

Planning, Design & Access Statement

No.20 Kensington Road, Chorlton, Manchester, M21 9QJ



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1.0 Introduction

- 1.1 This Planning Statement has been prepared by James Stannard of JS Planning Services, chartered member of the Royal Town Planning Institute (MRTPI) and acting Planning Officer for a Local Planning Authority, on behalf of the applicant Helpful Investments Ltd, in support of a full planning application submitted to Manchester City Council (herein referred to as the LPA) for the proposed change of use of an existing residential property No.20 Kensington Road, Chorlton, Manchester, M21 9QJ (C3(a) Use) as a Children's Care Home for accommodating up to three vulnerable young persons aged 7-17 years old (C2 Use).
- 1.2 This application follows the granting of a Certificate of Lawful Development under Application Ref: 136902/LP/2023 on 12th July 2023, that confirmed that the use of the four bedroom property as a Children's Care Home for one vulnerable young person aged 7-17 years (C2 Use), did not amount to a material change of use, did not require planning permission, and constituted a lawful change of use.
- 1.3 This Certificate represent an established fall back position that is a material consideration in the assessment and determination of this planning application and should be given significant weight.
- 1.4 This Planning, Design and Access Statement should be read in conjunction with all appendices, plans, and documentation submitted with this application.
- 1.5 The purpose of this document is to set out an analysis of the site and its surroundings; set out in detail how the proposed use will operate, including its similarities with the existing lawful use; identify the relevant local and national planning policies and other considerations pertinent to the assessment and determination of the application; and undertake an assessment of the proposal against such considerations, demonstrating compliance with all relevant planning policy.
- 1.6 Based on the specific characteristics of the site, and facts of the case, JS Planning Services believe that there is a strong, reasonable, and credible argument that despite the proposed use having a different use class, and given the established fall back position, it does not result in a material change of use, having regard to the "*North Devon District Council v The First Secretary of State [2003] EWHC 157 Admin*" High Court Judgement, and relevant Appeal Decisions.
- 1.5 However, in the interests of achieving a positive outcome in a swift and efficient manner, it has been decided to submit a full planning application, demonstrating that, notwithstanding the fact that the proposed use is likely to be lawful, the proposal is fully compliant with all relevant local and national planning policy considerations.
- 1.6 Section 6.0 of this Statement submits that the principle of development should be actively supported, whilst Section 7.0 of this Statement sets out how the proposed use aligns with all relevant local and national planning policy considerations, having regard to all material planning considerations.

- 1.7 JS Planning Services therefore submits that the proposed use constitutes a sustainable form of development that complies with all relevant local development plan policies, relevant supplementary planning guidance, and relevant paragraphs within the National Planning Policy Framework (NPPF) and should thus be approved subject to appropriate conditions.

2.0 Assessment of Context

- 2.1 The application relates to No.20 Kensington Road, Chorlton; a two storey mid terrace residential property which is characterised by a single off-street parking space to the front and a small garden to the rear. The property is constructed in a red brick similar to its neighbours and has a rear elevation that is defined by a single storey outrigger and first floor flat roof dormer.
- 2.2 The current residential dwellinghouse since its construction has been occupied by a single-family unit (C3(a) Use).
- 2.3 The site is bounded to the east by No.18 Kensington Road and to the west by No.22 Kensington Road, with the public highway situated to the south and a shared ginnel beyond the rear boundary to the north.
- 2.4 As shown on the Existing Floor Plans, the residential property has a ground floor that comprises an Entrance Porch and Hall; Living Room; Dining Room; Kitchen; and Utility Room.
- 2.5 At first floor level, the existing residential dwelling contains 3no. Bedrooms, one of which is served by an en-suite Bathroom, and a shared Bathroom. The property benefits from a fourth bedroom that is situated in the roof, served by the rear dormer window.
- 2.6 The site lies within the settlement boundary in a highly sustainable location with good access to local shops, services, facilitates, educational facilities and public transport links.

3.0 Planning History

- 3.1 A review of the LPA online planning portal reveals that the site has been subject to the following planning history:

136902/LP/2023 Use of a dwellinghouse (C3a) for a children's home for a maximum of one child (C2) (Granted 13/07/2023)

4.0 The Proposed Development

- 4.1 A recent report into the pressures on children's social care published by the Department of Education dated 23rd January 2019 (**Appendix 1**) highlights the critical need for increased provision of children's social care accommodation, with

the number of children in care gradually rising from 43.2 per 10,000 in 1994, to 64 per 10,000 in 2018, equating to an increase in 48% (Figure 4).

