

PLANNING STATEMENT

Change of use of the existing dwellinghouse (Use Class C3) to a children's home (Use Class C2) accommodating up to four children, together with loft/roof alterations, internal reconfiguration, an ancillary games room outbuilding, alterations to the front boundary treatment and formation of a dropped kerb.

Site	138 Valley Drive, Gravesend, Kent, DA12 5SA
Existing use	Use Class C3 – dwellinghouse
Proposed use	Use Class C2 - four-child children's home with associated loft/roof alterations, ancillary games-room outbuilding and frontage works
Residential capacity	Maximum of 4 children aged 11–16
Resident staff	1 live-in staff member resident at the property on a 24-hour basis
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1. Executive Summary

1.1 This Planning Statement supports an application at 138 Valley Drive, Gravesend, Kent, DA12 5SA for the change of use of an existing dwellinghouse (Use Class C3) to a small residential children's home (Use Class C2), together with the associated works shown on Drawings 138VD-001 to 138VD-007, dated 14 September 2026.

1.2 The home will accommodate a maximum of four children aged 11 to 16. It is intended for young people with complex social, emotional and mental health needs, including trauma-related and attachment needs, emotional dysregulation, behavioural challenge and heightened safeguarding vulnerability. The operating model is specifically designed around careful placement matching, placement stability, trauma-informed care and education engagement.

1.3 One member of staff will live at the property and will be resident on a 24-hour basis, occupying the rear ground-floor staff bedroom. This resident presence is supplemented by the wider staff team. The baseline operational model provides three to four support staff across the waking day, weighted toward higher-demand after-school and evening periods, together with two waking-night staff. Each shift is led by a senior or shift leader, with overlapping handovers.

1.4 The Proposed Floor Plans clearly identify four Child Bedrooms: one 12 m² bedroom at ground-floor level, two bedrooms of 15 m² and 12 m² at first-floor level, and one 14 m² loft bedroom. A separate 9 m² rear ground-floor room is identified as the Live-in Staff Bedroom. The fifth sleeping room is therefore staff accommodation and does not increase the residential capacity of the children's home.

1.5 National planning policy now gives express support to social care provision. The August 2026 National Planning Policy Framework defines “public service infrastructure” to include facilities for social care and, through Policy HC4, requires substantial weight to be given to the benefits of new or improved public service infrastructure. Locally, Gravesham Local Plan Core Strategy Policy CS10 supports additional physical and social infrastructure that improves community well-being.

1.6 The proposal retains the domestic scale and residential function of the property. Although the use falls within Class C2 rather than C3, day-to-day occupation remains residential in character. The small resident group, continuous professional supervision, structured matching process and management arrangements materially limit the potential for unacceptable effects on neighbouring amenity.

1.7 The application package is coordinated with the operational model. Drawing 003 distinguishes the four children's bedrooms from the live-in staff bedroom; Drawing 001 shows the proposed site arrangement, including the ancillary rear outbuilding and storage provision; and Drawing 007 illustrates the front boundary arrangement together with pedestrian and vehicular visibility splays. The proposal is considered capable of according with the development plan and the National Planning Policy Framework, and planning permission should therefore be granted.

2. Site and Surroundings

2.1 The application site is 138 Valley Drive, Gravesend. It comprises an established residential property within the built-up area of Gravesend. Valley Drive forms part of an established residential corridor containing conventional houses and residential estates.

2.2 Existing Floor Plans Drawing 002 shows the established residential accommodation within the house, including a 19.5 m² kitchen/living/dining area, ground-floor bedrooms and office space, and two first-floor bedrooms with bathroom/ensuite accommodation. Existing Elevations Drawing 004 records the present external appearance of the dwelling.

2.3 The proposal makes use of an existing residential building rather than introducing a purpose-built institutional form. This is important to the character of the scheme: the objective is to provide a normalised domestic environment in which a small group of children can live with consistent care and supervision.

2.4 The proposed site arrangement is shown on Drawing 001. It retains the dwelling within its established plot, introduces an ancillary outbuilding within the rear garden, and identifies bin and cycle storage together with the frontage parking arrangement. Drawing 007 separately shows the proposed front boundary treatment and pedestrian and vehicular visibility splays. Any separate designation-related validation requirement arising from the Council's mapping remains a matter for the relevant supporting information, if required.

