
SUMMARY REPORT

Application Ref:	20201231
Site Address:	Alexandrias Residential Home 147 Wrotham Road Gravesend Kent
Application Description:	Change of use of building from a care home (Use Class C2) to an 11 bedroom HMO (House in Multiple Occupation) (sui generis) with communal facilities and staffing areas to provide short-term supported accommodation.
Applicant:	Mr Daniel Killian, Gravesham Borough Council
Agent:	Mr Alex Johnson, Potter Raper Ltd
Ward:	Pelham
Parish:	Non-Parish Area
Decision due date:	18 January 2021
Publicity expiry date:	16 December 2020
Decision Level:	Planning Committee – Wednesday 6 th January 2021
Reason for referral:	Applicant is Gravesham Borough Council
Recommendation:	Permission Subject to Conditions

Summary of Reasons for Recommendations

The proposed change of use is considered to be an effective use of this empty property, whilst providing adequate accommodation for future occupiers, with minimal impact on both neighbour amenity and highways.

Subject to conditions, the proposal is compliant with national and local planning policy.

MAIN REPORT

1. Proposal

- 1.1. The proposal is for the change of use of building from a care home (Use Class C2) to an 11 bedroom HMO (House in Multiple Occupation) (sui generis) with communal facilities and staffing areas to provide short-term supported accommodation.
- 1.2. The ground floor will be developed with 3 en-suite bedrooms, with a communal kitchen, dining room, communal laundry room plus different rooms as multifunctional room and conservatory/lounge area. Bedroom 1, together with the communal dining room are wheelchair accessible. On the first floor, accessible by communal staircases, there will be 5 en-suite bedrooms, a communal kitchen, two multifunctional rooms and different rooms to be at use of the staff. On the second floor, there will be 3 en-suite bedrooms

and a communal kitchen. Three multi-use rooms will be used to provide the specialist support during the day, including therapy and rehabilitation services to residents.

- 1.3. The spare rooms may also be used overnight on occasions to provide emergency temporary accommodation in exceptional circumstances. Residents will be granted an initial 6 month assured short hold tenancy with the maximum stay being no more than 2 years, unless there are individual exceptional circumstances.
- 1.4. The front entrance will be adapted to be disabled/wheelchair accessible free with railing to prevent falls. The front garden will be cleaned and organised with a new bin store area on the right side of the building to tidy the external appearance.
- 1.5. The rear garden will be cleaned and organised with an installation of separate secure cycle store for staff and future occupants. It will provide another exit behind the building giving access to 3no. new parking bays and connecting on the adjacent Essex Road.
- 1.6. Replacement of 4no. external timber doors; - 1no. on the front (east facing) elevation to the right within the curved opening; 1no. on the north facing elevation; and 1no. on the rear (west) facing elevation. All are like for like timber replacements.

2. Relevant Planning History

Application Ref. No.	Description	Status	Date
20131049	Conversion of second floor to provide three additional resident bedrooms including installation of roof lights.	Permission	20.05.2014
20180698	Change of use from residential care home to bed-and-breakfast accommodation	Withdrawn	12.02.2020
19910701	Change of use of premises to residential home for the elderly incorporating demolition of 2 kitchens at ground floor level & erection of 2 storey rear extension to form 3no.bedrooms & bathrooms at ground floor with 3no. bedrooms at 1st floor level & formation of 4 parking spaces at the rear.	Permission	14.01.1992
19930492	Erection of conservatory at rear.	Permission	14.10.1993
19930722	Continued use of premises as residential home for the elderly without complying with condition (ii) granted under GR/91/319 and conversion of office and storeroom, to bedrooms at first floor level.	Permission	14.02.1994
19920622	Erection of a two storey rear extension to form bedroom at ground floor level with bedroom	Permission	23.11.1992

over, incorporating formation of a lift shaft.

19760463	Erection of a single storey extension at rear to form kitchen and conversion of existing kitchen to bedroom	Permission	12.07.1976
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3. Planning Policy, Development Plan and other Material Considerations

Development Plan

The Development Plan for Gravesham currently comprises: Gravesham Local Plan Core Strategy and Policies Map, September 2014; and Saved policies in the Gravesham Local Plan First Review, November 1994.

