housing and care provision for older people.

**6.12** An independent assessment has been undertaken and indicates that within a 3-mile radius there is a current shortfall of 193 en-suite beds and 517 wet room beds, including all planned beds. As such, there is a significant unmet need in the catchment area and a pressing need for care home accommodation within the local area which this proposal seeks to address.

**6.13** The provision of care homes remains an important part of the overall care provision in the area and is particularly important for those with advanced needs such as dementia.

**6.14** The proposed care home will provide accommodation for those living with dementia and other complex physical needs, many who will sadly be in the last years of their life. Residents will require 24-hour specialist care and help and support in undertaking everyday tasks that many of us take for granted.

**6.15** Discussions are progressing with a care home operator for the proposed care home. Residents will benefit from a tailored care package, determined according to their individual needs. A wide range of care services will be provided by on-site staff 24-hours a day and by visiting medical professionals from local doctors' surgeries. There will also be a dedicated ambulance drop off / pick up space within the car park to assist with hospital trips where required.

**6.16** The proposed facility allows individual residents to receive varying degrees of support and care and an on-site care team will be present 24-hours a day to help deliver this.

**6.17** This scheme proposes a care home for nursing and residential care where the needs of residents will be advanced. As needs become more advanced, demand to utilise local services and facilities reduces due to resident's reliance on care and services provided on-site. Due to their complex needs, the majority of residents are highly unlikely to be able to leave the facility unaccompanied meaning there will be very limited demand from residents to travel independently.

**6.18** The site is accessible by the road network and in close proximity to bus stops on Coldharbour Road and New House Lane which serve the surrounding area and these could be used by staff and visitors travelling to and from the proposed care home. The Lawrance Square Local Centre is a short distance away and provides local facilities. As such, the

site has access to a range of services as required by policy and does form a sustainable location in accordance with policy CS14.

**6.19** There are significant social benefits arising from a care home proposal, including significant savings to the NHS as a result of removal of 'bed blocking' within hospitals and reduced falls at home, improved wellbeing and a reduction in loneliness.

**6.20** It is also important to note the wide-ranging health and wellbeing benefits that can occur when someone moves into specialist care accommodation, improving their overall quality of life. In particular, residents benefit from a wider range of social interactions and access to events on-site which include consideration of their individual needs. Importantly, residents have access to specialist care.



**6.21** A further benefit of this type of accommodation is the potential to free up existing homes owned by older people who require specialist care, releasing them back into the market for family accommodation.

**6.22** Saved policy H6 seeks to avoid an overconcentration of uses to protect the character of the local area. The emphasis of this point is set out with the supporting text of policy CS14. On assessment the closest care homes would appear to be as follows;

- Dene Holm Care Home, Dene Holm Rd, Northfleet, Gravesend DA11 8JY approximately 0.2 miles away.
- Mayflower Care Home, Hartshill Rd, Northfleet, Gravesend DA11 7DX approximately 0.5 miles away.
- Wombwell Care Home, Wombwell Gardens, Northfleet, Gravesend, Kent, DA11 8BL approximately 0.6 miles away.

**6.23** These are not within the immediate vicinity of the site and it is not considered that the provision of a care home on this site would result in an overconcentration of uses in this location. It would instead, deliver a much-needed care home, diversifying the mix of residential uses in the immediate vicinity and leading to an improved mix of accommodation overall.

## Conclusion on Principle of Development

**6.24** In light of the matters discussed above, through the redevelopment of a previously developed site within a defined urban area, this proposal would deliver much-needed care beds in an area where there is an identified need for them. The site is located within a highly accessible and sustainable location to which development is directed and will not impact on the local character of the area in terms of over concentration. The proposal is therefore considered to comply with development plan policies CS02, CS14, CS15, H6; chapter 2, 5 and 11 of the NPPF and the principle of development is acceptable.

**6.25** In line with paragraph 11 (d) of the NPPF, it is considered that planning permission should be granted for this proposal. The planning balance is addressed further detail in section 7 below however it is considered that **significant weight** should be applied to the following **significant social benefits**:

- The delivery of 65 care beds within Class C2 in response to a significant unmet need within the local area.
- Significant savings to the NHS, as a result of reduced 'bed blocking' within hospitals and falls at home, improved wellbeing and a reduction in loneliness for local people.
- A considerable contribution of 36 units to the 5YHLS contributing to housing delivery in an area where there is a presumption in favour of sustainable development. The provision of care accommodation would also free up housing elsewhere in the district.

## Other Material Considerations

**6.26** The principle of development is supported by the development plan and the remainder of this chapter examines material planning considerations to demonstrate that in all other regards the proposal conforms with the policy framework including the development plan and the NPPF. Namely, these considerations relate to;

- Design;
- Neighbouring amenity;
- Access and Parking;
- Landscape and Ecology;
- Ground Conditions and Drainage; and
- Sustainability.

**6.27** The following sections explore each of these in further detail.

### Design

**6.28** The design approach is set out in the Design and Access Statement which accompanies the planning application. This provides an analysis of the site context and should be referenced in full. In brief, however, the design approach demonstrates that the proposal represents a high standard of design which respects the local context, meets all relevant standards and provides a high-quality design approach which will enhance the visual appearance of this site.

**6.29** Adopted policy CS19, the Kent Design Guide and the National Design Guidance require development to adhere to the principles of urban design and sustainability in order to achieve a high quality of development.

