

Delegated Report

Planning Application

Planning Application No: 20250248

Location: 5 Bernard Street Gravesend Kent DA12 2EX

Description: Change the use of the building from residential to a children's home.

Applicant: Miss Olabisi Solomon, New Pathway1 Ltd

Site Visit Date: 1st April 2025

Submitted Documents/Plans

Planning Application Form;
Site Location Plan;
Block Plan; and
Drawing No. GRE-2501-001 Rev A – Floor Plans.

Relevant Planning History

None.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- H5 – Increasing Housing Stock by Conversion of existing Buildings
- H6 – Provision to Meet Special Housing Needs

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development

- Section 12 – Achieving Well-Designed Places
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- King Street Conservation Area Appraisal (2009)
- Management Plan Gravesend Town Centre Conservation Areas (2009)

Consultations, Publicity and Representations

Consultees

Kent Police Designing Out Crime

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Due to the proposed use of the site, we would recommend the applicant review current site security and boundary treatments. We advise boundary treatments to be a minimum of 1.8m in height with support beams facing inwards, any gates to a rear/ side access must also be securely lockable from both sides. It is essential that there is no unauthorised access to the rear of the site either via the side access route or via neighbouring premises.
2. We recommend CCTV be installed at the main entrance doors to monitor the movements of the occupiers. In some circumstances, it can be advisable for staff carry personal attack alarms and in some instances BWV cameras for safety purposes.
3. We recommend lighting to cover entrances to aid in natural surveillance.
4. We strongly recommend external doors and windows meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Existing rear doors and windows that are not being replaced may require limiters/ restrictors to help maintain security.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCOs and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Neighbouring properties

The application was publicised by the displaying of a site notice, press notice and letters sent to nine surrounding properties with an overall expiry date of 25th April 2025. One letter of objection has been received making the following summarised comments:

- Concerns about potential impact on quality of life and my home environment
- Close proximity to neighbours
- Very thin walls and noise travels
- Increased levels of activity and noise
- Unsociable hours
- Highly disruptive and detrimental to living environment
- Current residential use is already noisy
- This property is not appropriate for the use
- Parking

Officer's Analysis

Proposal

The proposal is for the change of use of the existing 3-bedroom single residential (C3 - Dwelling house) to small residential care home (C2 Use). The property is already in use for the care of one looked after child (LAC) who is 14 years old with no special needs. In terms of the care arrangements, this would be in the form of 2no. non-resident care staff working on a shift basis starting at 9am and finishing at 9pm, 9pm to 9am the following day. No internal or external alterations are proposed. The purpose of the application is for the formal change of use to be able to register under Ofsted to provide care for look after looked after children.

There are no on-site parking facilities, the majority of staff do not have cars, but those that do and social workers visiting the site use the pay meter and park in town.

Site Description and Surroundings

The property is a two storey mid-terrace dwelling located within a residential road close to the Gravesend town centre. The property is located in the King Street Conservation Area. Parking is on-street permit only.

The property is a 3-bed single residential dwelling which is currently in use for the care of one 14-year-old looked after child, who's care is on a 9 to 9 shift pattern with two members of staff.

The principal issues in the consideration of this application are:

- Housing Need and principle of development;
- Design and impact on the surrounding area and conservation area;
- Amenity of future occupiers;
- Amenity of neighbouring properties;
- Parking and highway safety; and
- Ecology and biodiversity.

Principle of Development

The application site lies within a residential area. Policy CS14 of the Local Plan Core Strategy (LPCS)

requires that the Council protects the mix of housing in the existing housing stock while also expecting new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

The application site is a residential dwelling, however it is already in use for the care of one looked after child.

The proposal would regularise the use as a residential care home (C2 Use) for one looked after child. The proximity of the site to the town centre, local amenities and public transport links is such that its sustainable location is acceptable in principle as per Policy CS01 (LPCS).

