
SUMMARY REPORT

Application Ref:	20240195
Site Address:	219 Wrotham Road, Gravesend, Kent, DA11 7LL
Application Description:	Change of Use from Class C3 (A) Dwelling house to a Class C2 Children's Residential Care home.
Applicant:	Mrs Janine Stankiewicz
Agent:	Mrs Janine Stankiewicz
Ward:	Woodlands
Parish:	Non-Parish Area
Decision due date:	14 June 2024
Publicity expiry date:	9 May 2024
Decision Level:	Committee Decision
Reason for referral:	Councillor call-in
Recommendation:	Permission

Summary of Reasons for Recommendations

The proposal is for a change of use from a Class C3(A) dwellinghouse to a Class C2 Children's Residential Care Home for 3no. children. The care home would be supported by 2no. carers at all times and a site manager in the day.

The development will not be materially different to the character of a single family dwelling, will involve no external alterations to the building, will provide good quality amenity space for future occupiers, safeguard neighbour amenity and have no impact on the highway network.

All representations received from both 3rd parties and consultees have been taken into account when considering this proposal.

The development is considered to comply with local and national planning policy and material planning considerations.

The recommendation is for planning permission, subject to conditions as set out within this report.

MAIN REPORT**1. Site Description and Surroundings**

- 1.1. 219 Wrotham Road is a two storey semi-detached property, with habitable rooms in the loft space. The property is located on the western side of the highway, near to the junction with New House Lane. It benefits from a dropped kerb and driveway, with space to accommodate two vehicles.



- 1.2. The property was extended at some point in 2022/2023 with a dormer window and hip-gable roof enlargement, and a single storey outbuilding at the end of the garden. Although not benefitting from planning consent, the development is considered to be within the lawful limits set out within Classes B, C and E of Schedule 2, Part 1 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.



2. Planning History

- 2.1. The property has no relevant planning history.

3. Proposal

- 3.1. This application proposes the change of use of the 219 Wrotham Road from a single family dwellinghouse referred to a Class C3 (a) of the Town and Country Planning (Use Classes) Order 1987 (as amended)) to a children's home for three children within use Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).
- 3.2. The children's home would accommodate 3 children and there would 2 or 3 members of staff, working shift patterns 24/7. The Design and Access Statement submitted as part of the application states that the property will provide accommodation for children in need, with learning difficulties, aged between 5 and a maximum of 17 years old. The home will be to the standards specified by Ofsted and it is understood the premises will be continually inspected on a quarterly basis.
- 3.3. In the supporting documents it is stated that the central mission is to provide a stable living environment and supportive services to benefit each child's overall well-being and development during their time in our care. As part of their goal, the home will be a consistent, nurturing environment that can provide the stability needed to thrive with long-term placements for the children, until they reach the age of 18. Care will be provided by carers operating on a shift-based system and no permanent carer will be living at the property. It has been stated in the design and access statement that there will always be two carers at the property at any one time, including overnight, with a manager present during the day.
- 3.4. No external alterations are proposed to the dwelling itself. The internal configuration of the property will remain the same.

4. Planning Policy, Development Plan and other Material Considerations

- 4.1. Gravesham Local Plan Core Strategy (2014)
 - CS01 – Sustainable Development
 - CS02 – Scale & Distribution of Development
 - CS11 – Transport
 - CS12 – Green Infrastructure
 - CS14 – Housing Type and Size
 - CS18 – Climate Change
 - CS19 – Development & Design Principles
- 4.2. Gravesham Local Plan: First Review (1994)
 - P3 – Vehicle Parking Standards
 - H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
 - H6 – Provision to Meet Special Housing Needs
 - T1 – Impact of Development on the Highway Network

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.

4.3. National Planning Policy Framework (2023)

- Section 2 – Achieving sustainable development
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed and beautiful places
- Section 15 – Conserving and enhancing the natural environment

4.4. 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)
- Householder Extensions/Alterations Design Guide (2021)

5. Consultations and Publicity Responses

Consultations

- 5.1. Kent County Council Highways – I note from the submitted Site Management Plan, that there will be a maximum of 3 resident children and 3 staff, should permission be granted for the children's residential care home. I am therefore satisfied that the proposals would not generate a material increase in vehicle numbers above those already associated with the existing 3 bedroom dwelling.

There is an existing access and driveway and it is not anticipated that staff would be required to move their cars during their shift. Visitor numbers would be similar to those likely associated with a typical 3 bedroom dwelling.

Whilst there are good local transport links, I would also welcome the provision of secure, covered cycle storage.