- 4.2 The report estimates that as of 31st March 2018, the number of children in need of social care is estimated to stand at 404,710. The findings of the report clearly highlight that there are extreme pressures on the provision of children's social care operated by Local Authorities due to a number of factors – not least because of a lack of funding.
- 4.3 The applicant, Helpful Investments UK Ltd, are an established care home provider that seeks to provide high quality care for young vulnerable people in appropriate comfortable surroundings, supported by a good balance of male and female staff, that individually and as a collective, pride themselves in delivering the highest standard of care, by building positive and lasting relationships.
- 4.4 Plans for vulnerable young people are carefully tailored to meet specific individual needs ensuring that the aims and objectives of the placement are met and are achieved.
- 4.5 The proposed Care Home would accommodate no more than 3no. young people at any one time aged between 7 and 17 years of age of mixed gender; race; religion; disability; and sexual orientation; and who presents social, emotional, and behavioural difficulties.
- 4.6 The home will provide support for young people who have a range of complex individual needs, providing emergency medium- and long-term placements.
- 4.7 The compatibility and matching of young people living in the property is always a vital consideration in any admission and discharge situation, alongside the ability of the home to meet the needs of the young people.
- 4.8 The care provider and applicant Helpful Investments UK Ltd have established a detailed Statement of Purpose that sets out in detail how the care will be delivered, which accompanies this Statement (**Appendix 2**).
- 4.9 The proposed use would see the young people having full unrestricted access to the property, except for the Staff Office and Bedroom on the first floor, that would be locked for security and protection purposes - much in the same way that young people in the existing family household would have restricted access to the ground floor home office used by a parent for home working.
- 4.10 The role of staff at this property is almost identical to that of a parent or foster parent: cooking meals, assisting children with schoolwork, transporting children to school and other necessary appointments and providing emotional and physical support. The children residing at the property would not be reliant on any medical care.
- 4.11 The use of the dwelling would be entirely communal, and activities both during

the week and at weekends such as shopping, and going to school, will be undertaken as a family. The children and staff members would eat and live together as a single household, with preparation of meals, washing up, household cleaning, all undertaken together as a household. Similarly, recreational activities (e.g. trips to the cinema, shops, bowling) would again be undertaken in much the same way as a family would.

- 4.12 As shown on the submitted Proposed Floor Plans, the Children's Home would see the communal rooms at ground floor and first floor communal bathroom to be used in much the same way as a family dwelling, the negligible exceptions being the specific allocation of 3no. bedrooms for children residing at the home, with another allocated as a Staff Office, used by the Registered Manager, which also doubles up as a Bedroom used by staff on night shift.
- 4.13 The staff that would be required to look after the child that resides at this property would comprise a Registered Manager, who would be on site between the hours of 9:00am – 4:00pm Monday to Friday, and a small team of support workers who would be on site on a rota basis, with a maximum of 2no. staff being on site at any one time.
- 4.14 Overnight, the rota would allow for one member of staff sleeping, whilst a second member of staff is on site during night hours (referred to as 'Waking Night') on the weekly staff rota that accompanies this submission (**Appendix 3**).
- 4.15 Aside from staff, other visitors to the site would be very limited. A member of the Social Services team would be required to visit once every 6 weeks, with an Ofsted visit taking place every 12 months.
- 4.16 One Home Property UK Ltd have adopted a Public Transport and Car Sharing Incentive Scheme (**Appendix 4**) which encourages and provides financial incentives for staff members to utilise public transport or to cycle to work. It is therefore anticipated that the number of trips generated by staff arriving and leaving work will be lower than that which aligns with the staff rota.
- 4.17 The above policy also refers to the 'Pool Car', which amounts to a vehicle owned by a member of staff (not an additional vehicle) for necessary journeys. This provides a 'family car' at all times, where the idea is to simulate a typical inclusive family lifestyle. Any journeys will be collaborated in much the same way a single household would to minimise the number of trips.
- 4.18 Given the highly sustainable location of the site and relatively close proximity to local primary schools and shops, it is likely that the majority of trips will be made on foot, thereby further reducing vehicle movements.
- 4.19 Table 1 below has been provided to show and quantify the likely trip generation associated with the proposed use, based on the typical weekly rota that accompanies this Statement. This has been based on the worst-case scenario of no-one utilising the Car Incentive and Public Transport scheme.

