



Delegated Report

Planning Application

Planning Application No: 20240855

Location: 68 Whitehill Road Gravesend Kent DA12 5PH

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

Applicant: Mr Bola Adeshina, Brockwell Gate Ltd

Site Visit Date: Previous Site Visit

Submitted Documents/Plans

Application Form
Location and Block Plan
E001 – Existing Plans – Sheet 1
E002 – Existing Plans – Sheet 2
E003 – Existing Elevations and Section A
P001 – Proposed Plans – Sheet 1
P002 – Proposed Plans – Sheet 2
P003 – Proposed Elevations and Section A
Planning, Design and Transport Statement
Flood Risk Statement

Relevant Planning History

Reference	Description	Decision	Decision Date
19840897	Erection of single storey extension at the rear to form enlarged kitchen and dining room	Permitted	12.12.1984
19800561	Formation of a room in the rear roof slope to form a bedroom	Permitted	09.10.1980

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS07 - Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Design and Development Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network
- H5 – Increasing Housing Stock by Conversion of existing Buildings
- H6 – Provision to Meet Special Housing Needs

Paragraph 33 of the NPPF (2023) 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 (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving sustainable development
- Section 5 – Delivering a sufficient supply of homes
- Section 6 – Building a strong and competitive economy
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed and Beautiful places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG2 – Residential Layout Guidelines (2020).
- SPG4 – KCC Parking Standards (2006).
- Householder Extensions/Alterations Design Guide (2021)
- Technical Housing Standards – nationally described space standard (2015);
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

GBC Environmental Protection

Received on 25.10.24

Apologies for the delay in responding to this application – a combination of leave and workload.

Seven adults could potentially give rise to more noise than a family. Therefore, it is recommended that a condition is attached to the planning permission should it be granted that requires a Noise Management Plan (NMP) to be submitted for approval prior to the use commencing.

The MP should cover the following (this list is not exhaustive)

- Measures to supervise the residents over a 24 hour period
- Measures to manage and supervise residents' guests to the property (number of guests and times can visit)

- A complaint procedure for noise (and other complaints)
- How the garden and external area will be used
- How the internal areas will be used to minimise noise and other concerns

GBC Leisure and Resilience Manager
Received on 24.10.24

I am writing to confirm that I have no comments to make on the above application from a Leisure Services perspective.

GBC Development and Housing Strategy Manager
No comments received.

GBC Service Manager (Housing Options)
Received on 01.10.24

Thank you for your recent consultation request in regard to the above-mentioned proposal. We can confirm Private Sector Housing have no comments to relay in relation to our housing legislations and regulations. We believe the proposed scheme is currently outside of our remit with Planning requirements and Building Regulations taking precedence.

GBC Planning Policy
No comments received.

GBC Commercial Team
Received on 02.10.24

No objection in principle. The following comments are made for the information of the applicant and relate to the kitchen only.

Health and Safety

In these premises the Health and Safety Executive (HSE) will be the enforcing Authority for all health and safety matters. Should you require further advice and information check out the HSE website www.hse.gov.uk

Food Safety Comments

It is a requirement under Article 6(2) of Regulation 852/2004 that food business operators must register their establishments with the appropriate competent authority (in this case GBC Environmental Health) at least 28 days before food operations commence. Registration is via the Gravesham Borough Council website www.gravesham.gov.uk/food-safety

The applicant must ensure that the kitchen fully complies with current food safety legislation to the satisfaction of the Regulatory Services Manager. Structural and operational requirements are covered by the legislation notably EC Regulation 852/2004.

All internal structures to the kitchen must be impervious, non-absorbent and washable i.e. easy to clean and maintain in a clean condition.

The kitchen should be pest proofed as far as possible i.e. gaps and holes to external doors, windows, pipes and drains etc. must be filled or covered with a solid, durable material in order to minimise pest entry points

into food preparation and storage areas.

