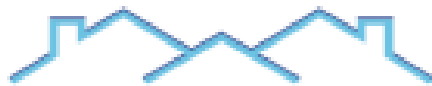


Planning, Design & Access Statement

Hill Crest, Phillips Park Road, Whitefield, Bury



JS Planning Services

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1.0 Introduction

- 1.1 JS Planning Services have been instructed by the applicant Mr Terry Krell of Helpful Investments Ltd to prepare and submit a full planning application for the proposed Change of Use of an existing, very large, residential property (C3 Use) to a Children's Care Home (C2 Use) at Hill Crest, Phillips Park Road, Whitefield, Bury.
- 1.2 This Statement has been prepared by James Stannard, chartered member of the Royal Town Planning Institute (MRTPI) and should be read in conjunction with all other plans and documentation that accompanies the application, which includes a Technical Advice Note prepared by SCP Consulting in relation to matters of highway safety.
- 1.3 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.
- 1.4 Based on the facts of the case, JS Planning Services believe that there is a reasonable, credible argument that despite the proposed use having a different use class, 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.
- 1.5 However, given that such a judgement is a matter of 'fact and degree' a full planning application has been submitted, in order to avoid a situation where Officers do not share this view.
- 1.6 In any event, this Statement confirms that the proposed re-use of the existing building meets one of the exceptions to 'inappropriate development' set out under Paragraph 150 of the National Planning Policy Framework (NPPF) and is therefore an acceptable form of development in the Green Belt.
- 1.7 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.
- 1.8 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 a large existing residential property known as Hill Crest, at the far end of Phillips Park Road, Bury. The last 500m of this road is unadopted, with passing places present, terminating at the entrance to the site with no through route for vehicles.
- 2.2 A public footpath which links the western end of Philips Park Road to the Outwood Trail which runs from Prestwich in the south to Radcliffe in the north.
- 2.3 The property is made up of a main building with two ancillary structures, which together contains 12no. bedrooms.
- 2.4 The site is accessed via a private electronically powered gate immediately beyond a turning circle utilised by refuse vehicles, beyond which is a private driveway leading to a turning circle, allocated and unallocated off-street parking provision.
- 2.5 The site lies within the open countryside beyond the settlement boundary within the Greater Manchester Green Belt, surrounded by greenfield land on all sides, within the M60 Motorway within close proximity to the south east (Fig 1).

Figure 1 – Site Location: Local Context



- 2.6 The existing Floor Plans show that the ground floor of the main house a large Living Room, an open plan Kitchen/Dining Room, a smaller Lounge, Utility Room with WC, and a larger Living Room, and UPVC Conservatory.
- 2.7 The first floor is shown to contain 5no. bedrooms and 4no. bedrooms.

3.0 The Proposed Use

- 3.1 The chronic shortage of Children's Care Homes nationally is well documented. A Government press release dated 8th July titled "*Many children placed in homes far away from their families amid national sufficiency challenge*" (Appendix 1) highlighted that a report by Ofsted suggests that there are too few suitable places to keep children in care close to home.
- 3.2 The report titled "What types of needs do children's homes offer care for?" finds that children with mental health problems, or experience of abuse and neglect, are likely to be living the furthest away from their home prior to coming into care, and above the average distance of 36 miles.
- 3.3 A recent article in the Bury Mercury Newspaper dated 18th November 2022 titled "*Ofsted warns of 'last-minute dash' to find homes for children entering care*" (Appendix 2) emphasises the severe shortage of suitable placements for vulnerable children reporting that Councils are continually struggling to find suitable placements within the care sector, that that delays in finding suitable placements, compound the impact of trauma, having regard to a recent Ofsted report.
- 3.4 Helpful Investments Ltd are a registered company 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.
- 3.5 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.
- 3.6 The proposed use as a house for vulnerable children would accommodate up to 4 x children aged between 7 and 17 years of age of mixed gender; race; religion; disability; and sexual orientation; and who present social, emotional, and behavioural difficulties. The home will provide support for young people who have a range of complex individual needs, providing emergency medium- and long-term placements.
- 3.7 The compatibility and matching of young people living in the property are always a vital consideration in any admission and discharge situation, alongside the ability of the home to meet the needs of the young people.
- 3.8 The proposed use would see the four young people having full unrestricted access to the property, with the exception of the ground floor staff office, that would be locked for security and protection purposes - much in the same way that young people in a typical family household would have restricted access to an ancillary office used by a parent for home working.
- 3.9 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.