Consequently, I refer to the above planning application and confirm that provided the following requirements are secured by condition or planning obligation, then I would raise no objection on behalf of the local highway authority:-

- Provision and permanent retention of the existing vehicle parking spaces/driveway.
- Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.
- Provision and maintenance of 2m x 2m pedestrian visibility splays behind the footway on both sides of the access with no obstructions over 0.6m above footway level, prior to the use of the site commencing.

Informative: It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street

furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have highway rights over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

- 5.2. *Kent Police Designing Out Crime* – 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. 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.
5. Any bedroom windows on the ground floor require a defensive treatment to deflect loitering, this can be achieved via planting of prickly plants or knee rails outside of windows.

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.

- 5.3. GBC Environmental Protection (Regulatory Services) – There is no objection to this application. Appropriate on -site supervision will be present 24/7. No conditions to recommend.
- 5.4. Local Ward Councillors – Application should be determined at Planning Committee if recommended for permission.
- 5.5. Publication and Neighbour Consultation

A notice was displayed on site 18 April 2024.

In addition, ten surrounding properties were consulted and fifteen representations were received. The representations received from neighbours all registered objection to the proposed change of use. The concerns raised have been separated below into material and non-material planning considerations:

Note – only the material planning considerations are relevant to this decision.

Material Planning Considerations

- Out of character with area
- Unsafe location for children's care home (busy road and junction)
- Impact on amenity
- Noise and disturbance
- Anti-social behaviour
- Light pollution
- Impact on highway / parking provision

- No planning approval for loft conversion or outbuilding

Non-Material Planning Considerations

- Loss of property value
- Applicants personal circumstances – companies financial history
- Reference to other planning applications – Elizabeth Huggins Cottages (not relevant to this proposal)
- Reference to Ofsted reports on other C2 children's care homes under company ownership
- Matters controlled under building regulations (fire safety)
- Speculation on future expansion or changes of use following this application

The consultation period expired 10 May 2024.

6. Planning Analysis and Head of Planning Comments

Principle of Development

- 6.1. Policy CS02 of the Gravesham Local Plan Core Strategy (LPCS) (2014) seeks to retain and improve the existing stock of housing and prioritises development in the urban area as a sustainable location.
- 6.2. Policy CS10 (LPCS) supports proposals that lead to the provision of additional infrastructure that improves community wellbeing.
- 6.3. Policy CS14 (LPCS) seeks to protect the mix of housing in the existing stock and to restrict the conversion of family sized units into smaller properties. It also requires new housing development to provide a range of dwelling types and sizes, taking into account local character and housing need.
- 6.4. Saved Policy H6(iii) of the Gravesham Local Plan First Review (LPFR) (1994) states that “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 preamble to this policy refers to the importance of controlling the concentration of residential institutional accommodation to ensure that the properties themselves are suitable and that the intensification of use in residential areas will not change the character of the area, nor involve a loss of amenity to residents because of the potential noise and disturbance it could create outside normal working hours.
- 6.5. It is noted that a Class C2 use (for the provision of residential accommodation and care to people in need of care) is an entirely separate use class from Class C3 (a). A C2 use is a type of residential institution, which implies that the occupants reside on a more individual basis. For the proposed development, there would be 3 children in residence and staff would permanently occupy the property albeit in shifts (with a minimum of 2 carers on site at all times), this would suggest that the staff would form part of a single household. Therefore, although a change in use of the property, the number of occupants and general operation of the building would not be materially different in character to a typical single-family dwelling.
- 6.6. The proposed development would involve no built development and it is considered that the day-to-day operation of the children's home would be very similar in character to a family dwelling (despite the use class distinction set out above) and would therefore not

be out of character with the surrounding properties. In particular the external aspects of the use, such as the use of the garden and access/parking area would be domestic in nature, with the number of vehicle movements being reflective of a single family dwelling. There would be a requirement for 2 off-street parking spaces to accord with Gravesham's adopted parking standards (SPG4) (this is assessed in the later 'Parking and Highways' section).