3. The Proposed Development

3.1 The proposed development comprises:

- change of use from a dwellinghouse within Use Class C3 to a children's home within Use Class C2;
- accommodation for a maximum of four children aged 11-16;
- one 9 m² rear ground-floor bedroom dedicated to a live-in member of staff resident at the property on a 24-hour basis;
- four children's bedrooms comprising a 12 m² ground-floor bedroom, 15 m² and 12 m² first-floor bedrooms, and a 14 m² loft bedroom;
- a dedicated 4 m² ground-floor office for staff/management use;
- shared domestic accommodation including a 19.5 m² kitchen/living/dining room, ground-floor shower, first-floor bathroom/ensuite and loft bathroom;
- internal reconfiguration together with the formation of usable loft accommodation and associated roof alterations/rooflights;
- a detached ancillary rear-garden outbuilding containing an 18 m² Games Room and 1.6 m² WC, shown at approximately 2.5 m in height on Drawing 006;
- front boundary and forecourt alterations as shown on Drawing 007, with two frontage parking positions, pedestrian and vehicular visibility splays, and associated bin/cycle storage shown within the drawing package.

3.2 The application is for a single, managed children's home. The bedrooms will not be independently let and the property will not operate as an HMO or as separate units of accommodation.

3.3 The drawings are consistent with the intended operation. Drawing 003 expressly labels four rooms as Child Bedroom and the 9 m² rear ground-floor room as Live-in Staff Bedroom. Drawing 006 identifies the detached outbuilding solely as a Games Room with WC; it does not provide additional sleeping accommodation or a separate residential unit.

4. Operational Model and Management

4.1 Care model

The home is designed for adolescents aged 11–16 whose needs may include trauma-related and attachment needs, emotional dysregulation, behavioural challenge and heightened safeguarding vulnerability. The service is intended in particular to provide stability for young people whose previous placements may have broken down or be at risk of breakdown.

The operational model is built around four core principles:

- Matching first – every referral is assessed for compatibility with the existing group before acceptance. A placement will be declined where the matching assessment indicates that it would destabilise the children already living at the home.

- Preventing placement breakdown – the care model is designed to support children through periods of difficulty rather than move directly toward notice or unplanned placement termination.
- Therapeutic and trauma-informed care – practice is formulation-led, with access to clinical and therapeutic input so that behaviour is understood and responded to in context.
- Education from day one – the home will work with the placing authority on EOTAS where necessary, local school links and planned reintegration to education.

4.2 Staffing and supervision

The home will operate a tiered staffing structure comprising management, senior/shift-lead staff and residential support workers. The overall staffing establishment is expected to be approximately 16–18 staff to provide rota resilience for annual leave, sickness, training and induction without routine dependence on agency staff.

The baseline operational staffing model is:

- one live-in staff member resident at the property on a 24-hour basis;
- generally three to four support staff across the waking day, weighted toward the after-school and evening peak;
- two waking-night staff overnight;
- a senior or shift leader leading every day and night shift; and
- overlapping handovers at shift change so that information and risk-management arrangements are transferred safely.

Actual staffing ratios will be informed by each child's risk assessment and placement plan and may increase for defined activities or higher-risk periods. The live-in member of staff provides an additional element of continuity and a permanent residential presence within the home.

4.3 Daily functioning

The home will function as a domestic residential environment. Typical daily activity will involve morning routines and education transport/engagement, an after-school and evening staffed peak, planned activities and contact, bedtime routines, and overnight supervision. The purpose of the staffing model is to provide structured care and reduce, rather than create, unmanaged activity.

5. Planning Policy Context

5.1 Statutory development plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Gravesham Borough Council confirms that the current development plan includes the Gravesham Local Plan Core Strategy and Policies Map (2014), relevant saved policies of the Gravesham Local Plan First Review (1994), and the Kent Minerals and Waste Local Plan 2024–30. For this proposal, the most relevant adopted Gravesham policies are:

- Policy CS01 – Sustainable Development;
- Policy CS02 – Scale and Distribution of Development;
- Policy CS10 – Physical and Social Infrastructure;
- Policy CS11 – Transport;
- Policy CS18 – Climate Change; and
- Policy CS19 – Development and Design Principles.

Saved transport and parking policies, including Policy P3 (Vehicle Parking Standards), are also relevant insofar as they apply to the existing access and parking arrangements.

The Council's Design for Gravesham – Design Code SPD is a material consideration and expands upon Policy CS19, including the requirement for development to respond appropriately to local character and provide a high standard of design.