- 3.10 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. Children will eat and live together as a single household, with preparation of meals, washing up, household cleaning, all undertaken by the group 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.
- 3.11 As shown on the submitted Proposed Floor Plans, the Children's Home would see the communal rooms at ground and first floor levels to be used in much the same way as a family dwelling, the negligible exception being the introduction of a staff office which, together with staff bedrooms, would have restricted access.
- 3.12 The Floor Plans show that the ancillary accommodation contained within the two detached bungalows will remain unchanged and will not form part of the proposed use.
- 3.13 The main dwelling would see the Ground Floor continue to function as it currently does for the existing dwellinghouse, containing communal living rooms, utility room, and kitchen.
- 3.14 At First Floor, the plans show two bedrooms allocated for 2no. Children, each with en-suite bathroom, with a further two bedrooms allocated for staff, separated by a Staff Office.
- 3.15 The Second Floor shows a further two bedrooms allocated for 2no. Children, with a shared Bathroom, and communal Games Room.
- 3.16 The staff that would be required to look after 4 x children at this property would comprise a Registered Manager, who would be on site between the hours of 9am – 4:30pm Monday to Friday, and a small team of support workers who would be on site on a rota basis, with a maximum of 5no. staff being on site at any one time.
- 3.17 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.
- 3.18 The weekly rota that would be operated by the care home provider Helpful Investments Ltd, accompanies this submission (Appendix 3). The rota shows that on certain shift patterns members of staff would be required to sleep at the property overnight.
- 3.19 Helpful Investments 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.

- 3.20 The above policy also refers to the 'Pool Car' which would be used by staff on shift to use for necessary journeys. This provides a 'family car' 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.
- 3.21 The Proposed Site Plan shows that the site can accommodate off-street parking provision for 5 x vehicles, with spaces measuring 2.4m x 4.8m, with appropriate turning facilities to allow vehicles to exit the site in a forward gear.
- 3.22 The proposed use responds directly to the chronic under provision of quality children's social care both nationally and within Greater Manchester and would make a positive contribution to the social care provision in the region.

4.0 Planning History

- 4.1 A review of the Bury Council online planning portal reveals that the site has been subject to the following planning history:

01/38244 Demolition of garage and outbuilding and construction of ancillary accommodation on the same footprint (Approved 26th Nov 2001)

5.0 Relevant Local and National Planning Policies

- 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 Development Plan for this site comprises the Unitary Development Plan (1997) which in time is set to be superseded by the 'Places for Everyone' Joint Development Plan for Greater Manchester, and the Bury Local Plan.
- 5.3 As neither Emerging Plan is at any form of advanced stage, it is considered that policies within both cannot be given any weight in the assessment of this application.
- 5.4 The National Planning Policy Framework (NPPF) was originally published in 2012 and recently revised in 2019 and 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 |
| - Protecting the Green Belt | Chapter 13 |
| - Conserving and Enhancing the Natural Environment | Chapter 15 |

- 5.5 The NPPF makes clear that the weight that can be given to Local Plan policies depends on the degree of consistency to which the current policies are consistent with the NPPF.
- 5.6 As such, Bury Council has undertaken an assessment to determined consistency between policies within the UDP and those set out in the NPPF, which forms the basis for determining the degree of weight that should be attached to UDP policies and instances where policies in the NPPF should take precedence in the development management process.
- 5.7 Regard is given to the above assessment throughout the remainder of this document.

