



Delegated Report

Planning Application

Planning Application No: 20251176

Location: 24 St Georges Crescent Gravesend Kent DA12 4AR

Description: Change of use from a dwelling house to a children's residential care home.
Erection of a single storey rear extension with two roof lights.

Applicant: Mr Asad Ali

Site Visit Date: 27th November 2025

Submitted Documents/Plans

Application Form
101A - existing and proposed plans
102A- existing and proposed plans
103A- existing and proposed plans
104A - existing elevations
105A – Proposed Elevations
106A- existing and proposed roof plans
107A- cycle storage
108A - refuse and recycle bin storage
109A- existing site plan
110A – Proposed Site Plan
111 - site location plan
LIVARCH/24SGC/BNG – BNG Drawings
Form 4 - reasonable exception statement
Planning Statement and supporting information
Revised Biodiversity Net Gain Statement (Version 2)
Reasonable Exception Statement
Planning Statement

Superseded Documents:

~~BNG Metric Calculator~~
~~LIVARCH/24SGC/BNG – BNG Drawings~~
~~Biodiversity Net Gain Statement~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20250564	Prior approval application for a single storey rear extension with a depth of 6.00 metres, maximum height of 2.78 metres and eaves height of 2.55 metres.	Prior Approval Not Required	18.07.2025
20231070	Erection of one bedroom bungalow and provision of off street car parking space.	Refused	11.12.2023

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- H6 – Provision to Meet Special Housing Needs

Paragraph 34 of the NPPF (2024) 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 (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places

Supplementary Planning Guidance

- SPG 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)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

KCC Biodiversity (03/06/26)

The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

SUMMARY: SUFFICIENT INFORMATION

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination provided that the baseline habitat plan can be updated to include a north arrow. Changes to post-development habitats and off-site habitat compensation will be required at the deemed condition discharge stage.

Recommended condition/informative wording is provided in Appendix 1.

Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain should not be treated as significant and so does not require securing for 30-years. Even though there is no on-site significant habitat identified on-site for legislative biodiversity net gain, we recommend that a simple ecological enhancement plan secure habitat retention, creation and enhancement works at the site under planning policy.

Detailed comments on the submitted ecological and biodiversity net gain information follow the subheadings below.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹ for development (unless exempt^{2,3}) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information⁴, we understand a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 1: To show whether the applicant has met the minimum validation requirements

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Yes	The application form indicates that the applicant considers that biodiversity net gain does not apply to the application. However, biodiversity net gain information has subsequently been submitted following our previous advice note and the submitted Biodiversity Net Gain Statement Version 2 indicates that mandatory 10% BNG does apply to this application.
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate).	Yes	A small sites metric calculation tool was completed by Mr William Norris on 28 th February 2026, with a site walkover reported on 27 th February 2026. We understand the 'relevant date' to be in April 2024.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	-	-
The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.	Yes	The site is 289 square metres in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool (289.9 square metres) matches the reported red line boundary site area as per the application form. We are content with the baseline habitat classifications which are based on April 2024 data.

		We are content with the strategic significance scoring at baseline and post-development.
A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('<u>degradation</u>'), and where they have: • a statement to the effect that these activities have been carried out; • the date immediately before these activities were carried out; • the pre-development biodiversity value of the onsite habitat on this date; • the completed metric calculation tool showing the calculations, and • any available supporting evidence of this.	Yes	Hard surfacing was installed in May 2025. Prior to this the area was a mixture of unvegetated/vacant and derelict land and vegetated garden. We understand the 'relevant date' for the purposes of BNG is April 2024.
A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date).		None reported.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	Yes	The drawing is scaled but does not show the direction of north. This should be added.

The habitat baseline must be correct prior to determination, but full details of how the proposals will deliver biodiversity gains are not strictly required until submission of the pre-commencement Biodiversity Gain Plan. However, it is advisable to seek an indication prior to determination as, it gives an indication of how the biodiversity gain hierarchy will be applied, and if granted consent, the project cannot commence until this information has been submitted to and approved by the local planning authority. This information will also provide sufficient indication as to how conditions need to be applied should planning permission be granted for this application.

