

68 Whitehill Road Gravesend DA12 5PH

PLANNING, DESIGN & TRANSPORT STATEMENT



Use of dwellinghouse for up to 7 adults requiring care (Use Class C2);
together with associated bin store, cycle store and landscaping.

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SECTION 1: SITE AND DEVELOPMENT DESCRIPTION

Site description

- 1.1 The application site covers 443 square metres and contains a semi-detached, 5/6-bedroom dwellinghouse arranged over two storeys, with an additional previously converted attic. The property is surrounded by landscaped gardens to the front, side, and rear. The front garden has not been previously converted into a driveway.
- 1.2 The application site forms a corner plot at the intersection of Whitehill Road and Hollybush Road. The former is a relatively busy, classified road defined by the local development plan as a “local distributor road”. A detached garage is located at the rear of the site, accessible from Hollybush Road, though it is not currently used for parking due to internal space constraints.
- 1.3 Due to its corner position, the application site borders only two other properties: the side of 1 Hollybush Road to the rear and 70 Whitehill Road, the adjoining semi-detached property.
- 1.4 The application site is situated in a residential neighbourhood of Gravesend, less than a 20-minute walk from Gravesend Town Centre, the borough’s principal hub for economic activity, transport, shopping, and local services. It is the only designated town centre within the borough. A bus stop is located directly outside the site, offering a frequent service (every 20 minutes during the day) on bus route 482, which connects to the town centre in under 7 minutes. In other words, the application site is in one of the best-connected parts of the borough. There are no parking restrictions on or near Whitehill Road or Hollybush Road.
- 1.5 Permitted development rights available to the applicant have not been removed by means of an Article 4 Direction or previous planning consent. Consequently, the existing dwellinghouse could already be used as an HMO (Use Class C4) or supported housing (Use Class C3b) occupied by up to six people without the need for planning permission or the ability for the Council to control any such uses through the imposition of planning conditions.

Development description

- 1.6 The proposed development involves the use of the existing dwellinghouse to provide extra care housing (Use Class C2) for up to seven young adults (typically defined as those aged between 18 and 64) with autism or learning disabilities, as their main residence. Although the maximum occupancy will be capped at seven, there will often be periods where fewer residents are present, such as during tenancy transitions or to optimise staffing levels.
- 1.7 The proposed C2 use will also require up to four non-resident staff (i.e., staff who do not sleep at the premises or use it as their residence) to be present on site at any given time, across both day and night shifts. This arrangement ensures adequate safeguarding, with one staff member required to supervise up to two

residents. Consequently, to maintain optimal staffing levels, occupancy may occasionally be limited to six residents (an even number).

- 1.8 No external building operations are proposed, except for the installation of a bin store and cycle store (which are currently lacking) at the side of the property. Other works are limited to the introduction of new perimeter planting, for which planning permission is not technically required, as such works do not constitute “development” under Section 55 of the Town and Country Planning Act 1990. Nonetheless, these works have been included to enhance the planning merits of the proposed development.

SECTION 2: PRINCIPLE OF DEVELOPMENT (LAND USE)

- 2.1 The provision of supported housing and other residential accommodation is supported by paragraph 63 of the National Planning Policy Framework (NPPF, 2023), which states:

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The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.

- 2.2 At the local level, policies supporting residential institutions and other forms of supported housing are contained within the Gravesham Local Plan Core Strategy (2014), particularly Policy CS14 ('Housing Type and Size'), which, under paragraph 5.10.10, states:

Sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants.

- 2.3 The application site, as detailed in Sections 1 (Site Description) and 5 (Transport and Highways), is situated in one of the best-connected areas of the entire borough, within walking distance of Gravesend Town Centre and Gravesend railway station. A frequent bus service connecting the application site with the town centre also stops outside the property. As such, the accessibility requirements of Policy CS14 are unequivocally met.

- 2.4 However, paragraph 5.10.7 of the Local Plan also stipulates:

The Council supports the provision of housing to meet the requirements of people in special need of help or supervision, where conventional housing may not be suitable. However, it is important that the concentration of residential institutional accommodation is controlled. This will ensure that the properties themselves are suitable and that the intensification of use in residential areas will not change the character of the area, nor involve a loss of amenity to residents because of the potential noise and disturbance it could create (including the impacts from service traffic) outside normal working hours. The Site Allocations and Development Management Policies DPD will include policies relating to residential institutional accommodation.

- 2.5 In relation to the proposed development, there are no records of any other assisted housing, sheltered housing, or similar C2/C3b land uses in the vicinity of the application site, including along Whitehill and Hollybush Roads. The Council's formal pre-application feedback (reference PRE20240068) confirmed that the proposal would not lead to an overconcentration of such uses in the area.

Therefore, the second requirement of the Local Plan—to avoid overconcentration of similar uses—has been clearly met.

Note: The applicant has reviewed the Council's public planning registry as well as their HMO register¹ (an HMO licence is required for most types of assisted living that meet the licensing requirements of the Housing Act 2004). This review has confirmed that there are no records of properties in C2 use or properties occupied by three or more unrelated individuals forming multiple households in the vicinity of the application site, or indeed anywhere on Whitehill Road and Hollybush Road.

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2.6 Regarding the loss of the existing dwellinghouse currently classified under Use Class C3(a), the pre-application report did not raise any concerns. Paragraph 5.10.8 of the Local Plan, linked to Policy CS14, specifies that only “the conversion of family-sized residential units to smaller properties” will be resisted. The explanatory notes (specifically paragraph 5.10.6) clarify that, for the purposes of this policy, family-sized housing refers to “two and three-bedroom homes”. In this case, the application site neither contains a two or three-bedroom home (it consists of 5-6 bedrooms) nor is it being converted into smaller properties. The development plan policy is therefore met.

