

Delegated Report

Planning Application

Application No: 20250224

Location: 14D Lennox Road, Gravesend, Kent, DA11 0EP

Description: Change use from class C3 (A) Dwelling House to a class C2 Children's Residential Care home.

Applicant: Mrs Varinder Kaur Cheema

Site Visit: N/A Desktop Assessment

Submitted Documents/Plans

- Application Form – dated 11 March 2025;
- Supplementary Information – Design and Access Statement, Business Strategy and Site Management Plan;
- Drawing no. LR1/SITE/001 – Ordnance Survey Site Location Plan (scale – 1:1250);
- Drawing no. LR1/SITE/002 – Proposed Block Plan (scale – 1:500);
- Drawing no. LR1/PLAN/001 – Existing Ground Floor Plan;
- Drawing no. LR1/PLAN/002 – Existing First Floor Plan;
- Drawing no. LR1/PLAN/003 – Existing Second Floor Plan;
- Drawing no. LR1/PLAN/004 – Existing Roof Plan;
- Drawing no. LR1/PLAN/005 – Proposed Ground Floor Plan;
- Drawing no. LR1/PLAN/006 – Proposed First Floor Plan;
- Drawing no. LR1/PLAN/007 – Proposed Second Floor Plan;
- Drawing no. LR1/PLAN/008 – Proposed Roof Plan.

Relevant Planning History

No relevant planning history.

Development Plan

Gravesend 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

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

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)

Consultations, Publicity and Representations

External Consultees

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.

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.

Internal Consultees

Local Ward Councillors – No comment received.

Neighbouring properties

Five surrounding properties were consulted and five representations were received, all registering objection to the proposal. The concerns raised have been summarised below, split into material and non-material planning considerations:

NB – only the material planning considerations are relevant to this decision

Material Planning Considerations

- Inappropriate and out of character with single family dwellinghouses;
- Not a suitable location for a children's care home;
- Impact on amenity;
- Increased parking pressures;
- Crime and Anti-social behaviour

Non-Material Planning Considerations

- Loss of property value

The consultation period expired 10 April 2025.

Officer's Analysis

Site Description

14D Lennox Road is a mid-terrace town house located on the western side of the highway.



It benefits from a driveway with space to accommodate 2no vehicles.

The property has not been extended, but the integral garage has been converted into a habitable room and a conservatory erected at the rear.

Proposed Development

This application proposes the change of use of the 14D Lennox 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).

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, some who have experienced trauma, abuse or neglect or with learning difficulties or emotional needs, 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.

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 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.

No external alterations are proposed to the dwelling itself. The internal configuration of the property will remain the same.

Principle of Development

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.

Policy CS10 (LPCS) supports proposals that lead to the provision of additional infrastructure that improves

community wellbeing.

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.

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.

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.

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).

The neighbour consultation raised concerns with the suitability of this location for a residential children's home, principally being out of character with the area. It is acknowledged that the surrounding area is made up of single-family dwellings, however as set out above the proposal is similar character and not materially different to a single-family dwellinghouse. 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.

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.

Overall, it is considered that the change of use of 14D Lennox 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).

Having established that the principle of the development is acceptable, it is now necessary to consider all other matters.

Design, Character and Appearance

Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 135 of the NPPF (2024) 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.

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 (2024).

Amenity of Future Occupiers

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.

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

In relation to the internal living space, the Council's 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.

The proposed dwelling has a gross floorspace of 179m². 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.

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
Office	5.5m ²
Staff Room (1)	3.6m ²
Staff Bathroom	2.8m ²
Living/Diner	22m ²
Kitchen	13.5m ²
Conservatory	16.5m ²
W.C	2.3m ²
Bedroom 5	15.1m ²
Games Room	18.75m ²
Bedroom 3	15.1m ²
Bedroom 4	8.85m ²
Staff Room (2)	5.45m ²
Bathroom	4.1m ²

Note – the bedrooms are shown in the table above as annotated on the floor plans. There are only three bedrooms within the property.

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 for staff. However, this bathroom is a shower room and as a shower basin requires less space than a bath, this is considered to be acceptable.

Therefore, the property is an acceptable size to accommodate the change of use into a C2 residential institution for 3 children and 2 staff (24/7 basis).

External Occupier Amenity

In terms of external space, the existing garden has an area of approx. 112m² and a depth of 21m, which is considered to be good sized amenity space for future occupiers of the property.

Summary

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 (2024).

Neighbouring Amenity

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 (2024) requires development to have a high standard of amenity for existing users (in this case surrounding properties).

The Local Planning Authority have received 5no. 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.

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 terraced 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. As such, the noise or anti-social behaviour impacts of the proposed use are not considered to have any detrimental impact on surrounding residents. 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.

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.

Other representations raised concerns with the proposal being inappropriate and out of character, with highway/parking and anti-social behaviour impacts. These matters are addressed in other sections of this report.

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 (2024).

Parking and Highways

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 (2024).

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.

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.

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.

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 (2024).

Any Other Material Planning Considerations

Waste Management

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

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.

Conclusion

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.

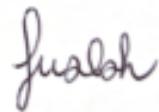
The proposed change of use from a C3 dwellinghouse to a C2 children's care home for 3 children will be of similar character to the surrounding single-family dwellings by virtue of scale and use. The proposal does not involve any external alterations to the property, will provide good quality amenity for the residents and will not have any adverse impacts on neighbouring amenity or the highway network.

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

Permission

(For detailed conditions and informatics, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	22 nd July 2025	Dated:	24 July 2025