

Mr. Peter Price
Principal Planner
Planning Department
Gravesham Borough Council
Civic Centre
Gravesend
DA12 1AU

8th August 2022

Dear Peter,

Application Ref: 20220432

Description: Demolition of existing structures on site and the erection of 75 Retirement Living apartments for older people (comprising 48 no. 1-bed and 27 no. 2-beds) including communal facilities, access, car parking and landscaping.

Site: Former Police Station, 133 Windmill Street, Gravesend, DA12 1DB

I write in respect of the above-mentioned planning application, which has been valid since the 21st April 2022.

Additional information has been prepared which addresses the comments made by statutory consultees. I would refer you to the **Summary Table** which is appended to this letter and which addresses queries fully where possible, but which refers to supplemental information where necessary.

The remainder of this letter specifically addresses comments on design raised in the Design South-East advice issued on the 22nd June 2022.

Suitability of the Site

The site is in a highly sustainable location at the southern periphery of the town centre and residents would access to a good range of shops, community facilities and public transport services (See Section 2.1 of the **Design and Access Statement** and Chapter 5: of the **Planning Statement**).

While we acknowledge it is an island site bounded by roads on all sides, we disagree with the conclusion that it is an '*aggressively disconnected environment*'. While Woodville Place and Windmill Street are busier roads, there are several controlled crossings a short distance from the site entrance. While Wrotham Road and Zion Place do not benefit from controlled crossings in the immediate vicinity of the site, these have a lower volume of traffic.

We would also like to reiterate that the retirement living apartments are for the 'active elderly' (See Chapter 2. Of the **Planning Statement**) and residents are unlikely to be 'vulnerable' as is asserted in the advice by Design South-East.

The site is an eminently suitable location for retirement living apartments and we strongly disagree with the comments regarding the suitability of the site for specialist older person' housing.

Building Layout

Design South-East are critical of the building layout advising that *'the urban design approach of the proposal is confused. The surrounding urban block structure is ignored, and the urban grain fragmented in the proposed development'*.

In depth consideration has been given to the building layout and the urban grain, with a perimeter block historically considered and ultimately rejected on the grounds of being unsuitable for the proposed development. The rationale behind the proposed T-block layout is detailed in section 4.3 of the **Design and Access Statement**, specifically on page 46.

An **Urban Design Analysis** has been undertaken by Barton Wilmore which reviews various site layouts including a perimeter block, H-block and T-block. When carefully considering the opportunities and constraints offered by the site, they concluded that the T-block layout offered the most balanced approach for a residential development in what is, increasingly, a residential area.

The T-Block is also necessary to build a viable and deliverable scheme, with the perimeter block layout utilised in historic applications and approvals requiring complex and costly design solutions. These points have been detailed thoroughly in Chapter 11. of the **Planning Statement**.

The T-Block layout also pulls the building away from the footway facilitating greater space for planting and the introduction of new trees on the perimeter of the site. Urban greening has numerous well-established benefits including improving air quality and biodiversity. In respect of the latter, the Preliminary Ecological Appraisal advises that the proposed landscaping plan will result in Biodiversity Net Gain of 2201.22% in habitat units and a 430.79% in hedgerow units. The increased planting would also reinforce the Council's commitment to urban greening in the town centre, as shown by the substantial number of new street trees on the Gravesend Community Square.

Churchill Retirement Living has carefully considered the most appropriate layout for the site and has concluded that the T-Block as proposed offers a well-designed, deliverable solution for the site.

Sheltered communal area:

Design South-East assert that a perimeter block or H-block layout would create a more sheltered central courtyard area which would be more pleasant for residents.

There is a fine balance in providing a sheltered communal area that also provides high-quality amenity space. If the communal area is too enclosed, then there is a high chance that it will be cast in shadow for the majority of day which will make it challenging for meaningful landscaped areas to thrive and therefore likely it will be under-used and unsuitable for the demographic. We note that the previous

applications proposing a perimeter block layout (Ref:20120590 & 20161205) both provided central courtyard areas that nearly entirely comprised of hardstanding.

The Barton Wilmore **Urban Design Analysis** very clearly concludes that the proposed T-block layout results in the least amount of overshadowing, with the perimeter block the greatest amount.

The hard landscaped central courtyard provided in the historic perimeter block applications were appropriate for what was proposed – mixed use development with the ground floors occupied by commercial uses. Accordingly, the courtyard was more orientated to an area facilitating a high degree of footfall and transient users but offered little to long-term residents. This approach is not however appropriate for a wholly residential development

The proposed Churchill Retirement Living approach designates the southern portion of the site for high-quality landscaped amenity space. This takes advantage of the southerly aspect for sunlight and is situated along the quietest road bounding the site, Zion Place, which is single lane width and is used predominantly by the 8no. terrace houses for access rather than as a through-road. Planting and street trees have been proposed for this area of amenity, within the site, along the boundary of the south and west to provide privacy for both residents of the development and those residing in neighbouring properties to the site.