2.7 Even if, for the sake of clarity and in response to emerging housing trends, reference is made to the emerging policies of the Council's Regulation 18 iteration of the Development Management Policies Document, family-sized dwellings (the loss of which is resisted under emerging Policy DM 29) are defined as those “with up to 4 bedrooms or a maximum gross internal floor area of 118 square metres, whichever is greater”. In the case of the host dwelling, it contains more than 4 bedrooms and has a GIA well above 118 square metres. Therefore, the loss of a dwelling under C3(a) use would not be contentious under the emerging development plan.

Note: no weight should be attributed to the emerging policies in decision-making, as they have not yet completed the statutory adoption process. Nevertheless, these policies provide a useful indication of future housing trends and allow for a robust assessment that goes above and beyond current planning requirements.

2.8 In any case, in absence of a relevant direction under Article 4 of the General Permitted Development Order 2015, the existing dwellinghouse could be used for any other purpose falling within Use Classes C3(b) (sheltered housing for up to 6 people) and C4 (HMOs for up to 6 people) without the need for planning permission.

2.9 In conclusion, the change of use from a 5/6-bedroom dwellinghouse to supported housing for individuals with learning disabilities (whether classified under Use Class C3(b) or C2) is fully aligned with and supported by the local development plan.

¹ <https://www.gravesham.gov.uk/directory-record/309/hmo-public-register>

- 2.10 During pre-application discussions, officers requested that any future application for planning permission be supported by information regarding the need for extra care housing, as proposed by the applicant. However, after assessing the policies contained within the local development plan (upon which planning decisions must be based), no explicit or implied policy requirement for such evidence was identified. Instead, the local plan clearly supports extra care housing (provided it is located in a suitable location) and acknowledges that a change of use for existing homes with four or more bedrooms is acceptable in principle.
- 2.11 Nonetheless, the need for more assisted housing units, particularly for individuals with learning disabilities or autism, is widely acknowledged in research on mental health and care needs.
- 2.12 For example, in its “State of Care 2022/23” report, the Care Quality Commission (CQC) – the body responsible for regulating the applicant and established under the Health and Social Care Act 2008 – states²:

Local authorities are planning for increased demand for services for people whose needs are more complex to meet. This includes specialist dementia care, managing multiple long-term conditions or services for people with a learning disability. However, significant market investment will be needed to provide extra care housing, supported living and suitable community housing, as well as homecare services.

- 2.13 These findings are supported by the report titled “Supported Housing for People with Learning Disabilities and Autistic People in England” (2023) issued by the Housing Learning and Improvement Network (LIN). It concluded³ that “it is estimated that there will be a shortfall of approximately 27,000 to 34,500 units of supported housing by 2037, or around 1,800 to 2,200 units per annum,” and that “supported housing plays an increasingly critical role in enabling people with a learning disability and autistic people to live independently at the heart of their communities.”
- 2.14 Academic research also highlights the need for more extra care housing. Wittenberg and Hu, in their 2017 research entitled “Projected Demand for Supported Housing in Great Britain 2015 to 2030⁴,” prepared for the Economics of Health and Social Care Systems Policy Research Unit at the London School of Economics, established that, in relation to supported housing for younger adults (defined as aged 18 to 64 years), they “project that the number of supported housing units for people with learning disabilities will need to rise by around 55% in England and around 53% in Great Britain over the 15-year period from 2015 to 2030.”

² <https://www.cqc.org.uk/publications/major-report/state-care/2022-2023/systems>

³ <https://www.housinglin.org.uk/Topics/type/Supported-housing-for-people-with-learning-disabilities-and-autistic-people-in-England/>

⁴ https://eprints.lse.ac.uk/84075/1/Wittenberg_Projected%20demand_2017_author.pdf

- 2.15 Additionally, all residents proposed to reside at the property will be referrals from the Council's own social services department, which underscores the need for extra care housing locally.
- 2.16 The Council's formal pre-application feedback (reference PRE20240068) has indicated that the employment of staff proposed in connection with the development will "give some weight to the development proposals in the overall planning balance," as the proposals align with Policy CS07, which aims to "enhance opportunities for all local people to access new jobs."
- 2.17 Indeed, the proposals will generate employment for 8 front-line support staff working in shifts (with no more than 3 or 4 members of staff on the property at any time), as well as an off-site administrator. The employment provisions will amount to 7 x 2,080 full-time equivalent (FTE) hours. It is anticipated that all staff members will be hired from the local area, facilitated by the site's location within the borough's largest centre of population, close to the economic, social, and transport hub of Gravesend town centre.
- 2.18 On balance, the proposed use aligns with the policies contained within the development plan, meeting key requirements such as good accessibility to local transport and services, and avoiding an overconcentration of similar uses. Furthermore, the applicant's choice of site has been thoroughly assessed and preferred over other options for the following key reasons:
- The preferred site must be situated in a residential neighbourhood; housing for more vulnerable individuals should not be located in town centres, light industrial areas, or other zones that are not predominantly residential or are disconnected from the local community.
 - The site must be situated near local populations (i.e., within a catchment area) to serve both residential referrals and staff. Additionally, it should be close to public transport and local services, and located on a well-connected but not overly busy or noisy road (the 'C road' classification of Whitehill Road is in fact ideal). A remote site would never be acceptable.
 - The premises must be spacious (i.e., a dwellinghouse of above-average size), located on a large plot, suitable for housing, and/or easily adaptable for its intended use.
- 2.19 Given the requirements of the Local Plan and the needs of future residents, it is evident that the only feasible sites for extra care housing are those located within established residential neighbourhoods in urban parts of the borough. The presence of neighbours is not only unavoidable but also welcomed, as it helps integrate residents into the heart of the community, in accordance with Government and NHS guidance. The applicant has already taken steps to mitigate potential impact on neighbours by choosing a corner plot, which is only bordered by other properties on two sides (rather than three), and is significantly larger than surrounding plots. Additionally, the closest neighbour (the adjoining semi-detached house) has expressed support for the proposed development. As demand for extra care housing is expected to grow until at least 2037, and such

housing must be located somewhere, it is considered that this site is well-suited for this purpose.