The relevant policies for your proposal are as follows:

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS07 – Economy, Employment and Skills
- CS14 – Housing Type and Size
- CS18 – Climate Change
- CS19 - Development & Design Principles

- 3.1 Paragraph 33 of the NPPF (2019) sets out those 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.
- 3.2 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 (2019), the Council will also seek to replace these. A Regulation 18 (stage 2) consultation is underway in regard to the Emerging Local Plan Partial Review, Site Allocations and Development Management Policies (until 31 December 2020). The early stage of these documents means they are not afforded any significant weight as part of the assessment of this application.

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- P3 – Vehicle Parking Standards
- H5 – Increasing Housing Stock by Conversion of existing Buildings
- H6(iii) – Provision to meet Special Housing Needs

Other material considerations

National Planning Policy Framework (February 2019)

- Section 2 – Achieving sustainable development
- Section 12 – Achieving well-designed places

Supplementary Planning Guidance

- SPG2 - Residential Layout Guidelines (1996)
- SPG 4 - KCC Parking Standards (2006)
- Gravesham Borough Council Guidance to HMO Amenity Standards (2006)

4. Consultations and Publicity Responses

- 4.1. This application was advertised with a site notice and letters were sent to 19 surrounding properties with an overall expiry date of 16th December 2020. No letters of representation have been received.
- 4.2. The Local Ward Councillors were also consulted and no responses were received.

5. Site Description and Surroundings

- 5.1. The application site is defined on the Gravesham Local Plan Core Strategy Policies Map as lying in the urban area of Gravesend, located on the outskirts of the town centre.
- 5.2. The sites current use is an 18-bed residential care home.
- 5.3. Parking on-site is located to the rear which can be accessed from Essex Road.
- 5.4. The building is not listed nor is it set within a conservation area.

6. Planning Manager (Development Management) Comments

- 6.1. The principal issues in the consideration of this application are:
 - Principle of development;
 - Design and impact on the surrounding area;
 - Amenity of future occupiers;
 - Amenity of neighbouring properties;
 - Parking and highway safety; and
 - Ecology and biodiversity.
- 6.2. Principle of Development and Need
- 6.3. The application site lies within a housing area where there exist no specific policies or constraints, other than general policies that seek to protect the character of the area and the amenity of existing residents. 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.
- 6.4. The application site has been operating as a residential institution of some form, be it a residential care home for the elderly since the 1991 when permission was granted in 1991 (Ref. 19910701). The proposed supported accommodation is for up to 10 adults in an independent arrangement. 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). This stance is further supported by saved Policy H6(iii) of the Local Plan First Review (LPFR) which supports in principle, proposals in appropriate locations. There are three other residential institutions in the local vicinity, namely 56 and 60 Pelham Road and 2 The Avenue. 2 The Avenue was recently

approved in 2019 (Ref. 20190445), which is due in part to the sustainable location of these large dwellings suitable for multiple occupation.

- 6.5. However it is important that the conversion of the buildings to provide more intensive occupation does not cause harm to the character and amenity of existing areas, and in the case of residential homes local planning policies seek to prevent clustering;
- 6.6. Saved Policy H6(iii) (LPFR) 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.
- 6.7. Given the fact the property appears to have been a residential care home since the early 1990's, it is not considered that the change of use from a residential care home to supported accommodation is materially different from the current lawful use. Therefore 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. There are also some known HMOs in the vicinity. As such the character of the area is domestic, and the proposed change of use will not erode the domestic character of the area.
- 6.8. It is considered that the proposal is in accordance with saved Policy H6(iii) of (LPFR), but also Policy CS14 (LPCS) which states sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants.
- 6.9. The preamble to this policy in 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.
- 6.10. Having regard to the above, it is concluded that the principle of converting the existing residential home into more conventional residential use in the form of a house of multiple occupation is acceptable.
- 6.11. Design and impact on the area
- 6.12. Policy CS19 (LPCS) requires development to conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. This stance is reflected in chapter 12 (Achieving well-designed places) of the NPPF (2019).
- 6.13. It is worth noting that the scheme that is before Members has been the subject to pre-application discussion prior to submitting this application.
- 6.14. The site is situated in the urban area of Gravesend and is not listed, nor within a conservation area. Only minimal external alterations in the form of the replacement of 3no. doors are proposed, which area like for like timber design. No extensions are proposed.
- 6.15. The existing garden to the front will be tidied up with new railings and a bin store to be provided. The proposed front elevations show that the bin store would be minimal in size and would be located to the north side of the building in front of the curved timber opening. Further details of its appearance will be required which could be by condition.