- 6.7. The neighbour consultation raised concerns with the suitability of this location for a residential children's home, principally due to the proximity to a busy arterial road and junction. While it is noted that Wrotham Road is a busy route between the town centre and A2, as set out above the surrounding area is made up of single family dwellings and the proposal is similar character, and therefore the proximity to a busy road is not sufficient grounds to refuse the application. Moreover, a C3 use (as existing) could be occupied by children with parents and carers, which is not materially different to the proposed change of use where responsible adults are onsite to ensure the welfare of the children.
- 6.8. Kent Police raise no objections to the proposal but provide comments regarding design features such as fencing, CCTV, lighting etc. which could be added as an informative for the benefit of the applicant should permission be forthcoming.
- 6.9. Overall, it is considered that the change of use of 219 Wrotham Road to a residential children's home would not result in a clustering of similar uses in the surrounding area, no new built development and no change to the character of the surrounding area. As such, the proposal would be compliant with Policies CS02 and CS14 (LPCS) and Saved Policy H6(iii) (LPFR).
- 6.10. Having established that the principle of the development is acceptable, it is now necessary to consider all other matters.

Design, Character and Appearance

- 6.11. Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 130 of the NPPF (2023) seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 (LPCS) reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.
- 6.12. This application does not propose any external alterations or extensions to the building. Therefore, the proposed change of use and conversion of the property will have no impact on the character or appearance of the building and the proposal is in accordance with Policy CS19 (LPCS) as well as Section 12 of the NPPF (2023).
- 6.13. There were some representations received from neighbouring residents relating to the outbuilding and roof extensions on the property. As referenced previously, these developments are considered to fall within the parameters of Classes B, C and E of Schedule 2, Part 1 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. Therefore, these elements do not form part of the consideration of this application.

Amenity of Future Occupiers

- 6.14. Policy CS19 (LPCS) requires that all development should be 'fit for purpose' and be

'adaptable to allow changes to meet the need of users' and that 'the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines' (RLG) (2020). Moreover, on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England and set out how these would be applied through planning policy. These standards came into effect on 1 October 2015.

- 6.15. The amenity of future occupants is also safeguarded in Policy H5 (iv) which requires proposals for the conversion of existing dwellings to have regard to the adopted Residential Layout Guidelines (RLG) (2020).

Internal living space

- 6.16. In relation to the internal living space, the Councils RLG (2020) and Nationally Described Space Standards (NDSS) (2015) which set out minimum internal areas for new dwellings based on the level of occupancy, bedrooms size and number of storeys.
- 6.17. The proposed dwelling has a gross floorspace of 131.15m². The Nationally Described Space Standards require a three storey, three bedroom, five person dwelling (3 children and 2 staff at all times) to have a minimum floor area of 99m², and as such the dwelling would meet the requirement of the NDSS.
- 6.18. Notwithstanding this, Gravesham's RLG breaks down the measurements further, recommending minimum floor areas for specific rooms as shown in the table below. These recommended minimum floor areas have been compared to the proposed room sizes within the property:

	RLG (minimum floor area)	Proposed Room Size
Living Room	13.2m ²	14.6m ²
Dining Room	9.5m ²	13.2m ²
Kitchen	7.2m ²	7.4m ²
Conservatory / Lean-to	-	12.4m ²
Bathroom	3.6m ²	5.1m ²
Bedroom 1	11.5m ²	13.8m ²
Bedroom 2	11.5m ²	11.6m ²
Study	-	5.4m ²
Bedroom 3	11.5m ²	20.3m ²
Ensuite Bathroom	3.6m ²	3.3m ²

- 6.19. The table above has been colour coded, to highlight which rooms accord with the RLG, and demonstrates that all rooms within the property exceed the RLGs minimum standards, with the exception of the second floor ensuite bathroom. However, this bathroom is a shower room and as a shower basin requires less space than a bath, this is considered to be acceptable.
- 6.20. Therefore, the property is an acceptable size to accommodate the change of use into a C2 residential institution for 2 children and 2 staff (24/7 basis).

External Occupier Amenity

- 6.21. In terms of external space, the existing garden has an area of approx. 100m² and a depth of

18m, which is considered to be good sized amenity space for future occupiers of the property.

Summary

- 6.22. Overall, the existing property is considered to be suitable to accommodate the proposed change of use and provide acceptable living conditions for future occupiers and staff, in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2023).

