



# Planning Statement

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Berkeley House,  
Lynsted Lane,  
Lynsted,  
Sittingbourne  
ME9 0RL

August 2023 | Project Ref 9168A



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# 1. Introduction

**1.1** This Planning Statement has been prepared by HCUK Group on behalf of GPM2, acting as agent on behalf of the owner of the application site. The report has been prepared by Rachel Humber, Associate Director.

**1.2** This application includes the submission of the following:

- Full set of existing plans – GPM2
- Full set of proposed plans – GPM2
- Heritage Impact Assessment – HCUK
- Tree Survey – FineView
- Preliminary Ecological Appraisal (PEA) - KBS Ecology

**1.3** Berkeley House was a residential care home registered to provide accommodation and personal care for up to 19 people who have learning disabilities or autistic spectrum disorder. The service was provided in four separate houses, The Windmill, The Granary, The Bakery and Pippin, and set in large grounds. Following an inspection by the Care Quality Commission (CQC) in October 2021 the service was rated as 'inadequate'. The service provider, 'Active Together Limited' was unable to make the necessary urgent improvements requested by the CQC and stopped providing a service to people at Berkeley house from 30 October 2021. The service has remained closed since 2021.

**1.4** The site and the care home have remained vacant since the inadequate rating was given. The buildings within the site are Grade II listed and are need of upgrading/repairing both internally and externally.



## 2. Site and Context

**2.1** Lynsted village is southeast of Sittingbourne, mid-way between the A2 London to Dover Road and the M2 motorway. The village is defined by a linear street pattern, with the parish church at the centre and the two most prominent buildings forming the southern edge of the settlement, Lynsted Court and Aymers. The application site is at the northern edge of the village at the junction where The Street turns east to become Lynsted Lane and runs along the southern boundary of the site. Adjacent to the west boundary of the site is Claxfield Road which leads into The Street (figure 1)



Fig 1: Aerial image, approximate site area edged in red. (Source: Google earth)

**2.2** The site is occupied by three prominent listed buildings;

- a. Berkeley House, grade II
- b. Mill 15 Yards East of Berkeley House, grade II
- c. Champions Windmill, grade II

## 2.3

Para No should be 2.3 The site is also occupied by a former office/admin building between the windmill and the mill (curtilage listed). There are two other buildings on the site Berkeley House Day Rooms and Pippin Cottages, shown as Pippin House on the site location plan below. Pippin Cottages takes the form of single storey bungalows, arranged in an L shape around a courtyard. There are four units each with a garden area, and connected by staff areas, plus a staff accommodation suite, a plant room and a utility/laundry room. – figure 2 shows the existing layout of the site.