SECTION 3: DESIGN AND APPEARANCE

- 3.1 The works required to enable the proposed change of use are entirely internal; consequently, the proposals will not have a material impact on the external appearance of the building or the character of the area.
- 3.2 Although it is proposed to install bin and cycle stores within the curtilage of the existing property, these measures are not strictly necessary to facilitate the proposed change of use. Instead, they are being introduced to address existing deficiencies in the current setup. In other words, if these facilities were not provided, bins and bicycles could still be stored in non-specific areas within the property's curtilage, meaning there would be no material departure from the current arrangements.
- 3.3 In any case, the proposed external alterations would not negatively impact the appearance of the property. For instance, the proposed cycle store would be positioned discreetly at the side of the building, behind existing tall boundary treatments. As a result, it will not be visible from surrounding viewpoints.
- 3.4 Finally, to improve the appearance of the property and further mitigate any residual concerns about noise, the applicant has highlighted planting improvements on the proposed plans. These include the provision of tall hedges around the site perimeter and the introduction of a planted buffer zone along the shared boundary with 70 Whitehill Road (see Section 7 on Neighbouring Amenity for further details).
- 3.5 Consequently, the proposals are considered acceptable on design grounds, likely resulting in an improvement over the existing arrangements.

SECTION 4: WASTE COLLECTION

- 4.1 Bins are currently stored at the side of the property; however, there is no dedicated bin store.
- 4.2 To improve upon the existing arrangements, it is proposed to erect a timber-clad bin store at the side of the property where the bins are currently stored.
- 4.3 If required, additional space is available for bin storage at the rear of the property, within the redundant driveway of the disused garage, which is accessible from Hollybush Road.

SECTION 5: TRANSPORT AND HIGHWAYS

Car parking

- 5.1 Policy CS11 ('Transport') of the Gravesham Local Plan Core Strategy (2014) states:

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Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities (par. 5.5.39). The Council will require applicable new developments to prepare and adopt Transport Assessments and Travel Plans using Kent County Council's guidance "Transport Assessments and Travel Plans, October 2008." It will also require developments to take into account current car parking standards. These will be refined taking into account the availability of alternative means of transport and accessibility to services and facilities (5.5.35). Currently, the Council uses the Kent Vehicle Parking Standards which it adopted in July 2006 as Supplementary Guidance. This recognises that the control of parking at new developments is one way of promoting more sustainable forms of transport (5.5.36).

- 5.2 In addition, Policy T11 of the Gravesham Local Plan First Review Adopted November 1994 (Saved Policies, 2014) states:

All new development will normally be required to provide parking in accordance with the County Council's Vehicle Parking Standards or a local town centre standard where this has been agreed between County and District Councils.

- 5.3 Before assessing the parking standards applicable to the proposed development, it is essential to understand the parking requirements of the existing use, so that the existing requirements can be offset against the proposals.
- 5.4 With regard to Use Class C3, the Kent Vehicle Parking Standards (2006), which have been adopted locally as Supplementary Planning Guidance SPG 4 (2006), prescribe a maximum of "3 spaces per dwelling" for dwellinghouses with "4 or more bedrooms". This indicates that, although a dwellinghouse with 4 or more bedrooms may generate demand for up to 3 car parking spaces, every effort should be made to limit the amount of parking provision to support more sustainable methods of transport, especially in areas well served by public transport or within close proximity to local services or a town centre.
- 5.5 The existing dwellinghouse (Use Class C3) consists of 5 bedrooms (or 6 if the second/surplus living room is counted as a bedroom); therefore, it is likely to generate demand for up to 3 car parking spaces, in accordance with the adopted SPG.
- 5.6 'Note 2' of the parking standards for Use Class C3 clarifies that "the level of car parking provision includes any garages, provided as an integral part of the

dwelling or within its curtilage, and/or driveways provided within the curtilage, subject to the preferred sizes set out in Appendix B".

- 5.7 Appendix B of the SPG refers to the use of residential garages for the purpose of car parking as follows:

Experience has shown that garages provided for individual residential dwellings are unlikely to be used for the parking of a vehicle unless sufficient space is also incorporated within the garage for storage. This may have less relevance for garages that are provided as a communal facility for residential accommodation. However, the needs of the mobility impaired, either as a driver or as a passenger, should also be considered in the design of garages and sufficient space should also be allowed to enable a garage to be used as a secure location for any cycle parking provision.

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- 5.8 Appendix B states that the internal dimensions for a garage to be considered suitable for parking are 5.5m (length) x 3.6m (width) for a single car and 5.5m (length) x 6.0m (width) for two cars.
- 5.9 There is an existing detached garage at the rear of the application site, accessible from a dropped kerb on Hollybush Road. The internal width of this garage varies between 2.8 and 3.1 metres, while the length is 9 metres. Consequently, according to the SPG, the existing garage would be considered unsuitable for parking and must therefore not be counted towards the existing on-site parking provision. Indeed, as observable in historic Google Streetview photographs, the site owners previously parked their cars on the public highway in front of the access to their garage, rather than inside it, precisely because of space constraints.



The existing outbuilding is not used for car storage, as its internal dimensions are too restricted to safely manoeuvre vehicles in and out, or to allow the doors of modern cars to open properly.

