

Planning Design and Access Statement

Site: Sandgate Manor, 46 Military Road, Sandgate, Folkestone, CT20 3BH

Proposal: Installation of two single-storey detached lodges to provide three self-contained assisted living residential annexes (C2 use class), in the grounds of Sandgate Manor.

Prepared by Credo Planning Ltd

On behalf of: MNP Complete Care Ltd

Date: July 2025



1 Overview

- 1.1 This Planning Design & Access Statement supports a FULL planning application for the installation of two single-storey detached lodges to provide three self-contained assisted living residential annexes in the grounds of Sandgate Manor, an established residential care home (Class C2).
- 1.2 Wellgate Care provides high-quality residential care and support services for adults with a variety of disabilities, including learning disabilities and physical disabilities. The aim is to help all their residents to develop their personal skills, enhancing communication and increasing their independence and supporting them to have an enhanced quality of life.
- 1.3 Sandgate Manor provides care facilities in the main building and there are three existing self-contained woodland lodges / assisted living annexes within the grounds of the care home. The assisted living lodges are in high demand, offering residents the opportunity to further develop independent living skills and enhance their self-confidence. All residents receive one-to-one care hours according to their individual needs with the reassurance that additional support is available 24 hours a day.
- 1.4 The proposed development would provide three additional assisted living lodges within the grounds of Sandgate Manor which will allow the care home to provide a greater range of accommodation for residents with varying levels of independence.
- 1.5 The proposed lodges provide self-contained living accommodation and will be used by residents who are hoping to move away from residential care and into a more independent way of living. They will act as a stepping-stone towards independence where a resident may one day have the choice to live in a home of their own.
- 1.6 The proposed lodges would be low-level single-storey structures and would be located at the rear / side of the main care home and would not be visible outside the site.
- 1.7 The application site is in a sustainable urban location and the proposed development and use would be compatible with the established C2 care facility at Sandgate Manor.
- 1.8 The proposed lodges would be set away from the shared boundary to safeguard the amenities of the neighbouring properties, there would be no increase in vehicle parking and new level pedestrian access paths would link up with existing pedestrian routes within the site.
- 1.9 In summary, the proposal would provide good quality additional assisted living accommodation to support and enhance the established care facility at Sandgate Manor and the scheme would be in full accordance with Local Plan policy HB12 and the aims and objectives of the NPPF, in particular para. 63.



2 Application Site

- 2.1 The application site comprises Sandgate Manor, an established care home, located on the northeast side of Military Road.



Site Location showing the approx. location of the assisted living lodges

- 2.2 The site comprises the large care home facility which specialises in looking after residents with physical and learning disabilities. The care home provides assisted living and care facilities within the main building, as well as three detached assisted living lodges located within the grounds of the care home to the north of the main building.
- 2.3 The site has a separate in and out vehicle access. Vehicles enter via a vehicle entrance from Military Road in the southeast corner of the site via a security barrier entrance. The dedicated vehicular exit is via Bybrook Way to the north of the site.
- 2.4 On-site vehicle parking is provided in front of the main building and in the northern part of the site.
- 2.5 The location of the proposed assisted living lodges is on a lower ground level than the care home and comprises a relatively flat area of managed lawn located behind the main care building to the east and southeast.
- 2.6 A level pedestrian access route is proposed between and around the proposed lodges which would link up to existing level / ramped pedestrian paths through the site.

- 2.7 The site is located in Flood Zone 1 and is not subject to flooding. The site is not located in a conservation area and the building is not listed. There are no listed buildings located in proximity to the site. Sandgate High Street Conservation Area is located to the east and south of the site, including the Saga site on the east side of Enbrook Road, the boundary of which is approx. 50m from the proposed development site.
- 2.8 The application site is located within the settlement where the principle of additional development is supported under Core Strategy Policy SS1 & SS3 and the NPPF.
- 2.9 The site is located within a land stability area and the wider site is covered by a group Tree Preservation Order - TPO No 03 of 1978.