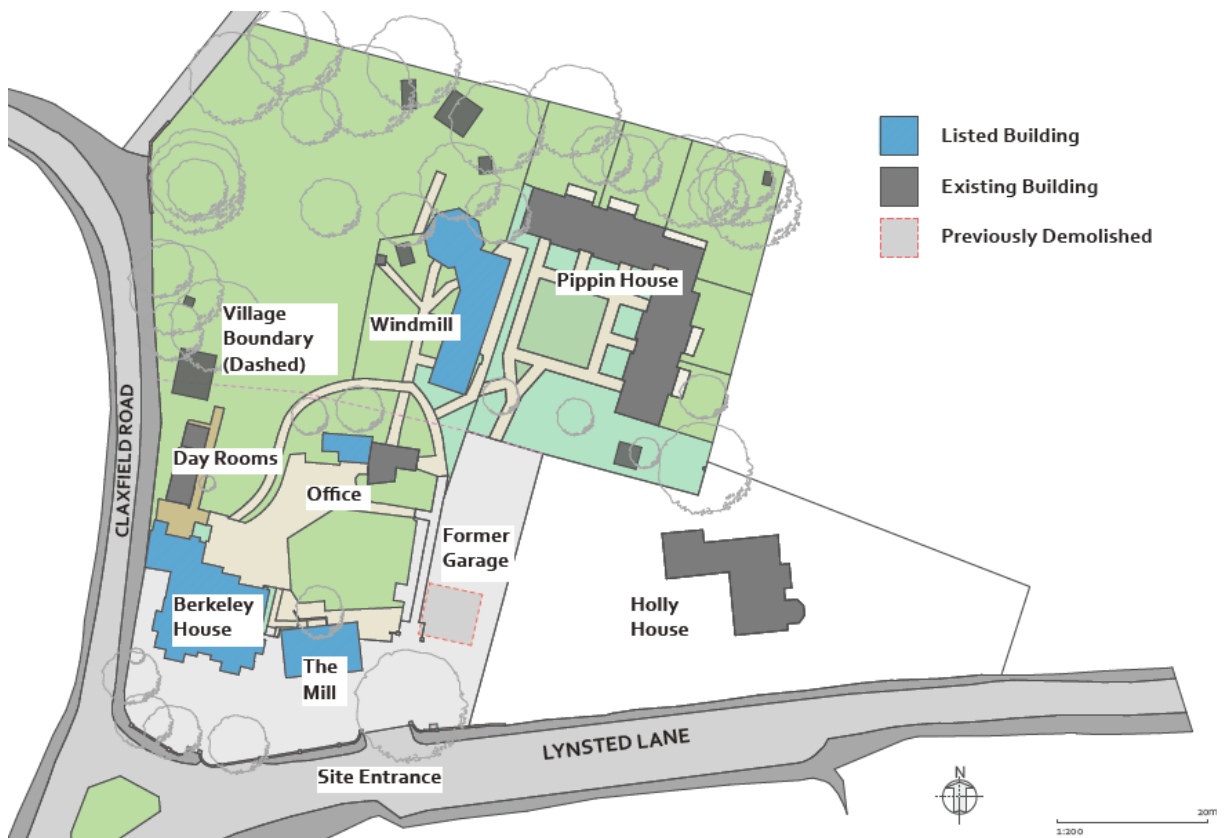


Fig 2: Existing site location plan (Source: GPM2)

## 2.4

The entire site is within the conservation area (figure 3). The southern part of the site where the main house stands is within the village confines, but the southern

part of the site where Pippin Cottages and the Windmill are situated are outside of the village confines (figure 4).



Fig 3: Yellow =conservation area (Source: Interactive Policy Map, Adopted Local Plan 2017)



Fig 4: Red line =village confines (Source: Interactive Policy Map, Adopted Local Plan 2017)



## 3. Proposal

- 3.1** Paragraph numbering should be 3.1 etc. The development has been informed by the pre-application advice (May 2023), research and analysis, which has in turn informed the design of the proposals. Following the pre-application advice the number of proposed units has been reduced from 12 to 10.
- 3.2** Planning permission is sought for the change of use and conversion from a care home to residential (use class C3), converting the existing buildings to apartments and houses and building a new house where a garage once existed.
- 3.3** The proposal involves the demolition of the Berkeley Day Rooms, a modern addition of no merit, and the conversion and preservation of the listed buildings, making use of all the historic buildings on the site.
- 3.4** A new landscaping scheme is proposed to enhance the setting of the buildings and create a sense of place within the site, which is currently experienced in an ad hoc manner.
- 3.5** A total of 10 dwellings would be provided, in the following format:
- *Mill House will be converted to 1 dwelling – 4 bedrooms*
  - *Berkeley House will be subdivided into 3 units each with 3 bedrooms– the day room extension on the back of the building will be demolished and the area will be restored and returned to garden land for the benefit of the occupiers.*
  - *The Windmill will be converted to 1 self contained dwelling with 4 bedrooms*
  - *Pippin house will be converted to 4 self-contained 1 bed units*
  - *The new build dwelling known as Cottage 1 (site of the former garage) will provide 2 bedrooms*
- 3.6** The former office building located centrally within the site will be retained and used as communal storage (e.g. bikes and bins) for the residents.
- 3.7** The proposed block plan (figure 5) indicates that each property will have access to their own private amenity space and the occupiers of Berkeley House will benefit from a very large communal garden. The block plan indicates that 19 car parking spaces will be provided across the site and will be allocated to each dwelling.



