

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 29/11/2025 4:27 PM from [REDACTED]

Application Summary

Address:	7 The Turnstones Gravesend Kent DA12 5QD
Proposal:	Application for a Proposed Lawful Development Certificate; Change of use from C3(a) dwellinghouse to C3(b) young people's care home.
Case Officer:	Mrs Lisa Fisher

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] Gravesend

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:	Subject: Objection to Planning Application 20251081 - Application for a Proposed Lawful Development Certificate; Change of use from C3(a) dwellinghouse to C3(b) young people's care home - 7 The Turnstones Gravesend Kent DA12 5QD Dear Sir/Madam, I object to this Change of Use Application for the following reasons: 1. A children's home with staff and managed care does not meet the definition of a single household under C3(b), therefore the applicant cannot rely on Class C3(b) to claim that the use is lawful. The title deeds contain a covenant legally stating that all properties on the Turnstones development including 7 The Turnstones should be used for residential purposes only. I enclose the relevant bullet point extracts from the common Deeds below: - Neither the Property nor any building erected thereon shall be used for any purpose other than a single private residence in the occupation of one family with necessary offices garages and conveniences and any part of the Property not built upon shall be maintained exclusively as private garden ground - Not to do or permit or suffer to be done anything on or about the Property or buildings now or hereafter constructed thereon which shall or may be or grow to be an annoyance nuisance or disturbance to the Vendor or the owners or occupiers of any other property on the Estate. 2. The presence of multiple unrelated staff members working shifts means the property cannot meet the "single household" requirement central to Clause 3(b). Therefore, the proposal cannot fall within Class C3(b) and cannot be deemed lawful through an LDC. 3. A children's residential care home with professional staffing, regulated care
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procedures, and non-family-based occupancy constitutes a Class C2 residential institution. C2 uses require full planning permission because they create a different pattern of activity and intensity than a normal dwelling. The application attempts to classify a C2 operation as C3(b), which is incorrect in planning terms and therefore the LDC should be refused.

4. Material Change of Use Beyond What Clause 3(b) Allows.

The following features represent a material change of use:

1. Staff on site day and night
2. Shift changes creating regular vehicle movements
3. Professional visits as part of regulated care
4. Management procedures and safeguarding measures not found in a standard household
5. Increased comings and goings compared with a family home.
6. These operational characteristics take the use well beyond the scope of what Clause 3(b) permits.

5. The proposed children's home does not fall within Clause 3(b) because it is not a single household and the operational arrangements align with Use Class C2. The LDC must therefore be refused, as the change of use is not lawful without a full planning application.

Impact Statement - Neighbourhood

1. Overview

The proposal represents institutional use of a property within a quiet residential street solely composed of single-family homes. This would be out of keeping with the original purpose and established character of the development and in my view contrary to local planning policies that seek to protect residential neighbourhoods from incompatible uses.

2. Highway & Pedestrian Safety

- The property lies on a route heavily used by unaccompanied school children walking to and from the nearby school. Additionally, there are high levels of vehicle traffic mornings and afternoons by parents dropping off, parking and subsequently picking up pupils. This proposal will significantly increase vehicle movements in an enclosed cul-de-sac from staff, visitors, support services, and potential transport needs of the residents. These concerns directly relate to material matters that must be considered in this application as it would significantly increase already heightened concerns by residents in respect of:

- Highway and pedestrian safety, especially for school children using an already busy pedestrian route.

- Insufficient on-site parking provision, potentially leading to overspill onto the street and increased congestion.

- Reduced visibility, access issues, or obstruction of pavements due to additional parked vehicles

3. Noise and Disturbance

The change of use will introduce a higher level of activity, noise, and disturbance than expected for a single-family dwelling, particularly due to shift-based staff arrivals/departures, visiting professionals, and service vehicles 24 hours per day, 7 days per week.

4. Access Restrictions

This will negatively affect the residential amenity of neighbours of numbers 8-24 The Turnstones in what is a currently quiet and peaceful environment with a mixture of very young families and elderly couples. In particular, the proposed change of use property geographically forms a narrow (and the only available) gateway for access in and out of the cul-de-sac for both residents, pedestrians, service, delivery and emergency vehicles.

5. Conclusion

I respectfully request that the Local Planning Authority refuse the application as it is incorrect in planning terms, does not fit with the established landscape of the area, and therefore the LDC should be refused.

Yours faithfully,



Kind regards