



Delegated Report

Planning Application

Planning Application No: 20230591

Location: 79 Dickens Road Gravesend Kent DA12 2JX

Description: Change of use from class C3(a) dwellinghouse to a class C2 residential institution.

Applicant: Alan Dennington, Haven Care Support Services Ltd

Site Visit Date: 22 June 2023

Submitted Documents/Plans

Planning Application form;
Drawing no. 01 Existing ground and first floor layout;
Drawing no. 02A Proposed ground and first floor layout;
Drawing no. 03 Site location plan;
Drawing no. 04 Existing and proposed block plans; and
Design and Access Statement Revision A May 2022.

Procedural issues

At the site visit, it was noted that the application property was already in use as a Class C2 residential institution, with one young person in occupation. The case officer was informed that the use commenced approximately three months ago.

Relevant Planning History

Reference	Description	Decision	Decision Date
20191044	Single storey rear extension with a depth of 5.8 metres, maximum height of 2.85 metres and eaves height of 2.65 metres.	Approved	07.11.2019

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P5 – Exceptions to the Vehicle Parking Standards – Change of Use of Buildings
- T1 – Impact of Development on Highway Network
- H5 – Increasing Housing Stock by Conversion of existing Buildings
- H6 – Provision to Meet Special Housing Needs

Paragraph 33 of the NPPF (2021) 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 (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 5 – Delivering a Sufficient Supply of Homes
- 12 – Achieving sustainable development and well-designed places

Supplementary Planning Guidance

- 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)

Consultations, Publicity and Representations

GBC Environmental Protection Team (Regulatory Services)

Although there are no objections as such to this application, it sounds like supervision on site is not 24/7 with the manager 'calling in' during the day. In my experience, this type of residential institution can give rise to noise problems, [particularly at night, if the residents are not supervised. At the very least, I would recommend that a condition is imposed on the planning consent if you are minded to grant it at requires a management plan to be submitted for approval prior to the use continuing. The plan should contain steps to deal with any issues should they arise, details of how to contact etc.

GBC Highways Officer

Whilst I have no objections, I find this application confusing. The Design and Access Statement states staff do not drive to work, but I can see no way that this can be enforced either by the applicant or the Council. The Statement also states in part 3 of the Proposed Use section that there is no off street parking provision at this site, but Google Street View clearly shows a paved front garden and carriage crossover in existence.



I would also like to see secure cycle parking for at least two cycles to permit staff to cycle to work, but

ideally four to promote Active Travel by the residents.

GBC - Waste & Recycling Manager

I have reviewed the amended planning application and can confirm that the standard bin provision is suitable.

To confirm that is

- 1 x 180ltr black bin (residual)
- 1 x 240ltr bin with green lid (recycling)
- 1 x 23ltr food bin with orange lid

KCC Children's Social Services

As a local authority, a range of placements for children are commissioned, including those regulated in accordance with their needs. To ensure that provision is of the appropriate standard and quality, we have built up a portfolio of providers over times, which includes Haven Care, that are able to meet the needs of children, specifically in the geographical areas where placements are required.

There are occasions where we need to source a regulated placement for children who have complex needs and behaviours, which has seen the Council rely on providers such as Haven Care to care for some of Kent's most vulnerable children. Children placed with Haven Care have thrived and have gone on to achieve independence in their local communities.

The need for regulated accommodation for complex children has been acknowledged as a strategic priority for KCC Commissioned Services. 79 Dickens Road, Gravesend would form a key part of ongoing transitional work to provide the best start in life for vulnerable children.

Kent Police - Designing Out Crime Team

We request a condition for this site to follow SBD guidance 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.

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 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 and the parking area 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.

Please note, 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.

Neighbouring properties

The application was publicised by a site notice and to ten neighbouring properties by letter. One representation (an objection) has been received and is summarised as follows;

- Loud noise, unacceptable language and threatening behaviour at the application site.

Officer's Analysis

Principle of Development

Policy CS10 of the Gravesham Local Plan Core Strategy (2014) supports proposals that lead to the provision of additional infrastructure that improves community well being.

Policy CS14 of the Gravesham Local Plan Core Strategy (2014) seeks to protect the mix of housing in existing housing stock and requires new housing development to provide a range of dwelling types and sizes taking into account existing character and evidence of local need.

Saved Policy H5 of the Gravesham Local Plan First Review (1994) provides criteria for the consideration of proposals for the conversion of existing properties to provide multiple occupancy accommodation (including care homes). These are as follows;

- (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 of the Gravesham Local Plan First Review (1994) supports proposals in appropriate locations for residential hostels and homes (by either new build or conversion) whilst ensuring that they do not cluster together and harm the character of the area.

The proposed development would change the use of the application property from a Class C3 dwellinghouse (three bedroom) to a Class C2 residential institution (supported living for young persons aged 16/17). But the day-to-day character of the use would be very similar to a dwelling and there would be no physical alterations to the exterior of the property. Internally an office/staff room would be provided on the ground floor, with the rest of the layout being unchanged. One or two young persons would reside at the property with adult support (two or three staff at any one time) 24 hours a day, seven days a week.

KCC Social Services supports the proposal and states that the need for regulated accommodation for complex children has been acknowledged as a strategic priority for KCC and that the application site would form a key part of ongoing transitional work to provide the best start in life for vulnerable children.

The application site is located in a residential area, which is predominantly comprised of single family dwellings. It is noted that no. 85 Dickens Road had planning permission for a change of use from a dwelling to a meeting facility with office (reference 19980122) but at present the property appears to be in use as a dwelling. Therefore, the proposed development would not cluster together with other residential hostels/homes and harm the character of the area and would be in line with Saved Policy H6 of the Gravesham Local Plan First Review (1994). But the proposed development would not be in line with sub-paragraphs (i) or (ii) of Saved Policy H5, as the building is suitable for single family occupation and it is not considered to be located in an appropriate area for conversion to multiple occupancy. The following sections will consider compliance with the Residential Layout Guidelines (RLG) and the Vehicle Parking Standards (VPS).