5.2 National Planning Policy Framework – August 2026

The August 2026 National Planning Policy Framework (NPPF) is a material consideration of critical importance. The following national decision-making policies are particularly relevant:

- DP3 – Key principles for well-designed places: development should respond to its context, integrate with its surroundings and support liveable, healthy and integrated communities;
- TR6 – Assessing transport impacts: transport information should be proportionate to the nature and scale of development, and refusal on transport grounds is directed to severe network effects or unacceptable highway-safety impacts;
- HC4 – Proposals for new and improved community facilities, public service infrastructure and development providing public health benefits: substantial weight should be given to the benefits where new or improved public service infrastructure is provided;
- P3 – Living conditions and pollution: development should be appropriate for its location and should consider likely effects on health and living conditions.

The NPPF glossary expressly defines “public service infrastructure” as including education and healthcare facilities and facilities for blue light, social care, library and criminal justice uses. A regulated children's home is a social-care facility and therefore falls squarely within the social-care component of that definition.

5.3 Emerging Gravesham Local Plan 2042

The Council's emerging Local Plan 2042 has reached Proposed Submission (Regulation 19) stage. It is therefore a material consideration to the extent appropriate having regard to its stage, consistency with national policy and any unresolved objections. This statement does not rely on the emerging plan to establish acceptability because the proposal can be supported under the adopted development plan and the 2026 NPPF.

6. Principle of Development and Need

6.1 Social-care use in principle

The proposal provides new social-care accommodation within an existing residential building. This is precisely the type of public service infrastructure to which the 2026 NPPF gives positive support. Policy HC4 directs substantial weight to the benefits of providing new or improved public service infrastructure, while Policy CS10 of the Core Strategy supports additional physical and social infrastructure that improves community well-being.

The proposed use is also intrinsically residential. The children will live at the property as their home, with staff providing care and supervision. The Class C2 classification reflects the care element of the use rather than an institutional scale of development. With only four children, the proposal remains small and domestic in its day-to-day land-use character.

6.2 Evidence of need

Kent County Council's Children in Care Sufficiency Strategy 2025–2028 sets out its statutory approach to securing sufficient high-quality accommodation for children in care and care leavers. The strategy emphasises safe accommodation, placement stability, robust safeguarding, matching, and the need to manage increasingly

complex needs through suitable provision. It also reflects the Council's ambition to accommodate children within Kent where appropriate and to increase access to local provision.

The proposed home directly aligns with these objectives: it provides a small-scale residential setting, applies matching before admission, seeks to avoid placement breakdown and is structured around therapeutic, educational and safeguarding support. Even where an individual placement may be commissioned by an authority other than Kent, the evidence demonstrates a wider and continuing need for suitable residential children's-home provision.

6.3 Efficient use of an existing building

The proposal makes effective use of an established residential property in the urban area. It avoids the land-take and more institutional character that could arise from a purpose-built facility and embeds the service within a normal residential environment. This accords with the sustainable-development objectives of national policy and Policy CS01.

7. Design, Character and Appearance

7.1 The drawings show that the main dwelling retains its established footprint and domestic form. The principal changes to the house are the formation of usable loft accommodation and associated rooflights. Additional site works comprise the detached single-storey games-room outbuilding in the rear garden and the proposed front boundary/parking arrangement shown on Drawings 006 and 007.

7.2 The proposal does not introduce a purpose-built institutional building, large commercial signage, a reception forecourt or other inherently institutional built form. The visual effect remains that of a residential property. This supports integration with the surrounding street and is consistent with the contextual and liveability principles in NPPF Policy DP3 and with Core Strategy Policy CS19.

7.3 The use of an existing house is also important to the care model. A conventional domestic setting supports normalisation, privacy, stability and community integration for the children. The planning and care objectives therefore point in the same direction: retaining a residential character is both visually appropriate and operationally desirable.

7.4 Proposed Elevations Drawing 005 shows the dwelling continuing to read as a conventional brick-built house, with the roof alterations expressed principally through rooflights rather than a large dormer or institutional addition. Drawing 006 shows the ancillary games room as a modest single-storey flat-roofed structure approximately 2.5 m high. These works are subordinate to the dwelling and maintain the residential character of the site.

8. Residential Amenity and Living Conditions

8.1 Nature and intensity of use

The key amenity question is whether the change from an ordinary C3 household to a professionally managed four-child C2 home would create a materially unacceptable level of noise, disturbance or comings and goings. On the facts of this proposal, it would not.

The occupancy is capped at four children. The home is continuously supervised, including a live-in staff member, waking-day staffing and waking-night staffing. The matching process is specifically intended to ensure that referrals can be integrated safely with the existing resident group, and placements will be declined where the assessment indicates that accepting them would destabilise the home. These arrangements materially distinguish the proposal from an unmanaged or high-turnover residential use.