The government's standing advice on BNG states (under paragraph 002 Reference ID: 74-002-20240214): "[BNG] is not just a post-permission matter. To ensure the biodiversity gain objective is met and the condition can be discharged successfully, it is important biodiversity net gain is considered throughout the planning process."

Post-development habitat calculations have been provided and indicate a 32.66% biodiversity net gain on-site. We anticipate that this figure is misleading and will need to be corrected for the biodiversity gain condition discharge.

We disagree with the following:

- The metric currently indicates that 77m² of vacant or derelict land will be retained post-development. However, plans currently indicate that this area will in fact comprise paving slabs and should therefore be recorded in the metric created developed land; sealed surface;
- The metric currently indicates the creation of 5m² of bioswale in good condition. The submitted version 2 Biodiversity Net Gain Statement indicates that this feature will comprise pendulous sedge, tufted hair-grass, devil's-bit scabious and water mint. Pendulous sedge is a plant of damp woodland and river banks, tufted hair-grass is a plant of well-drained to moist conditions, devil's-bit scabious is a plant of damp

meadows, marshes and riverbanks, water mint is a marginal, aquatic or semi-aquatic plant. We note that some of these plants will require constantly wet/damp conditions and are unlikely to cope with the likely lengthy periods of dry soils, particularly during the summer in this location. We consider there is a high chance of failure of this feature to achieve more than poor condition;

- The metric currently indicates that 28.40m² of biodiverse green roof will be created on-site. In accordance with the UK Habitat Classifications definition/statutory condition assessment sheets, a biodiverse green roof needs to have a substrate depth that varies between 80-150mm, with at least 50% of the roof at 150mm depth, and should have a ratio of 60:40 between wildflower and sedum species, with the species richness of dry grassland species including ≥25 wildflower species. The manual also indicates that a biodiverse roof should include habitat features such as log piles, bricks for solitary bees etc...The submitted version 2 Biodiversity Net Gain Statement indicates that this feature will have a substrate depth of 150mm-200mm and seeded with native wildflowers, plug plants and hardy perennials (total 7 species). We advise that at present, the roof is likely to qualify as an intensive green roof;

- The metric currently indicates that a sustainable drainage system in good condition will be created on-site. This will be made up of a vegetated grid system planted with creeping thyme. Based on the statutory condition assessment we consider that it will not be possible for this feature to pass more than two of assessment criteria. It will therefore not be possible for this feature to achieve more than poor condition;

- The metric currently indicates that the front garden will be turned into a rain garden in moderate condition. A rain garden is defined in the UK Habitats Classification definition as "Shallow depression planted with deep-rooted native plants and grasses, located near a runoff source like a downspout, driveway or sump pump to capture rainwater runoff and stop the water from reaching the sewer system".

The condition assessment for this habitat type requires there to be a varied vegetation structure or vegetation type. Vegetation structure is provided vertically or horizontally. Vertical structure is provided by a mixture of two or more of the following: canopy cover (tallest trees/shrubs), understory (smaller trees/shrubs and herbaceous plants), shrub layer (even small woody plants), ground layer (low-lying herbs, grasses etc...covering the soil surface). Horizontal structure describes the spatial pattern of plant cover across the landscape. We assume that the vegetation types reflect the aforementioned vertical vegetation structure, although vegetation types can also be classifications of plant communities determined by climate, soil and ecological conditions, broadly categorised into forests, grasslands, deserts, tundras and wetlands.

The submitted version 2 Biodiversity Net Gain Statement indicates that this feature will include a drier zone, transitional to wet zone and wet zone. Species proposed for the wet area are typical of marginal/wet wetland environments, for the transitional zone, plants preferring damp soil but able to tolerate dry spells, and for the drier areas, meadowsweet and meadow cranesbill.