3 Planning History

Y06/1044/SH - Formation of new pedestrian access off Military Road – Approved with conditions on 01/08/2006.

Y05/0144/SH - Formation of a new vehicular access together with erection of refuse storage area (re-submission of Y04/1532/SH) – Approved with conditions on 17/02/2005.

Y04/1532/SH - Formation of a new vehicular access together with erection of refuse storage area – Refused on 10/11/2004

Y01/0274/SH - Formation of additional car parking spaces and turning area - Approved with Conditions on 29/03/2001.

95/0102/SH - Erection of a single storey extension to the north elevation - approved with conditions

89/0695/SH - 8 new flats – approved with conditions.

89/0386/SH - Construction of fire escape and bedrooms to rear at ground floor level – approved with conditions

87/1092/SH - Change of use from a nursing home to a care home – approved with conditions.

86/1272/SH - Erection of a two storey extension – approved with conditions.

84/1012/SH - Change of use to nursing home – approved with conditions.

84/0388/SH - Erection of a metal fire escape – approved with conditions

Various TPO applications works to trees within the grounds of Sandgate Manor.

4 Proposal

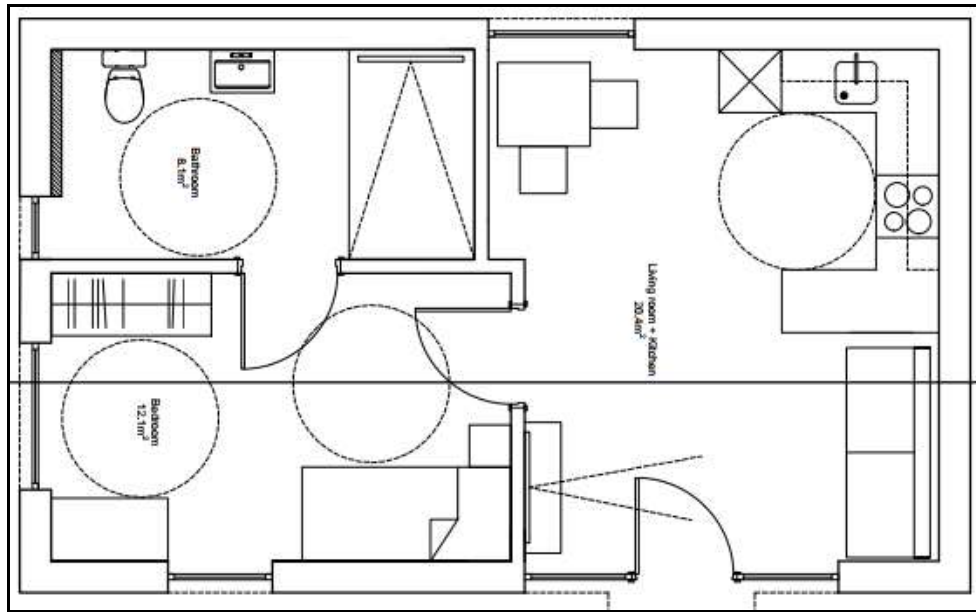
- 4.1 Installation of two single-storey detached lodges to provide three assisted living residential annexe accommodation in the grounds of Sandgate Manor.
- 4.2 One building would contain one self-contained annexe the other building would contain two self-contained annexes.
- 4.3 The proposed lodges would be located behind and to the southeast of the main care building and would be connected to the wider site via proposed and existing footpaths.



**Proposed assisted living lodges highlighted red above – one individual self-contained annexe unit (south) and 2x self-contained annexe unit (north)
The three existing assisted living lodges are highlighted yellow.**

