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Planning and Building Control
Shepway District Council
Civic Centre
Castle Hill Avenue
Folkestone
Kent CT20 2QY

Corporate Post Room

11 AUG 2016

10th August 2016

Dear Mr Howson

Application No: Y16/0306/SH

Thank you for your letter dated 3rd August in relation to the additional information submitted in support of Application No: Y16/0306/SH for change of use to a HMO. I welcome the opportunity to make further comments.

The additional information comprises a 7 page document (with 6½ pages text) described as a 'management plan'. It states that an entity named Kent Property Care Limited "is appointed management company" for the property.

Management plan

The first thing to say about the document is that it is clearly in the form of a standard template; little of it (if any) appears specifically tailored to the particular property that is the subject of the planning application.

The main substantive part of the 'plan' is a statement that:

"The property will be maintained in good repair condition in order to prevent any injuries or accidents. The property will be regularly inspected and any issues will be recorded. The property will have a weekly cleaner scheduled to take care cleaning of the communal areas and arrange bins collection and bin store and bicycle rack to the rear of the property and structural elements plus the inside facilities which are part of the dwelling."

Obvious questions arise from this:

- What is meant by 'regularly' inspected? (once every two years would be regular, though not frequent).
- While a 'cleaner' is specifically identified, there is no indication that that there will be visits from anyone else other qualifications, skills or experience necessary to address the issues listed afterwards – why not? In reality, does the 'plan' amount to nothing more than a weekly visit from a cleaner?
- What happens once issues have been 'recorded'? That in itself does not seem sufficient to be a 'management plan', only an inspection plan.

There then follows about 6 pages constituting nothing more than a generic statement of things that "could" or "can" have "an effect on likelihood and harm outcomes". While adding to the length and apparent substance of the document, they are too general to communicate anything relevant about the application and proposed use of this property.

The management plan is one aimed at identifying measures "considered when taking reasonable steps to reduce health and safety risks in the property in addition to taking into account neighbourhood [sic]". As such, the plan is limited almost entirely to health and safety.

It is obvious that the plan fails to address any other aspect of the application's adverse impact on amenity already identified by myself and others, including as to parking and design - and of course does not address the District's policy or matters of need.

My view is that the 'management plan' does nothing to overcome the objections to the application already stated.

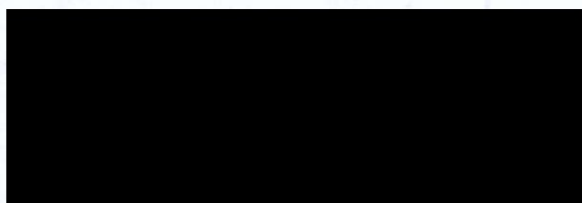
Management company

I would ask you to take into account the following remarks about the proposed management company, Kent Property Care Limited (registered at Companies House under Company number 10023732):

- The now sole director and 100% shareholder of Kent Property Care Limited is Nazmi Cesur, who previously submitted a comment in support of the application (Thursday 23 Jun 2016).
- The company was incorporated in only June this year, with nominal capital of £100.
- Therefore, in considering Mr Cesar's comments, you may wish to take into account that the named management company has negligible substance in itself and evidently no track record of property management.
- Indeed, the cOmpany's principal activity, as stated in its 'confirmation statement' filed with Companies House last month, is instead '*construction of domestic buildings*'.

Overall, I ask you to consider that the latest information adds nothing that would lead to the application being accepted.

Yours sincerely

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