Whilst the proposal would not be a conversion of the building and just a change of use from C3 dwelling house to C2 residential children's home, it is important that the change of use of the building does not cause harm to the character and amenity of existing areas. Therefore Saved Policy H5 (LPFR) is still relevant.

Saved Policy H5 (LPFR) with regard to proposals for conversion of existing properties to provide flats states that the Borough Council will have regard for the following criteria;

(i) The building shall be in an appropriate area for conversion to flats maisonettes, bedsitters and multiple occupancy. Unless there are special or overriding circumstances, conversions will not normally be permitted in an area comprised for the most part of single family dwellings.

Conversely conversions will not normally be permitted in areas which are environmentally unsuitable for young families and which already demonstrate a predominance of multiple occupation.

(ii) The building shall be of such a size and arrangement as to be generally unsuitable for single family occupation.

(iii) The proposal shall have regard to the Borough Council's Residential Layout Guidelines, as set out in supplementary planning guidance.

(iv) The adopted Vehicle Parking Standards must be achieved wherever feasible.

Saved Policy H6 (LPFR) with regard to the provision to meet special housing needs states that the Borough Council will in principle support proposals in appropriate locations by Housing Associations, the private sector and other organisation which incorporate:-

(iii) With regard to proposals for residential hostels and homes, whether by new build or by conversion, the Borough Council will take particular care to ensure that these do not cluster together and harm the overall character of the area.

The property is currently in use for the care of one looked after child and this is its intended use. In addition, whilst the proposal is for the change of use from a C3 dwelling house to C2 residential children's home, the property is not being converted and as such would still operate as a single residential dwelling. Also, taking into consideration the single residential character of the area, a wholly new type of use is not being introduced into the area. There is no clustering effect which may harm the overall character of the area. The property is located in a street predominantly consisting of single family dwellings. As such the character of the area is domestic, and the proposed change of use will not erode the domestic character of the area.

It is considered that the proposal is in accordance with saved Policies H5 and H6 of (LPFR), but also Policy CS14 (LPCS) which states development provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

The preamble to this policy in paragraph 05.10.6 states that the Council's strategy is to plan for a mix of house sizes and types that will be appropriate to the differing needs of the community. Paragraph 5.10.7 states that while the Council will look to support the provision of housing to meet the requirements of people in special need of help or supervision, the use should not change the character of the area nor involve a loss of amenity to residents because of potential noise and disturbance it could create outside normal

working hours.

Having regard to the above, it is concluded that the principle of the change of use of the property is acceptable.

Design and impact on the surrounding area and the King Street Conservation Area

CS19 (Development and Design Principles) (LPCS) sets out the design principles which will be taken into account when considering proposed redevelopment proposals. The policy requires new development to be visually attractive, fit for purpose and locally distinctive. In particular, the design of new development should be derived from a robust analysis of local context and character, make a positive contribution to the street scene and the character of the area and integrate well into the surrounding area. At a national level the revised National Planning Policy Framework 2024 (NPPF) in section 12 provides guidance on achieving well designed places.

CS20 (Heritage and the Historic Environment) (LPCS) states that when considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset.

There are no proposed alterations to either the front or rear elevations and as such there are no objections in terms of the impact of the proposal on the streetscene or the King Street Conservation Area.

Existing Streetscene



In terms of design, the proposed development accords with Policies CS19 and CS20 (LPCS) and paragraphs 135 and 208 of the NPPF (2024).

Impact on Residential Amenity

Paragraph 135 of the revised NPPF (2024) seeks to ensure decisions “*create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future user*”.

Policy CS19 (Development and Design Principles) (LPCS) seeks to ensure new development is located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight of its occupants and those of neighbouring properties and land, new development should meet the requirements of the Nationally Prescribed Space Standards in terms of the size of the accommodation being provided based on the level of occupancy, bedroom size and building height and the adopted Residential Layout Guidelines in terms of the appropriate levels of private amenity space for future residents.