**6.30** This scheme has evolved following a comprehensive pre-application and consultation process which included discussions with officers, Design South East, elected Members and local residents.

**6.31** The original pre-application submission of July 2021 received comments mainly relating to its layout and design. During the first pre-application meeting with the officer, it was acknowledged that the proposed layout was beneficial regarding its relationship with St Clement's Close and the preference was to have the care home provided as a single unit with the building reinforcing the street line. In addition it was considered necessary to reduce the bulk and mass of the building and consider the design presence of the building located on the corner of Coldharbour Road and New House Lane.

**6.32** Following these comments, the design was carefully considered and updated in October 2021. As noted previously, amendments included:

- Relocating bedrooms internally to the ground and first floor from the second floor to allow for the massing to be reduced. This included provision of accommodation within the roof served by dormer windows.

- A more varied roof form including pitched and flat roof sections, gables and hipped sections.
- Detailing in the form of projecting bays, recessed terraces, dormer windows and variation in materials to break up the elevations.
- Maintaining the layout to reinforce the street line.

**6.33** Subsequent to this, further discussions were held with the Case Officer and the updated scheme was presented to Design South East (DSE) who made additional suggestions. These additional comments were reviewed by the project team and the following further changes were made:

#### **Coldharbour Road Elevation**

- Further measures to break up the massing of the Coldharbour Road elevation, breaking down a continuous hipped section into 2 hipped sections with a recessed central element and adding a flat roofed section on the corner of the building. The roofs were also adjusted to reduce overall ridge height.
- Reduction in the bulk of the roof of the elevation adjacent to the St Clement's Close boundary, replacing a large hipped section with a flat roof section.



Above: Previous pre-app visual from Coldharbour Road.



Above: Updated visual from Coldharbour Road for this planning application submission.

### ***Coldharbour Road / New House Lane Corner***

- Introducing a curved corner feature on at the junction of Coldharbour Road and New House Lane to increase the set back from the frontage. The appearance of this corner feature has been simplified with brick used at ground and first floor level and the second floor finished using metal cladding and recessed behind the main elevation to allow for a terrace to be provided. This has helped to work better with the levels, introduce a path within the garden adjacent to the building and to better ensure that the root protection area of the existing tree is maintained.
- Changing the proposed roofing materials from metal cladding to tiles.



Above: Previous pre-app visual from Coldharbour Road / New House Lane Junction.



Above: Updated visual from Coldharbour Road / New House Lane Junction.

### ***New House Lane Elevation / Care Home Entrance***

- Further measures to break up the massing of the New House Lane elevation including reduction of the 2 hipped sections to make them narrower with 2 dormer windows instead of 3. The ridge heights in this area have also been reduced.
- Reduction of the roof adjacent to the site access, replacing a hipped section with a flat roof section.
- Reduction of the flat roof section above the care home entrance from 3 to 2 storeys including amending the materials from white cladding to brick.
- Changing the proposed roofing materials from metal cladding to tiles.



Above: Previous pre-app visual from New House Lane.



Above: Updated visual from New House Lane for this planning application submission.

**6.34** This scheme was presented at the public consultation event and comments on design were largely positive. Further minor changes have been made to the scheme and are reflected in this planning application submission. The Design and Access Statement provides a detailed analysis of the submitted scheme.

**6.35** Overall, the design approach has been carefully considered to reduce the visual scale and mass of the proposed care home so that it responds positively to the site, the existing street scene and neighbouring residential properties. The surrounding area is predominantly residential in character with heights typically around two storeys. Whilst the building is three storeys in part, the majority of the accommodation has been provided within the first two storeys to reduce the footprint of the second storey. In addition the second storey has been set back from the main building line to break down the building form, creating a more primary presence of the two-storey element with a secondary lightweight roof element. The mass of the building is also further broken down through articulated blocks, creating a sense of separate structures whilst still providing a single building which is preferable operationally for this use. As such it is considered that the overall height and massing of the building is appropriate in this location, having been reduced as much as possible to ensure sympathetic integration with its surroundings whilst still responding to and celebrating the corner location of the site to make effective use of the site and enhance the streetscene.

**6.36** The building has an 'L' shaped footprint and this considers the context of the site being on a corner plot, allowing for the creation of a dual street frontage. The layout has also considered the landmark protected Copper Beech tree located at the corner of the junction between New House Lane and Coldharbour road with the curved corner feature responding effectively to this. This provides a distinctive separative architectural element providing a break between the two frontages and a green edge to the site.

**6.37** The building is contemporary in design with a strong form and the use of subtle detailing. The location of the site on this corner location has been celebrated through a design which creates a clear sense of place rather than just simply blending in with the surrounding suburban residential development. Overall, it is considered that this scheme will significantly improve the streetscene in this location given that the site has remained vacant and underused for a considerable period of time.

**6.38** The proposed site layout has also been made more legible and readable with the main entrance more clearly defined through changing proportions and detailing. As a whole, the scheme is considered to sympathetically integrate with its surroundings whilst also celebrating the sites prominent location.

**6.39** As a result of Case Officer, DSE, ward Member and local resident feedback, improvements have also been made to the public realm through the provision of footpaths and public amenity space surrounding the prominent corner beech tree. This

also includes an extension of the public footpath along New House Lane to connect with the existing footpath next to the bus stop and significantly enhancing pedestrian connections in this location.