6.0 Principle of Development

- 6.1 The application seeks full planning permission for a proposed change of use from a large residential dwellinghouse (C3 Use), to a Children’s Care Home (C2 Use).
- 6.2 There are many instances where the desired change of use applied for under this application, does not require planning permission as 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.
- 6.3 The existing dwellinghouse contains 8no. bedrooms, with a further 4no. bedrooms contained within the ancillary detached building within the curtilage, amounting to a total of 12no. bedrooms.
- 6.4 In light of the above, it is considered reasonable to anticipate that the lawful use of the building as a dwellinghouse (C3 Use) could attract far in excess of 6no. vehicles and associated tips/movements to and from the adopted public highway.
- 6.5 When considering the fact that the proposed Children’s Home would operate very much in the same way as a typical family home, and that a maximum of 5no. staff would be on site at any one time, JS Planning Services submit that there is a reasonable and credible argument that the proposed use as applied for may not require planning permission as a matter of ‘fact and degree’.
- 6.6 However, to avoid any potential disagreement and in the interests of regulating the proposed use in a swift manner, JS Planning Services have advised the applicant that on balance, the most appropriate way of achieving a formal decision from Bury Council to implement the proposed use is to apply for full planning permission.

General Principle

- 6.7 With the above in mind, UDP Policy CF1 relates specifically to ‘Proposals for New and Improved Community Facilities’ and states that such proposals will generally be looked upon favourably by the Council.
- 6.8 UDP Policy CF1/1 goes on to set out the factors that will be considered when assessing proposals for new and improvement community facilities, which includes social care for children. These factors are set out as follows:
- *Impact on residential amenity and the local environment;*
 - *Traffic generation and car parking provision;*
 - *The scale and size of the development;*
 - *Where applicable, access to shops and other services;*
 - *If the use is intended to serve a local community, or catchment area, the suitability of the chosen location in relation to that community or catchment area;*
 - *Accessibility by public or private transport;*
 - *The needs and requirements of the disabled*
- 6.9 Given the nature of the proposed use, and there this varies from other types of residential and social care for different aspects of the community, not all these factors are relevant to this proposal.
- 6.10 UDP Policy CF3 refers specifically to social care services, and states the following:
- “The Council will, where appropriate, consider favourably proposals for the provision of new, and the improvement of existing social services facilities for children, young people, elderly people, people with mental and/or physical handicaps and illnesses, and other groups with special needs.”*
- 6.11 The supporting justification to UDP Policy CF3 is set out below:
- “The Council is committed to the principle of ‘care in the community’. This means that, wherever possible, people will be encouraged to live in the community rather than in large institutions. The Council's policies and plans concerning Community Care are expressed in the annual Community Care Plan produced jointly with Bury Health Authority and Bury Family Health Services Authority.*
- Although this may mean less need for residential type care facilities, it may well mean a need for an increase in day care and support facilities. Whatever the needs, the Council will support new and improved social services for those who are often some of the most disadvantaged in society provided that they do not conflict with existing residential amenity, the environment and other policies in the Plan.”*
- 6.12 UDP Policy CF3/1 refers specifically to Residential Care Homes and Nursing Homes and states that Residential care homes will be located in residential areas

and will be permitted where they do not conflict with the amenity of adjoining areas.