- 6.16. A small amount of parking is available to the rear, accessed from Essex Road and not highly visible from public vantage points. The rear garden will be tidied, together with the installation of a secure cycle store for use by residents and a separate cycle store for staff. The proposed ground floor plan shows that 3no. parking spaces can be provided. Details of marking out of spaces, together with the location and details of the cycle store will need to be requested which could be by condition.
- 6.17. As such, in respect of design and the impact on the character and visual amenity of the area, it is considered the proposal is compliant with Policy CS19 (LPCS) and saved Policy H5 (LPFR).
- 6.18. Amenity of Future Occupiers
- 6.19. 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'.
- 6.20. The Gravesham Borough Council Guidance to HMO Amenity Standards (2006) set out the minimum size of rooms, facilities to be provided.
- 6.21. The proposal is for 11no. bedrooms, each with its own en-suite. Each floor has a communal kitchen and 'multi-functional' rooms. The ground floor has a communal dining room and separate lounge area. The ground floor and first each have a staff office. Separate staff access and facilities has also provided. All bedrooms and communal kitchens exceed the minimum room sizes.
- 6.22. The individual bedroom sizes exceed the standards set in the HMO Amenity Standards. The minimum for a 1 person unit combined bedroom and living room is 10m². The floor layout has annotated double bedrooms with en-suites for all bedrooms with the exception of bedroom one which is a wheelchair room and bedroom 10 on the second floor. The minimum room size for a 2 person unit with living room is 14m².

Room No. and Floor	Proposed Room Size	Standard
Ground Floor		
1 (1 person wheelchair)	21m ²	10m ²
2 (2 person)	20.5m ²	14m ²
3 (2 person)	20m ²	14m ²
Communal Kitchen	14.5m ²	9m ² (based on 6 sharing)
Dining Room	20.6m ²	2m ² per person
First Floor		
4 (2 person)	21.1m ²	14m ²
5 (2 person)	2.6m ²	14m ²
6 (2 person)	20.7m ²	14m ²
7 (2 person)	18m ²	14m ²
8 (2 person)	20.6m ²	14m ²
Communal Kitchen	10.2m ²	9m ² (based on 6 sharing)
Second Floor		
9 (2 person)	18.6m ²	14m ²
10 (1 person)	18m ²	10m ²
11 (2 person)	22.2m ²	14m ²

- 6.23. Whilst the dining room would have a shortfall of 1.4m², this is considered acceptable as it is unlikely that all residents would be using the dining room all at one time.