Fig 5: proposed site layout plan (Source: GPM2)

## 4. Planning Policy Context

- 4.1** Under section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the development plan in force unless material considerations indicate otherwise.
- 4.2** In this case, the Development Plan comprises the Bearing Fruits 2031: Local Plan (BFLP) (2017). Swale Borough Council also 'made' the Faversham Creek Neighbourhood Plan 2016-31 (albeit the application site is outside of this).
- 4.3** Other material considerations include the National Planning Policy Framework and Guidance.

### Bearing Fruits 2031: The Swale Borough Local Plan 2017

- 4.4** The BFLP is the core document for the Local Planning Authority to set out the vision and strategy for the area from 2014 to 2031. Policies applicable to this proposed development are set out below:
- 4.5** ST1 Delivering sustainable development in Swale - seeks to deliver sustainable development in Swale, by delivering a wide choice of high-quality homes, achieving good design, and conserving and enhancing the natural environment.
- 4.6** ST3 The Swale settlement strategy - sets out the settlement strategy for the borough, with emphasis, where possible, upon the use of previously developed land within defined built up area boundaries and on sites allocated by the Local Plan.
- 4.7** ST4 Meeting the Local Plan development targets - lists the sites that have been identified as draft allocations to help meet the objectively assessed housing need. Paragraphs 5.3.40 and 5.3.41 state that not all of Swale's identified needs for housing will be met from the development of sites allocated within the emerging Local Plan. During the plan period, it is likely, that windfall allowance sites will be required for additional housing.
- 4.8** CP1 Building a strong, competitive environment - seeks to build a strong, competitive economy

- 4.9** CP2 Promoting sustainable transport and CP3 Delivering a wide choice of high-quality homes.
- 4.10** CP4 Requiring Good Design - states that all proposals are to be of a high-quality design and appropriate to their surroundings.
- 4.11** CP5 Health and well being – aims to safeguard existing community services and facilities, where they are:
- Viable or can be made so;
  - Where replacement facilities can be provided without leading to a shortfall in provision;
  - Where the local Clinical Commissioning Group (CCG) has indicated a need for health facilities.
- 4.12** CP6 Community facilities and services - this policy also seeks to safeguard existing community services and facilities where they are:
- Viable or can be made so unless replacement facilities can be provided without leading to a shortfall in provision.
- 4.13** CP7 Conserving and enhancing the natural environment.
- 4.14** CP8 Conserving and enhancing the historic environment.
- 4.15** DM6 Managing transport demand and impact
- 4.16** DM7 Vehicle Parking - relates to parking and states until such time as a local Swale Borough Supplementary Planning Document (SPD) can be adopted, the Council will continue to apply extant KCC vehicle parking standards to new development proposals. When prepared, the Swale Vehicle Parking SPD will provide guidelines for development.
- 4.17** DM14 General Development - sets out general development control criteria for proposals.
- 4.18** Criteria DM28 Biodiversity and geological conservation - states development proposals will conserve, enhance and extend biodiversity, provide for net gains in biodiversity where possible, minimise any adverse impacts and compensate where

impacts cannot be mitigated. Development proposals should be informed by and further the guidelines and biodiversity network potential of the Council's Landscape Character and Biodiversity Assessment SPD; be accompanied by appropriate surveys undertaken to clarify constraints or requirements that may apply to development, and provide, where possible, a net gain of biodiversity overall.

- 4.19** DM32 Development involving listed buildings and DM 33 Development affecting a conservation area. These policies have similar aims and seek to preserve and enhance the historic built environment in order to ensure the borough's heritage assets are conserved and sensitively adapted.

## National Planning Policy Framework (NPPF) 2021

- 4.20** The entire Framework should be read (including its footnotes and annexes). However, the parts considered most relevant to the proposed development are outlined below.
- 4.21** Paragraph 11 - requires plans and decisions to apply a presumption in favour of sustainable development. For decision-taking this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
  - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: the application of 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 and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 4.22** Paragraph 60 - states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.



- 4.23** Paragraph 69 - emphasises that small and medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out relatively quickly.
- 4.24** Paragraph 111 - states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.25** Paragraph 124 - states that planning policies and decisions should support development that makes efficient use of land.
- 4.26** Paragraph 125 - states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
- 4.27** Paragraph 126 - states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, and effective engagement is essential for achieving this.
- 4.28** Paragraph 130 - sets out the design criteria planning policies and decisions should achieve.