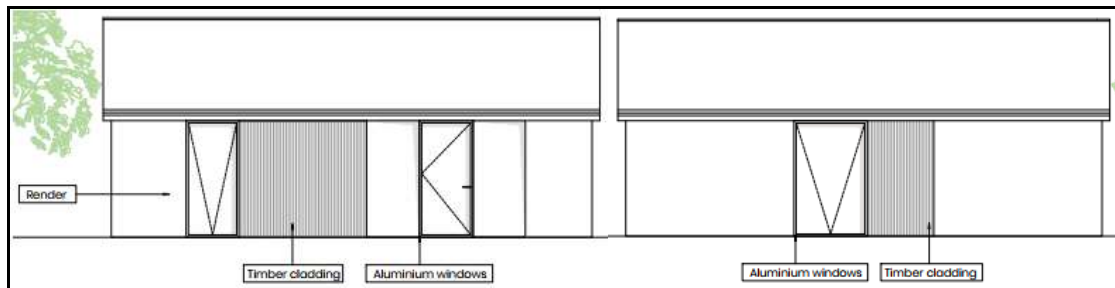
- 4.4 The proposed lodges would be pre-fab light weight structures constructed on a concrete base.
- 4.5 Each lodge / annexe would provide self-contained living accommodation built to wheel chair and Care Quality Commission's Fundamental Standards. The annexe accommodation would provide a single bedroom, open plan living/kitchen area and a bathroom. The internal floor area of each annexe would be circa 41sqm.



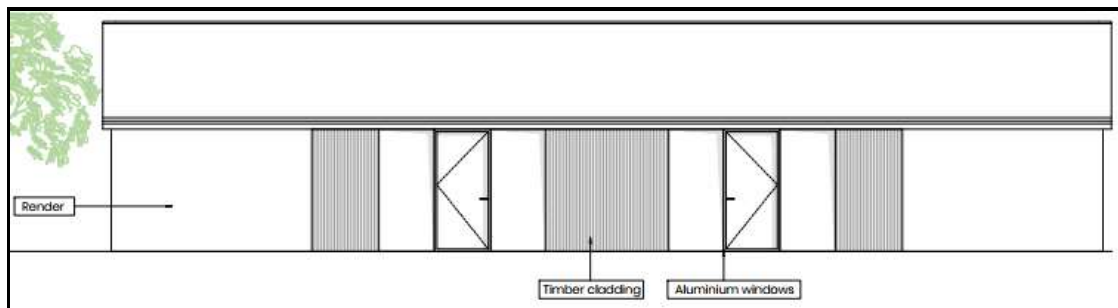


Internal floor area of single self-contained annexe assisted living accommodation

- 4.6 The lodges would be low-level single storey structures with a simple pitched roof and gable ends, measuring approx. 2.1m to eaves level and approx. 4.1m to the ridge.
- 4.7 The lodges would be finished in a mix of render and vertical timber cladding with aluminium fenestration.



Front & rear elevation of single lodge



Front elevation of twin annexe containing two self-contained units



5 Planning Policy Framework

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Development Plan

- 5.2 The adopted development plan for Folkestone & Hythe District Council comprises the Core Strategy Review (2022) and the Places and Policies Local Plan (2020), along with the St Mary in the Marsh Neighbourhood Plan (2019); and the Kent Minerals & Waste Local Plan (2016).

Core Strategy Review 2022

- 5.3 The Core Strategy Review 2022 provides the strategic policies to guide development in Folkestone and Hythe for the next 15 years.
- 5.4 **Policy SS1** (District Spatial Strategy) supports housing development in sustainable urban areas of Folkestone.
- 5.5 **Policy SS3** (Place-Shaping and Sustainable Settlements Strategy) advises that development within the district is directed towards existing sustainable settlements.

Places and Policies Local Plan (2020)

- 5.6 **Policy HB1** (Quality Places Through Design) states planning permission will be granted where the proposal:
1. Makes a positive contribution to its location and surroundings, enhancing integration while also respecting existing buildings and land uses, particularly with regard to layout, scale, proportions, massing, form, density, materiality and mix of uses so as to ensure all proposals create places of character;
 2. Facilitates circulation and ease of movement within the locality for all users, promoting low vehicle speeds, integrated resident and visitor parking and prioritising active forms of travel with roads, footways and paths appropriately located to allow for natural surveillance while maximising legibility;
 3. Creates, enhances and integrates areas of public open space, green infrastructure, biodiversity and heritage and other public realm assets;
 4. Does not lead to an adverse impact on the amenity of future occupiers, neighbours, or the surrounding area, taking account of loss of privacy, loss of light and poor outlook. In assessing the potential impacts of new build residential development on neighbouring dwellings, the Council will apply the same guidelines as for alterations and extensions set out in Policy HB8;