4.20 The table has been colour coded as follows:

Green = AM trip arriving on site
 Brown = AM trip departing site
 Grey = PM trip arriving on site
 Blue = PM trip departing site

Day	Journey 1	Journey 2	Journey 3	Journey 4	Journey 5	Journey 6
MON	Registered Manager arriving 09:00	Registered Manager departing 16:00				
TUES	Support Worker (2) departing 07:30	Support worker (1) arriving 08:00	Senior Support Worker (1) departing 08:30	Registered Manager arriving 09:00	Registered Manager departing 16:00	Senior Support Worker (2) arriving 17:00
WED	Registered Manager arriving 09:00	Support Worker (2) arriving 17:00	Registered Manager departing 16:00	Senior Support Worker (1) departing 22:00		
THURS	Support Worker (2) departing 08:30	Senior Support Worker (1) arriving 08:00	Registered Manager arriving 09:00	Registered Manager departing 16:00	Support Worker (1) arriving 17:00	Senior Support Worker (2) departing 21:00
FRI	Senior Support Worker (1) departing 08:30	Registered Manager arriving 09:00	Registered Manager departing 16:00	Senior Support Worker (2) arriving 17:00		
SAT	Support Worker (2) arriving 10:00	Support Worker (1) departing 21:00				
SUN	Senior Support Worker (1) arriving 08:00	Senior Support Worker (2) departing 21:00				

Table 1: *Trip generation required to service the Staffing Rota for the property.*

- 4.21 Table 1 above shows that the total number of trips generated by members of staff associated with the proposed use is 26 trips across a 7-day week, amounting to an average of 3.71 (4) trips per day with noticeably less trips taking place at a weekend.
- 4.22 No other external or internal physical extensions or alterations would be made to the existing building.
- 4.23 The rota has been co-ordinated in such a way that allows a minimum 30-minute gap between a member of staff leaving the site and a member of staff arriving on site, thereby minimising disruption.

5.0 Legislative and Planning Policy Context

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan taking into consideration any material considerations relevant to the determination of the application.

5.2 The Local Development Plan for the site comprises the following documents:

- Places for Everyone Joint Development Plan (2024)
- Core Strategy (2012)
- Core Strategy Addendum (2024)

5.3 The National Planning Policy Framework (NPPF) was originally published in 2012 and most recently updated in December 2023. The NPPF sets out the Government's planning policies for England and how they should be applied. The NPPF is a material consideration for the determination of all planning applications. Relevant chapters of the NPPF to this proposal are set out as follows:

- | | |
|---|------------|
| - Achieving Sustainable Development | Chapter 2 |
| - Delivering a Sufficient Supply of Homes | Chapter 5 |
| - Promoting Healthy and Sustainable Communities | Chapter 8 |
| - Promoting Sustainable Transport | Chapter 9 |
| - Achieving Well Designed Places | Chapter 12 |

6.0 Principle of Development

6.1 The application seeks full planning permission for the proposed change of use of an existing dwellinghouse (C3 Use) known as No.20 Kensington Road, Chorlton, Manchester, to facilitate care for up to 3no. vulnerable young persons supported by staff (C2 Use).

6.2 The Places for Everyone (PfE) Development Plan Document (DPD) adopted in March 2024 covers the vast majority of authorities in Greater Manchester and forms part of the Local Development Plan.

6.3 PfE Policy JP-H3 refers to the Type, Size and Design of New Housing Development and states that new housing development should:

*"...seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods. **Where appropriate, this should include incorporating specialist housing for older households and vulnerable people.**"*
(Our Emphasis).

6.4 Core Strategy (CS) Policy SP1 sets out the Spatial Principles for development, and states amongst other things that:

“The Regional Centre will be the focus for economic and commercial development, retail, leisure and cultural activity, alongside high quality city living.

Beyond these areas, the emphasis is on the creation of neighbourhoods of choice, providing high quality and diverse housing around district centres which meet local needs, all in a distinct environment.”