## Emerging Local Plan

- 4.29** Swale Borough Council (SBC) is in the process of carrying out a Local Plan Review. Consultation on the 'Issues and Preferred Options' (Regulation 18) took place in October and November 2021. SBC intended that the Regulation 19 draft would proceed to consultation in October 2022. However, according to the more recent 'Local Plan Review Update and Next Steps' report, it was recommended that SBC pauses work on the Local Plan until the Levelling Up and Regeneration Bill (LURB) gains Royal Assent. It is likely that the delay to adoption of the new Local Plan would be circa 18 months which will have an impact on the identification and allocation of housing sites through the local plan process, thereby reducing housing supply and delivery. This delay is set against a backdrop that SBC acknowledges that it cannot currently demonstrate a 5 year supply of housing.

- 4.30** It is asserted that the delay in the Local Plan Review places greater emphasis on approving proposals such as the development of this sustainable windfall site.

## Supplementary Planning Documents

- 4.31** Lynsted Parish Design Statement (2002).
- 4.32** The conversion of buildings into flats and houses of multiple occupation.
- 4.33** Listed buildings – A guide for owners and occupiers.
- 4.34** Planting on new development – a guide to developers.

## 5. Planning History

- 5.1** There is a lengthy planning history relating to this site but the most relevant history appears to be:
- 5.2** SW/87/ 0991 – Change of use from dwelling house to residential care home for the elderly. Old Steam Mill in grounds Of Berkeley House.
- 5.3** 16/507054/FULL – Construction of 4no. assisted living accommodation units.
- 5.4** 18/504440/FULL -Change of use of 4no assisted living accommodation units to 4no. residential dwellings (class C3), to be occupied only by persons in need of care and support – Pippin Cottages
- 5.5** Pre-application advice was sought and received from SBC in May 2023 (LPA ref: 23/500860/PAPL) regarding the '*change of use, conversion and additional development of 12 separate dwellings*'. The advice relating to the effect on heritage was **high** level due to the limited detail provided on specific alterations. The attached Heritage Statement seeks to provide clarity on the effect of the proposed works as required by the council. A summary of the advice is provided below:
- 5.6** *In the absence of comprehensive justification for the loss of the care home there is an objection in principle to the change of use.*
- 5.7** *Pippin House lies outside the built confines. SBLP Policy ST3 states that outside the built-up area boundaries development will not be permitted. Given the policy position, a strong justification will be required to accompany any planning application for any development (including change of use) outside the built-up area.*
- 5.8** *The fact the development plan is out of date will be taken into account. In addition, the tilted balance would be taken into account (see para 11d NPPF footnote 8).*
- 5.9** *No details of the works to convert the listed buildings have been provided as such it is not possible to say whether the interventions would cause harm to the significance of the building or not. Pre-application engagement is clearly at an early stage, without detailed designs having been presented. Officers have therefore*

*taken a cautious approach and you are advised that in the absence of information (are there some words missing?) to confirm no harm would be caused.*

**5.10** *One of the principal concerns relates to the layout of new buildings. The proposed dwellings (Cottages 1, 2 and 3) would be positioned between existing buildings, and there would be the potential for habitable room windows to be introduced well within 21m of the existing buildings on the site. Such a close juxtaposition of buildings and associated windows would introduce the potential for overlooking between dwellings and a loss of privacy.*

**5.11** Other concerns related to the provision of the vehicle access onto Claxfield Road and the loss of vegetation. Advice was given on technical matters such as drainage and biodiversity issues.

**5.12** *There are 21 parking spaces proposed for the new dwellings. Looking at the Council's residential parking standards (set out in Appendix A of the SPD) 23 parking spaces are recommended. Many of the proposed dwellings are large (and likely to have a large parking demand) and the site is not well connected to public transport. Going forward, justification will be needed for the level of parking proposed. In addition, the location and allocation of the parking spaces is unclear and should be clarified as the scheme progresses.*

**5.13** *The parking layout to the front of The Mill House and Berkeley House looks awkward and further information is needed in the form of a swept path analysis to show the parking spaces are workable and would not, for example, cause damage to trees of merit.*

## 6. Planning Assessment

**6.1** Planning law requires planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise. It is necessary for the LPA to consider whether the application proposal accords with the statutory development plan and if not, whether any material considerations indicate that planning permission should nevertheless be granted.