Lavatories must not lead directly into rooms in which food is handled, stored or prepared. There should be an intervening ventilated space between toilets and food rooms. Food should not be stored in that space.

The provision and location of sinks and wash hand basins is an important consideration in the design and planning of a kitchen. A minimum of 1 wash hand basin and a double sink unit must be installed. A dish washer is also recommended.

For further advice on starting a food business please visit the FSA website

<https://www.food.gov.uk/business-guidance>

Environment Agency
Received on 01.10.24

We have no comments to make on this planning application as it falls outside our remit as a statutory planning consultee. Please refer to the attached 'When to consult the Environment Agency' document for guidance on when to consult us.

Non planning consents

Although we have no comments on this planning application, the applicant may be required to apply for other consents directly from us. The term 'consent' covers consents, permissions or licenses for different activities (such as water abstraction or discharging to a stream), and we have a regulatory role in issuing and monitoring them.

The applicant should contact 03708 506 506 or consult our website (<https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit>) to establish whether a consent will be required.

KCC Biodiversity Officer
Received on 08.11.24

NO INFORMATION – NO FURTHER INFORMATION REQUIRED

No ecological information has been submitted with this application for change of use, provision of bin and cycle store and associated landscaping. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that the proposed development has limited potential to result in significant ecological impacts. We have taken this view due to the change of use of the existing residential property and garden will have minimal impacts. As such, we are satisfied that there is no requirement for an ecological survey to be carried out at this time¹.

This application is exempt from Biodiversity net gain requirements under the de minimis exemption.

The LPA need to conduct an appropriate assessment.

Breeding birds

The photographs provided showed the garden to be overgrown in places and landscaping is planned. There is the possibility that breeding birds may be using the vegetation and we recommend a breeding bird informative is included for the landscaping works. Suggested wording is below

Vegetation within the site has been identified as suitable breeding bird habitat and some will be impacted. We recommend that any works to vegetation are conducted outside the breeding bird season (1st March to 31st Aug) to avoid risk of impacts or if within the breeding bird season, a survey by a suitably qualified person needs to be conducted to confirm absence, prior to commencing works.

North Kent Sites

This application states it is for a change of use of an existing residential property to provide a residential

care property for 7 adults. This property is c.2km from, and within the zone of influence (ZOI) (6km), of the Thames Estuary and Marshes Special Protection Area and its associated Wetland of International Importance under the Ramsar Convention (Ramsar Site).

As this development is a change of use the LPA will need to determine if this application classifies as new dwellings for the agreed approach under the North Kent Strategic Access Management and Monitoring Strategy (SAMMS), and how the SAMMS payment is applicable. We consider that as this was a former dwelling there is unlikely to be any greater impact on the protected areas.

Gravesham Borough Council must consider the impact the proposal will have on these designated sites in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the National Planning Policy Framework (NPPF) 2023.

Gravesham Borough Council will need to ensure that the proposals fully adhere to the agreed approach within the North Kent Strategic Access Management and Monitoring Strategy (SAMMS). This is to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation before first occupation.

A decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a full Appropriate Assessment is needed under the Habitats Directive. Therefore, we advise that due to the need for the application to contribute to the North Kent SAMMS, there is still a need for an appropriate assessment to be carried out as part of this application.

The responsibility for carrying out a Habitats Regulations Assessment (HRA) Screening and Appropriate Assessment lies with the Competent Authority, Gravesham Borough Council.

Biodiversity Net Gain (BNG)

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications received in England (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG) from the 12th February 2024 and all minor applications from the 2nd April 2024.

This application is for a change of use of an existing residential building and garden. We consider that this comes under the de minimis exemption, as under 25m² of habitat will be affected.

Enhancements

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) 2023, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for avoidance, mitigation and compensation. As such, we advise that a simple enhancement plan is provided and this measure can be carried out within the garden as part of the landscaping plans. A condition wording is suggested below.