**6.40** Public art is to be incorporated into the proposed boundary treatment for the site and a high-quality landscape scheme has been designed, including internal footpaths. The landscaping scheme ensures a good relationship with the surrounding area and a clear separation with the associated parking area. The position of the resident garden means it is shielded from the road and this helps to provide a quiet space for residents to enjoy.

**6.41** Overall, this proposal seeks to deliver a 65-bed care home which accords with policy and which the submitted plans demonstrate can be comfortably accommodated in this location. The site is highly visible from the street scene and is currently vacant





and underused, providing little value in terms of its contribution to the character and appearance of the wider area. Importantly, this proposal seeks to effectively re-use a previously developed site which will lead to significant environmental enhancements for the surrounding area.

**6.42** Having regard to the above considerations, the design, layout and form of the development has been carefully considered in terms of the local context and provides a positive contribution to the street scene and character of the area. The proposal is therefore considered to accord with adopted policy CS19; Chapter 11 and 12 of the NPPF; and the National Design Guide.

## Neighbouring Amenity

**6.43** Due consideration has been given to the amenities of residents occupying neighbouring properties through the positioning of the building, associated landscaping and boundary treatments.

**6.44** The design team has paid particular attention to the residential amenity of properties immediately adjoining the site from the early design stages to ensure that the proposed development respects and is sympathetic to these. The proposed site layout has been designed to avoid harmful impacts on residential amenity, in accordance with adopted local plan policies.

**6.45** Through the 'L' shaped design of the development, the building is positioned towards the road frontages, away from the immediate north east and south eastern boundaries of the site, in which existing and proposed planting along with hard landscaping features, such as fencing, will provide screening. With respect to the residential properties located to the north west and south west, considering the separation afforded between them and the proposal, by virtue of the roads and garden frontages in conjunction with existing tree screening, it is considered there will be minimal impact on the neighbouring residential amenities.

**6.46** A daylight, sunlight and overshadowing assessment has been undertaken by Hawkins Environmental and submitted in support of the application. This also confirms that the proposed development will not have a detrimental impact on neighbouring residential amenity with a negligible

impact in respect to overshadowing or loss of daylight or sunlight occurring to the adjoining school playing fields and gardens of St Clements Close.

**6.47** In terms of the users of the development, the proposed accommodation will be of a high quality and will provide a high-quality living environment, tailored to individuals with advanced needs. Access will be available to outdoor amenity space which includes a large, spacious garden. This will be landscaped to ensure that the garden itself as well as the building and neighbouring properties are not unduly impacted with regards to shade.

**6.48** Overall it is considered that the proposed development will safeguard the amenity of its occupants and neighbours in respect to privacy, loss of daylight and sunlight or other impacts and is therefore in accordance with adopted policy CS19 and Chapter 12 of the NPPF.

## Access and Parking

**6.49** A Transport Statement prepared by Royal Haskoning DHV is submitted alongside the planning application, and should be referred to in full.

**6.50** Access is proposed from New House Lane and is located slightly further east compared to the consented access under the previously permitted residential scheme. The level difference between the highway and the ground level of the site varies along the length of New House Lane, but is c. 2.2m in the vicinity of the previously consented access. The proposed will therefore ramp into the site at a gradient of 1 in 10. The visibility splays are in

accordance with those previously accepted under the approved residential scheme. The existing New House Lane embankment will be cut back and a retaining wall and associated footpath provided the along the site frontage will ensure visibility splays are unimpeded. The footpath will also provide a connection to the existing footway on the southern side of New House Land and the local bus stop, something which was suggested by both the Council and DSE at the pre-application stage. Kent County Council also welcomed this in the highway's pre-application enquiry.

**6.51** The Kent Vehicle Parking Standards (July 2006) requires up to 1 space per resident staff; 1 space per 6 residents; and up to 1 space per 2 other staff. There will be no resident staff. The proposal seeks to provide 27 parking spaces, including two disabled spaces. An ambulance space will also be provided. A car parking accumulation assessment has been undertaken to determine whether the level of car parking provision is sufficient. This established that up to 13 cars can be expected to park on site at any one time which equates to 50% of the proposed car parking capacity during peak demand. As such the proposed level of parking is considered to be acceptable in meeting the parking demand associated with the proposed care home.

**6.52** It is noted that residents are highly unlikely to have their own car or be able to drive due to their advanced needs. Parking provision will therefore be for staff and visitors only.

**6.53** The site occupies a sustainable location with good access to public transport services which could also be used by staff and visitors.

**6.54** Deliveries and servicing will take place on site, away from New House Lane and Coldharbour Road. The accompanying Transport Statement includes swept path analysis to show that this is feasible.

**6.55** It is anticipated that the proposed care home will generate 4 two-way trips in the AM peak travel period and 8 two-way trips in the PM peak travel period. Over the course of a 12-hour day, a two-way total of 100 vehicle movements to / from the site are predicted, incorporating 49 arrivals and 51 departures. These represent an acceptable number of trips which are not considered to give rise to harm the local highway network.

**6.56** The NPPF sets out the Governments planning policies for England and notes that:

*'Development should only be prevented or refused on transport ground where the residual cumulative impacts of development are severe.'*

**6.57** In accordance with the NPPF it has been demonstrated that proposals will not result in a severe residual transport impact.

