

31st January 2023

REF: FRON1094

Ms Lisa Williams
Development Control
Gravesham Borough Council
Planning Department
Civic Centre
Gravesend
DA12 1AU

Dear Lisa,

Site address: Former Battle of Britain Site, Coldharbour Road, Gravesend, DA11 8NT.

Application Ref. 20221251: Construction of a care home (within Class C2) associated parking, access, drainage, boundary treatments, landscape and other associated works.

Further to recent discussions, on behalf of our client Frontier Estates (BB) Ltd, I'm please to enclose the following amended / additional documents:

- Proposed Street Elevations ref. 3172-HIA-01-XX-DR-A-0304 rev. P1.
- Proposed Drainage Strategy ref. 144828/2000 P01.
- Flood Risk Assessment and Drainage Strategy Issue 3 prepared by Fairhurst, ref. 144828-CM-FRA-100, dated 6th January 2023.
- Updated Tree Survey, Arboricultural Impact Assessment, Arboricultural Method Statement prepared by TLP, dated September 2022.

Additional Plans

Please see attached street elevations as requested. These show the following boundary treatments:

- Decorative Metal Railing in front of 1.8m Evergreen Hedge / 1.8m Hoop Top Metal Railing in front of 1.8m Evergreen Hedge along New House Lane.
- 1.8m Hoop Top Metal Railing in front of 1.8m Evergreen Hedge along Coldharbour Road.

Any terraces are marked as such on the plans. Areas not marked as terraces on the plans will be accessed for maintenance purposes only.

The care home has been designed to accommodate the storage needs of care home operators. HIA are specialists in care home design and we are confident that the storage proposed will be sufficient to meet the needs of the future care home operator. Our experience shows that operators of this type of home do not require storage space for mobility scooters. This is because future residents of homes such as this have advanced needs which prevent them from getting out and about and leaving the care home unaccompanied. There is sufficient space to accommodate wheelchairs at the proposed care home.

Drainage

Please see attached an updated FRA and Drainage Strategy incorporating an updated Drainage Strategy. This provides responses to both the Environment Agency and LLFA comments including:

- Addition of a table in section 13 to clarify arrangements regarding roof water infiltration into a small area of the car park.

- Amended calculations to show manhole numbers.
- Addition of the layout from the submitted Applied Geology document showing where infiltration tests have been undertaken.

Trees

Please see attached an updated tree report which includes an updated drawing 602 to show an extended area of 'no-dig' construction methodology for the proposed footpath adjacent to tree A1. This is as requested.

Parking Provision and Highways

The submitted transport statement provides further information on staffing in section 5.1, 5.3 and 6.7.

This notes that:

5.1: *'Due to the nature of the development, which is likely to accommodate residents with an average age in excess of 75, the on-site car parking spaces will be largely used by staff and visitors to the Site. The development would not accommodate any resident staff.'*

The number of staff anticipated to be present on-site during a daytime shift at the proposed care home is based upon a typical ratio of one staff member per three beds. This is therefore anticipated that up to 22 staff day-time staff present on-site at any one time'.

5.3: *'The proposed level of parking provision would serve to provide flexibility in accommodating the additional staff demand associated with dementia care and is sufficient to accommodate additional demand over and above the recognised peak periods, such as that occurring during shift changeover times'.*

6.7: *'Based on the trip rates generated for cars, the assessment establishes that up to 13 cars can be expected to park at any one time in association with the development and this equates to 50% of the proposed car parking capacity during peak demand. It is recognised that this assessment may not take account of brief periods during shift changeover times when staff arrive on-site before the previous shift is finished.'*

The above analysis is considered to be a reasonable forecast for the purposes of this study as the sites assessed in TRICS would also have staff shifts similar to that of the proposed scheme. The parking provision associated with the care home is sufficient and appropriate to meet the anticipated parking demand'.

The site will be managed by an experienced care home operator and staff changeover will be managed as a result.

SPA Mitigation

As noted in paragraph 6.64 of the submitted Planning Statement:

'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'.

It's likely that the average age of a resident will be around 86 years old and the proposed care home will provide accommodation for the elderly 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. Many will also require specialist medical input from the nursing team.

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, close to the main entrance to assist with hospital trips where required.

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.

The proposed care home is designed to serve inactive residents and pets will not be kept on site. Resident gardens will provide recreational space for residents on site and no residential staff accommodation is proposed.

As such, the proposal will not give rise to any recreational disturbance on the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes).

As noted above, we consider that the approach taken on the Ascot Arms site under ref. 20220207 should be applied here for consistency.

We look forward to agreeing a suitably worded condition with you in due course.

Conclusion

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

Yours Sincerely



Laura Grimason
Associate Director