- 6.4 CS Policy C1 sets out the hierarchy for the authority area which directs the focus of new development towards the City Centre, followed thereafter by District Centres, including Chorlton, and then smaller Local Centres.
- 6.5 The Local Plan is silent with regards to the provision of social care, particularly this relatively new type of provision that sees care provided within a residential as opposed to an institutional setting. As such, it is considered that the presumption of sustainable development as set out under Chapter 2 of the NPPF is engaged.
- 6.6 Paragraph 70 of the NPPF makes clear that small sites can make an important contribution to meeting housing requirements of an area, and that local authorities should give great weight to the benefits of using suitable sites within existing settlements.
- 6.7 Paragraph 97 of the NPPF states that in order to provide the social, recreational, and cultural facilities and services the community needs, policies and decisions should (amongst other things) plan positively for the provision of...community facilities (including places of worship), and other local services to enhance the sustainability of communities and residential environments.
- 6.8 The proposed change of use relates to an existing residential dwellinghouse that lies within a highly sustainable location with good connections to local services, facilities and educational institutions, within the District Centre of Chorlton on a site that is not constrained by any sensitive statutory designation.
- 6.9 The proposed Children’s Care Home would provide high quality accommodation for up a vulnerable young person and make a positive contribution to the well-publicised chronic under provision of child social care provision, both at a national and regional level and would clearly support and comply with relevant strategic Local Plan policies and paragraphs 70 and 97 of the NPPF.
- 6.8 It is therefore submitted that the principle of development is acceptable, and thus the application can be supported subject to detailed assessment and consideration of all relevant planning considerations.
- 6.9 In any event, it is our position that owing to the fact that the Local Plan is silent with regards to any policies dedicated to social care provision of the nature proposed, the presumption in favour of sustainable development (referred to as the ‘titled balance’) is engaged, and as such permission should be granted, unless there is any identified harm that significantly and demonstrably outweigh any associated benefits.

7.0 Relevant Planning Considerations

7.1 Having established that the principle of the proposed use in this location is acceptable, having regard to relevant local and national planning policies, this section considers the relevant material planning considerations that are pertinent to the assessment and determination of this application, which are set out as follows:

- Amenity
- Parking Provision and Highway Safety

Amenity

7.2 CS Policy DS1 contains a number of design principles to be incorporated and considered within any proposed development, and requires (amongst things) developers to have regard to the following:

“Effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise.”

“Community safety and crime prevention.”

7.3 Paragraph 135 of the NPPF requires the amenity of all existing and future occupiers of land and buildings to be preserved as a result of any new development proposal.

7.4 Paragraph 190 of the NPPF requires policies and decisions to ensure that new development is appropriate for its location taking into account likely effects on living conditions, which includes potential impacts resulting from noise and light pollution.

7.5 The proposed use of the building as a Children’s Care Home would operate much in the same way as a family household, with staff acting as guardians to the child residing at the property on a rota basis.

7.6 The site benefits from a Lawful Development Certificate for the use of the property as a Children’s Care Home for up to one vulnerable young person. Given that this use has not yet been implemented, the current use of the property remains as a dwellinghouse (C3 Use). However, in light of this Certificate being granted, it is clear that the proposed Care Home Use (C2 Use), can be introduced at any time. This fall back position should be attributed significant weight.

7.7 In light of the above, the assessment of this application with regards to the potential impact on residential and public amenity simply comes down to whether there would be any adverse impacts resulting from an additional 2no. children residing at the home.