This results in a well-lit high quality landscaped communal garden for residents and increased urban greening improving the character and environment of the Conservation Area.

Façade design and Materiality:

The proposed approach to the elevational treatment is fully detailed in pages 30 -31 of the **Design and Access Statement**.

Low-maintenance, long-lasting materials and detailing that respond to the historic local-context have been fully considered. Particular care has been taken to ensure the two-bay proportion prevalent on the opposite side of Windmill Street has been respected and breaks in the building line and footprint have been incorporated to reduce any feeling of canyoning as well as breaking up the appearance of the façade into terrace proportions with a palette of materials found in the surrounding conservation area. Window design and positioning has taken reference from the adjacent context - legibility and hierarchy have been considered with window proportions altering on the taller stories; emulating that of neighbouring properties.

Churchill Retirement Living retains management of the development following construction and occupation by residents and therefore a regular maintenance schedule is in place to ensure that the building, landscaped gardens and boundaries remain looking tidy, clean and in a good state of repair.

Single aspect / north-facing flats

Retirement Living apartments are typically single aspect due to the requirement for double-loaded corridors, necessitated by the needs to optimise the development potential of sites.

In the applicant's experience there is a wide variety of preferences from customers in terms of aspects; sunny or shaded accommodation and therefore a range of choices is desirable. This designed layout approach has been tried and tested on over 200 Churchill Retirement Living sites.

The corridor with designated front-doors to each apartment provides a warm, safe and protected environment for residents to access their homes as well as providing a community aspect where chance encounters and conversations can take place with your neighbour; helping to mitigate the effects of loneliness which is common amongst this age demographic.

Regarding concerns over daylight levels within the development, an independent **Daylight and Sunlight Assessment** was submitted with the application which concluded that the proposed design achieves a very high level of compliance with the BRE recommendations and will provide future occupiers with adequate levels of natural light.

Arrival experience:

The main entrance to the development is accessed from the private car park so as to be inclusive to all residents and their accessibility needs or lifestyle choices i.e. be it by foot, car or mobility scooter.

The main entrance is demarcated by a porte cochere and positioned in the centre of this wing of the development parallel to the eye-line on approach to the site by either the pedestrian or vehicular access points. A single secure entrance from the car park area is appropriate to maintain passive security from the Lodge Manager over the parking area and ease of entrance for residents.

There needs to be 'progressive privacy' from the public realm to one's apartment. A video link from the entrance intercom to owner's apartments allows owners to see who is requesting entry, responding to the particular need for safety and security for this demographic.

Please refer to page 8 of the **Design and Access Statement**.

Position of Owner's lounge

The owner's lounge is situated next to the main entrance and the Lodge Manager office/ reception, to provide ease of entrance for residents and their visitors. As the entrance is located directly from the car park, and at this site the car parking is located at the north of the site to utilise an existing vehicular access point, the owners lounge is therefore located to the north but addresses the patio which is positioned to the west. This takes advantage of evening light and provides direct access to the landscaped amenity space to the south via a path from the patio or through the stairwell adjacent to the Owners Lounge internally.

Further details are provided on page 8 of the **Design and Access Statement**.

Balconies

The proposed extent of balcony provision has considered advice received from the Council during pre-application consultation. The proposed level of provision balances the needs of residents with the impact on the Conservation Area accordingly. All residents will have access to the professionally landscaped communal gardens

Landscape Strategy

The applicant has considerable experience in delivering retirement living developments nationally and a subsequent clear understanding of the use and need for amenity space. Details of how the communal landscaped areas are to be used are detailed in the Chapter 10. of the **Planning Statement**.

A **Landscape Strategy** has been submitted in support of this application which shows that landscaping and planting that will be provided on the site. Native species will be used to enhance biodiversity. Borders are included with species chosen to add visual interest but also to encourage pollinators.

Summary

Churchill Retirement Living have carefully considered the points raised by statutory consultees, Council Officers and the public during the currency of the planning application. This supplemental submission comprehensively addresses the matters raised and has provided minor revisions and additional supporting information where appropriate.

The proposal comprises a well-designed, deliverable scheme and there are no adverse impacts that would significantly and demonstrably outweigh the significant benefits, when assessed against the policies in the NPPF and the Development Plan.