- 6.13 Both UDP Policies CF1 and CF3 have been found to be consistent with the National Planning Policy Framework.
- 6.14 Policy UDP H4/2 refers to 'Special Needs Housing'. The supporting justification gives strong emphasis towards provision for the elderly, and the disabled and makes no reference to children's social care. It is thus considered that this policy is not relevant, and that consideration of this proposed use should have regard to UDP Policy CF1, CF1/1 and CF3.
- 6.15 Paragraph 69 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.
- 6.16 Paragraph 93 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.
- 6.17 The proposed use responds directly to the established under provision of suitable, high quality children's social care nationally and within Greater Manchester and fully supports the aims and objectives of UDP Policies CF1 and CF3, H4/2 and paragraphs 69 and 93 of the NPPF.
- 6.18 Having regard to the factors set out under UDP Policy CF1/1 relevant to this specific proposal, the proposed Children's Care Home is of a modest scale, which would accommodate 4no. children, within the existing 12no. bedroom property, with the ancillary accommodation not being utilised.
- 6.19 Given that the care home is for Children below the legal driving age, it is submitted that the isolated nature of the property a short distance from the settlement of Whitefield can be justified, particularly given that the existing lawful use has the potential to generate significantly greater vehicle movements than the proposed use.
- 6.20 Matters relating to potential impacts on residential amenity, traffic generation, and car parking provision and considered in detail under Section 7.0 and are not considered to give rise to any adverse impacts.

Green Belt

- 6.21 The site lies within the Green Belt and as such the application is subject to relevant 'Open Space' UDP Policies. Policy OL1/4 relates to the 'Conversion and Re-use of the Buildings in the Green Belt' and states the following:

“The conversion and re-use of buildings in the Green Belt is not inappropriate development and will not be permitted providing that:

- *it does not have a materially greater impact than the present use on the openness of the Green Belt and the purposes of including land within it;*
- *any extension of re-used buildings, and any associated uses of land surrounding the building do not conflict with the openness of the Green Belt and the purposes of including land in it (e.g. because they involve extensive external storage, or extensive hardstanding, car parking, gardens, boundary walling or fencing);*
- *the buildings are of permanent and substantial construction, and are capable of conversion without major or complete reconstruction;*
- *the form, bulk and general design of the buildings are in keeping with their surroundings;*
- *suitable access and likely traffic generation can be accommodated without creating a traffic hazard or the need for major road improvements or lengthy new routes;*
- *all the necessary services can be provided without extensive works;*
- *it can be established by the applicant, to the satisfaction of the local planning authority, whether or not the building contains any protected species, such as bats or barn owls. Where it is shown such species are present, measures to prevent damage to habitats will be required.*

6.22 Whilst other Local Plan policies relating to the Green Belt have been found to have some areas of inconsistency with the NPPF, the above policy has been found to be consistent with restrictive policies that relate to the ‘Protection of the Green Belt’ contained under Chapter 13 of the NPPF.

6.23 Paragraph 138 of the NPPF sets out the 5no. purposes of including land within the Green Belt, as follows:

- (a) *to check the unrestricted sprawl of large built-up areas;*
- (b) *to prevent neighbouring towns merging into one another;*
- (c) *to assist in safeguarding the countryside from encroachment;*
- (d) *to preserve the setting and special character of historic towns; and*
- (e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*

- 6.24 Paragraph 147 of the NPPF states that “inappropriate development” is by definition, harmful to the Green Belt, and should not be approved except in very special circumstances.
- 6.25 Other types of development (other than new buildings) that are exceptions to ‘inappropriate development’ provided they preserve its openness and do not conflict with the purposes of including land within it, include:
- (d) *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - (e) *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds);*
- 6.26 The application is for a proposed change of use (which, for the purpose of this application is material) and relates to an established large residential dwelling which is clearly of a permanent and substantial construction.
- 6.27 The proposed use does not involve any new physical development, and as such, it is submitted that the proposal would both preserve the openness of the Green Belt and not conflict with any of the five purposes of including land within it.
- 6.28 As such, it is submitted that the proposed use fully complies with UDP Policy OL1/4 and relevant restrictive policies relating to the Protection of the Green Belt contained under Chapter 13 of the NPPF.
- 6.29 In light of the above, we submit that having regard to the chronic undersupply of children’s social care provision both nationally and in Greater Manchester, the existing lawful use, and characteristics of the site and its surroundings, the principle of development fully aligns with relevant policies within the Local Plan and the NPPF, including those that relate to the protection of the Green Belt.