- 7.8 The weekly rota shows that the earliest that a member of staff would arrive or depart from the site is 08:00 and that the latest a member of staff would vacate the site is 21:00, with other occasional journeys such as social activities and shopping happening in the early evenings and at weekends, consistent with timeframes that relate to the lawful use of the property as a Care Home for one child.
- 7.9 In anticipation that occupiers of neighbouring properties may object to the proposed change of use on the grounds of residential amenity, relating to the following issues:
- *Intensification of the site (general comings and goings of vehicles)*
 - *Noise and Disturbance (associated with difficult children occupying the site)*
 - *Fear of Crime and Disorder*
- 7.10 The following paragraphs specifically addresses each aspect relating to residential amenity in turn.
- 7.11 As shown under Table 1, the number and nature of vehicle movements associated with the proposed use would be very similar to those associated with the existing lawful use, notwithstanding the highly sustainable location of the site within the main urban area, and are also broadly consistent with the vehicle movements and trip generation associated with the lawful use of the property as a Care Home for one child (single occupancy).
- 7.10 It is therefore submitted that the proposed change of use to a Children's Care Home for three children supported by a small team of staff at any one time will not result in any intensification of the site or be materially different to the existing use of the building as a 4no. bedroom family dwellinghouse, or indeed the lawful use of the property as a Children's Care Home for one child, with regards to traffic generation and the overall disturbance to the residential amenity of neighbouring properties.
- 7.11 Turning to any potential noise and disturbance arising from the specific nature of the proposed use, Helpful Investments UK Ltd are an established care provider that prides itself on high professional standards and have adopted Behaviour Management Policies and a Complaints Procedure to address any specific isolated issues relating to noise and disturbance.
- 7.12 Consideration should be given to the fact that children residing at this home are all individuals in their own right and should not be 'stereo-typed' or 'labelled' as anti-social or troublesome. Specific procedures would be enacted and adhered with, in line with relevant government legislation to effectively manage such issues.
- 7.13 All placements have an initial 28-day assessment which allows for the home to assess how the young person has settled into their surroundings and identify any other risks that were previously unknown.

- 7.14 The Care Home provider employ experienced qualified and well-trained staff. A C2 Use is essentially a residential one which is not incompatible with other nearby residential properties in an urban area.
- 7.15 Due to the low number of children which would be residing at this property and having regard to the specific policies and procedures implemented by Helpful Investments UK Ltd, it is submitted that the proposed use of the premises as a Children's Home will not result in any adverse harm to the residential amenity of neighbouring properties or the wider area in relation to potential noise and disturbance – and certainly not which are materially different to the established fall back position.
- 7.16 With regards to any potential impacts relating to crime and anti-social behaviour issues arising from the behaviour of individual children, this could occur as a result of any residential use and are essentially a management issue for staff/carers. Labelling or stereotyping all children that would reside that the home as anti-social or potentially criminal is discriminatory and is not considered to offer any credible reason for refusal.
- 7.17 The existing property enjoys an abundance of natural light into all bedrooms and communal spaces.
- 7.18 For the reasons outline above, it is submitted that the proposed use of the existing dwelling as a Children's Care Home for up a single child would provide a high standard of amenity for future occupiers and preserve the amenity of neighbouring residential properties, in full accordance with CS Policy DM1 and paragraphs 135 and 190 of the NPPF.

Parking Provision and Highway Safety

- 7.21 CS Policy DS1 contains a number of design principles to be incorporated and considered within any proposed development, and requires (amongst things) developers to have regard to the following:
- “Vehicular access and car parking.”*
- 7.22 Parking Standard contained under Appendix B of the Core Strategy does not include any standards for new dwellings (C3 Use) or indeed institutions (C2 Use). As there are no specific standards for either the existing use or the proposed use, it is submitted that this application should be assessed on its own individual merits, having regard to the specific context of the site, and taking account of the established fall back position, whereby a Care Home which accommodates a single child that be implemented without planning permission being required.
- 7.23 Paragraph 114 of the NPPF requires that local authorities, when assessing specific applications for development, ensure that safe and suitable access to the site can be achieved for all users.

- 7.24 Paragraph 115 of the NPPF goes on to state that development should only be prevented or refused on highway safety grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 7.25 Based on the weekly staff rota that would be applied to the running of this premises which accompanies the application, there would be a maximum of 2no. staff on site at any one time, consistent with the established lawful use of the property as a Care Home for one child.
- 7.26 Due to the nature of the street and character of properties, there is limited off-street parking available on site. Crucially, the parking provision is substandard for the existing lawful use of the property as a family house which contains 4no. bedrooms.
- 7.27 The Table in Section 3 (Table 1) shows the expected trip generation associated with the proposed use. However, this is based on a 'worst case scenario' that no members of staff would take advantage of or utilise the Car Sharing Incentive and Public Transport Scheme - this is considered by the applicant to be highly unlikely.
- 7.28 Taking the existing lawful use of the current four bedroom residential property being occupied by a family unit of five, made up of two working adult parents, each with their own vehicle, and 3 x children, one of which is of driving age (17+) with his/her own vehicle – amounting to a total of 3 x vehicles - it is possible to make a reasonable estimate of the likely trips generation from the current household, and compare this to that generated by the proposed use.
- 7.29 Allowing for each working parent driving to work, and the teenager sons/daughter driving to work/college in a morning, and all returning home in an evening, this equates to a minimum of 6 x trips per day Monday – Friday, equating to some 30 trips per week. When adding shopping, medical, and social trips both during the working week and at a weekend, it is not unreasonable to estimate that the total number of trips generated by this scenario would exceed 40 trips per week.
- 7.30 It is therefore argued that this proposed use would generate a lower number of traffic movements, levels of activity and intensity, comparable to the existing lawful use of the site as a single family unit of 5, which own a total of 3 x vehicles, and would be consistent with the lawful use of the property as a Children's Care Home for one child.
- 7.31 Both the current lawful use of the property as a family home and proposed use as a Care Home will therefore inevitably result in vehicles having to be parked on street or within the nearby vicinity. As such, it is submitted that there is no material change of use to the nature of the use of the property or the wider area as a result, and that conflict arising from the lack of off-street parking provision does not result in any degree of harm to highway safety that warrants a credible