Neighbouring Amenity

- 6.23. Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and paragraph 135(f) of the NPPF (2023) requires development to have a high standard of amenity for existing users (in this case surrounding properties).
- 6.24. The Local Planning Authority have received 15no. letters of objection from surrounding residents. The 'Consultations and Publicity Responses' section has listed the material and non-material planning considerations introduced by residents, with only the material considerations relevant to this decision.
- 6.25. A number of representations were received by neighbouring properties expressing concern for amenity through noise, disturbance and antisocial behaviour, which would impact on amenity. Due to the accommodation of children who may potentially have challenging backgrounds and the fact the property is a semi-detached dwelling, in a built-up residential area there is the potential for a higher amount of noise/disturbance. However, as stated previously in this report the change of use of the property into a children's care home for 3no. children and 2no. staff (day/night) is not materially different to a single family dwellinghouse. Therefore, although in a different use class the proposed C2 children's care home is not materially different to a standard C3 dwellinghouse. Moreover, Gravesham's Environmental Protection Team have reviewed the application and raised no concerns in relation to noise or anti-social behaviour impacts of the proposed use. The application has been supported by a Site Management Plan, which sets out the nature of the use and care arrangements provided. While this plan does not set out clear rules and procedures for the operation of the care home, such as noise management, this can be achieved through planning condition with a trigger of prior to commencement and will ensure that clear measures are in place to address any anti-social behaviour and noise impacts.
- 6.26. Further concerns were raised by neighbouring residents in relation to privacy and light impacts. The proposed development does not involve any extension or alteration to the property, and therefore there would be no impact through overlooking as a result of this development. In addition, the use as a children's care home would not be materially different to a single-family dwellinghouse and there is not expected to be any impact on amenity through light.
- 6.27. Other representations raised concerns with the proposal being out of character, an unsafe location, highway/parking impacts and no planning approval for building works. These matters are addressed in other sections of this report.
- 6.28. Overall, the proposal would not be detrimental to the residential amenity of surrounding occupiers and would be in line with Policy CS19 (LPCS) and Section 12 of the NPPF (2023).

Parking and Highways

- 6.29. Any new development should have an acceptable amount of parking, not be detrimental to the highway network and promote sustainable transport methods, to accord with saved policy T1 and P3 of Gravesham Local Plan First Review (1994), Policy CS11 (LPCS) and Section 9 of the NPPF (2023).
- 6.30. In terms of highways, as aforementioned the existing property benefits from off-street parking, with a dropped kerb and a driveway with sufficient space for 2no. vehicles. Gravesham's adopted parking standards (SPG4) (2006) requires 2 parking spaces for a three bedroom property, therefore the existing arrangement accords with these standards. However, the Design and Access Statement highlights that the staff would be expected to travel to work by public transport, with the exception of the visiting manager who would arrive by car. Therefore, subject to the information provided, there would not be a reliance on cars and the site is in a sustainable location.
- 6.31. A number of neighbour representations were received and raised concerns with the impacts on the highway and parking provision. As set out above, the property benefits from a dropped kerb access onto a driveway with sufficient space to park 2no. vehicles, which is in accordance with SPG4, and there is no objection to the proposal on highway grounds.
- 6.32. The supporting plans do not demonstrate any secure cycle storage as required by Gravesham's adopted parking standards (SPG4), however there is sufficient space within the garden for a store to be located. Therefore, if permission is forthcoming, a condition will be attached to ensure that details of cycle storage are submitted to and approved by the Local Planning Authority.
- 6.33. Overall, the proposed change of use is not considered to have any detrimental impact on the highway network or parking provisions in the area. Therefore, the proposal is in accordance with Policy CS11 (LPCS), Gravesham's adopted parking standards (SPG4) (2006) and Section 9 of the NPPF (2023).

Any Other Material Planning Considerations

Waste Management

- 6.34. The existing waste provision and collection would remain unaltered, with the bins stored on site and taken out to the kerbside on collection days. There is no objection to this arrangement and therefore the proposal is considered acceptable and in accordance with Policy CS19 (LPCS).

Crime and Anti-Social Behaviour

- 6.35. Comments have been received referring to the crime and anti-social behaviour associated with the proposed use and concerns have been raised over the potential anti-social behaviour from the proposed use. Although anti-social behaviour has been assessed in the neighbour amenity section above, Kent Police Designing Out Crime Officers were consulted on this application and no objections were raised. However, it was suggested that the boundary treatments be 1.8m in height with the gates lockable from both sides, security cameras and lighting installed on the entrances, and secure windows and doors. An informative would be added to the application to encourage engagement with Kent Police in this regard if permission were forthcoming.

7. Conclusion

- 7.1. It is recommended that the proposed change of use from Class C3 (A) Dwelling house to a Class C2 Children's Residential Care home is GRANTED planning permission, subject to

conditions.

- 7.2. The proposed change of use from a C3 dwellinghouse to a C2 children's care home for 3 children will be of similar character to the surrounding single-family dwellings by virtue of scale and use. The proposal does not involve any external alterations to the property, will provide good quality amenity for the residents and will not have any adverse impacts on neighbouring amenity or the highway network.
- 7.3. Overall, the proposal complies with all relevant national and local planning policies, and it is recommended that planning permission is granted, subject to conditions.