We note that the rain garden is proposed right up to the existing building and that it is generally recommended if the rain garden is proposed within 5m of a house, to consult a geotechnical adviser or registered ground engineer to avoid any damage to foundations from infiltrating water⁵. We recommend that the Local Planning Authority confirm whether it is comfortable with the location of the proposed rain garden at the point of the deemed condition discharge.

We also note that for a rain garden to be successful, the drainage of the soil will need to be assessed. The ideal rain garden site drains at a rate of a minimum of 1.25cm per hour, but will work with absorption rates of up to 5cm per hour. The size of the rain garden also needs to reflect the available sources of water from runoff. The information to show the site is suitable will be required at the time of the deemed condition discharge should the rain garden be taken forward.

Taking the above into account, we consider that a more than 20% biodiversity loss from the site is anticipated to be recorded in the final version of the biodiversity metric calculation tool and we re-iterate that off-site compensation is highly likely to be required.

Off-site biodiversity gains

'Off-site' biodiversity gains are any BNG measures proposed outside of the red line boundary. It can be achieved through habitat creation on land owned by the applicant/developer, a third-party provider or through the purchase of BNG units from a habitat bank operator for a site which is registered on the Biodiversity Gain Site Register.

The statutory Biodiversity Gain Plan (BGP) must contain the biodiversity gain site register reference number for any off-site units if these are used. BNG sites must be registered here: Register a biodiversity gain site - GOV.UK.

If off-site habitat creation is required, we direct the applicant towards the Kent Biodiversity Net Gain Site Register⁶ available on the Making Space for Nature in Kent and Medway website. Biodiversity Net Gain Guidance for Kent is also available on this website.

If any off-site habitat creation/enhancement is proposed outside of the LPA boundary/National Character Area of the impact site these will be subject to spatial risk penalties.

Where off-site gains are secured on land owned by the developer (but outside the redline boundary), or on third-party land (but not through a 'habitat bank operator'⁷), the biodiversity net gain needs to be subject to a deed of conservation covenants or Section 106 (as appropriate). Section 106 agreement templates are available on the Planning Advisory Service website. It is generally inappropriate to rely solely on conditions to secure off-site biodiversity net gain. The following needs to be secured as part of the off-site biodiversity net gain:

- The submission of a habitat management and monitoring plan (HMMP);
- Notice of HMMP implementation and completion of the habitat creation and enhancement works;
- Timescales for completion of habitat creation, and the submission of a completion report;
- Submission of monitoring reports;
- A habitat monitoring fee to be paid to the local planning authority on every habitat management monitoring event.

The HMMP shall be submitted when the general BNG condition is discharged and shall contain the following information 8:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.

Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Where off-site gains are to be secured through a 'habitat bank operator' (which has its own legal agreement and HMMP), no additional conditions or section 106 obligations are required, but the deemed condition still applies.

How the BNG is to be achieved will have to be agreed, secured and, where applicable, registered on the Biodiversity Gain Site Register, prior to the submission of the pre-commencement Biodiversity Gain Plan.

Statutory Credits

If it can be demonstrated that onsite biodiversity gains are not possible, the developer will need to demonstrate that they have approached 3 local or national suppliers, habitat banks or trading websites

before considering statutory credits. The only exception⁹ to this is where a developer has a unit deficit smaller than 0.25 biodiversity units (area or linear), in which case they do not need to approach 3 suppliers before considering statutory biodiversity credits. Statutory credits are intentionally marked up in price to prevent undercutting the off-site market; these prices are reviewed every 6 months. Prices are available here: Statutory biodiversity credit prices - GOV.UK.

It is not usually necessary to secure the biodiversity net gain through additional conditions (other than the deemed condition) or a section 106 agreement.

Submission of Biodiversity Gain Plan

The applicant should submit a biodiversity gain plan form¹⁰ along with supporting information (e.g., legal agreement and habitat management and monitoring plan) once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered. The biodiversity gain plan must include the following information:

- Information about steps taken or to be taken to minimise the adverse effects of the development on biodiversity;
- The pre-development biodiversity value of the on-site habitat;
- The post-development biodiversity value of the on-site habitat;
- Any registered off-site biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development;
- Any biodiversity credits purchased for the development; and
- Any other matters that the Secretary of State may be regulations specify.