5. Provides a clear definition between the public and private realm, incorporating high quality hard and soft landscaping, boundary treatments, public open spaces and lighting, including details of future maintenance and management; and
 6. Complies with other relevant policies within the development plan and responds positively to the design policies and guidance contained within relevant Town and Village Design Statements and Neighbourhood Plans.
- 5.7 **Policy HB3** (Internal and External Space Standards) requires new homes to meet the nationally described technical housing space standard, or subsequent updates to the standard, including minimum floor-to-ceiling heights. Provision of a private usable balcony with a minimum depth of 1.5m for flats as long as it does not reduce privacy of neighbours.
- 5.8 **Policy HB8** (Alterations and Extensions to Buildings) states alterations and extensions should seek to reflect the scale, proportions, materials, roof line and detailing of the original building and not have a detrimental impact on the street scene, either by themselves or cumulatively. Proposals should protect the amenity of the occupants of neighbouring properties and ensure avoidance of unacceptable overlooking and inter-looking.

Policy HB12

Development of New or Extended Residential Institutions (C2 Use)

Planning permission will be granted for the development of new residential institutions, or the conversion of existing properties to this use, subject to the following requirements:

1. Accommodation is designed and built to the Care Quality Commission's (CQC) Fundamental Standards;
2. The proposal is in a sustainable location with access to local services, leisure and community facilities, including shops, healthcare and public transport in accordance with Core Strategy Policies DSD: Delivering Sustainable Development and SS3: Place-Shaping and Sustainable Settlements Strategy;
3. The proposal is compatible with surrounding land uses, so that the development does not cause substantial disturbance or detrimental impact to neighbours and is not located in an area subject to significant noise or other disturbance, or reasonably likely to be so as a result of the expansion of existing businesses, in accordance with National Planning Policy Framework 2012 paragraph 123⁽⁷⁾;
4. The design and layout of the proposal are in accordance with the design policies in this Local Plan, as well as the parking requirements of Policy T2;
5. Sufficient open and defensible amenity space is provided for use by residents, staff and visitors; and
6. The site and immediate surroundings have a gentle topography to facilitate pedestrian movement and access to services and public transport facilities.

- 5.9 **Policy T2** (Residential Parking Standards) – Sets minimum parking standards for development.
- 5.10 **Policy T5** (Cycle Parking Standards) requires development to provide cycle parking.
- 5.11 **Policy NE2** (Biodiversity) requires development to safeguard and protect all sites of European and Global, designated as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites as well as nationally important sites, including Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR) and Local sites, including Local Nature Reserves (LNR), Key Wildlife Sites (KWS) and Regionally Important Geological and Geomorphological Sites (RIGS).
- 5.12 All new development will be required to conserve and enhance the natural environment, including all sites of biodiversity or geodiversity value (whether or not they have statutory protection) and all legally protected or priority habitats and species.
- 5.13 **Policy NE6** (Land Stability) states that planning permission will be granted for development within the area defined on the Policies Map, or as identified by the British Geological Survey, only if investigation and analysis is undertaken by a competent accredited authority which clearly demonstrates that the site can be safely developed. This analysis should also demonstrate that the proposed development will not have an adverse effect on the slip area in part or as a whole.
- 5.14 Where proposals affect land where instability is suspected, any planning application must be accompanied by a Phase 1 desktop land stability or slope stability risk assessment report which:
1. Identifies and assesses the degree of instability;
 2. Identifies the measures required to mitigate against any risk identified in point 1 (above);
 3. Specifies routine monitoring (as appropriate); and
 4. Addresses the need for formal environmental assessment arising from any stabilisation works.