**6.2** This Planning Statement addresses the relevant material planning considerations.

### Principle/Marketing

**6.3** The site has a lawful use as a care home, which is considered to be a community facility. It is acknowledged that this development would result in the loss of a care home use on the site and the Housing Market Assessment for Swale identifies a need for care home provision in the Borough. However, there are a number of material consideration which supports the change of use of the buildings.

**6.4** The site was first marketed by Christies at the end of 2022 (appendix 1) with an asking price of offers in excess of £1.7m, Christies have confirmed that there was



no interest in the site. The property was then marketed by Allsop with a guide price of £1.5m+ it was put to auction twice, 22<sup>nd</sup> September 2022 (appendix 2) and 15<sup>th</sup> December 2022 (appendix 3), but was not purchased, there were no bidders. This highlights a lack of demand for care provision at this site. The applicant approached Christies and purchased the site directly in January 2023.

**6.5** To reduce costs of retaining the site, the applicant has sought to rent Pippin House. An exchange of emails between the applicant and SBC planning officers in February and April 2023 confirms the position that SBC consider that Pippin house should not be used independently of Berkely house as it would not comply with the planning condition.

**6.6** Given that rental of the units is not possible (without planning permission) and with the rising cost of upkeep of the site the applicant has approached three different marketing agents.

**6.7** The general response from the marketing agents, confirm that general lack of interest from buyers are for the following reasons:

- given the bad publicity that the care home received;
- The sprawling nature of the buildings across the site – makes management and care of residents very difficult; and
- The old, dilapidated condition of the buildings.

**6.8** To this end they would only be interested in marketing the site with planning permission in place for change of use to residential.

**6.9** Given the above, the applicant has been in negotiation with Cushman and Wakefield since May 2023 to see how the site could be marketed. Cushman and Wakefield visited the site in June 2023 and the applicant entered into contract with them on the basis of the sale being confidential and with no guide price. The aim was for Cushman and Wakefield to seek out interested parties through their own connections with no express advertising of the sale. More information will be provided regarding their success over the next few weeks.

**6.10** A statement summary (appendix 4) produced by GPM2 (architectural and surveying firm) explains that the listed buildings are not viable to be retained as a care home.

The comply with current building and fire regulations to meet care home standards would result in harm to the listed buildings and would be cost prohibitive.

- 6.11** It is asserted that the proposal accords with policies CP5 and CP6, the care home has been marketed and the supporting statement from GPM2 confirms that it would not be feasible or economically viable to refurbish, renew or modernise the existing buildings for a care home use.
- 6.12** As advised in the pre-application letter, we have contacted the ICB to seek clarification on any unmet needs as a result of the closure of this facility. At the time of writing this report a response had not been received.
- 6.13** It is reasonably assumed that considering the Winterbourne Review, the ICB's approach is towards care in the community rather than specialist housing.
- 6.14** Policy ST3 identifies Lynsted as a village and confirms that it will provide development on minor infill and redevelopment sites within the built up area boundaries. The majority of the site is within the confines of Lynsted, only Pippin House is outside the arbitrary red line marking the confines, the access to the site is within the confines. Whilst in technical terms in accordance with policy ST3 Pippin House is in the countryside, it does not fall within the definition of being an isolated site. Policy ST3 (5) advises that proposals outside the built-up area boundaries will not be permitted, unless supported by national planning policy.
- 6.15** It is submitted that policy ST3 is out of date and the blanket ban on residential development in the countryside is out of step with the NPPF. Paragraph 79 of the NPPF 'Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'. Paragraph 80 of the NPPF advises that isolated dwellings in the countryside should be avoided – it is clear from the site location that Pippin House is not isolated and therefore the NPPF would support residential development where it is closely and in this case intrinsically linked to the village confines. It is asserted that policy ST3 is out of date and holds limited weight.
- 6.16** SBC published its 'Statement of Housing Land Supply 2021/22' in December 2022. This confirms that its housing land supply position is 4.83 years. The lack of a five year supply of housing means that the "tilted balance" through paragraph 11(d) of

the NPPF is engaged. This adds weight to the benefits of housing delivery that this proposal would bring.