- 6.24. In terms of amenity space, there is a large rear garden measuring some 271m² and 16.17m in depth from the rear wall. This area does include the proposed parking area. The area that would be usable space for the enjoyment of residents would measure approx. 122.17m². The HMO Amenity Standards do not contain guidelines on garden space but this area and depth is considered acceptable for an 11 room HMO.
- 6.25. In respect of the amenity of future occupiers, the proposal is considered compliant with Policy CS19 (LPCS).
- 6.26. Neighbour Amenity
- 6.27. 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 127 of the NPPF (2019) requires development to have a high standard of amenity for existing users (In this case surrounding properties).
- 6.28. As a care home use, the rooms were used for residential rooms for individual residents and so the proposal for individual HMO rooms would not raise any new issues regarding overlooking to neighbouring properties etc. No extensions or other alterations are proposed. In respect of neighbour amenity, the proposal is considered compliant with Policy CS19 (LPCS).
- 6.29. Highway Impacts and Vehicle Parking
- 6.30. Parking for 3no. spaces for staff, is shown on the proposed ground floor plan, with ample space for turning. Due to the nature of the HMO, it is not envisaged that residents would have a private vehicle. Access is from the existing access to the rear from Essex Road.
- 6.31. The property is located approximately 0.54miles from the town centre and would be within walking distance for future occupiers.
- 6.32. Cycle storage has also been proposed for both staff and residents. It is considered a condition would be included relating to cycle storage.
- 6.33. Subject to conditions, in respect of parking and highways the proposal is considered compliant with Policy CS11 (LPCS) and saved Policy P3 (LPFR).
- 6.34. Ecology and Biodiversity
- 6.35. The application site is located in the Thames Estuary and Marshes Ramsar Buffer Zone. The Ramsar site is of international biodiversity importance, particularly for birds. Recent evidence suggests that there has been a decline in bird populations in the internationally significant Special Protection Areas (SPA) and Ramsar sites that make up the North Kent Marshes. There is currently insufficient evidence to adequately assess the cause of this decline although interim findings indicate that recreational activity causes disturbance to birds and that more development will lead to an increase in disturbance. In the meantime, a precautionary approach to development will be applied. It will be imperative that developers address and mitigate any detrimental impacts on biodiversity.
- 6.36. In this instance, due to the existing use being an 18-bed residential care home, the proposed use would result in a net decrease of 7 units to an 11-bed HMO and therefore no net increase in residential units and as such, no mitigating measures are needed.

6.37. The proposal would accord with Policy CS12 (LPCS) which affords internationally important areas such as Ramsar sites and SPA's the highest protection and addresses the comments raised by Natural England.

6.38. Refuse

6.39. A refuse storage is proposed to the north side of the building. Details of its appearance will be required which could be by condition.

7. Suggested Conditions

- Standard time limit;
- Approved plans;
- Details of soft landscaping;
- Details of hard landscaping, including the replacement railings;
- Details of marking out of parking bays and parking spaces to remain;
- Details of cycle storage; and
- Details of refuse storage.

8. Conclusion and Overall Balancing Exercise

- 8.1. The principle of converting the existing residential home into more conventional residential use in the form of a house of multiple occupation is acceptable, and is in accordance with saved Policy H6(iii) of (LPFR), but also Policy CS14 (LPCS) which states sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants.
- 8.2. The proposal would not result in material external alterations to the property and therefore in respect of design and the impact on the character and visual amenity of the area, it is considered the proposal is compliant with Policy CS19 (LPCS) and saved Policy H5 (LPFR).
- 8.3. In respect of the amenity of future occupiers, the proposed room sizes accord with the Gravesham Borough Council Guidance to HMO Amenity Standards (2006) and as such is considered compliant with Policy CS19 (LPCS).
- 8.4. It is considered that the change of use from a care home to an HMO would not raise any new issues regarding overlooking to neighbouring properties and in respect of neighbour amenity, the proposal is considered compliant with Policy CS19 (LPCS).
- 8.5. Due to the property being within walking distance of the town centre, resident car parking would not be required, subject to the provision of secure cycle storage being provided.
- 8.6. The proposed use would result in a net decrease of 7 units to an 11-bed HMO and as such, no mitigating measures are needed in relation to the development resulting in disturbance to birds.
- 8.7. In terms of the assessment of the impact of the development the key considerations, beyond the form and principle of the development, have been:
- Design and impact on the surrounding area;
 - Amenity of future occupiers;

- Amenity of neighbouring properties;
- Parking and highway safety; and
- Ecology and biodiversity.

8.8. Subject to conditions, the proposal is compliant with national and local planning policy.

Recommendation

The recommendation is for the application to be GRANTED Planning Permission, subject to the following conditions:

Time Limit

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which this permission is granted.

Reason In pursuance of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

Approved Plans

2. The development hereby permitted shall be carried out in precise accordance with the following submitted plans and particulars and pursuant to any condition hereinafter contained and there shall be no deviation therefrom without the prior permission in writing of the Local Planning Authority:-

Planning Application Form;
 Design and Access Statement;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL001 - Location & Block Plans;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL101 - Existing Floor Plans;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL102 - Proposed Floor Plans;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL201 - Existing South Elevation;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL202 - Existing North Elevation;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL203 - Existing East & West Elevations;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL204 - Proposed South Elevation;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL205 - Proposed North Elevation;
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL206 - Proposed East & West Elevations; and
 Drawing No. B9689-PR-WR-ZZ-M2-B-PL401 - Proposed South Elevation.