We advise the local planning authority that there may be conditions attached to the decision notice should planning permission be granted that are linked to the biodiversity gain plan. Wording should be included in such conditions to ensure that it is clear that any documents/plans are produced in accordance with the 'approved biodiversity gain plan'.

Relevant conditions where this is likely to be appropriate include soft and hard landscaping conditions, and any other ecology/biodiversity conditions. Other relevant conditions may include drainage conditions.

Ecological Impact Assessment

Having reviewed the photographs submitted as part of the BNG information, we consider that the building is very low risk for bats and we therefore do not request an ecological impact assessment. However, a bat informative should be included on the decision notice should planning permission be granted for this application.

Kent Police Designing Out Crime Team

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. 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 to aid in natural surveillance.
4. If new external doors and windows are proposed, we recommend these to 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.
5. For cycle storage, we advise on the use of ground/ wall SBD or sold secure anchors within a lockable shed or storage area. Bin storage must also be secure with access control.

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.

Neighbouring properties

A site notice was placed on 27.11.25 and 4no. surrounding properties were consulted and 3 comments were received from members of the public, supporting the scheme. 1 comment was received objecting to the scheme. The final date to submit comments ended on 31.12.25.

Summary of supporting comments:

- It will have a positive impact
- Work should be carried out in line with planning regulations and with consideration for the local community.
- No biodiversity Net gain statement or metric calculation has been submitted.

Summary of objection:

- This proposal represents a material change in the nature and function of the property
- Remove regular housing stock from residents
- Lack of outdoor space for potential vulnerable children who will live there.

Officer's Analysis

Proposal

The proposal is for the change of use of the existing 3 bedroom dwellinghouse (C3) to a small, 2 bedroom (plus a carer room), residential care home (C2). Externally, this would include the erection of a single storey rear extension, and car parking to the rear for 2 staff members and an ambulance/visitor. The care home would be for 2 children between the ages of 8-17.

The planning statement details the supervision as follows:



- Daytime (08:00–20:00): 2 care staff will be present.
- Night-time (20:00–08:00): 1 waking night staff + 1 sleep-in staff.
- Registered Manager: On-site Monday–Friday, 9am–5pm.

Staff work on a rota basis, ensuring 24-hour support without excessive comings and goings. Visits by social workers and Ofsted inspectors are occasional and comparable to family visitors.

Site Description

This is a two-storey, mid-terraced dwellinghouse located within an urban, residential area.



Photo taken on 27/11/25

- Housing Need and principle of development;
- Design and impact on the surrounding area and conservation area;
- Amenity of future occupiers;
- Amenity of neighbouring properties;
- Parking and highway safety; and
- Ecology and biodiversity.

Principle of Development

The application site lies within a residential area. Policy CS14 of the Local Plan Core Strategy (LPCS) requires that the Council protects the mix of housing in the existing housing stock while also expecting new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

The proximity of the site to the town centre, local amenities and public transport links is such that its sustainable location is acceptable in principle as per Policy CS01 (LPCS).

Whilst the proposal would not be a conversion of the building and just a change of use from C3 dwelling house to C2 residential children's home, it is important that the change of use of the building does not cause harm to the character and amenity of existing areas. Therefore, Saved Policy H5 (LPFR) is still relevant.

Saved Policy H5 (LPFR) with regard to proposals for conversion of existing properties to provide flats states that the Borough Council will have regard for the following criteria;

(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 (LPFR) with regard to the provision to meet special housing needs states that the Borough Council will in principle support proposals in appropriate locations by Housing Associations, the private sector and other organisation which incorporate:-

(iii) With regard to proposals for residential hostels and homes, whether by new build or by conversion, the Borough Council will take particular care to ensure that these do not cluster together and harm the overall character of the area.