- 5.10 In conclusion, the existing land use is likely to generate demand for up to three car parking spaces, all of which are currently provided on the public highway in the form of on-street parking.
- 5.11 Regarding the proposed land use, the Council's Supplementary Planning Guidance SPG 4 (2006), in particular paragraph 55 ('Land Use Class C2: Residential Institutions') sets maximum car parking standards based on predicted demand for Class C2 uses, such as "residential accommodation with an element of care for people in need" (e.g., "Residential Care Homes"). For employee parking, the SPG specifies a maximum of "1 space per resident staff member" or "1 space per 2 other (non-resident) staff". For residents and visitors, it recommends up to "1 space per 6 beds or residents."
- 5.12 The proposed use will accommodate up to 7 residents at peak capacity, though typically, to ensure more efficient staffing (with one carer required for every two young adults living at the property), the total number of residents will be 6. As a result, the proposals are expected to require up to 1.16 parking spaces at peak capacity or up to 1 space when operating at its most efficient setup.
- 5.13 In terms of staffing, safeguarding requirements will necessitate one staff member on site for every two residents present at the premises. At peak capacity, 3.5 staff members may be required (rounded to 4 in practical terms); however, to ensure staffing efficiency, there will often be only 6 residents, requiring no more than 3 staff members on site at any given time.
- 5.14 None of the staff will be residential staff, meaning they will not live at the property as their main residence. Instead, all staff will be non-resident, working in shifts and returning home after work. Consequently, the maximum anticipated demand for staff parking, as outlined by the SPD, is expected to be between 1.5 and 2 spaces (for between 3 and 4 non-resident staff members), depending on occupancy.
- 5.15 Applied to the proposed use, this suggests a total maximum provision of 3.16 parking spaces for staff, residents, and visitors when the premises are at peak capacity (7 residents), or 2.5 spaces when occupied by 6 residents. On balance, it is reasonable to state that parking demand for the proposed use could reach up to 3 spaces.
- 5.16 Consequently, the maximum parking standards — and therefore the predicted parking demand — for the proposed use (up to 3 spaces) are similar those for the existing use, which would also require up to 3 parking spaces. In other words, unless the proposed development results in a reduction of parking spaces (which it won't), there should be no change in the number of parking spaces needed, as the demand from both the existing and proposed uses remains the same.
- 5.17 The above conclusions are unsurprising once the personal circumstances of the residents are considered. The Council's parking standards refer to "Residential Care Homes", which are often understood to be supported living facilities for the elderly. As such, residents are typically unlikely to drive or own a car. In the case

of the proposed use, it is for similar supported living accommodation, but specifically for young adults with autism or learning disabilities. Not only are these individuals unlikely to be able to drive or own a car, but in this instance, it is a condition of their stay that they are not permitted to drive or keep a vehicle, as doing so would interfere with their safeguarding.

- 5.18 As a result, by the very nature of the proposed use, residents will neither need nor be allowed access to parking spaces. Regarding visitors, unfortunately, based on the applicant's experience, due to the personal circumstances of most referrals, residents are typically visited no more than once a month on average; in some cases, they receive only one visit per year. Consequently, the demand for visitor parking is low. Moreover, as all visits must be pre-arranged, staff can ensure that no two visitors are present at the same time and can encourage them to use public transport, which is facilitated by the short distance to Gravesend town centre and its local and regional transport services.
- 5.19 Consequently, while SPG 4 predicts parking demand of up to one space per six residents in C2 accommodation, the actual demand for residents and visitors at the application site may be closer to zero.
- 5.20 Regarding non-resident staff, while the SPG makes allowances for up to between 1.5 and 2 parking spaces, the calculations in that document apply to Kent as a whole and do not consider factors such as proximity to public transport, local services, or employment catchment areas. Given that the application site is situated in one of the best-connected areas of the borough, it is reasonable to expect that actual parking demand may be lower.
- 5.21 Indeed, the application site is situated in a residential neighbourhood of Gravesend that is less than a 20-minute walk from Gravesend Town Centre, the borough's principal hub for economic activity, transport, shopping, and local services. It is the only designated town centre within the borough. A bus stop is located directly outside the site, offering a frequent service (every 20 minutes during the day) on bus route 482, which connects to the town centre in under 7 minutes. In other words, the application site is in one of the best-connected parts of the borough. Whitehill Road itself is classified as a "C Road" or "local distributor road".
- 5.22 The applicant has also confirmed that most, if not all, of the staff will reside locally and will be encouraged to use public transport for their commute. The applicant will endeavour to manage staffing so that, at any given time, of the 3 to 4 staff members present on site, only one will travel to work by car. This rota will ensure that at least one car is available for taking residents on occasional trips, using a staff member's vehicle that is pre-designated and adheres to the correct insurance requirements. Any trips will likely involve no more than two residents at a time, in order to comply with safeguarding requirements.
- 5.23 Given that the application site is neither within nor close to a controlled parking zone⁵ (indicating no evidence of any shortage of on-street parking), and

⁵ <https://kent.traffweb.app/traffweb/1/TrafficOrders>

considering that the proposed use will not result in the loss of any existing parking spaces or lead to a demonstrable increase in parking demand, the proposals are deemed acceptable in transport terms.

- 5.24 Paragraph 115 of the National Planning Policy Framework (NPPF) 2023 states that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” Based on the aforementioned findings and in the absence of any evidence to the contrary, it is clear that the cumulative impact on the road network will not be severe.
- 5.25 Finally, officers are reminded that under SPG 4, a detailed Transport Assessment and/or Travel Plan is required for proposals falling under Use Class C2 only if the demand for parking spaces exceeds 100.

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Note: While paragraph 55 of SPG 4 recommends a designated space for ambulances in connection with “Nursing/Residential Care Homes” (i.e., for C2 uses providing extra care housing for the elderly), the proposed use involves extra care housing specifically for young adults with learning rather than physical disabilities. As such, there is no need for a dedicated ambulance space beyond the existing access arrangements, which already provide direct access to all parts of the application site from both Whitehill Road and Hollybush Road, including direct access to the rear garden without having to traverse the house – another benefit of utilising a corner plot.