**6.58** The proposal does therefore comply with adopted policies CS11, CS19, T1, T5, P3, SPG4 and Chapter 9 of the NPPF.

## **Landscape, Trees and Ecology**

**6.59** The application is supported by an Arboricultural Impact assessment, a Preliminary Ecological Appraisal, a landscaping plan and a Biodiversity Net Gain Assessment prepared by TLP.

**6.60** There are few trees within the site boundary, and these are located to the south eastern and north eastern boundary with the neighbouring school grounds. A dead/dying Elm is to be removed by the proposed access as well as Privet which is considered to be of low value, contributing little to the character of the area.

**6.61** A Silver Birch and a Goat Willow, located along the eastern boundary of the site may be affected by the proposed development as well as the Pear and Beech tree, located to the north west. Sections of footpath proposed adjacent to these trees fall within their root protection areas and will therefore be constructed utilising 'no dig' principles. All excavation works associated with the construction of the boundary railings will also be undertaken by hand.

**6.62** As well as the retention and protection of existing trees, the site will be enhanced through the provision of a high-quality landscaping scheme which will consist of new tree planting as well as native and ornamental planting, as shown on the submitted landscaping scheme. This has considered the existing context and views of the site from neighbouring properties with the intention of creating an attractive setting for the new building, whilst also providing attractive usable garden spaces



for future residents. Overall the site, will achieve a biodiversity net gain, which has been calculated at 48.50% for habitats and 4234.03% for hedgerows.

**6.63** In terms of ecology, the submitted Preliminary Ecological Appraisal undertaken by TLP concludes that the value of the site to wildlife is to be lower at the Parish scale. The site has been assessed for its potential to support bats and one of the trees within the site boundary was assessed as providing low bat roost potential, requiring no further survey work.

**6.64** It is anticipated that no negative impacts to the Ramsar and SPA are likely to result due to the distance from the proposed development, its context in an already developed area and the purpose and type of residents that will occupy the care home. This will consist of the elderly with complex physical and care needs, such that residents will not be active or keep any pets onsite. They will also not have access to or need to use vehicle parking spaces as they will be unable to drive. On this basis it is not considered that mitigation is required in this regard in accordance with the approach that was undertaken for the care home recently approved on the former Ascot Arms site by the Council under application ref. 20220207.

**6.65** The impact of the proposal is therefore considered to be neutral whilst the adoption of all or most of the enhancement measures suggested would give rise to a neutral-minor beneficial impact. These include bat and swift boxes, habitat piles and the creation of hedgehog highways through fences.

**6.66** Overall, the ecological implications of the proposed development have been properly considered and it is demonstrated that subject to the recommendations outlined in the reports, any ecological impacts can be appropriately managed. There will be an overall enhancement in local biodiversity resources as part of the proposal and therefore the development will be in accordance with adopted policies CS12, CS19 and Chapter 15 of the NPPF.

### **Sustainability**

**6.67** This application is supported by a Sustainability and Energy Statement prepared by Turley Associates.

**6.68** The development will be designed to minimise environmental impacts associated with energy, resource consumption, water and air pollution. A fabric first approach will be adopted to reduce energy use and subsequent carbon emissions through careful consideration of ventilation, building orientation, layout, efficient lighting and the use of appropriate building management systems at the operational stage.

**6.69** Consideration will be given to Building Regulation requirements and appropriate sustainability initiatives and principles will also be applied potentially including implementing a waste hierarchy, sourcing sustainable construction materials and selecting sanitaryware that has a lower water rate. A full list of measures are set out within the Sustainability Statement supporting the application and it is anticipated that a standard condition relating to sustainability would allow for

the final sustainability scheme to be approved at the detailed design stage.

**6.70** It is therefore considered that the development accords with policies CS01, CS18, CS19; Chapter 12 and 14 of the NPPF; and the National Design Guidance.

### **Noise**

**6.71** This application is supported by a noise assessment prepared by Hawkins Environmental.

**6.72** The study has shown that based on the surrounding environment, the site is considered a 'medium risk' site under the ProPG: Planning and Noise Professional Practice Guidance (2017). The noise levels recorded when applied to the noise exposure hierarchy indicate that noise must be considered, mitigated and reduced to a minimum.

**6.73** Using the guidance and calculation methods contained within BS 8233: 2014 'Guidance on sound insulation and noise reduction for buildings', it can be shown that the recommended maximum internal noise levels for each room can be achieved through the provision of suitable glazing and ventilation. The proposal will therefore include appropriate glazing and ventilation.

**6.74** Consideration is also given to noise within the external amenity areas. The report concludes that suitable noise levels can be achieved in gardens meaning that all residents will have access to quiet external amenity space.

**6.75** The report concludes that noise should not be a constraint to the development of the site for a care home. As such the proposal minimises noise levels to an acceptable level and the development will not have an unacceptable adverse impact upon the living conditions of future occupiers and users of the development in accordance with policy CS18 and Chapter 15 of the NPPF.

### **Air Quality**

**6.76** This application is supported by an air quality assessment prepared by Hawkins Environmental.

**6.77** At present, and in the opening year of the development (2024), concentrations of all pollutants are below air quality objectives. Due to the size of development, a full assessment of impacts on local air quality is not required.