Reason For the avoidance of doubt and to ensure a satisfactory standard of development in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Prior to occupation

Hard Landscaping

3. Prior to the first occupation of the development hereby approved and notwithstanding the details shown on the approved plans a scheme of hard landscaping shall be submitted to and approved in writing by the Local Planning Authority. The landscaping works shall be completed in accordance with the approved details prior to the completion of the development or the first occupation of the residential unit whichever is sooner. The scheme shall include:
 - proposed boundary treatments,

- hard surface finishes to the vehicle parking areas, pedestrian accesses, private gardens and amenity areas;
- details of any retaining walls, steps, railings, walls, fencing, gates or other supporting structures
- details of the pedestrian and vehicular access

Reason To protect and enhance the visual amenity and the character of the area and to ensure a satisfactory environment for existing and future residents in accordance with Policy CS19 of the Gravesham Local Plan: Core Strategy (September 2014).

Soft Landscaping

4. Prior to the first occupation of the development hereby approved and notwithstanding the details shown on the approved plans a scheme detailing the proposed soft landscaping shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include the type and species of planting to be carried out, to include their quantity and size as well as arrangements for aftercare. Thereafter the approved soft landscaping scheme shall be carried out in full during the first available planting season following first occupation of the dwelling. Any trees or plants that die, are damaged, removed or become diseased within five years from the date that the development is first brought into use shall be replaced with a species of a similar size and species during the next available planting season.

Reason To ensure that the landscaping is maintained in the long term in the interests of the visual amenity of the development, in accordance with adopted Policy CS19 Gravesham Local Plan: Core Strategy (September 2014).

Parking Arrangements

5. Prior to the first use of the building as a house of multiple occupation and notwithstanding the details shown on the approved plans, details of how the parking bays as shown on drawing no. B9689-PR-WR-ZZ-M2-B-PL001 shall be suitably marked on the ground 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 prior to the first use of the building as the house of multiple occupation hereby permitted and shall thereafter be maintained while the building remains in use as the house of multiple occupation.

Reason In the interests of highway safety and visual amenity in accordance with Policies CS11 and CS19 of the Gravesham Local Plan Core Strategy (2014) and saved Policies P3 and TC3 of the Gravesham Local Plan First Review (1994).

Cycle Storage

6. Prior to the first use of the building as a house in multiple occupation and notwithstanding the details shown on the approved plans, details shall be submitted to and approved in writing by the Local Planning Authority of a secure, weather proof cycle store and its location within the site, which provides sufficient space for bicycles to be parked. The approved cycle store shall be implemented in full prior to the first use of the building as the house of multiple occupation hereby permitted and the structure shall thereafter be maintained and kept available for the parking of bicycles while the building remains in use as a house in multiple occupation.

Reason In order to provide for alternative modes of sustainable transport in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy (2014) and the adopted

Vehicle Parking Standards (SPG4).

Refuse Arrangements

7. Prior to the first use of the building as a house in multiple occupation and notwithstanding the details shown on the approved plans, details shall be submitted to and approved in writing by the Local Planning Authority of the location and appearance of the refuse and recycling storage area to serve the development and the waste management arrangements associated with the proposed use. The submitted details shall ensure adequate provision for non-recyclable waste, food waste and recyclable waste. The approved bin store and waste management arrangements shall be implemented in full prior to the first use of the building as the house of multiple occupation hereby permitted and shall thereafter be maintained while the building remains in use as a house in multiple occupation.

Reason In order to ensure the development is served by a suitable refuse storage area, to preserve the residential and visual amenities of the locality in accordance with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (2014).

INFORMATIVES:-

- 1 **STATEMENT OF POSITIVE AND PROACTIVE APPROACH TO DECISION-TAKING**
- 2 **DEVIATION FROM THE APPROVED PLANS**
- 3 **BUILDING REGULATIONS AND PARTY WALL ACT 1996**