Recommendation

Planning Permission, subject to conditions as set out within this report.

Conditions and Informatives

Suggested Conditions

Approved Plans

1. The development hereby permitted shall be carried out only in accordance with the following schedule of approved plans:
 - Application Form – dated 28 February 2024
 - Design and Access Statement
 - Site Management Plan
 - Un-numbered Plan Drawing – Ordnance Survey Site Location Plan (scale – 1:1250)
 - Un-numbered Plan Drawing - Existing Plans and Elevations

Reason: For the avoidance of doubt and in the interests of proper planning.

Written Management Scheme

2. Prior to occupation of the C2 children's residential care home hereby granted permission, a written management scheme, demonstrating how the Class C2 use hereby permitted will be managed to adequately control noise/disturbance to surrounding residents and including details of 24 hour staff supervision, shall be submitted to, and approved in writing, by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: In order to ensure adequate management of the use, in line with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Bicycle Storage

3. Prior to occupation of the C2 children's residential care home hereby granted permission, details of secure, covered and accessible cycle storage facilities (comprising of a minimum of two cycle spaces) to serve the property shall be submitted to, and approved in writing, by the Local Planning Authority. The approved storage facilities shall be provided within three months of the date of this permission and shall be retained for such purposes at all times thereafter.

Reason: In order to encourage options for sustainable travel in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Number of Occupants

4. Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or any order revoking and re-enacting that Order with or without modification) the property shall be used only for the provision of residential accommodation and care to a maximum of three people (maximum age 17) in need of care and for no purpose including any other purpose in Class C2 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification, without being approved in writing by the Local Planning Authority.

Reason: In the interests of residential amenity and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Vehicular Parking

5. The existing vehicle parking area on the site frontage shall be kept available at all times for such use, and no development, whether or not permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), or any provision equivalent to that Order in any statutory instrument revoking and re-enacting that Order, with or without modification, shall be carried out on the site in such a manner or in such a position to preclude its use for vehicle parking.

Reason: That the development, without the retention of the existing vehicle parking area, is likely to lead to car parking inconvenient to other road users and detrimental to amenity and in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy (2014) and Saved Policy P5 of the Gravesham Local Plan First Review (1994).

Informatives

1 STATEMENT OF POSITIVE AND PROACTIVE APPROACH TO DECISION-MAKING

In accordance with Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), and paragraph 38 of the National Planning Policy Framework (NPPF) 2023, the Local Planning Authority has approached the assessment and determination of this application in a positive and creative way and, where appropriate, has worked pro-actively with the applicant to secure a development that is sustainable and that improves the economic, social and environmental conditions of the area, and that is in accordance with the Development Plan for the area.

2 BUILDING REGULATIONS AND PARTY WALL ACT

This decision DOES NOT imply any consent which may be required under the Building Regulations or under any other enactment or provision. Nor does it override any private rights which any person may have relating to the land affected by this decision, including the provisions of the Party Wall etc. Act 1996.

3 DEVIATION FROM APPROVED PLANS

It is possible that any proposed deviation from the approved plans could be classed as a 'material' change requiring a further application/permission. In the event that any change is proposed, applicants are advised to seek advice from the Local Planning Authority [as proceeding without the

necessary permissions could nullify this permission].

4 INFORMATION FROM KENT POLICE DESIGNING OUT CRIME TEAM

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. 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.
5. Any bedroom windows on the ground floor require a defensive treatment to deflect loitering, this can be achieved via planting of prickly plants or knee rails outside of windows.

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.

5 SMOKE CONTROL

The proposed development is situated in a smoke control area. As such, only authorised smokeless fuels as listed in the Smoke Control Areas (Authorised Fuels) Regulations 1991 shall be burnt or fireplaces/appliances exempted by Smoke Control (Exempted Fireplaces) Orders shall be utilised. Exempt appliances are appliances (ovens including pizza and tandoori ovens, wood

burners and stoves) which have been exempted by Statutory Instruments (Orders) under the Clean Air Act 1993. These have passed tests to confirm that they are capable of burning an unauthorised or inherently smoky solid fuel without emitting smoke. They must be fitted and used according to manufacturer's instructions and they can only be used for the fuel for which they are designed.

When purchasing fuels and fireplaces the applicant should clarify with the vendor their suitability with respect to use in Smoke Control Areas. For further information, including confirmation that an appliance and/or fuel is suitable for use in a smoke control area, the applicant should contact the Council's Regulatory Services air.quality@gravesham.gov.uk.

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