- 6.17** Paragraph 69 of the NPPF acknowledges that small sites such as this one can make an important contribution to meeting the housing requirements of an area and are often built out relatively quickly. Paragraph 69 (c) advises that LPA's should support the development of windfall sites through their decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 6.18** It is accepted that there is a need for care home provision but there is also a need for family dwellings as now being proposed. It is submitted that this village location is not the ideal location for people requiring care. The services which people in care would need to regularly access such as social workers, social groups and health specialist are not readily available without a car. It is widely accepted that care homes are better accommodated for in town centre locations, where minority groups can better integrate with the wider community.
- 6.19** The redevelopment of these buildings would make good use of a brownfield site and would be the optimum viable use for these grade II listed buildings.
- 6.20** Taking into account the varying residential needs of the Borough, the proposal is considered to be compliant with both National and local policy as set out above and therefore the principle of development is acceptable, consistent with policies ST1, ST3, ST5 and CP1, CP5 and CP6 of the Local Plan 2017.

## Character and Appearance

- 6.21** Paragraph 130 of the National Planning Policy Framework supports the creation of places which are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity afforded to existing and future users. Policy CP4 of the Swale Local Plan 2017 requires development proposals to be of high-quality design and to be in keeping with the character of the area.
- 6.22** In this case, minimal external alterations to the buildings are proposed and the new dwelling is of design and scale wholly appropriate to the site location. Therefore the proposed development will not impact the character or appearance of the conservation area or the quality of the street scene in a negative manner.

- 6.23** Given that there are minimal external alterations proposed and the retention of a form of residential use of the building, the change of use is not harmful to the listed buildings or the character or appearance of the conservation area, consistent with the aims of policies CP4 and DM14 of the Local Plan (2017).
- 6.24** The design approach is considered and discussed in greater detail in the Design and Access Statement produced by GPM2.
- 6.25** The Heritage Impact Assessment produced by HCUK confirms that the proposed development will preserve and enhance the heritage assets - thus there would not be a detrimental impact on the visual appearance of the street scene and would comply with policy CP4 of the BFLP 2017.

## Residential Amenity

- 6.26** Policy DM14 states that any new proposed developments should not cause significant harm to the amenities of surrounding uses or areas and due consideration will be given to the impact of the proposed development upon neighbouring properties. Any new proposed schemes should not result in significant overshadowing through loss of daylight or sunlight, in an unreasonable loss of privacy, in an unreasonable loss of outlook or in excessive noise or odour pollution.
- 6.27** It is submitted that the proposed use would provide a betterment to the residential amenities of surrounding neighbours. The reduction in the number of occupants at the site, the reduction in the number of visitors, carers, staff and deliveries would reduce the level of noise and disturbance from the site.
- 6.28** The conversion and the new build dwelling will provide a high standard of residential accommodation to the future occupiers, meeting the National Internal Space Standards, with ample outlook and ventilation. Private external amenity space is provided for each property, together with a communal store room for bikes and bins.
- 6.29** Details of waste management is covered in the Design and Access Statement (page 29)

## Parking and Traffic

- 6.30** Policy DM 6 of the BFLP is concerned with managing transport demand and impact. It requires development proposals to demonstrate that sustainable modes of transport have been taken up; the residual cumulative impact of development on traffic generation would not be severe; safe and suitable access can be achieved; and air quality management and environmental quality has been considered when developing the proposal.
- 6.31** The current use of the site would result in a much higher volume of traffic and parking demand generated by staff, visitors and deliveries, than these proposed ten dwellings. It is submitted that the change of use would result in a betterment, generating fewer vehicle trips on the local roads. It would not cause a severe impact in highway capacity terms, therefore the impact on highway safety is acceptable and as such there is no conflict with paragraph 111 of the NPPF.
- 6.32** Further details of highway and parking matters are covered in the Design and Access Statement (page 28)

## Other Matters

- 6.33** The NPPF states at paragraph 174 states that the “planning system should contribute to and enhance the natural and local environment by ... minimising impacts on biodiversity and providing net gains in biodiversity where possible ...”
- 6.34** An Ecological Report prepared by KB Ecology is submitted with this application. The applicant is aware of the recommendations for surveys and biodiversity enhancements and is committed to their implementation.
- 6.35** It is, therefore, considered the impact of the proposed development on ecology could be controlled by condition.
- 6.36** Paragraph 159 of the NPPF refers that inappropriate development in areas at risk of flooding should be avoided. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). The application site is not within an area prone to flooding and is designated as being of low risk; accordingly, the development would not pose a flood risk issue to the wider environment.