The property is currently in use as a C3 dwellinghouse. It is noted that use class C3(b) would covers up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems. Whilst this application applies for a C2 use, it is noted that a similar type of care can be provided within the existing use class of this property. As such, the care use would not be dissimilar to a C3(b) use, particularly given that 2 children would be housed with a maximum of 3 staff members on the property at any given time. Taking this into consideration the residential character of the area, a wholly new type of use is not being introduced into the area. There is no clustering effect which may harm the overall character of the area. The property is located in a street predominantly consisting of single family dwellings. As such the character of the area is domestic, and the proposed change of use will not erode the domestic character of the area.

It is considered that the proposal is in accordance with saved Policies H5 and H6 of (LPFR), but also Policy CS14 (LPCS) which states development provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

The preamble to this policy in paragraph 05.10.6 states that the Council's strategy is to plan for a mix of house sizes and types that will be appropriate to the differing needs of the community. Paragraph 5.10.7 states that while the Council will look to support the provision of housing to meet the requirements of people in special need of help or supervision, the use should not change the character of the area nor involve a loss of amenity to residents because of potential noise and disturbance it could create outside normal working hours.

Having regard to the above, it is concluded that the principle of the change of use of the property is acceptable.

Design, Character and Appearance

The proposed development would incorporate a single storey rear extension. It would be 3.5m deep, full width and 3m high with a flat roof. There would be no other changes to the external structure of the building. The extension would have no visibility from the streetscene given its rear location. It would be reasonable in depth and height. On balance it would be a subservient addition.



There would be some landscaping required to provide car parking to the rear. Rear parking in the form of garaging, is evident in the surrounding area. However, it is important to ensure an appropriate mix of hard and soft landscaping would be maintained, for ensuring a high-quality appearance is maintained. This could be reserved by condition.

In terms of design, the proposed development accords with Policies CS19 and CS20 (LPCS) and paragraphs 135 and 208 of the NPPF (2024).

Amenity of Future Occupiers

The NPPF (2024) 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.

Room Type	Proposed Internal Floor Area (m ²)	Minimum Space Standard (m ²)
Living/Kitchen/Diner	34.7	Living: 13.2 Kitchen/Diner: 12 Total: 25.2
Bedrooms	11.95 14.9	6.5 (Single) 11.2 (Double)
Bathroom and WC	4.7 3	3.6

Garden Measurement	Proposed Garden Space	Minimum Space Standard
Area (2 bed)	68.2m ²	37.2m ²
Depth (2 bed)	8.5m	7.6m

The proposed development would have one undersized bathroom and WC. However, this bathroom is the existing bathroom for the property. The proposal actually provides improved bathroom space as it introduces an ensuite which is above size.

All other internal and external space standards for a 2 bedroom dwellinghouse would be complied with. It is noted that this scheme would be for C2 use and not a dwellinghouse, however these standards provide a useful benchmark to understand whether the development would provide adequate space standards for users.

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, 1 objection to the proposal was received.

The proposed single storey rear extension would have limited impact on the neighbouring properties to either side given its limited depth, height and flat roof. In terms of occupancy and a potential intensification of use and increase noise, the existing dwelling contains 3 bedrooms. It is therefore reasonable to consider that this family sized dwelling may have in the past or could in the future house 2 or more children. Therefore, the proposal to provide full time care for 2 children would not likely result in any increased activity or noise as a result of this application. Overall, and taking into account the existing built form of both the application site and the surrounding buildings, it is considered that there will be no loss of outlook, daylight or sunlight to any neighbouring property and therefore complies with Policy CS19 (LPCS) and paragraph 135 of the NPPF (2024) in this regard. The proposed use is not materially different from a single-family dwelling due to the modest nature of the proposed children's home.