Cycle parking

- 5.26 With regard to cycle parking, the SPG stipulates a requirement of one bicycle space per bedroom for the existing C3(a) use, indicating a current need for 6 or 7 spaces. At present, bicycles can be stored anywhere within the curtilage of the property, including the rear garden or detached garage; however, there is no dedicated cycle store.
- 5.27 For the proposed use, the SPG sets a minimum of 1 space per 10 beds for residential institutions offering a level of care (Use Class C2). There are no specific cycle parking requirements in adopted guidance for staff.
- 5.28 The applicant proposes to install a dedicated cycle store at the side of the property, positioned in a secure location out of view from adjoining properties. This store will accommodate 2 bicycles for use by staff (as residents are not likely to cycle for safeguarding reasons).
- 5.29 The proposed cycle store therefore satisfies the minimum requirements of adopted guidance. Additional space for cycle parking is available within the curtilage of the property, including the garage. However, given that the existing dwelling does not currently have dedicated cycle storage, it is important that the requirements for the proposed use are not overly burdensome.

SECTION 6: LIVING CONDITIONS OF FUTURE RESIDENTS

- 6.1 Pre-application discussions have established that officers consider the proposed use most likely to fall within Use Class C2. Under the proposals, the existing dwellinghouse will accommodate up to seven residents (young adults with learning disabilities) in need of care, with approximately 3 to 4 members of staff present on-site at all times (maintaining a safeguarding ratio of 1 member of staff for every two residents). However, occupancy levels may fluctuate over time and could fall below a total of six residents.
- 6.2 Because the proposed use is considered to fall under Use Class C2 rather than Use Class C3, officers should not assess the internal living arrangements using the Nationally Described Space Standard (Technical Housing Standards, 2016) or the Council's Supplementary Planning Guidance 2: Residential Layout Guidelines (2020). These standards are not intended to determine internal space for residential institutions.
- 6.3 Additionally, as the proposed use will be managed by an organisation registered with the Care Quality Commission (CQC), established under the Health and Social Care Act 2008, the property will be subject to CQC's own quality standards. For example, premises managed by registered bodies providing personal care "must be clean, suitable and looked after properly⁶."
- 6.4 The applicant's registration with the Care Quality Commission (CQC), along with their most recent inspection report, is available for viewing on the CQC website⁷.
- 6.5 Nonetheless, to ensure thoroughness and provide the highest level of compliance, the applicant has evaluated the proposed living arrangements as if they were a standard dwellinghouse, adhering to the space standards outlined in the Technical Housing Standards and SPG 2.
- 6.6 The property has a gross internal area of 198.15 square metres, which exceeds the minimum requirements for all potential occupancy scenarios outlined in the Technical Housing Standards.
- 6.7 In addition, each room within the property would meet the minimum space standards outlined under both SPG 2 and the Technical Housing Standards, as follows:

Room	Floor Area	SPG 2 Minimum	National Minimum
Bedroom 1 (Single)	17.45 m ²	6.5 m ²	7.5 m ²
Bedroom 2 (Single)	19.80 m ²	6.5 m ²	7.5 m ²
Bedroom 3 (Single)	17.70 m ²	6.5 m ²	7.5 m ²
Bedroom 4 (Single)	9.90 m ²	6.5 m ²	7.5 m ²
Bedroom 5 (Single)	12.70 m ²	6.5 m ²	7.5 m ²
Bedroom 6 (Single)	18.50 m ²	6.5 m ²	7.5 m ²
Bedroom 7 (Single)	17.70 m ²	6.5 m ²	7.5 m ²
Bathroom (Main)	4.38 m ²	3.6 m ²	n/a

⁶ <https://www.cqc.org.uk/about-us/fundamental-standards>

⁷ <https://www.cqc.org.uk/location/1-996882727>

Kitchen	11.40 m ²	7.2 m ²	n/a
Lounge/Diner	21.75 m ²	18 m ²	n/a

- 6.8 In addition, office space is provided across two rooms to accommodate up to four members of care staff. While staff will be present on site 24/7, they will not be resident staff and will work in shifts, without sleeping at the property.
- 6.9 The rear garden, excluding the side passage and planted buffer, has a usable area of 170 square metres, which is well in excess of the minimum amenity area requirement of 100 square metres indicated in Table 2 of SPG 2.
- 6.10 The proposals therefore meet and exceed the minimum space requirements of SPG 2 as well as the Nationally Described Space Standard.
- 6.11 Depending on the final property management arrangements, the proposed use may also trigger the need for an HMO licence under the Housing Act 2004. **This requirement is separate from planning legislation and is not pertinent to, or material to, planning decisions made under the Town and Country Planning Act 1990.**
- 6.12 However, in the interest of thoroughness and to ensure full compliance with HMO space standards, should an HMO licence be required under separate legislation, the applicant has also assessed the proposed internal layout against Gravesham's current HMO standards⁸. Unlike planning space standards, HMO standards specify that the area occupied by ensuite shower rooms must be excluded from bedroom floor area calculations. In the case of the proposed development, all bedrooms, kitchens, and dining/living rooms meet or exceed the standards applied to HMOs with 7 to 10 occupants, demonstrating that the property is suitable for its intended use, regardless of the final management arrangements.