or substantive reason for refusal, when taking into account all material considerations.

- 7.32 The application is therefore considered to be acceptable with regards to matters of parking provision and highway safety, having regard to all relevant Local Development Plan policies and relevant paragraphs contained under Chapter 9 of the NPPF.

Other Matters

- 7.33 The proposed use does not include in any physical alterations to the existing building and as such there would be no change to the character and appearance of the dwellinghouse or indeed the wider street scene.

8.0 The Planning Balance

- 8.1 LP Policy P1 sets out the Presumption in Favour of Sustainable Development, and states that planning applications that accord with the Local Development Plan will be approved without delay unless material considerations indicate otherwise, aligning with paragraph 11 of the National Planning Policy Framework.
- 8.2 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which is to be applied. For decision taking, this means approving development proposals that accord with an up-to-date local plan without delay; or
- where there are no policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or
 - any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole
- 8.3 The site relates to an existing property that lies within the District Centre of Chorlton, and not constrained by any statutory designation.
- 8.4 Based on the context of the site, and nature of the proposed development, JS Planning Services submit that the principle of development is acceptable, subject to an assessment of all relevant local and national planning policies.
- 8.5 The site benefits from a Certificate of Lawful Development for the proposed use of the current residential property as a Children's Care Home for one child, which falls within the same C2 Use as that proposed under this application. This represents a material consideration that should be attributed significant weight in the assessment of this application.

Benefits

- 8.6 The use would provide a much-needed contribution to the chronic shortage of regulated children's social care at both the local and national level, supporting the aims and objectives set out under Chapters 5, 8 and 11 of the NPPF.
- 8.7 JS Planning Services submits that the positive benefits to the health and wellbeing of young vulnerable individuals on a brownfield (previously developed) site which lies in a highly sustainable location should be afforded significant weight in the overall planning balance.

Harm

- 8.8 This Statement has confirmed that the proposed use would not result in any material change to the external appearance of the building thereby preserving the overall character and appearance of the building and wider street scene.
- 8.9 When considering the established fall back position, and that the proposed use will operate much in the same way as a family household, with broadly consistent staff numbers and associated vehicle movements to that relating to the lawful use of the property as a Children's Home for one child, it is submitted that the proposed use does not result in any intensification of the site, with regards to any loss of privacy, vehicle movements, general noise levels or disturbance, that would warrant a credible or substantive reason for refusal on amenity grounds.
- 8.10 Similarly, Helpful Investments Ltd are an established regulated operator of Children's Care Homes and have detailed rigorous policies and procedures that addresses and mitigates any potential behavioural issues associated with individual children. It is submitted that it is not reasonable or appropriate to stereotype all children that would reside at this home to be anti-social or criminal and to do so would be discriminatory.
- 8.11 As such, the proposed change of use would not give rise to any adverse harm to residential amenity or highway safety, and by virtue of the fact that the proposal does not involve any physical external extensions or alterations to the building,

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- 8.12 In light of the above assessment, this Statement concludes that the proposed change of use complies with all relevant Local Development Plan policies and all other relevant considerations which includes relevant paragraphs contained within the NPPF, and thus constitutes a sustainable form of development.
- 8.13 In line with paragraph 11 of the NPPF, it is therefore submitted that the application should be approved subject to appropriate conditions.