**6.78** Regarding air quality during construction, the site is considered to be a 'medium risk' site but with appropriate mitigation, residual effects will not be considered significant.

**6.79** The assessment concludes that the proposals meet relevant guidance and that air quality should not be a constraint to development in accordance with policy CS18 and Chapter 15 of the NPPF.

## Ground conditions

**6.80** A ground investigation report, prepared by Applied Geology has been undertaken and should be referred to in full.

**6.81** Contaminants were found within the upper granular made ground. Due to the proposed use of the site it is recommended that the made ground affected is stripped and removed or if left in situ. A suitable inert cover layer is then recommended within the proposed garden spaces and other areas of soft landscaping.

**6.82** In addition, contaminants within the made ground may impact on the type of water supply pipes used depending on the location of the routes. The applicant would welcome any such condition regarding this matter should it be considered necessary.

**6.83** The site is not considered to pose a significant risk to controlled waters and no precautionary gas protection measures are required.

**6.84** Having regard to the above it is considered that an appropriate ground contamination assessment has been undertaken demonstrating that no adverse impact will be caused on future occupiers and users of the development, neighbouring development or the wider environment. The proposal is therefore in accordance with policies CS18 and CS19 and Chapter 14 and 15 of the NPPF.

## Drainage

**6.85** The application is accompanied by a Drainage Strategy prepared by Fairhurst.

**6.86** This document confirms that the site is located within Flood Zone 1 and is therefore, at the lowest risk of flooding. It includes details of a surface water drainage strategy and concludes that the site is underlain by a layer of made ground of varying depths with Thanet Sand Formation beneath this. The only deviation from BGS records is the indication that there is potentially a layer of head deposits within the north western corner of the site. Based on the detail provided in the accompanying Ground Investigation, it is anticipated that soakaways would be feasible for on-site drainage of surface water. Infiltration testing will however, be required to confirm this. Permeable paving is proposed in the car park with geocellular infiltration blankets underneath to provide an increase in water quality from runoff.

**6.87** The intention is to connect to an existing foul connection that historically served the pub. A drainage trace will be required in order to discover the connection and route. If this is not possible, a new foul connection will be required and will pass through 3rd party land. If this is required, it will be necessary to requisition a sewer to be constructed by Southern Water. This could take the form of a small section of foul sewer into the adopted highway, which will open up the possibility of constructing a foul sewer in the highway by the developer, or a sewer can be requisitioned right up to the site boundary.

**6.88** The proposed drainage infrastructure will be designed to ensure that the proposals do not cause flooding offsite for the 1 in 100 plus 40% climate change rainfall event.

**6.89** Having regard to the above, this proposal seeks to provide an appropriate drainage strategy which provides for the satisfactory disposal of surface and waste water in accordance with adopted policies CS18 and CS19; and Chapter 14 of the NPPF.

# The Planning Balance

7

**7.1** On the basis of the analysis set out in the above section, it is considered that the proposed development comprises sustainable development in the context of the policies set out within the NPPF and accords with the Development Plan.

**7.2** In line with paragraph 11 (d) of the NPPF, it is considered that planning permission should be granted for this proposal. In summary, the proposal is considered to give rise to:

## Social Benefits

**7.3** There is a significant shortfall of market standard beds (with wet room provision) in the local area which this proposal seeks to address. This proposal provides an opportunity to enhance provision with the borough, ensuring that there are enough care beds for local people in the context of an ageing population.

**7.4** It is also noted that the provision of care beds contributes to overall housing land supply (the equivalent of 36 dwellings in this case) and the release of family accommodation in the open

market. This is of particular importance given the current lack of a 5-year housing land supply in the borough and the presumption in favour of sustainable development which applies.

**7.5** There are further social benefits in the form of savings to the NHS as a result of 'bed blocking' within hospitals and reduced falls at home in addition to improved wellbeing and a reduction in loneliness for residents

**7.6** It is considered that **significant weight** should be assigned to the wide-ranging social benefits of the scheme.

## Environmental Benefits

**7.7** The site is located in a sustainable location, within walking distance of local amenities and accessible by non-car modes. It seeks to make effective use of previously developed land and to deliver a high-quality design which will significantly enhance this site which has remained vacant and underused for a considerable period of time.

**7.8** The proposal comprises a well-designed and high-quality building, which is entirely appropriate to its context in terms of urban form and materials. The building is of a scale that responds to the surrounding area and respects the amenity of neighbouring properties. Residential amenity of both existing and proposed residents is protected and a high-quality building is proposed for this location.

**7.9** The proposal seeks to secure a biodiversity net gain of 48.50% for habitats and 4234.03% for hedgerows. These figures are significant and will be delivered through new landscaping and ecological enhancements.

**7.10** The proposals also seek to provide an extension to the public footpath along New House Lane, enhancing pedestrian connections overall in this area.

**7.11** It is considered that **significant weight** should be assigned to the wide-ranging environmental benefits of the scheme.

## Economic Benefits

**7.12** The proposed development will result in short-term construction jobs and a subsequent uplift in general productivity within the local area.

**7.13** Circa 70 (53 FTE) long-term jobs will be associated with the care home in addition to further indirect jobs in a range of positions including administration, management, care and maintenance.

**7.14** The proposal will also generate wider economic impact including income generated in the local economy. In the current climate, this is particularly important.