Moreover, we would respectfully remind the Council that there is an urgent need to increase the delivery of housing in the Authority and a **critical need** for older people housing (see Chapters 4 and 9. of the Planning Statement). Paragraph 11(d) of the NPPF is engaged and **significant weight should be given to the delivery of housing in the planning balance**.

The proposal accords with Section 38 (6) of *The Planning and Compulsory Purchase Act 2004* and should be granted approval accordingly.

Yours sincerely,

Ziyad

Ziyad Thomas
BSc (Hons), MSc, MTRPI, MRICS
Associate Director

DD: 01425 462161

E: ziyad.thomas@planningissues.co.uk

Statutory Consultees Responses on Windmill Street, Gravesend
(Ref No. 20220432)

Statutory Consultee	Comments	Action
Commercial Team	Clarity on the Food preparation in Coffee Shop	A note of clarification on the 'Food Safety': the 'coffee bar' shown in the Plans does not sell food and beverages commercially. It functions as a 'tea point' which residents may use to prepare beverages when socialising in the communal lounge.
KCC Flood & Water Management	Further technical information needed	Please see Supplemental Information Note by AWP.
Natural England	Subject to appropriate contribution	The applicant understands habitat mitigation is a legal requirement and is prepared to begin the preparation of a Unilateral Undertaking for these contributions
Southern Water	Further technical information need on sewer connections and SuDs	Please see Supplemental Information Note by AWP.
NHS	NHS contribution of £43,632k requested	See Technical Note on S106 contributions .
KCC Economic Development	S106 contributions of £35,094 requested.	See Technical Note on S106 contributions .
Kent Police (Designing out crime)	Advice re. Lighting	The applicant agrees to the provision of a lighting strategy and recommends that this is secured by a suitably worded condition.
	Doorframe specification	Advice is noted.
	Advice re. glazing specification	Advice is noted.
	Advice re. window films	Advice is noted.
	Advice re. cycle storage	Advice is noted.
	Advice re. CCTV	Advice is noted.
	Advice re. nurse station / drug storage	Not applicable.
KCC Biodiversity	Landscape & Ecological Management Plan required	The applicant recognises the need to contribute to the North Kent SAMMS. A draft condition regarding the preparation of <i>the Landscape & Ecological Management Plan</i> (LEMP). The applicant agrees to the condition however would respectfully suggest an alternative trigger for the condition to be discharged so as to not cause undue delay in the delivery of the project. I would suggest that the requirement for this condition to be discharged is amended to 'prior to works above ground level'.
Waste & Recycling	Further information requested on waste collection provision and frequency of collection	See Waste & Recycling Technical Note by Churchill Retirement Living.
	Further information on the no. of bins for refuse / recycling & food waste	
GBC Environmental Protection	Lighting	The applicant agrees to the provision of a lighting strategy and recommends that this is secured by a suitably worded condition.
	Watching brief for contamination	The applicant agrees to the watching brief and recommends that this is secured by a suitably worded condition.
	Code of Practice on Construction and Demolition	The applicant agrees to the provision of a lighting strategy and recommends that this is secured by a suitably worded condition.
	Requires a Noise Management Plan	For clarification the proposal is not for a 'residential care home' but for 'retirement living apartments.' There will be no deliveries or works associated with the day-to-day provision of on-site care. There is very little noise associated with retirement living apartments, which are generally considered 'good neighbour' uses accordingly.

Statutory Consultees Responses on Windmill Street, Gravesend
(Ref No. 20220432)