Within three months of works commencement, a plan showing how the development will enhance biodiversity, will be submitted to, and approved in writing by, the local planning authority. This will include a landscaping plan to include native and wildlife-friendly planting, and integrated wildlife features. The approved measures will be implemented and retained thereafter.

Appendix 1 provides some generic (non-exhaustive) information regarding the most common enhancements we see proposed. To provide a view regarding the potential ecological benefits of any project, in line with relevant legislation and planning policy, we require sufficient detail to be submitted. Without sufficient detail we are unable to provide an opinion regarding the suitability of any proposed measures. Suitable detail may include the provision of information such as:

- The proposed target species;
- Make and model of any boxes;

- Location information such as height, aspect, surrounding habitat;
- Detailed planting schedules; and
- Relevant management necessary to ensure the habitat is suitable for the target species.

KCC Flood and Drainage Officer
Received on 01.10.24

As Lead Local Flood Authority, Kent County Council are required to provide technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangement put forward by developers to any new major development.

According to the Town and Country Planning (Development Management Procedure) (England) Order 2010, major development is defined in planning as any development involving any one or more of the following:

- a) The winning and working of minerals or the use of land for mineral-working deposits;
- b) Waste development;
- c) The provision of dwelling houses where:
 - i. The number of dwelling houses to be provided is ten or more; or
 - ii. The development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph
- (c) (i);
- d) The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) Development carried out on a site having an area of one hectare or more.

The application under the above reference number therefore falls outside the definition of major development and also falls outside of KCC's remit as statutory consultee.

Notwithstanding the above, please feel free to contact us again if you consider there to be local flood risk issues on this site that may require further consideration.

Dartford Group Fire Safety Officer
Received on 10.10.24

Thank you for your email dated 01 October 2024. Following my assessment of Fire and Rescue Service emergency access provisions for application number 20240855, I would like to make the following observations.

Upon reviewing the plans available on the Dartford planning portal, I note the main access road appears to be unaffected by the proposed changes to the existing premises. Therefore, it is in my opinion, that the emergency access requirements under the above act appear to have been met.

Please be aware that should this proposal be successful it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under section B5.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

KCC Economic Development
No comments received.

Kent Police – Design Out Crime Team
Received on 01.10.24

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

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

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

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

1. Due to the proposed use of the site, we would recommend the applicant review current site security and boundary treatments. We advise boundary treatments to be a minimum of 1.8m in height with support beams facing inwards, any gates to a rear/ side access must also be securely lockable from both sides. It is essential that there is no unauthorised access to the rear of the site either via the side access route or via neighbouring premises.
2. Access Control and Security Compartmentalisation - For the main communal doors audio/visual door entry systems controlled by reception/carers are required to prevent unauthorised access. It is vital that members of the public cannot freely walk around the building, they must be let in via reception/carers and must be limited to what areas they can access without a member of staff present.
3. 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.
4. CCTV is advised for all communal entry points to monitor who enters/ exits the premises.
5. We recommend lighting to cover entrances and the parking area to aid in natural surveillance.
6. 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.
7. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.
8. Shared Surface - Vehicle and pedestrian shared routes do not meet SBD guidance. We strongly recommend the installation of pavements on all roads to avoid vehicle and pedestrian conflict and improve the safety of the future residents.
9. Vehicle mitigation may be required on pedestrian routes, to prevent mopeds or similar vehicles accessing the area and causing nuisance.
10. Cycle and Bin Stores must be well lit and lockable, with controlled access for the residents within the care home.

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

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

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice

focuses on CPTED and Community Safety with regard to this specific planning application.

National Grid

No comments received.

NHS

No comments received.

Natural England

Received on 21.10.24

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

The proposed development has the potential to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

Natural England's statutory advice on these potential impacts is set out below.

Further information required - recreational pressure impacts to European Sites (habitats sites)

This development site is within the zone of influence (ZoI) for recreational pressure impacts to one or more European Sites (habitats sites).