The Council will look favourably on schemes that can bring unstable land back into use, subject to other planning and viability considerations.

National Planning Policy Framework

- 5.15 The overarching principle of the NPPF is a clear presumption in favour of sustainable development. In terms of determining applications this means approving development proposals that accord with the development plan without delay.
- 5.16 The NPPF was updated in December 2024 with a renewed focus on housing supply and infrastructure with the aim of achieving its core objectives of increasing housing

supply and fostering economic growth. One of the key aims of the updated NPPF is to increase national housing targets to get Britain building again with the government committed to delivering 1.5 million more homes over the next parliament. This results in an increased target of circa 370,000 homes per annum across England – up from 300,000 under the previous method. A 40% increase in the southeast.

- 5.17 **Paragraph 8** of the NPPF states that there are three dimensions to sustainable development; an economic objective; a social objective and an environmental objective.
- 5.18 **Paragraph 39** states local planning authorities should approach decisions on proposed development in a positive and creative way. They should work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.
- 5.19 **Paragraph 61** 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. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.
- 5.20 **Paragraph 63** states within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.
- 5.19 **Paragraph 109** states (inter alia) that opportunities to promote walking, cycling and public transport use are identified and pursued.
- 5.20 **Paragraph 115** states (inter alia) for new development it should be ensured that (a) sustainable transport modes are prioritised (b) safe and suitable access to the site can be achieved for all users.
- 5.21 **Paragraph 124** advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding & improving the environment & ensuring safe & healthy living conditions.
- 5.22 **Paragraph 125d)** states planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

- 5.23 **Paragraph 129** states that planning policies and decisions should support development that makes efficient use of land, taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.
- 5.24 **Paragraph 135** states (inter alia) that development should be visually attractive, add to the overall quality of the area, be sympathetic to local character and safe, inclusive and accessible.
- 5.25 **Paragraph 185** seeks to protect and enhance biodiversity.

National Planning Policy Guidance

- 5.26 Why is it important to plan for the housing needs of disabled people?
- 5.27 The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives. Unsuitable or unadapted housing can have a negative impact on disabled people and their carers. It can lead to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities. Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives. Without accessible and adaptable housing, disabled people risk facing discrimination and disadvantage in housing. An ageing population will see the numbers of disabled people continuing to increase and it is important we plan early to meet their needs throughout their lifetime.
- Paragraph: 002 Reference ID: 63-002-20190626
- 5.28 What range of needs should be addressed?
- 5.29 The National Planning Policy Framework glossary provides definitions of older people and people with disabilities for planning purposes, which recognise the diverse range of needs that exist.
- 5.30 Similarly, disabilities can include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs, which may generate a range of housing requirements which can change over time. Local



planning authorities may also wish to consider groups outside of the scope of this definition in order to meet specific needs within their community. To enable disabled people to live more safely and independently, local planning authorities will need to consider their variety of needs in both plan-making and decision-taking.

Paragraph: 003 Reference ID: 63-003-20190626

5.30 How can the housing requirements of particular groups of people be addressed in plans?

5.31 Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.

Paragraph: 006 Reference ID: 63-006-20190626

6 Five Year Housing Supply

6.1 Folkestone and Hythe District Council has recently acknowledged that their housing land supply figures have dropped significantly to **3.1 years**.

6.2 The NPPF and NPPG advise that residential care homes for disabled adults, classified as C2 use class, can and should be counted towards a local planning authority's 5-year housing supply.

6.3 In addition, Core Strategy SS2 also includes Class C2 as housing delivery – *The core long-term requirement is to deliver 738 dwellings (Class C2/C3) a year on average from 2019/2020 to 2036/37, a total requirement of 13,284 new homes over the plan period.*

6.4 The assisted living C2 annexe accommodation proposed within this application would therefore count towards the Council's 5-year housing land supply.

6.5 The inability to demonstrate a 5-year supply of deliverable housing sites means that paragraph 11(d) of the NPPF (referred to as the 'titled balance') is now engaged.

