

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 03/12/2025 7:52 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:	Dear Sir/Madam, EXECUTIVE SUMMARY This proposal cannot lawfully fall under C3(b). The operation described is a staffed children's home that functions as a C2 Residential Institution and requires full planning permission, not a Lawful Development Certificate. It introduces clear highway safety risks, increases vehicle movements in an area with no footpath, creates noise and disturbance, reduces residential amenity, and conflicts with Gravesham Local Plan policies CS13, CS19, CS14 and Saved Policies T1 and P3. The LDC should therefore be refused. MAIN OBJECTION 1. The proposal does not meet the definition of C3(b) C3(b) applies only where up to six people live as a single household with carers. A staffed children's home with shift workers, regulated procedures and professional visitors is not a household. It is an institutional setting. Case law confirms this, including: R v Bristol CC ex parte Everett (1998) - staffed children's homes are not C3 use. Brighton & Hove CC v SSCLG (2004) - shift-based care = C2 use.
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Therefore the proposed use cannot be lawful under C3(b).

2. The use falls under Class C2, requiring planning permission

Key characteristics-24-hour staffing, shift patterns, safeguarding procedures and managed care-are defining features of Use Class C2.
C2 uses cannot be authorised via an LDC.

3. Material change of use

The following represent a material intensification beyond C3(b):

Continuous staff presence

Frequent vehicle movements

Professional visits

Increased comings and goings

Institutional care procedures

This constitutes a material change of use, not permitted development.

4. Conflict with Gravesham Local Plan policies
CS19 - Development & Design

Harm to residential amenity through noise, traffic and disturbance.

CS13 - Transport

Increased vehicle movements in a confined cul-de-sac with no pedestrian footpath conflicts with transport safety aims.

CS14 - Housing

Removes a family dwelling from a family-oriented residential area.

Saved Policy T1 - Highway Safety

Additional staff and visitor traffic will create safety hazards at the narrowest access point.

Saved Policy P3 - Parking

Insufficient parking provision → overspill, obstruction and reduced visibility.

5. Highway and pedestrian safety - significant concern

There is no footpath beyond No. 7, meaning all pedestrians must walk in the road, including school children, elderly residents and families.
The proposal adds:

Staff vehicles from shift changes

Professional visitors

Deliveries and service vehicles

This dramatically increases collision risks and obstructs access for residents and

emergency services.

6. Noise, disturbance and amenity loss

A staffed home operating 24/7 will introduce noise from shift changes, vehicle movements and general activity inconsistent with a quiet cul-de-sac. This is contrary to CS19.

7. Access and congestion problems

No. 7 is located at the narrow entry to the turning head for houses 8-24. Extra vehicles will cause congestion and may block emergency access.

CONCLUSION

The proposal:

Does not fall within C3(b)

Operates as C2 institutional use

Involves a material change of use

Conflicts with the Gravesham Local Plan

Creates significant highway and pedestrian safety risks

Harms residential amenity

The LDC must be refused.

Kind regards