Room	Floor Area	HMO Minimum
Bedroom 1 (Single) excluding ensuite	14.31 m ²	6.51 m ²
Bedroom 2 (Single) excluding ensuite	16.95 m ²	6.51 m ²
Bedroom 3 (Single) excluding ensuite	14.45 m ²	6.51 m ²
Bedroom 4 (Single) (no ensuite)	9.90 m ²	6.51 m ²
Bedroom 5 (Single) excluding ensuite	10.42 m ²	6.51 m ²
Bedroom 6 (Single) excluding ensuite	16.01 m ²	6.51 m ²
Bedroom 7 (Single) excluding ensuite	15.20 m ²	6.51 m ²
Kitchen	11.40 m ²	11 m ² (for 7-10 occupants)
Lounge/Diner	21.75 m ²	18 to 21 m ² (for 7-10 occupants)

- 6.13 In summary, the proposed development would meet not only the space standards set out in the Council's Supplementary Planning Guidance and the Nationally Described Space Standard, but also those required for licensing under the Housing Act 2004. Additionally, the development must provide a suitable environment for residents in accordance with the Health and Social Care Act 2008 and its regulator, the Care Quality Commission, with which the applicant (and proposed manager) is registered.

⁸ <https://www.gravesham.gov.uk/downloads/file/41/guidance-to-hmo-amenity-standards>

6.14 Finally, no concerns were raised, nor was any follow-up information requested by officers with regards to living conditions during the formal pre-application discussions, undertaken under reference PRE20240068.

SECTION 7: IMPACT ON NEIGHBOURING AMENITY

- 7.1 The proposed development will not involve any extensions to the existing dwellinghouse or the creation of new or alterations to existing window openings. As a result, neighbouring amenity in terms of overshadowing, outlook, daylight, sunlight, and sense of enclosure will be preserved.
- 7.2 In terms of traffic generation, previous sections of this statement have already demonstrated, with reference to the own Council's Supplementary Planning Guidance (SPG 4), that the anticipated parking demand will be similar to that of the existing use. While around three staff members will be on-site at any given time, it is likely that they will arrive and leave via public transport. SPG 4 predicts a parking demand of one space per two staff members, though this does not take into account that the application site is located in one of the most accessible parts of the borough.
- 7.3 Even in the unlikely event that every staff member – contrary to the aims of their employer – were to drive to work, this would only result in vehicle movements during shift changes at 8am and 8pm. Given that the application site is situated on a relatively busy classified road (a local distribution road), this worst-case scenario of car movements would still be negligible. Moreover, as outlined elsewhere in this document, residents are unlikely to own a car and, for safeguarding reasons, will not be permitted to drive.
- 7.4 In essence, the overall traffic generation will be driven solely by staff, whose numbers are comparable to or lower than if the property were still in use as a private residence, or, for example, as a six-person house in multiple occupation (HMO), which would not require planning permission. Therefore, at worst, the proposed use is expected to generate traffic similar to that of the current or comparable uses not requiring planning permission. At best, it may lead to a reduction in traffic movements and provide more predictable and manageable traffic patterns.
- 7.5 In addition, due to its corner location, any traffic generated by the site would be distributed across two roads, effectively reducing the impact on each. This further highlights the inherent suitability of the site in terms of accessibility.
- 7.6 It has already been established that the proposed land use is supported by the local development plan, given the site's location in an accessible part of the borough and the absence of any overconcentration of similar uses. Pre-application discussions, along with a detailed review of planning permission and HMO licence records, confirm that there are no similar uses in the vicinity of the application site, including none along Whitehill Road.
- 7.7 Importantly, no concerns regarding noise were raised in the formal pre-application feedback, nor was there any indication that noise issues would be a significant or decisive factor in the determination of a future planning application. In other words, the *principle* of the proposed land use was considered acceptable

in terms of potential noise impact, subject to the provision of further details regarding the intricacies of the proposed use and how any concerns regarding noise could be effectively managed or mitigated.

- 7.8 While the pre-application feedback indicated that a noise impact assessment should be submitted in support of the application, it did not provide the reasoning behind this requirement, nor clarify the standards against which such an assessment should be conducted.

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- 7.9 Indeed, noise impact assessments are typically conducted in accordance with either British Standard 4142:2014, "Methods for Rating and Assessing Industrial and Commercial Sound", or BS 8233:2014, "Guidance on Sound Insulation and Noise Reduction for Buildings". The former is used to assess noise from industrial and commercial premises, particularly concerning machinery or fixed plant where commercial and industrial activities might affect residential areas. Therefore, it is not applicable to the proposed use, which is classified as a noise-sensitive use in itself⁹. The latter standard does not address noise breakout from buildings that might affect external receptors and states that "psychological factors are not practicable to consider in this guide"¹⁰. In other words, neither of these standards is suitable for assessing the potential noise impact of the proposed development, nor are they applicable in this context.

- 7.10 Instead, it is considered more appropriate to assess the potential for noise and other disturbances from the proposed use based on site-specific characteristics, the relationship of the site to adjoining premises, and the proposed management procedures. These procedures will ensure that both neighbours and, equally importantly, residents of the host building can live in a safe and quiet environment, in line with the requirements of the Care Quality Commission (CQC). The Noise Policy Statement for England (DEFRA, 2010) emphasises that "effective management" is crucial in "mitigating and minimising adverse impacts on health and quality of life," including "neighbour noise". Therefore, the applicant proposes that, should planning permission be granted for the proposed use, it should be conditional upon the submission and approval of a Noise Management Plan prior to the first occupation. Using such conditions is a well-established practice in Gravesham to ensure that potential noise issues are managed, controlled, and, if necessary, enforced (e.g. planning permission ref: 20230591). This approach provides neighbours with greater control and recourse regarding noise and disturbances compared to if the property were used as a typical large dwellinghouse or house in multiple occupation.