7.0 Relevant Planning Considerations

- 7.1 Having established that the principle of development is acceptable, this section considers all relevant material planning considerations that are applicable to this application, which are identified as follows:
- Public and Residential Amenity
 - Parking Provision and Highway Safety

Public and Residential Amenity

- 7.2 UDP Policy H2/1 concerns the form of new residential development, requiring that new development make a positive contribution to the form and quality of the surrounding area. Factors to be considered when assessing proposals include (amongst other things) the impact of developments on the residential amenity and the position and proximity to neighbouring residential properties.

- 7.3 UDP Policy CF1/1 sets out the factors that will be considered when assessing proposals for new and improvement community facilities, which includes social care for children, which amongst other things, include potential impacts on residential amenity and the local environment.
- 7.4 UDP Policy EN1/5 relates specifically to 'Crime Prevention' and states that the Council will encourage development proposals which include environmentally sensitive design features aimed at discouraging crime, with particular paid to specific factors, which include (amongst other things) the location of footpaths and access points, and the location and design of parking facilities.
- 7.5 UDP Policy EN7/2 refers to 'Noise Pollution' and states that in seeking to limit noise pollution the Council will not permit development which could lead to an unacceptable noise nuisance to nearby occupiers and/or amenity users, or development close to a permanent source of noise.
- 7.6 Paragraph 130 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.
- 7.7 Paragraph 185 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.
- 7.8 The property is located a short distance from Whitefield but within a relatively isolated location in relation to any neighbouring residential properties or other sensitive receptors.
- 7.9 Given that the proposed use would operate much in the same way as a large family home, it is not considered that there would be any adverse harm to the amenity of neighbouring properties or the general public, in accordance with UDP Policies CF1/1, EN1/5 and EN7/2, and paragraphs 130 and 185 of the NPPF.

Parking Provision and Highway Safety

- 7.10 UDP Policy CF1/1 sets out the factors that will be considered when assessing proposals for new and improvement community facilities, which includes social care for children, which amongst other things, include matters of '*traffic generation and car parking provision*' and '*accessibility by public or private transport*'.
- 7.11 UDP Policy HT2/4 states that the Council will require all applications for development to make adequate provision for their car parking and servicing requirements in accordance with the Council's car parking standards.
- 7.12 Supplementary Planning Document (SPD)-11 sets out the Council's Parking Standards for the authority area.

- 7.13 Paragraph 110 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.
- 7.14 Paragraph 111 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.
- 7.15 The site lies approximately 3km from the centre of Whitefield at the southern end of St Phillips Park Road. This highway is adopted in part with the last 500m immediately beyond the junction with Old Hall Lane being unadopted.
- 7.16 In order to ensure that the proposed use of the property as a Children's Home would not lead to any unacceptable intensification of the site that would, as a result of a change to vehicular movements, or the safety of users of St Phillips Park Road, SCP Consulting were instructed to advise on likely highway safety impacts, and to produce a Technical Advice Note (TAN).
- 7.17 The TAN has been prepared having regard to the Staff Rota designed by the care home provider (Appendix 3) which has been modelled on other homes currently in operation which provides a high standard and quality of care for the young people residing, and the associated Trip Generation table (Appendix 5) that shows the movements of staff on a daily basis.
- 7.18 The findings of the Technical Note illustrate that the proposed change of use, comparable to the existing lawful use of the site as a large residential dwelling, will not have a material impact on the surrounding highway network, with no trips expected to be generated within the typically busy peak periods, and a very low number of trips expected outside of peak periods, taking into account that no accidents have been recorded within the vicinity of the site access over the last 5 year period.
- 7.19 The curtilage associated with the property includes a private driveway that leads to a turning area. As shown on the proposed Parking Layout, the proposed use seeks to utilise the 5no. formal parking spaces that exist for regular staff, with occasional visitors such as OFSTEAD inspectors utilising the informal parking areas.
- 7.20 In light of the above, JS Planning Services submit that the application has categorically demonstrated that the proposed change of use from a large residential dwellinghouse to a Children's Care Home would not lead to any adverse impacts to highway safety or indeed users of the nearby public footpath thus demonstrating accordance with UDP Policies CF1/1, HT2/4, relevant Supplementary Planning Guidance and relevant paragraphs under Chapter 9 of the NPPF.