The children's day-to-day life will take place in a domestic setting with structured routines, education engagement, shared living accommodation and staff support. The care model is designed to reduce crisis and placement instability. While any residential use can generate ordinary household noise, there is no basis to conclude that the small, managed use would necessarily create unacceptable levels of disturbance.

8.2 Neighbouring privacy, outlook and built form

The external alterations should be assessed against Policy CS19 and the Council's design guidance, including privacy, outlook, daylight and sunlight. The main-house changes are concentrated within the roof and do not materially enlarge the dwelling footprint. The detached games-room outbuilding is single storey and approximately 2.5 m high, which materially limits its potential for overlooking or overbearing effects. Its use is ancillary to the children's home and it does not introduce separate residential accommodation.

8.3 Management as mitigation

Management is an inherent component of the proposed land use rather than an afterthought. Senior-led shifts, overlapping handovers, individual placement plans and continuous staff presence provide clear responsibility at all times. If the Local Planning Authority considers it necessary, the applicant would accept an appropriately worded condition limiting the use to a children's home for no more than four resident children, so that materially different C2 activities would require separate consideration.

9. Transport, Parking and Movement

9.1 The children will be aged 11–16 and will not generate private resident car-parking demand. Vehicle movements will principally arise from staff, education-related transport, professional visits, family/contact arrangements where applicable, deliveries and ordinary servicing.

9.2 The live-in staff arrangement provides a permanent on-site staff presence and therefore avoids the need for every element of supervision to be delivered solely through commuting shifts. However, the operational model includes shift staffing and overlapping handovers, so there will be periods of staff overlap.

9.3 The drawing package provides specific information on parking and visibility. Drawing 001 shows the proposed frontage arrangement together with bin/cycle storage, while Drawing 007 shows two cars accommodated side-by-side within the frontage, the proposed front boundary treatment and both pedestrian and vehicular visibility splays. Drawing 007 also notes that the adjoining area toward the neighbouring driveway is unobstructed.

9.4 Given the maximum four-child capacity, the proposal is not a development that would ordinarily be expected to generate a significant amount of movement requiring a full Transport Assessment under NPPF Policy TR6. The children themselves will not generate private resident parking demand, one staff member is resident at the property, and the wider staffing model operates by shifts rather than the full establishment being present simultaneously. The two on-plot parking positions, cycle storage and visibility information shown in the drawings provide a proportionate basis for assessment of the modest but managed transport effects of the use.

10. Safeguarding, Management and Community Integration

10.1 The home will be subject to a separate regulatory framework for children's homes, including Ofsted registration and compliance with the Children's Homes (England) Regulations 2015. Planning permission does not replace that regime; equally, the planning assessment should focus on the land-use effects of the proposed operation.

10.2 The operator's matching-first approach is central to both safeguarding and residential stability. Referrals are assessed against the needs and dynamics of the existing group and can be declined where they would create an unacceptable risk of destabilisation. This approach supports consistent occupation and reduces the prospect of repeated emergency turnover.

10.3 The care model also places emphasis on planned education, therapeutic input, stable routines and deliberate transition or step-down planning. These are positive indicators of a structured residential service rather than a transient or institutional use.

10.4 A children's home of this size can be appropriately integrated within an ordinary residential area. The purpose of the proposal is to provide children with a home environment rather than segregate them from the community. The small occupancy, domestic form and continuous supervision support that objective.

11. Sustainability and Other Planning Considerations

11.1 Re-use and climate considerations

The proposal reuses and adapts an existing building rather than replacing it. This is inherently resource-efficient and consistent with the sustainable-development objectives of the NPPF and Core Strategy Policies CS01 and CS18. Detailed Building Regulations matters, including fabric performance, ventilation and fire safety, will be addressed separately at the appropriate stage.

11.2 Refuse, cycle storage and servicing

The use remains residential in character and will generate domestic-type refuse and recycling. Drawing 001 identifies dedicated bin storage and cycle storage within the site. The ancillary games-room outbuilding is internal to the residential plot and does not create a separate servicing requirement.

11.3 Crime, safety and secure design

The continuous staff presence and senior-led shift structure provide active supervision within the home. Any detailed security measures should remain proportionate and should avoid creating an institutional external appearance, consistent with the objective of maintaining a normal residential setting.