- 7.11 While a full Noise Management Plan is proposed to be submitted to the Council in the form of an application for discharge of planning conditions, prior to the first occupation of the proposed development, the key elements of the proposed noise management measures can be summarised as follows:

⁹ https://www.cieh.org/media/1256/propg-document-1_planning-noise-policy-and-guidance.pdf

¹⁰ <https://knowledge.bsigroup.com/products/guidance-on-sound-insulation-and-noise-reduction-for-buildings?version=standard>

- Residents will be under supervision 24/7 and will never be left unsupervised under any circumstances.
- CCTV will be installed for safeguarding, security and reporting purposes.
- Contact numbers for both off-site administrative staff and on-site supervisors (available 24 hours a day) will be provided to neighbouring occupants. Additionally, details of the anti-social behaviour, complaints, and noise management policies will be distributed. These will include contact information for residents to escalate matters to the Care Quality Commission (CQC) or social services in the unlikely event that complaints cannot be resolved by the applicant. Details will also be available on the applicant's website and posted near the entrance of the property.
- The use of the garden will be restricted to daylight hours. Residents will never be allowed to enter the garden unaccompanied by a carer. Additionally, residents will not be in the garden simultaneously; rather, they will most likely visit in small groups (two residents per carer) at different times. Nightshift staff will not be allowed in the garden.
- Smoking will be discouraged and if absolutely necessary, limited to a dedicated area within the garden.
- Windows are to be kept shut other than for ventilation purposes and never longer than absolutely necessary.

7.12 Unlike the use of the property as a large family dwellinghouse or other uses not requiring planning permission (e.g. a six-person HMO), the proposed use would benefit from professional 24/7 supervision, strict management policies, a complaints procedure, and a noise management plan linked to the planning permission. This would enable the Council—and, by extension, local residents and neighbours—to exert a much higher degree of control over the application site than if it were a large dwellinghouse or a six-person HMO (a likely alternative scenario, given the size of the property and the number of bedrooms available). Additional controls over noise, management, and waste could be enforced under HMO regulations as per the Housing Act 2004 (should a license be necessary), with further escalation options available to the adult care regulator, the Care Quality Commission (CQC), which has its own procedures for addressing concerns about noisy living environments.

7.13 Indeed, when officers assessed a development for a care home for children with special educational needs and a staff-to-child ratio of two staff per child under planning permission reference 20230591, they noted that “in terms of anti-social behaviour, the proposed use would operate very similarly to a dwelling but with the added benefit of professional adult supervision of the young occupier(s) being available 24 hours per day, seven days a week. This should allow more effective control of anti-social behaviour than a normal dwelling. In addition, the security measures which have been installed would reduce the opportunities for anti-social behaviour and crime at the property in general”.

Note: For the aforementioned reasons, the owners of 70 Whitehill Road (the adjoining property) have already expressed their support for the proposed use.

- 7.14 It is crucial to recognise that the proposed use (extra care housing) is classified as a *noise-sensitive* use rather than a noise-generating one. Given the sensitivities of the occupants, who will have autism or learning difficulties, it is essential for them to reside in a quiet and stress-free environment. This requirement is also expected by the Care Quality Commission (CQC), which will periodically inspect the practices and setup of the care provider. Therefore, failing to ensure a noise-free environment for neighbours would reflect a failure on the part of the care provider to meet its obligations to its residents and the regulator.
- 7.15 Consequently, it is considered that, at worst, noise from the proposed use will be no greater than that of the existing use, which has limited enforcement options, or a six-person HMO. At best, it is expected to be less likely to cause nuisance to neighbours due to the comprehensive management, complaints, and control measures outlined above.
- 7.16 In any case, the property is situated on a large corner plot, bordered by roads on two sides. The only adjoining premises that might be impacted by noise and other disturbances are 70 Whitehill Road (the adjacent semi-detached property) and 1 Hollybush Garden, whose flank elevation wall is positioned behind the rear garden of the application site.
- 7.17 Consequently, any unacceptable noise emanating from inside the house (contrary to the proposed control measures, but assumed for argument's sake) is unlikely to be audible from 1 Hollybush Garden, as it would need to travel a distance greater than 17 metres and would therefore be significantly diminished by background noise.



The windows on the flank elevation of 1 Hollybush Road (shown above) do not serve habitable rooms and are positioned more than 17 metres away from the rear elevation of the application site.

- 7.18 Any noise generated from the garden (despite the strict usage policies in place) would be mitigated by several factors. The flank elevation wall of 1 Hollybush Garden contains no primary windows or openings to habitable rooms. Additionally, the outbuilding at the rear of the application site acts as a noise buffer, ensuring that residents cannot gather outside near the site boundary, further reducing the potential for disturbance. However, due to the garden usage policies, neighbours can be confident that large group gatherings or use during unsociable hours will be avoided, with clear processes in place for addressing any complaints. This level of management and oversight is a benefit not afforded to neighbours when the house is in traditional residential use.
- 7.19 Similarly, although the host building shares a party wall with 70 Whitehill Road (the adjacent semi-detached property), it features a double-brick wall. In most instances, this wall is separated from the actual rooms by en-suite bathrooms or built-in cupboards, as indicated on the proposed plans. This configuration is considered a sufficient sound barrier. Moreover, while there may be an intensification of residential use across the site, only unacceptably loud noises from rooms directly adjoining the party wall would be of concern. Noise from rooms not connected to the shared party wall (which accounts for more than half of the total floor area) would have no impact on 70 Whitehill Road.
- 7.20 In other words, of the 11 habitable rooms within the dwellinghouse, only 4 are directly adjacent to or otherwise open onto the shared party wall. This number is not considered excessive, especially given that both the existing and proposed uses are residential in nature. Therefore, with the sound barriers provided by built-in cupboards, en-suite shower rooms, and the existing double-brick wall, additional noise insulation is not deemed necessary. However, should the Council have a different assessment, a planning condition requiring details of further sound insulation measures could be considered.
- 7.21 While the possibility of introducing a planted buffer along the shared boundary with 70 Whitehill Road was discussed with the owner of that property, it was ultimately deemed unnecessary by the owner, given the proposed garden use policies. These policies, which can be conditioned and enforced as part of a noise management plan, are seen as sufficient. The host property, being a large building with 11 rooms, would likely see frequent and uncontrolled garden use if retained for its current lawful use or for other uses that do not require planning permission (e.g. a 6-person HMO). However, under the proposed policies, residents will be supervised at all times when using the garden, allowing staff to prevent any loitering near the boundaries. As a result, noise disturbances are considered unlikely.
- 7.22 In addition, the substantial width of the plot (14.5 metres) helps to disperse residents away from shared boundaries. To put it into perspective, neighbouring plots can be as narrow as 6 metres, particularly where properties are terraced. The larger surface area of the application site therefore reduces the density of people on the property. Although up to 7 residents may occupy the site, this would equate to only 3.5 residents per parcel if the site were divided into two plots of a similar width to nearby properties—still in keeping with the pattern of