- 6.37** Policy DM21 of the SBLP sets out a various criteria aimed at preventing or reducing flood risk and policy CP7 requires new development to be supported by the timely delivery of green infrastructure, including SuDS.
- 6.38** Given the size of the site and scale and nature of the proposed development it is considered that it is unlikely to have a significant impact on drainage in the area and could be dealt with via safeguarding conditions.
- 6.39** The Design and Access Statement (page 27) explains the drainage scheme in detail and clearly indicates a betterment by providing more green areas for drainage.
- 6.40** Natural England has previously advised that the level of population increase predicted in Swale should be considered likely to have a significant effect on the interest features for which the Special Protection Area (SPA) and RAMSAR have been identified. SBC produced the 'The Strategic Access Management and Monitoring Plan (SAMM)' to deal with these matters, which focuses on the impacts of recreational activities on the Special Protection Area (SPA). The studies indicate that recreational disturbance is a potential cause of the decline in bird numbers in the SPA. To enable the Council to be satisfied that proposed residential development will avoid a likely significant effect on the designated sites (due to an increase in recreation) a financial contribution is required for all housing developments to contribute to the district wide mitigation strategy. This mitigation has meant that the Council accords with the Habitat Regulations. This mitigation is secured under policy CP7 of the Local Plan.
- 6.41** On request by the LPA an undertaking will be submitted to secure the payment of this contribution.

## 7. Conclusions

- 7.1** NPPF Paragraph 8 advises that achieving sustainable development means that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways. In this regard, and in meeting the economic objective, it is submitted that the development will assist the Council in supporting local economic growth in the district through the provision of housing to support local facilities and amenities. The development will bring about employment opportunities; both directly through the construction of the development and indirectly by the support given to the local supply chain for building services, materials etc. The additional dwelling will also provide additional finance to the Council through Council Tax charges and additional housing will support local shops and facilities and services including the local bus service.
- 7.2** In meeting the social objective, the proposal will provide for 10 high-quality family homes which will meet the needs of existing and future generations as identified by the District's SHMA. The development will not give rise to any adverse impacts, or effects, upon the listed buildings, conservation area or the character and appearance of the wider rural area and will retain the site's positive contribution to this edge of village setting.
- 7.3** It is submitted that the change of use of this niche care home facility would not have a detrimental impact on care provision. Following the Winterbourne Review it is the Government's clear intention to promote care in the community rather than isolating people with mental health issues in village sites such as this one.
- 7.4** The marketing efforts have demonstrated that there is not a demand for a care home provision in this location and the viability statement (produced by GPM2) confirms that it would not be financially viable to upgrade these listed buildings to meet the current care home standards.
- 7.5** In addition, the development will not give rise to any harmful impacts upon neighbouring property occupiers.
- 7.6** In refurbishing the listed buildings, designing a dwelling that will be constructed using energy efficient construction techniques and methods, and ensuring that

enhancements to the biodiversity interests of the area are provided, the proposal will meet with the environmental objective.

**7.7** Through the careful landscaping of the site and as can be required by condition, the environmental objective can be further advanced. The change of use of the site will reduce the number of vehicle movements at the site, and as a consequence, keep CO<sub>2</sub> emissions to a minimum.

**7.8** This planning statement has demonstrated that BFLP 2017 is out of date and therefore the tilt of balance (NPPF paragraph 11 d) is applicable. The presumption is in favour of granting planning permission on small sustainable sites such as this one. These 10 units would help SBC meet there unmet housing supply.

**7.9** The developer team would welcome a site meeting with the planning officer and heritage officer to discuss the application at your earliest convenience.