**7.15** It is considered that **significant weight** should be assigned to the wide-ranging environmental benefits of the scheme.

**7.16** The proposed use is acceptable in principle in this location and the technical assessment work undertaken in support of the application confirms that there are no other material considerations which suggest any harm would outweigh the benefits of the proposed development. The benefits are extensive and weigh heavily in favour of the scheme, allowing the presumption in favour of sustainable development to be applied in line with paragraph 11 (d) of the NPPF.

**7.17** On this basis, and taking into account the significant benefits arising from the scheme, it is respectfully considered that planning permission should be granted.



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## Public Exhibition

Frontier Estates are developing proposals for a care home for the elderly on the site of the former Battle of Britain Public House, Coldharbour Road, Northfleet.

The plans are at an early stage and we are keen to involve local people in shaping the final development.



To find out more please come along to our public exhibition:

**St Marys Church Of England**  
Wrotham Road, Gravesend, DA11 7LL

**Monday 4th July**  
**1.30pm to 7.30pm**

If you are unable to attend, please contact Laura or Kate for more information using the details below. We look forward to meeting you.

**Contact**  
laura@gillingsplanning.co.uk  
02382 358870

Newsdesk: 01623 564327



The George and Dragon pub in Swanscombe has been on the market for many years without success

www.kentonline.co.uk



The Wheatsheaf pub in Swanscombe High Street has been tipped to become flats after being empty for some time

June 30-July 6, 2023 Trusted News 7

**IN BRIEF**

**Pub cooking oil stolen**

Two men have been arrested in connection with cooking oil thefts after a vehicle was spotted outside a pub in Gravesend in the early hours.

Officers spotted the vehicle just before 3am on Thursday, June 23.

They found two men who claimed they were collecting cooking oil, but inquiries established there was no arrangement in place with the pub.

They were arrested on suspicion of theft and upon searching the vehicle, police found several empty drums. An investigation has since linked the vehicle to other thefts.

Two men, aged 39 and 36, both from London, have since been released from custody pending further inquiries.

**Blood donors needed**

Blood donors are needed to fill a session at Church of the Latter Day Saints, Pelham Road, Gravesend, on Friday, July 6, which is only 70% full.

Book [www.blood.co.uk](http://www.blood.co.uk), call 0300 123 23 23 or download the NHS Give Blood app.

**Not again! Fresh plans to turn pub into Domino's takeaway**

By Sean Delaney  
[sean@frontierukgroup.co.uk](mailto:sean@frontierukgroup.co.uk)  
OMGEditor

Plans have resurfaced to transform an historic 130-year-old pub into a pizza takeaway – just two years after they were turned down.

The George and Dragon has been sat on the corner of the junction between London Road and Swanscombe High Street since 1891.

As a former Victorian coaching inn the vintage boozery would welcome many a weary traveller and in more recent times enjoyed success as a local CAMRA pub of the year.

But despite its reputation it has not welcomed its past for a light refreshment since its permanent shut its doors in 2019 when the landlord and landlady announced they were retiring.

An application was later made to the Ebbsfleet Development Corporation (EDC) to change the use of the premises to a food takeaway business with Domino's Pizza poised to take over.

But the bid was refused in 2020 and an appeal against the decision refused by the Planning Inspectorate.

Planners said the proposal would result in loss of a "community facility for non-community purposes" and deemed it an inappropriate location with insufficient parking.

Undeterred, pizza houses have now submitted a fresh application which again seeks permission for the change of use to a hot food takeaway.

Plans outline a new layout to provide a customer service area with a limited amount of seating at the front with the kitchen behind.

There will be eight car parking spaces to be accessed via London Road.

The proposed takeaway would operate between 10am and midnight daily.

The resubmitted plans come fresh off the back of new updated market evidence after its appearance and street scene.

"It is therefore clear that the loss of the public house is just a loss in national and local planning policy terms."

But the re-emergence of the Domino's Pizza plans have sparked more than 30 comments on the EDC planning portal, with most voicing their opinion against the proposals.

The main reasons cited were traffic congestion, poor access and parking provision and the loss of a community facility.

One commented: "This should not be allowed. The town needs more local amenities, not pizza restaurants of which there are multiple within a few miles."

More does need to be sought to help the town become a positive place to live."

Another added: "We have far too many low rate food places why on earth would we want to turn this lovely building into another one?"

"This will cause traffic issues at this junction and put more delivery scooters on the roads."

Rent historian Christoph Bull said: "I want the building to be used for something but I don't want it to be destroyed or demolished into a takeaway."

"Swanscombe does not need more saturated fat in its blood stream than it already has."

He added his preference would be for it to be converted into a German restaurant but said whatever it's use it would face issues over parking and access.

Swanscombe and Greenhithe Town Council has also voiced its opposition to the plans.

A statement read: "Members of the Town Council, as local people, know that the proposal would bring more traffic flow in the immediate vicinity which already suffers from heavy use and cannot absorb this."

"The town council do not feel that this application does enough to mitigate the reasons the previous application was refused with the refusal being upheld on appeal by The Planning Inspectorate."

It's not the first historic building in the area to be subject to redevelopment plans, with the All Saints' Church opposite having been converted into flats.

The Alma in Swanscombe High Street was demolished to make way for homes and The Wheatsheaf, also in the High Street, has been tipped to become flats too.