Overall, the proposed development would provide social/housing infrastructure to meet a specified need

and would, to all intents and purposes, operate as a single residential dwelling. As such, the proposal would be in line with Policies CS10 and CS14 of the Gravesham Local Plan Core Strategy (2014) and Saved Policy H6 of the Gravesham Local Plan First Review (1994) and would be acceptable in principle.

Design, Character and Appearance

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 sets out that new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the built environment and take account of the scale, height, building lines and other architectural features of buildings. Account should also be taken of strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.

As the proposed development would not result in any alteration to the exterior of the application property, there would be no adverse impacts on the character or appearance of the building or the surrounding area.

The Kent Police Designing Out Crime Team have highlighted some design requirements relating to boundary treatments, CCTV installation, external lighting and window/door specifications. At the site visit, it was noted that CCTV and external lighting was in operation, the rear and side boundaries were well fenced, the side access is locked and access to it is controlled by carers and that the windows are modern and in good repair. As such, it is considered that on-site security is of a high standard. The comments of the Kent Police Designing Out Crime Team can be brought to the attention of the applicant by way of an informative attached to any planning permission granted.

Overall, the proposed development would be appropriate in terms of design and would not have an adverse impact on the character or appearance of existing building or the surrounding area. Therefore, the proposal would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Amenity of Future Occupiers

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants. In this regard, the Nationally Described Space Standards (NDSS) and the Borough Council's adopted Residential Layout Guidelines (RLG) are relevant.

The proposed development would retain two existing first floor bedrooms, which exceed the minimum floor area requirements for a single and double bedroom respectively in the NDSS. There would be no alteration to the existing garden, which exceeds the requirement for a dwelling with three bedrooms in the Residential Layout Guidelines (June 2020).

The application site has sufficient space for the storage and presentation of the standard refuse bins as set out by the GBC Waste and Recycling Manager.

As such, the proposal would provide a good standard of living for future occupiers and be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Neighbouring Amenity

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring occupiers and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

The closest residential properties to the application site are nos. 77 and 81 Dickens Road (located to the south and north respectively). Nos. 44 and 46 Roehampton Close are located to the west and nos. 72 and 74 Dickens Road are located to the east across the roadway.

A local resident has raised concerns regarding existing adverse noise and anti-social impacts and the GBC

Environmental Protection Team (Regulatory Services) highlight that noise can be an issue for the proposed use and suggest a condition to mitigate such impacts.

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.

In terms of noise and disturbance, there would be the potential for harm from the comings and goings of staff and other health/social care providers and from day-to-day activities at the application site. This harm could be greater than a normal residential use. As such, it would be reasonable to require the submission of a management plan to mitigate any adverse noise impacts.

Due to the proposed development not affecting the exterior of the property, there would be no adverse overlooking, overshadowing or overbearing impacts to the occupiers of any surrounding dwellings.

Overall, the proposed development would not be detrimental to the residential amenity of surrounding occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Parking and Highways

Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policy T1 of the Gravesham Local Plan First Review November 1994 require new development to mitigate its impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards (the Kent Vehicle Parking Standards (VPS)).

Saved Policy P5 of the of the Gravesham Local Plan First Review (1994) relates specifically to proposals for the change of use of buildings and encourages meeting parking standards except where this would be prejudicial to the townscape or lead to the building being unused/underused. In that instance, a relaxation of the parking standards may be acceptable, provided that it does not unduly exacerbate on street parking problems in the area.

For a residential institution, the VPS require a maximum of one space per resident staff plus one space per two additional staff. The applicant has set out that two or three staff would be on-site at any one time. Therefore, one or two parking spaces would be required, as a result of the proposed development.

The application property has three bedrooms and on-site parking for one vehicle. The proposed development would result in the application property being used as a Class C2 residential institution and there would be no alteration to the existing parking or access arrangements. The GBC Highways Officer has not raised an objection but seeks secure cycle parking by planning condition, for at least two cycles to permit staff to cycle to work, but ideally four to promote Active Travel by residents.

The application site is in an urban location, close to public transport and local amenities and there are no parking restrictions in Dickens Road, which would allow on-street parking if required. Therefore, there would be no adverse parking or highway safety impacts. Sufficient space would be available at the application site to provide cycle parking and a condition can be attached to any planning permission granted to ensure provision.

Overall, it is considered that the proposed development would have no adverse impacts to highway safety and would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policies T1 and P5 of the Gravesham Local Plan First Review November 1994.

Any Other Material Planning Considerations

The application site is located in Flood Zones 2 and 3 but it is noted that the proposed development would not result in any alteration to the existing ground floor levels and the internal layout would remove one bedroom from the ground floor. As such, there would be no requirement for a flood risk assessment and no increased flood risk and the proposal would be in line with Policies CS18 and CS19 of the Gravesham Local Plan Core Strategy (2014).

The application site is located in a smoke control area. As such, advice regarding smokeless fuels/appliances can be given to the applicant in an informative attached to any planning permission granted.

Suggested Conditions

Development in accordance with the approved plans
Submission and approval of management plan within three months
Submission and approval of cycle parking provision
Maximum number of children
Retention of existing frontage parking

Conclusion & Recommendation

The proposal would comply with local and national planning policies and subject to the conditions set out above, the proposal would be acceptable.

Planning permission subject to conditions is recommended.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	02 August 2023	Dated:	02 August 2023