development in the area. In other words, while the proposed use may increase the intensity of residential occupation, this intensification is spread across a wider plot than typical local dimensions. Additionally, the site's corner position, along with the absence of an overconcentration of similar uses in the vicinity, makes it well-suited to accommodate the proposed development.

SECTION 8: BIODIVERSITY CONSERVATION

- 8.1 The use of the Thames estuary and marshes for recreational purposes has been linked to a decline in the number of birds using these sites. To address this, the Council has adopted developer contribution requirements under the SAMMS Tariff (The North Kent Strategic Access Management and Monitoring Scheme). This tariff aims to mitigate the impact of increased recreational visits to these sites due to a net increase in residential development.
- 8.2 The pre-application report previously issued by the Council under reference PRE20240068 indicated that a total contribution of £2,626.16 would be payable under the SAMMS Tariff, based on the proposed development providing “8 residential units” (sic). However, this calculation is considered flawed and not aligned with guidance, as outlined in the following paragraphs.
- 8.3 Principally, the previously undertaken calculation does not account for the existing use of the site or the origin and specific needs of future occupants, who are young adults receiving care. Understanding where these occupants are moving from and their specific requirements is essential for an accurate assessment of the potential net increase in demand on nearby sites of nature conservation.
- 8.4 The SAMMS tariffs published on the Council’s website¹¹ indicate that proposals falling within Use Class C2 (‘residential institutions’) are subject to developer contributions of “£328.27 per unit and otherwise on a case-by-case basis”. However, the webpage does not provide a definition of “unit” in this context.
- 8.5 To establish the context and policy evidence under which the SAMMS tariffs were published on the Council’s website, officers are referred to the Bird Wise North Kent Steering Group Guidelines (2019), “for applying the mitigation tariff for holiday accommodation and other dwelling categories.” This document has been used as the basis for setting the SAMMS tariffs for Canterbury, Gravesham, Medway, and Swale.
- 8.6 Sections 1.4 and 3 of the Bird Wise North Kent Steering Group Guidelines (2019) confirm that, with reference to residential institutions (Use Class C2), the agreed charging tariff is expressed in relation to “units of staff residential accommodation” for the local authority areas of Gravesham, Medway, and Swale. Only in Canterbury is the SAMMS tariff calculated based on the number of bedrooms.
- 8.7 The tariffs set by the Steering Group, including the concept of “units of staff residential accommodation” in relation to Use Class C2, were subsequently

¹¹ <https://www.gravesham.gov.uk/planning/samms-tariffs>

adopted by Gravesham Council, as confirmed in the cabinet meeting on 29 June 2020¹².

- 8.8 The proposed development, classified under Use Class C2, will not include any accommodation for staff. All staff members will be non-resident employees who will use the property solely as their workplace, continuing to live at their current residences. Similarly, as the SAMMS tariff does not require contributions for new employment spaces, it should not apply to staff working at a residential institution.
- 8.9 Consequently, the proposed development should be exempt from developer contributions in relation to the North Kent Strategic Access Management and Monitoring Scheme.
- 8.10 These conclusions, based on policies and guidance adopted by the Council's cabinet, are entirely commensurate given that future residents will be placements from existing households within the borough, resulting in no net increase in recreational activities. Additionally, residents will not be able to leave the premises independently and will therefore be less likely to visit sites of nature conservation. By contrast, student flats are subject to a SAMMS tariff of £328.27 for every five students, even though students have unrestricted access to local nature reserves. Furthermore, as the proposed use would involve the loss of a large dwellinghouse (which is policy compliant), any potential increase in recreational pressures would be mitigated by the change of use.
- 8.11 In addition, neither residents nor staff will be permitted to keep pets under the management regulations. This restriction further reduces the likelihood of regular visits to protected nature reserves with dogs. Finally, the application site is situated more than 5 km from the nearest part of the RAMSAR site, making it a journey of over 2 hours round-trip.
- 8.12 Indeed, paragraph 2.3 of the Bird Wise North Kent Steering Group Guidelines (2019) states that:
- C2 residential accommodation is considered on a case by case basis as a number of factors will determine the likelihood of residents having any impact upon the SPAs and Ramsar site. These include whether residents of new accommodation are permitted to have pets, the mobility of the residents and parking provision on site, in addition to looking at the overall size of the scheme and proximity to the SPA.*
- 8.13 Finally, the applicant has established that similar applications for planning permission—specifically those involving the change of use of an existing dwellinghouse to C2 accommodation, where staff do not reside at the premises—are exempt from financial contributions under the SAMMS tariff. Examples of such applications include 20230591 and 20230837.

¹² <https://democracy.gravesham.gov.uk/documents/s58825/North%20Kent%20SAMMS-Bird%20Wise%20Charging%20Schedule%20Report%20FINAL.pdf>

SECTION 9: SITE PHOTOGRAPHS



Rear elevation



Front elevation (Whitehill Road)



Side elevation (Hollybush Road)



Rear garden