Within this ZoI, proposals for any net increase in residential units will have a likely significant effect on the qualifying features of the European Site(s) (habitats site(s)) through increased recreational pressure when considered either alone or in combination with other plans and projects.

Your authority has measures in place to manage these potential impacts through a strategic solution which Natural England considers will be effective in preventing adverse impacts on the integrity of the site(s).

Notwithstanding this, Natural England advises that these measures should be formally checked and confirmed by your authority, as the competent authority, via an appropriate assessment in view of the Natural England Access to Evidence - Conservation Objectives for European Sites and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).

Providing the appropriate assessment concludes that the measures can be secured, it is likely that Natural England will be satisfied that there will be no adverse effect on the integrity of the European Site(s) (habitats site(s)) in relation to recreational disturbance.

Where the proposal includes bespoke mitigation that falls outside of the strategic solution, Natural England should be consulted.

Reserved Matters applications, and in some cases the discharge/removal/variation of conditions, where the permission was granted prior to the introduction of the strategic approach, should also be subject to the requirements of the Conservation of Habitats & Species Regulations 2017 (as amended) and our advice above applies.

Discretionary Advice

Natural England may provide further advice to the applicant through the discretionary advice service (DAS).

Refer to Developers: get environmental advice on your planning proposals - GOV.UK (www.gov.uk) for more information.

Impact Risk Zones for Sites of Special Scientific Interest

We strongly recommend that local planning authorities (LPAs) use Natural England's Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) (available from the Natural England Open Data Geoportal (arcgis.com) and to use on MAGIC (defra.gov.uk) along with guidance) to decide when to consult Natural England on development proposals that might affect a SSSI.

The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances. Use of the SSSI IRZs avoids the need for a formal email consultation on some development proposals, reducing unnecessary delays in the planning process. In turn this allows Natural England to concentrate resources on development proposals with the highest risks and opportunities for nature recovery.

Planning and transport authorities: get environmental advice on planning - GOV.UK (www.gov.uk) provides further guidance on when LPAs must consult Natural England on development proposals.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Southern Water
Received on 08.10.24

One of the public sewers is a combined system, receiving both foul and surface water flows, therefore no flows greater than are currently directly received can be accommodated in this system. However, it is possible that by removing some of the existing surface water entering the sewer, additional foul flows could be accommodated, i.e. no net increase in flows. If the applicant wishes to investigate this option, the applicant will be required to provide Southern Water with a topographical site survey and/or a CCTV survey showing the existing impermeable areas draining to the sewer and their connection points, pipe sizes, gradients and calculations confirming the proposed flows will be no greater than the existing flows received by the sewer.

Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service:

<https://developerservices.southernwater.co.uk> and please read our New Connections Charging Arrangements documents which are available on our website via the following link:

<https://www.southernwater.co.uk/developing-building/connection-charging-arrangements> We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water.

In situations where surface water is being considered for discharge to our network, we require the below hierarchy for surface water to be followed which is reflected in part H3 of the Building Regulations. Whilst reuse does not strictly form part of this hierarchy, Southern Water would encourage the consideration of reuse for new developments.

- Reuse
- Infiltration
- Watercourse
- Storm Sewer
- Combined Sewer

Guidance on Building Regulations is here: <https://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h>

We would like to engage with you on the design for disposal of surface water for this development at the earliest opportunity and we recommend that civil engineers and landscape architects work together and with Southern Water. In many cases this may negate or reduce the need for network reinforcement and allow earlier completion of the development.

Where a surface water connection to the foul or combined sewer is being considered, this should be agreed by the Lead Local Flood Authority, in consultation with Southern Water.

Neighbouring properties

12no. surrounding properties were consulted and 3no. comments were received from members of the public. 2 comments were objecting and 1 comment supported the scheme. The final date to submit a response was 22nd October 2024.