		The request for a pre-commencement Noise Management Plan is highly unusual in our experience and presumably derives from a misunderstanding over the proposed land use. We respectfully request that this proposed condition is not applied.
	EV Charging point	The applicant will comply with the Kent County Council requirement for EV vehicle charging to 3 spaces and ducting to the remainder. Further information is provided in the EV Technical Note.
GBC Housing Enablement Officer	Supports the delivery of specialist older persons' housing.	The applicant welcomes the Council's recognition of the need to deliver specialist older persons' housing.
	Agrees with conclusions of independent review of viability assessment.	See Technical Note on S106 contributions.
KCC Leisure Management	Request for £43,910 for leisure contributions	See Technical Note on S106 contributions.
KCC Archaeology	Requirement for an Archaeological Watching Brief Condition	The applicant agrees to the condition as proposed.
GBC Arboricultural Officer	Request different approach to crown reduction but subject to a different application	See response from Barrells Tree Consultancy
GBC Highways & Transportation	Provision needs to be made for 2 disabled spaces	Two designated accessible parking bays positioned next to main entrance. See revised Site Plan submitted (Ref: 20085GD_PL_001_P2)
	Undercroft parking should be 2.7 metres wide resulting in a reduction in spaces	Parking spaces within undercroft increased in width to 2.7m. One space lost within the southern undercroft area as a result. See revised Site Plan submitted (Ref: 20085GD_PL_001_P2)
	Cycle space / mobility scooters	3no. Sheffield stands to accommodate 6no. bicycles for visitors positioned within parking area. See revised Site Plan submitted (Ref: 20085GD_PL_001_P2)
	Space for off-street Ambulance / deliveries	Dedicated parking provision for an ambulance / delivery vehicle is not considered necessary. There is sufficient room in the car park for these vehicles to park temporarily off-street.
	Address safety of on-street refuse collection	Refuse collection can now occur off-street with vehicles able to access and egress the site in forward gear (see Drawing XXX).
KCC Highways & Transportation	Further information required on EV charging	The applicant will comply with the requirement for EV vehicle charging to 3 spaces and ducting to the remainder. Further information is provided in the EV Technical Note.
	Review Condition and advise if acceptable	The applicant agrees to the condition as proposed.
Design South-East Panel	Several matters raised in respect of the design.	A comprehensive response to the points raised is provided in the Supporting Letter and the Urban Design Analysis by Barton Wilmore.

Statutory Consultees Responses on Windmill Street, Gravesend
(Ref No. 20220432)

Comments from Officer Meeting	Site Boundary – queries on the height of railings / colour of brick piers	White rendered piers are proposed to match those of surrounding properties, in particular the fore-gardens of properties along Windmill Street opposite the site. While we acknowledge Officer concerns, white rendered piers in the surrounding area are not unduly affected by vandalism or graffiti. On that basis we would wish to retain the brick piers as proposed. Railings to the site boundary are proposed at a 1.2m height, which is again in keeping with the surrounding context. A hedgerow of 900mm depth is proposed to sit behind the railing to prevent opportunities for forced entry into the site.
	Ground level difference & Floor Levels	A middle-point datum taken from levels across the site has been used for the proposed Ground Floor FFL. This will enable a good visual relationship with the pavement and principal street elevation along Windmill Street and enable the existing vehicular access point along Woodville place to be utilised. Further information is provided on page 57 of the Design & Access Statement.
	Use of render	Low-maintenance, long-lasting materials and detailing that respond to the historic local-context have been fully considered. Please refer to page 30 -31 of the Design & Access Statement. Churchill use a product called K Rend which is a coloured render which goes on the outside walls of your house instead of sand, cement & paint or bricks. The colour pigment is within the render meaning you don't have to paint it. K Rend renders contain silicone which helps with the water repellence. This ensures the render stays fresh by keeping the surface drier for longer, making it more resistant to algae growth. Churchill have their own in-house management company who look after all development in perpetuity and regular inspections are carried out of all our properties to ensure they are in pristine condition. In addition, each lodge is managed by a dedicated lodge manager (Monday to Friday, 9 till 5) who will escalate any maintenance issues between inspections.
	Location & refurbishment of police plaque	The police plaque will be retained and integrated within the entrance piers. We would suggest that details on the relocation and refurbishment of the plaque be secured by a suitably worded condition.
	Lighting	The applicant agrees to the provision of a lighting strategy and recommends that this is secured by a suitably worded condition.
	Status of Drawings in TS as indicative	Drawings in Appendix A of Transport Statement to be reissued without 'For Information Only' label.
	Sustainability – details of measures to be used	Details of sustainability measures t are contained within Sustainability Statement but a summary of the measures includes: • Energy efficient construction specification • Efficient electric heating systems to each apartment and communal areas • Naturally ventilated accommodation

Statutory Consultees Responses on Windmill Street, Gravesend
(Ref No. 20220432)

		- Fabric Energy Efficiency Betterment (EEB) of 10.3% over Building regulations Part L. - Photovoltaic panels proposed to be installed on areas of roof where appropriate.
	Overlooking from corner T-block units	The corner flats used are proven standard CRL flats which have been carefully designed for the purposes of spanning the corner whilst providing adjoining residents good levels of privacy and eliminating any overlooking concerns between the two. The flats have been laid out with living spaces (where habitation levels are higher) are at the extremities of each flat and at the furthest point to one another. The natural reflectivity of the glass this helps limit any views into the opposing internal space and furniture layouts carefully considered to orient the natural direction of view from the apartments outwards and away from their neighbours. Bathrooms have also been internalised to make optimum use of the residual space inherent to the corner, so there is no privacy issue in this regard. Bedrooms have been carefully designed so to position the bed and walk in wardrobe are on opposing sides of the party wall to ensure overlooking is not possible.