6.6 Paragraph 11(d) of the NPPF states that a presumption in favour of sustainable development applies and, for decision-taking this means:

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:



- i. 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
 - 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.
- 6.7 In effect, paragraph 11(d) requires additional weight to be given to the issue of delivering homes in the required balancing exercise, particularly where a Council is failing housing delivery targets and cannot demonstrate a 5-year supply of housing.
- 6.8 The tilted balance weighs heavily in favour of the C2 residential development proposed which should be granted permission providing criteria (i) and (ii) are not triggered.
- 6.9 Criterion (i) refers to policies in the Framework that protect areas or assets of particular importance, examples of these types of environments are listed in Footnote 7 of the NPPF.
- 6.10 The application site does not affect any of the protected areas or assets of particular importance listed in Footnote 7 of the NPPF, therefore paragraph 11(d)(i) is not relevant to this application and is not triggered.
- 6.11 In relation to criteria (ii), and as demonstrated in this Planning Statement and on the proposed drawings, there would be no significant and demonstrable adverse impacts associated with the proposed development, therefore criteria (ii) of 11(d) is also not triggered.
- 6.12 The benefits of the proposal include the social and economic benefits of additional C2 residential accommodation. This should be afforded significant weight when determining the application and tilt the balance in favour of granting permission.
- 6.13 In addition, the proposals would make the most efficient use of the wider care home site by providing quality additional living accommodation which is in high demand, which would meet the environmental objective at paragraph 8 of the NPPF. The environmental benefits of the proposal should also be afforded significant weight when determining the application and tilt the balance in favour of granting permission.
- 6.14 Therefore, in the absence of any significant and demonstrable harm the titled balance under paragraph 11 (d) is engaged and planning permission should be granted for the proposed development.



7 PLANNING ASSESSMENT

Principle of development

- 7.1 The NPPF at para. 61 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, that the needs of groups with specific housing requirements are addressed*. While para. 63 of the NPPF advises that *within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include ... people with disabilities*.
- 7.2 The pre-text to Local Plan policy HB12 at para. 9.84 states that KCC's 'Better Homes: Greater Choice' highlights that there will be a particular demand for quality residential accommodation in the district, focused in Folkestone, Hythe, New Romney and Lydd. Both the District and County Council support the provision of accommodation to meet the requirements of those in special need of supervision so that they are fully integrated into existing communities and can live in sustainable locations.
- 7.3 Local Plan policy HB12 specifically relates to and supports development for new or extended residential institutions (C2 Use Class).
- 7.4 The proposals would provide three additional assisted living annexe units within an established C2 site and would therefore be in accordance with the principles of Local Plan policy HB12.
- 7.5 Policy HB12 sets six criteria which need to be met for new or extended C2 uses which are assessed in full below.

Policy HB12

Development of New or Extended Residential Institutions (C2Use)

- 7.6 **Planning permission will be granted for the development of new residential institutions, or the conversion of existing properties to this use, subject to the following requirements:**
- 1. Accommodation is designed and built to the Care Quality Commission's (CQC) Fundamental Standards;**
- 7.7 The self-contained units would all provide high standard living accommodation for future occupants in accordance with wheelchair space standards and CQC Standards as demonstrated by the submitted floor plans.

2. The proposal is in a sustainable location with access to local services, leisure and community facilities, including shops, healthcare and public transport in accordance with Core Strategy Policies DSD: Delivering Sustainable Development and SS3: Place-Shaping and Sustainable Settlements Strategy;

7.8 Sandgate Manor is located in a sustainable location in close proximity to the local services, shops and facilities in Sandgate.

7.9 The site is in close proximity to Military Road Park and is close to leisure, healthcare and community facilities in Folkestone and Hythe.

7.10 In addition, the site is in close proximity to bus stops along Sandgate High Street offering frequent services to Folkestone and Hythe and, Folkestone West Train Station is less than 1 mile from the site.