Summary of objections:

- Concerns regarding use as similar property in Hollybush Road, resulted in residents attacking a neighbour.
- Are inspections for safety for residents and neighbour to take place regularly?
- The garage has been converted to meeting room or bike storage, beside neighbouring properties kitchen.
- The garage has an asbestos roof, covered with a fast growing vine. For the sake of residents something should be done to minimise danger and fire risk as the designated smoking area would be besides it.
- Parking is often an issue on Hollybush Road with front gardens too small for off-road parking and people often need to park near their homes.
- The disabilities/vulnerabilities of the residents have not been disclosed, which is worrying for vulnerable people living nearby.

Commented [RH1]: Do you mean attacking?

Commented [LF2R1]: yes

Summary of support:

- Support for proposed use and endeavours.

Officer's Analysis

Principle of Development

This site is in the Urban Boundary as defined by the Policies Map of the Core Strategy Document (2014).

Policy CS02 of the Core Strategy prioritises development in the urban area as a sustainable location for development.

The main considerations in the assessment of this proposal therefore relate to the following issues:

- Employment Use;
- Provision of Young Peoples Care Accommodation;
- Character, Appearance, Scale and Massing;
- Impact of the development on the amenity of future adjacent occupiers;
- Trees and Landscaping;
- Impact of the development on the highway network;
- Ecology and biodiversity;
- Waste and refuse arrangements.

Employment Use

A benefit of this proposal is that the development will employ staff employed on a shift pattern. The proposal would result in up to 4 no. non-resident staff members (one per resident) at the site, at one time, with 7 FTE staff members, working on a shift pattern. The employment gives some weight to the development proposals in the overall planning balance.

There would also be associated opportunities for job creation including in the construction of the development including the internal changes, landscaping and erection of the bin and cycle store and through services to support the care home operation once operational.

The proposal accords with Policy CS07 that seeks to enhance opportunities for all local people to access new jobs arising from the Council's employment policies.

Provision of Care Accommodation

In respect of the specific use as proposed for a care home Policy CS14 (LPCS) states that '*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.*'

The planning statement provided identifies that residents will be those referred by the relevant local authorities, social services department and will consist of up to 7 'Young adults'. The planning statement defines young adults as those between the ages of 18 and 64. The application form states that those adults will be those requiring care. The planning statement gives some background information of the need for more assisted housing units, particularly for individuals with learning disabilities or autism.

The pre-ambles to Local Plan Policy CS14 (in Paragraph 5.10.7) indicates that it is important that the concentration of residential institution accommodation is controlled and therefore that such accommodation is in accessible locations and would not result in a concentration of such facilities. The application site is reasonably well served by public transport, local services are easily accessible and there are no existing facilities within close proximity. A new care home in this location would therefore contribute to addressing the Council's spatial planning objectives and will help in delivering a broad mix of social community uses in the area.

Design, Character and Appearance

The only external changes proposed would be the erection of a timber bin and cycle store with a green roof and perimeter planting. The details submitted indicate the position of the bin and cycle store to the north side of the dwellinghouse. The perimeter planting includes a hedge to the north side of the plot adjoining Hollybush Road, and to the south side of the plot, in the rear garden, adjoining 70 Whitehill Road. These features would not have a significant impact on the character of the area.

On balance, the proposed development would comply with the requirements of Policy CS19 of the Core Strategy 2014 and paragraph 135 of the NPPF (2023) in terms of design, character and appearance.

Amenity of Future Occupiers

The NPPF (2023) states that planning decisions should aim to secure a high standard of amenity for all existing and future users. The impact on amenity is also considered with regard to the criteria with Policy CS19 of the Core Strategy, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land. The impact on neighbours will be assessed in the next section of the report.

The below tables show the spaces which would be provided, when compared against the minimum space standards for a dwellinghouse, as detailed in the Residential Layout Guidelines (2020). As the tables show the space standards would be acceptable.