Other Matters

Design, Character and Appearance

- 7.21 The proposed change of use does not involve any new physical development and as such would not result in any material change to the character and appearance of the building or the wider street scene, in line with UDP Policy H2/2, EN1/2 and relevant paragraphs under Chapter 12 of the NPPF.

8.0 The Planning Balance

- 8.1 Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. For decision taking this means:

- *approving development proposals that accord with an up-to-date development plan without delay; or*
- *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:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or*
 - ii. *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*

- 8.2 The application seeks full planning permission for the change of use of an existing 12no. bedroom detached property known as Hill Crest, St Phillips Road, Bury from a residential dwelling (C3 Use) to a Children's Care Home to accommodate up to 4 x children (C2 Use).

- 8.3 Based on the facts of the case, JS Planning Services believe that there is a reasonable, credible argument that despite the proposed use having a different use class, 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.

- 8.4 However, given that such a judgement is a matter of 'fact and degree' a full planning application has been submitted in the interests of securing the proposed use in a swift and smooth manner.

- 8.5 The proposed use would make an important contribution to the children social service provision within Greater Manchester and the wider North West region, responding directly to a chronic shortage as identified by Ofsted as referenced in press releases which are contained within the appendix.

- 8.6 It is submitted that the public benefits associated with this proposal should be attributed significant weight in the overall planning balance.
- 8.7 The proposed use of the building as a Children's Home of a modest scale that has found to support the aims and objections of Policies CF1, CF1/1 and CF3. Given that the proposal amounts to the re-use of an existing building which is of a permanent and substantial construction, the proposal is compliant with UDP Policy OL1/4 and relevant restrictive policies relating to the Protection of the Green Belt contained under Chapter 13 of the NPPF.
- 8.8 The proposed use does not result in any physical alterations or new built development, and would therefore not result in any material impact to the character and appearance of the property or indeed the immediate and wider rural landscape.
- 8.9 Whilst the site is located within a short distance of Whitefield and services, facilities and educational institutions therein, the site is relatively isolated from and within a significant distance of neighbouring residential properties.
- 8.10 As such, given the nature of the proposed use being similar to that of a family dwellinghouse, and is isolated location with regards to neighbouring properties, it is submitted that the proposed use would not give rise to any adverse harm to public or neighbouring residential amenity in accordance with UDP Policies CF1/1, EN1/5 and EN7/2, and paragraphs 130 and 185 of the NPPF.
- 8.11 The Technical Advice Note (TAN) prepared by SCP Consulting satisfactorily demonstrates that when considering the existing lawful use of the site, the vehicle movement and trip generation associated with the proposed use, and the existing characteristics of the site and local highway network, that there would be no adverse harm to highway safety as a result of the proposed use, and that an appropriate amount of off-street parking provision is incorporated, in accordance with UDP Policies CF1/1 and HT2/4, the Supplementary Planning Document, and relevant paragraphs under Chapter 9 of the NPPF.
- 8.12 In light of the above, it is submitted that the proposed use of this existing residential property as a Children's Care Home complies with all relevant Local Development Plan policies, restrictive Green Belt policies and all other relevant policies within the NPPF.
- 8.13 The application thus constitutes a sustainable form of development and in line with paragraph 11 of the NPPF JS Planning Services respectively requests that the application be approved subject to appropriate conditions.