7.11 The site is therefore in a sustainable location in accordance with the Core Strategy.

3. The proposal is compatible with surrounding land uses, so that the development does not cause substantial disturbance or detrimental impact to neighbours and is not located in an area subject to significant noise or other disturbance, or reasonably likely to be so as a result of the expansion of existing businesses, in accordance with National Planning Policy Framework 2012 paragraph123(7);

7.12 The proposal would provide enhanced and additional living accommodation within the grounds of an established C2 facility and would supplement the existing accommodation, including the three existing self-contained annexes within the site. The proposal is therefore fully compatible with the existing lawful planning use of the site.

7.13 Sandgate Manor is an established care facility and has been operating from this site since at least the late 1980s and is therefore well integrated into the surrounding area and adjoining residential properties.

7.14 The application site backs onto the rear gardens of several private dwelling houses which front onto Enbrook Road. The shared boundary along the eastern edge of the site is mostly planted with mature hedgerows, trees and boundary fencing, which provides a good degree of screening and physical protection between the care site and adjoining residential properties.

7.15 The proposed lodges would be set in from the shared boundary so as not to result in any harmful amenity impacts on the neighbouring residential properties. In addition, the proposals would be low-level single storey structures (2.1m to the eaves and 4.1m to the ridge) and would therefore not result in any unacceptable loss of light, outlook or overbearing impacts on the adjoining properties.



- 7.16 Ground floor windows would provide views towards the established boundary treatment only and would not cause any unacceptable loss of privacy to the neighbouring residential properties.
- 7.17 The proposal would replace an area of existing outdoor amenity space within the grounds of the care home and therefore would not cause any additional harmful amenity impacts in terms of noise and disturbance to the adjoining residential uses.



Approx. location of the lodges in relation to the neighbouring residential properties.

- 4. The design and layout of the proposal are in accordance with the design policies in this Local Plan, as well as the parking requirements of PolicyT2;**
- 7.18 As stated above, the lodges are single storey structures and would have a subordinate relationship to the main building. In addition, proposed lodges would be compatible with the scale and form of the three existing lodges located in the grounds of the care home to the north of the main building.
- 7.19 The proposals would have very limited or no visual impact on the character of the surrounding area and street scene due to the changes in ground levels and established boundary screening and the single-storey scale and discreet location towards the rear of the site.
- 7.20 There would be no change to the existing parking or access arrangement. The occupiers of the annexes would not require any on-site parking and the applicant has confirmed that there would be no increase in the number of care staff as a result of the annexes. No additional on-site parking spaces are therefore required.



5. Sufficient open and defensible amenity space is provided for use by residents, staff and visitors; and

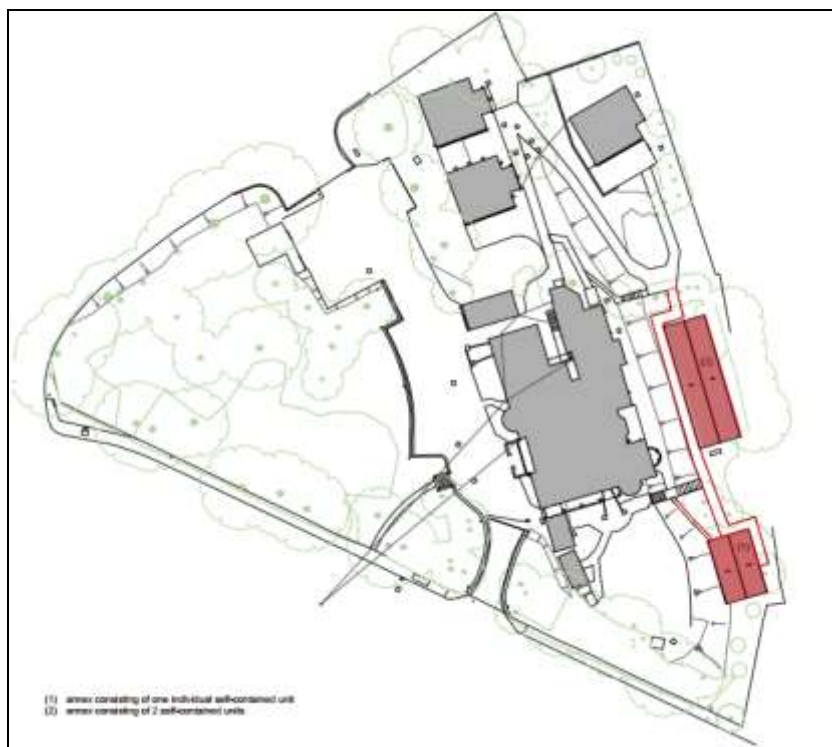
7.21 The lodges would be located on an area of under used outdoor amenity space which is at a lower ground level to the main care facility.