Room Type	Proposed Internal Floor Area (m ²)	Minimum Space Standard (m ²)
Bedroom 1	17.45	6.5
Bedroom 2	19.8	6.5
Bedroom 3	17.7	6.5
Bedroom 4	9.9	6.5
Bedroom 5	12.7	6.5
Bedroom 6	18.5	6.5
Bedroom 7	17.7	6.5
Communal Room (Living Area)	21.75	13.2

Kitchen	11.40	7.2
Bathroom and WC	4.5	3.6

Garden Measurement	Proposed Internal Floor Area (m/m ²)	Minimum Space Standard (m/m ²)
Area	130	100
Depth	7-10.1	10

Neighbouring Amenity

As outlined above, it is important that any development safeguards the amenity of neighbouring properties and land. Following a period of consultation with neighbouring properties, two objections to the proposal were received.

There would be no changes to the external built form, with exception to the proposed cycle and bin store. These structures would be placed on the north side of the dwellinghouse, adjoining the road and so would not impact the neighbours. There would be no changes in number, position or scale of the existing windows. Therefore, there would be no impact in terms of overshadowing.

The Environmental Protection Team have commented advising that the change of use from family occupation to use by 7 individuals could result in an increased level of noise. As such, they have recommended that a condition is attached to the planning permission should it be granted that requires a Noise Management Plan (NMP) to be submitted for approval prior to the use commencing.

The proposal is therefore considered to safeguard the amenity of neighbouring properties in compliance with policy CS19 of the Core Strategy 2014, subject to the inclusion of planning conditions.

Parking and Highways

The current property has a long garage capable of parking 2 vehicles but no other parking provision. During the meeting it was advised that this garage would be converted to a games room, and so no parking provision would be available.

The below information is taken from SPG4 and details the required parking provision for C2 uses.

Land Use Class C2: Residential Institutions

55. Use Class C2 covers development that provides residential accommodation which includes an element of care for people in need, and residential accommodation for an education establishment.

Maximum Vehicle Parking Standards

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

Minimum Cycle Parking Standards

Hospitals & other residential institutions offering a level of care	1 space per 10 beds
Residential schools, colleges & training centres	1 space per 5 students

Residential Care Homes such as the one proposed would require the provision of 1 space for an ambulance, 1 space per resident staff + 1 space per 2 other staff and 1 space per 6 beds or residents.

The proposal would include no resident staff members. The 7FTE non-resident staff members would equate to a requirement for 4 spaces. As there would be up to 7 residents, of driving age (Between 18 and 64), there would be a requirement for 2 parking spaces for these individuals. There would also be a requirement for 1 ambulance space. The total required parking spaces would be 6 plus an ambulance space.

The existing garage does not meet the required internal space standards prescribed by the Kent Parking Standards and so for planning purposes would be considered unsuitable for parking. Therefore, the 3 parking spaces as required by the existing dwellings would be accommodated off-site.

The planning statement advises that as the supported living accommodation would house young adults with autism or learning disabilities, the individuals will be unlikely to be able drive or own a car and that a condition of their stay will be that they are not permitted to drive or keep a vehicle, for safeguarding purposes. However, it is likely that the extent of individual occupiers' abilities to drive will be on a case-by-case basis and depend on the totality of their individual circumstances. However, it is agreed that if it is a condition of individuals stay that they are not able to drive a vehicle, that the need for 2 of the required spaces would not be necessary. This should be secured via a condition for a management plan, if the

recommendation is to approve.

The planning statement goes on to say that only 3 to 4 staff members will be present on site and only one will travel to work by car. The planning statement indicates that there is a nearby bus stop nearby which officers frequent (20 minute) services to the town centre in under 7 minutes, which also has a train station. However, whilst best endeavours to encourage active travel may be taken, this cannot be guaranteed. No parking survey of the local roads has been submitted and neither has a Travel Plan. A travel plan could be help to limit car journeys and encourage active travel. However, to fully understand the impact that the scheme would have on the local roads, a parking survey showing local parking availability would be vital. The planning statement provided states that there is no evidence of any shortage of on-street parking as the site is not in a controlled parking zone. However, the below image taken from Google Street View of Whitehill Road, shows a high level of on street parking.