The previous landlord and landlady purchased the George and Dragon back in 2011 and oversaw an upturn in fortunes.

Only eight years ago it was named among the 101 best local real ale pubs in the country, winning the title of Gravesend and Darent Valley CAMRA pub of the year two years in a row.

**Historian Christoph Bull is against the plans**



attempts to find a buyer fell flat.

The pub has been vacant since 2019 and has been on the market since November 2018.

In its planning application, the applicant states that while some "very limited interest" has been shown in re-using the site as a pub, no realistic evidence was provided to demonstrate a purchase would have been possible.

It says: "Five months have elapsed following the target market campaign with no further interest in the site."

In addition to the initial 12-month marketing period, this is ample time to establish that there is no potential for the site to be reoccupied in community use."

As such, the franchisee believes the change of the use of the site is in line with EDC's development policy.

The statement adds: "The proposed change of use will have significant economic benefits for the local area, with the building re-use resulting in the creation of a significant number of jobs for local people, together with other benefits arising from the refurbishment of the building and improvements to the site."

**'Swanscombe does not need more saturated fat in its blood stream'**

**Public Exhibition**

Frontier Estates are developing proposals for a care home for the elderly on the site of the former Battle of Britain Public House, Coldharbour Road, Northfleet.

The plans are at an early stage and we are keen to involve local people in shaping the final development.



To find out more please come along to our public exhibition:

**St Marys Church Of England**  
Northfleet Road, Gravesend, DA11 1JL

If you are unable to attend, please contact Laura at 01474 610000 for more information. Leaving the church doors open, we look forward to meeting you.

**Monday 4th July 1.30pm to 7.30pm**

Contact: [sean@frontierukgroup.co.uk](mailto:sean@frontierukgroup.co.uk) (01622 306475)



Proposed Care Home  
Coldharbour Road | NORTHFLEET

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## Welcome to today's exhibition to find out more about our proposals for a Care Home



### Frontier Estates

**The Applicant**  
Frontier Estates Ltd are a leading developer in the care home sector with extensive experience of delivering nursing and residential care accommodation for the elderly. Frontier deliver carefully designed healthcare facilities that offer the highest level of care, service and flexibility for residents.

**The Development**  
Frontier Estates are working to bring forward a new high quality care home for the area on the site of the former Battle of Britain Public House. The proposal is for a 65 bed care home for the elderly to provide nursing and residential care, including care for individuals with dementia. The home will be registered with the Care Quality Commission (CQC) and will provide an excellent standard of living for future residents.

