

Presentation to Tenterden Town Council on 4th May 2020, in objection to Application 17/00708, 56 bed Care Home etc.

Subject: Care Home staff car parking.

I would draw the Council's attention to an apparent error in DHA's 2018 Transport Statement which has caused the Care Home staff car parking requirement to be significantly under provided.

The provisioning of parking is governed by the "Kent and Medway Structure Plan: Supplementary Planning Guidance 4 (SPG4) 2006" There are 2 paragraphs in this document which apply to class C2.

The first is on page 7, paragraph 23, headed 'Measuring Developments'. This paragraph explains in broad terms how parking for different classes of development should be calculated, some of which are based on floor area, others on the number of staff or visitors etc. It contains the following clause, quote: "**Where appropriate, the number of full-time equivalent staff should be used.**" end quote. Now, "*appropriate*" may seem an odd word to use but, in the context of this paragraph, this clause is only *inappropriate* for any calculation which is *not* based on staff numbers. Bear this clause in mind as its significance will become clear.

The second relevant SPG4 section is on page 23, paragraph 55, 'Land Use Class C2'. This is the table that specifies the Residential Care requirements for ambulance parking, employee parking and visitor parking. Ambulance and visitor parking are unambiguous and cause no concern. Under employee parking it states, quote: "1 space per resident staff + 1 space per 2 other staff", end quote. In the original 2017 Crabtree application the number of full-time equivalent staff is stated as being 60. Therefore, the number of staff car parking spaces required by SPG4 for 'other staff' is 60 divided by 2 = 30.

DHA's calculation of the staff car parking spaces is in their 2018 Transport Statement on page 15 paragraph 4.6.3, under 'Parking Policy' and it states, quote:

"According to the proposed Care Home operator, the 56-bed Care Home will require no resident staff. For other staff, it is likely that during the day there will be 11 care staff and 10 support staff, with fewer staff on duty during the night. Therefore based on this, the Care Home will require 11 car parking spaces for employees ((11 + 10) / 2 = 10.5)." End quote.

DHA, whilst quoting from SPG4, have ignored the clear instruction to use the full-time equivalent staff number and have generated their own

interpretation based on the shift number provided by Barchester. There is a huge disparity between their figure of 11 spaces and the 30 which SPG4 would require.

30 spaces may sound generous but, just as with hospitals, care staff will need an overlap on shift change to facilitate handover. The overlap period could mean that all these spaces will be occupied at times.

I ask that TTC evaluate this presentation and, if determined to be a valid proposition, it is presented to ABC in order that they can explain their grounds for approving DHA's figure.

End of presentation.

R. Haslam, Rogersmead, TN30 6LF

The full text of SPG4, paragraph 23, Measuring Developments

23. The parking standards for cars, goods vehicles (where applicable), cycles and motorcycles are cumulative. The parking provision required for a development is usually based on the floor area, the number of staff, the seating capacity or the number of visitors. However, other factors may also apply. Unless otherwise stated, the floor space to be used in applying the standards is the gross floor area based on the external measurement over each floor of the building with corridors, stairwells, etc. included in the measurement. **Where appropriate, the number of full time equivalent staff should be used.** To avoid delay in processing planning applications developers should provide an estimate of staff numbers either at informal inquiry stage or with the planning application. When parking is based on visitor numbers this may be determined from a business plan for the occupier, or by comparison with similar developments

SPG4, paragraph 55, Land Use Class C2

Maximum Vehicle Parking Standards

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