In terms of the ambulance space, the planning statement advises that this scheme is unlike other care homes, where residents have physical ailments and as such an ambulance space would not be required as it would not be frequently needed. Much like with a standard dwellinghouse, if an ambulance is required, the ambulance would park on the local street.



The planning statement indicates that one vehicle would be required as per the planning statement, to allow up to 2 residents to be taken on trips. The planning statement indicates that there would be 4 members of staff present at a time. In the instance that 4 member of staff travel to work by private car, 4 vehicles would be parked on the street. As staff members would work on a shift pattern, there would be a crossover point, where a greater number of cars could be parked during this changeover period.

No evidence has been supplied which would indicate that there is adequate on-street parking provision, should staff members choose to travel by car. There is evidence that there are good local public transport services, and a good Travel Plan would encourage active travel. However, a Travel Plan has not been submitted and it does not guarantee that all members of staff will choose to travel by public transport and so an assessment of parking availability is necessary to understand the potential impact of increase traffic movements.

In conclusion, subject to a condition relating to a management plan, which would restrict resident ownership of vehicles, resident parking would not be required. Given the nature of care provided on site, the ambulance space would also not be required.

The proposed scheme would result in the requirement of 4 parking spaces for staff members. Some justification of the local transport accessibility has been provided for a reduced level of parking. However, at least 1 vehicle would need to be parked on the street, with potential for up to 4 additional vehicles parked in the street, with greater parking crossover, at the point of shift change. No details of on street parking availability have been supplied and no Travel Plan has been submitted which would demonstrate a plan to minimise car journeys. The scheme includes a cycle store and the existing garage could be utilised for further storage of cycles.

Adequate vehicle parking provision would therefore **NOT** be available in compliance with paragraphs 114 to 117 of the National Planning Policy Framework (2023), Saved Policies T1 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Local Plan Core Strategy 2014. However, this could be appropriately mitigated by inclusion of planning conditions.

Thames Estuary and Ramsar Sites

The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering waterbirds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites which means that further declines in the bird population cannot be ruled out. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Having considered a number of options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £328.27 for every new C2 unit provided within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds.

Where there are no other contributions required for a development applicants generally have chosen to submit the payment of £328.27 per dwelling by filling in the Strategic Access Management and Monitoring Strategy (SAMMS) Agreement. By filling in this form there are no legal fees to be paid by the applicant and refund mechanisms are in place in the event of a refusal. In this case, there is an existing 5 bedroom dwellinghouse, and the bedrooms would increase to 7 rooms would be proposed by the change to a C2 care unit. Therefore, there would be requirement for a SAMM's payment for 2 additional units. In this case as there would be an increase of 7 units, a fee of £656.54 is required.

Therefore, the development would comply with the requirements of the Habitat Regulations and Section 14 (specifically paragraphs 185 and 186) of the National Planning Policy Framework 2023 and Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

Conclusion

Development is supported in the urban area. The proposed development would result in housing for people with special needs, in an existing urban residential area. An increase in housing for special care needs, is supported principally by local planning policy. The development would involve an increase in employment opportunities which is also supported. The scheme would involve minimal external changes, thus having a limited impact on the character of the area, and the neighbouring amenity would not be significantly harmed. There is some concern regarding the potential increase in on-street parking. However, on balance, the scheme as a whole would be acceptable when considered against local and national planning policies, with the parking harm mitigated by inclusion of appropriate conditions.

Recommendation

The recommendation is to approve this application.

(For detailed reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Lisa Fisher	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	21 st November 2024	Dated:	25th November 2024