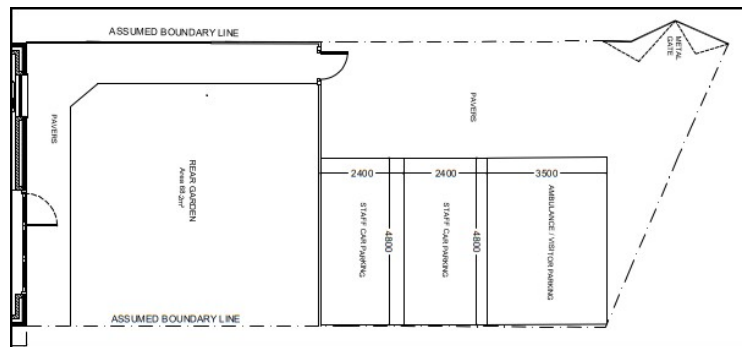
The proposal is therefore considered to safeguard the amenity of neighbouring properties in compliance with policy CS19 of the Core Strategy 2014.

Parking and Highways

KCC Parking Standards (2006) lays out the required parking provision for C2 uses as per the table below.

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		

The proposed plans detail spaces to the rear of the property. 2 spaces are provided for staff members, and one space for ambulance/visitor's space. A secure bike locker would also be provided.



Adequate vehicle and cycle parking provision is therefore available in accordance with paragraphs 109 to 114 of the National Planning Policy Framework (2024), Saved Policies T1 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014 subject to further details of cycle parking provision.

Biodiversity

Net Gain

Under the Environment Act 2021 and supporting Statutory Instruments Biodiversity Net Gain (BNG) is now mandatory for most development. The legislation requires a minimum 10% gain in biodiversity from applicable development either onsite, offsite or a combination of both.

BNG provided under the mandatory requirements offsite and significant BNG onsite must be secured by a legal agreement for 30 years under an approved Habitat Management and Monitoring Plan (HMMP)

There are strict legal requirements in terms of what an application must contain in relation to BNG before it can be accepted as valid. This is set out in Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 and requires the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application and other information.

However, certain applications are exempt from the BNG regulations (the Biodiversity Gain Requirements Exemptions) Regulations 2024) including householder applications and include:

- Householder development as defined within article 2(1) of the Town and Country Planning Development Management Procedure) (England) Order 2015.
- Development granted planning permission by a development order under section 59. This includes permitted development rights.
- Development subject to the de minimis exemption - development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of habitat, or 5 metres of linear habitats such as hedgerows.
- Self-build and custom build development - development which:
 - consists of no more than 9 dwellings, and
 - is carried out on a site which has an area no larger than 0.5 hectares, and
 - consists exclusively of dwellings which are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015

The application form states that this site would be subject to the de minimis exemption as the development does not impact a priority habitat and impacts less than 25 square metres. However, the site contains an existing patio to the rear where the proposed extension would be located. The additional pavers and landscaping for parking would result in some loss of existing vegetated garden as a result of the proposed hardstanding. The habitat affected is non-priority residential garden of low ecological value. While this engages the statutory Biodiversity Net Gain requirement, the scale of impact is limited and can be appropriately addressed through proportionate on-site biodiversity enhancements, secure by planning condition.

Following extensive consultation KCC Biodiversity and amendments to provide the necessary information for assessment, they have in their most recent comments advised that there is sufficient information provided for determination. This was subject to the inclusion of a north arrow being added to the baseline habitat plan, which has since been updated in this regard. Condition was recommended for provision of an Ecological Enhancement plan, plus the inclusion of a informative which highlights the deemed Biodiversity Gain Plan condition which must be discharged prior to commencement of works. Plus an informative relating to potential for occurrence of the presence of bats.

The comments also state that:

Post-development habitat calculations have been provided and indicate a 32.66% biodiversity net gain on-site. We anticipate that this figure is misleading and will need to be corrected for the biodiversity gain condition discharge.

They conclude following reasons for their interpretation as follows:

Taking the above into account, we consider that a more than 20% biodiversity loss from the site is anticipated to be recorded in the final version of the biodiversity metric calculation tool and we re-iterate that off-site compensation is highly likely to be required.

Based on the comments received it is deemed that this can be appropriately addressed within the Biodiversity Gain Plan submission as part of the deemed condition, as per the advice from KCC Biodiversity.

Conclusion

The proposed development complies with all relevant national and local planning policies.

Recommendation

The recommendation is to approve the application.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Lisa Fisher	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	5 th June 2026	Dated:	8 th June 2026