12. Planning Balance and Conclusion

12.1 The proposal delivers a clear public-interest benefit by providing new social-care accommodation for a small number of children with complex needs. The 2026 NPPF now expressly defines social-care facilities as public service infrastructure and directs substantial weight to the benefits of new or improved public service infrastructure under Policy HC4. This is reinforced locally by Core Strategy Policy CS10.

12.2 The use is appropriately accommodated in an existing residential property and remains domestic in its scale and function. The proposal is limited to four resident children, with a live-in member of staff and structured day/night staffing. The matching-first model, continuous supervision, therapeutic approach and education planning are all directed toward stable, well-managed occupation.

12.3 The associated physical works remain residential in appearance and subordinate to the existing dwelling. The principal house alteration is the loft accommodation/rooflight arrangement shown on Drawings 003 and 005; the rear outbuilding is a modest ancillary games room; and the frontage works provide on-site parking and visibility information without introducing an institutional form of development.

12.4 The principal operational planning considerations - amenity, parking, movement and management - are proportionate to a small four-child home and can be satisfactorily controlled. The drawings clearly show four Child Bedrooms, one Live-in Staff Bedroom, the dedicated office and shared living accommodation, together

with the two frontage parking positions, visibility splays, bin/cycle storage and ancillary games-room outbuilding.

12.5 Taking the development plan and material considerations as a whole, the proposal represents sustainable development, provides needed social-care infrastructure, makes effective use of an existing residential building and is capable of operating without unacceptable harm to residential amenity, highway safety or local character.

12.6 Planning permission is therefore respectfully requested for the change of use of 138 Valley Drive from Use Class C3 to a four-child Use Class C2 children's home, together with the loft/roof alterations, ancillary games-room outbuilding, front boundary/parking works, visibility arrangements and other associated works shown on Drawings 138VD-001 to 138VD-007.

Appendix A – Accommodation Schedule

The following schedule reflects the accommodation expressly shown on Proposed Floor Plans Drawing 003 and Proposed Outbuilding Drawing 006.

Floor / location	Drawing label	Approx. area	Planning use	Occupant / function
Ground - front	Child Bedroom	12 m ²	Children's Bedroom 1	Child
Ground - rear	Live-in Staff Bedroom	9 m ²	Staff Bedroom	Live-in staff member
First	Child Bedroom	15 m ²	Children's Bedroom 2	Child
First	Child Bedroom	12 m ²	Children's Bedroom 3	Child
Loft	Child Bedroom	14 m ²	Children's Bedroom 4	Child
Ground	Office	4 m ²	Staff / management office	Staff use
Ground	Kitchen / Living / Dining	19.5 m ²	Shared domestic living space	Children and staff
Rear garden	Games Room + WC	18 m ² + 1.6 m ²	Ancillary recreation outbuilding	Children and staff

For the avoidance of doubt, the maximum number of resident children is four. The fifth sleeping room is staff accommodation ancillary to the operation of the children's home.

Appendix B - Key Policy, Evidence and Drawing References

Document / policy	Relevance
National Planning Policy Framework (August 2026)	Relevant national decision-making policies include DP3 (well-designed places), TR6 (transport impacts), HC4 (new/improved public service infrastructure) and P3 (living conditions and pollution). The glossary defines public service infrastructure to include facilities for social care.

Gravesham Local Plan Core Strategy (2014)	Relevant policies include CS01 Sustainable Development, CS02 Scale and Distribution of Development, CS10 Physical and Social Infrastructure, CS11 Transport, CS18 Climate Change and CS19 Development and Design Principles.
Gravesham Local Plan First Review (1994) – saved policies	Relevant saved parking/highway policies include P3 and related access/highway policies where applicable.
Design for Gravesham – Design Code SPD	Material design guidance supporting implementation of Policy CS19 and applicable across the Borough, including non-residential development.
Kent Children in Care Sufficiency Strategy 2025–2028	Sets out Kent County Council’s approach to providing sufficient high-quality accommodation for children in care and care leavers, including placement stability, safeguarding and the need to meet increasingly complex needs.
Application drawing package - 138VD-001 to 138VD-007, dated 14/09/2026	Drawing 001: Location Plan, Existing Block Plan and Proposed Block Plan; Drawing 002: Existing Floor Plans; Drawing 003: Proposed Floor Plans; Drawing 004: Existing Elevations; Drawing 005: Proposed Elevations; Drawing 006: Proposed Outbuilding (18 m ² games room and 1.6 m ² WC); and Drawing 007: Visibility Splays and Front Boundary. The package expressly identifies four Child Bedrooms, one Live-in Staff Bedroom, two frontage parking positions, bin/cycle storage and the ancillary rear-garden games room.