Future occupiers:

Internal living space

The current proposal seeks to provide supported accommodation for up to 1 child and the proposal does not include any conversion of the property. The existing bedrooms provide a good level of accommodation with access to natural light and outlook.

Therefore the proposal would provide a good standard of internal living space for future occupants and as such complies with Policy CS19 (LPCS) and paragraph 135 of the NPPF (2024).

In terms of private amenity space, the existing external areas in total measures 28.38m² which falls short of the 60m² minimum for a 3-bedroom property. There are no extensions proposed that would alter the size of the garden and the amount of bedrooms would remain. Whilst it is acknowledged that the garden area is deficient, this would be the case if the property would remain within the C3 Use Class, and it is not considered that the proposed use of residential accommodation for children would significantly alter this position. In addition, the property is located within a short walk from the Riverside Country Park.

Neighbours amenities:

The existing property is a 3-bedroom residential property which has the potential to house up to 4 persons due to one of the bedrooms being of double room size. The proposed use would provide accommodation for up to 3 people (1 residents and 2 staff members). There are no elevational changes proposed that would have an impact on the surrounding properties.

In terms of occupancy and a potential intensification of use and increase noise, the existing dwelling is currently in use for the care of a looked after child and the change of use is for the purposes of Ofsted registration. Therefore there should not be any increase activity or noise experience as a result of this application. Furthermore, the property is a 3-bedroom property and as a result of the proposal would remain as a 3-bedroom property, but with only 1 bedroom being used for a looked after and the other two bedrooms for staff occupation. Overall, and taking into account the existing built form of both the application site and the surrounding buildings, it is considered that there will be no loss of outlook, daylight or sunlight to any neighbouring property and therefore complies with Policy CS19 (LPCS) and paragraph 135 of the NPPF (2024) in this regard. The proposed use is not materially different from a single family dwelling due to the modest nature of the childrens home.

Waste Collection

The existing waste provision and collection would remain unaltered, with the property being able to use

kerbside collection. There is no objection to this arrangement and therefore the proposal is considered acceptable and in accordance with Policy CS19 (LPCS).

Parking and Highways

In terms of highways, the existing property does not benefit from off road parking. The KCC Parking Standards requires 1 parking spaces for a 3 bedroom residential property in a town centre location, therefore the existing property does not accord with these standards. However the proposal would not result in a change in the number of bedrooms at the property. There is on street parking available and staff either don't drive or use meter parking in town and walk to the property. The number of staff proposed is two members of staff working on a shift basis and therefore the maximum number of parking required would be 2. Due to the proximity of the property to the town, local services and public transport, it is possible that staff may not rely on a personal vehicle to travel. It is therefore considered that the parking provision for the existing and the proposed use would be the same and therefore there is no objection to the proposed change of use in this regard.

There are no objections to the proposal subject to a condition of maximum occupation and for secure and weatherproof cycle storage be provided for a minimum of one space in the interests of sustainable transport. It is considered a condition would be included relating to cycle storage.

Subject to conditions, in respect of parking and highways the proposal is considered compliant with Policy CS11 (LPCS) and saved Policy P3 (LPFR).

Other Material Considerations

Crime and Anti-Social Behaviour

The Kent Police Designing Out Crime Officer was consulted on this application and no objections were raised, however it was suggested that the applicant review current site security and boundary treatments. Boundary treatments should be 1.8m in height with the gates lockable from both sides and security cameras installed at the main entrance, together with security lights. An informative will be added to the application to encourage engagement with Kent Police in this regard.

Taking into account the number and age of the proposed residents, together with the number of staff permanently on site, there are no objections in terms of crime and anti-social behaviour.

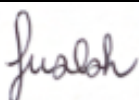
Conclusion

It is considered that the proposal would accord to local and national planning policy and is therefore recommended for approval.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Mrs Faye Walsh
Signed:	A Cue	Signed:	

Dated:	23rd May 2025	Dated:	23 May 2025
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