### The Team

  
**Laura Grimson**  
Associate Director  
Gillings Planning

  
**Kate Chapman**  
Senior Planner  
Gillings Planning

  
**Max Paddick**  
Development Director  
Frontier Estates

  
**Ben Garlick**  
Architect  
Harris Irwin Associates






Proposed Care Home  
Coldharbour Road | NORTHFLEET

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## Location

  
View of Site - Coldharbour Road

  
View of Site - New House Lane

  
Opposite Site - Coldharbour Road

  
Opposite Site - New House Lane

  
St Clements Catholic Church

  
Rear of Site

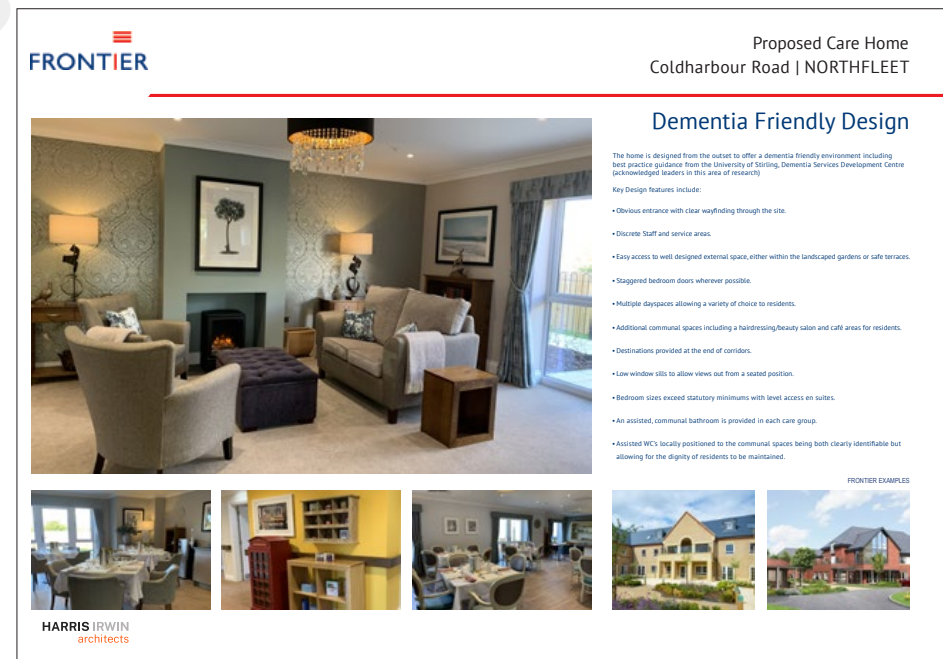
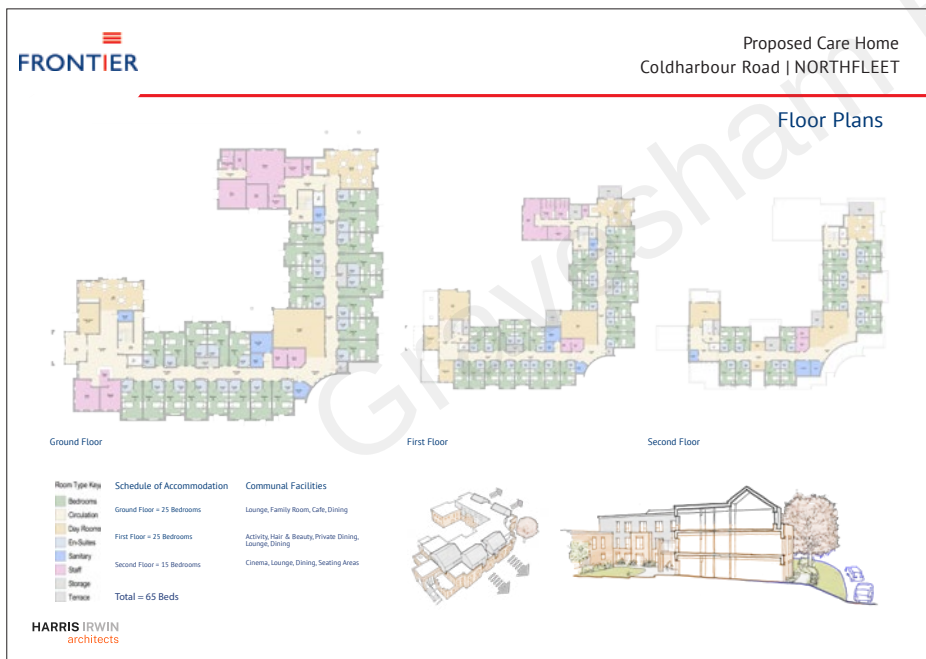
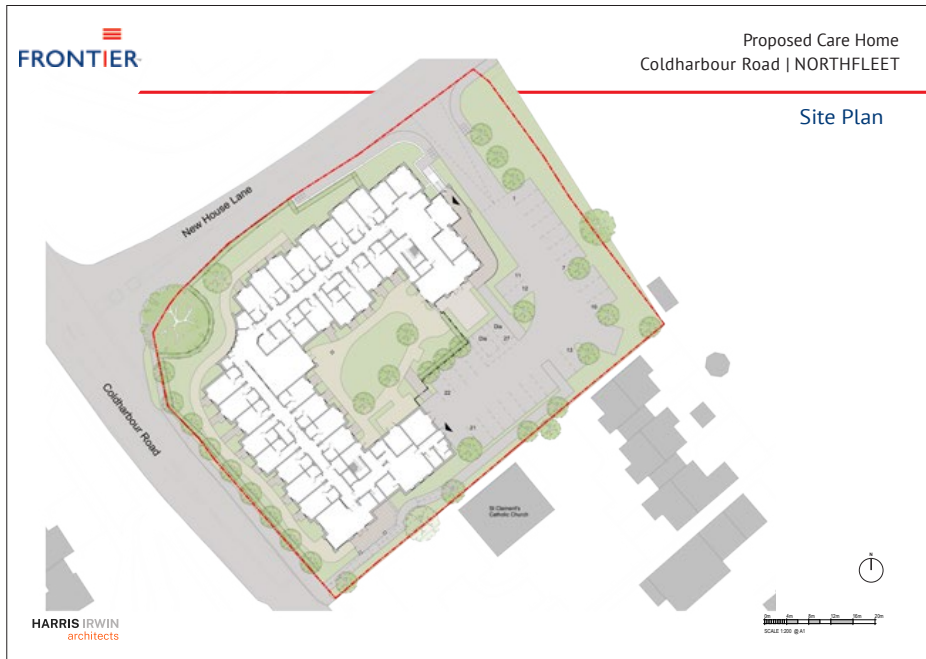
  
St Clements Close

  
Coldharbour Road

  
SITE LOCATION PLAN

  
WIDER SITE LOCATION PLAN









Proposed Care Home  
Coldharbour Road | NORTHFLEET



CARE HOME - COMPUTER GENERATED IMAGE OF THE PROPOSAL FROM ST CLEMENTS CLOSE

### Development Benefits

- Provision of accommodation for the elderly, including dementia care, for which there is a local need.
- Opportunities for local residents to remain living locally when their care needs increase.
- Creation of job opportunities at a range of skill levels.
- Environmental and biodiversity enhancements through new planting and landscaping.
- Release of mature housing stock from local area.
- Potential for enhanced pedestrian connections to Coldharbour Road and New House Lane

### Next Steps

Thank you for visiting our exhibition. We would be grateful if you would spend a few minutes completing our feedback form, if possible by Friday 15th July. Alternatively you can leave your comments online by using the following link <https://survey.monkey.co.uk/V/BNKSH>

Our intention is to submit an application in Summer 2022.

Once the application has been submitted the Council will hold their own consultation on the proposed development, which we would encourage you to participate in.

Thank you for your feedback.

If you have any questions or would like to tell us about any further local issues, please do not hesitate to contact us on:

 [laura@gillingplanning.co.uk](mailto:laura@gillingplanning.co.uk)  
 02582 358855



**For further information contact**

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Kate Chapman  
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Gravesham Borough Council