7.22 An area of open amenity space / garden would be retained directly to the south of the care home. This area is located directly adjacent the main building, is at the same ground level, and can be accessed directly from the building as per the current arrangement.

7.23 Sufficient outdoor amenity space would therefore continue to be provided for the residents of the care facility.

6. The site and immediate surroundings have a gentle topography to facilitate pedestrian movement and access to services and public transport facilities.

7.24 A new wheel chair accessible pedestrian route would be provided to the proposed lodges. The area marked in red on the below plan would provide a flat / level route and would link up with existing access paths within.



Site plan showing the proposed lodges and pedestrian routes

7.25 The application site is located approx. half way up Military Road. It is acknowledged that Military Road is relatively steep, however the proposal would facilitate the expansion / enhancement of an established care facility therefore any minor conflict with criteria 6 would not warrant a reason for refusal.



Other Matters

- 7.26 The application site comprises previously developed residential land within an urban area. Specifically, the application site comprises two areas of managed lawn and therefore has a relatively low ecological value. The application is supported by a PEA which demonstrates that there would be no negative impact to protected species or habitats and recommends a number of ecological enhancements, such as bird / bat bricks / boxes and climbing plants, in accordance with policy and guidance.
- 7.27 The application is also supported by a completed BNG metric and BNG Statement which advises that the development site is very constrained with regards to areas, thus off-site BU will be needed to reach 10%BNG. The number of BU needed is small and there are numerous local providers as per Kent BNG site Register. The credits can be secured by an appropriately worded condition.
- 7.28 The application site is covered by a group TPO and the application is supported by an arboriculture report and survey. The report indicates that the development would result in the removal of one small semi mature holly tree. The tree has no public amenity value, therefore no arboricultural objections are raised to the loss of this tree. There is sufficient space within the site to provide a replacement tree should the Council deem this is wholly necessary.
- 7.29 The application site is located within a land stability area. The applicant has advised that the proposed lodges would comprises light weight pre-fabricated and/or timber structures (similar to a residential outbuilding) and would be placed on a solid base, on a relatively flat area of the application site. As a result, the proposals would not involve any intrusive ground works and there would be no significant impact on the stability of the land within the site or surrounding area.

8 Conclusion

- 8.1 Wellgate Care provides high-quality residential care and support services for adults with a variety of disabilities, including learning disabilities and physical disabilities. The aim is to help all their residents to develop their personal skills, enhancing communication and increasing their independence and supporting them to have an enhanced quality of life.
- 8.2 Sandgate Manor provides three existing assisted living woodland lodges within the grounds of the care home. The lodges are in high demand, offering residents the opportunity to further develop independent living skills and enhance their self-confidence.
- 8.3 The proposed development would provide three additional assisted living lodges within the grounds of Sandgate Manor which will allow the care home to provide a greater range of accommodation for residents with varying levels of independence.

- 8.4 The proposed lodges provide self-contained living accommodation and will be used by residents who are hoping to move away from residential care and into a more independent way of living.
- 8.5 The proposals would provide assisted living annexes within an established C2 site and would therefore be in accordance with the principles of Local Plan policy HB12 and the aims and objectives of the NPPF.
- 8.6 The proposed lodges would be low-level single-storey structures and would be located at the rear / side of the main care home and would not be visible outside the site.
- 8.7 The application site is in a sustainable location and the proposed assisted living accommodation would be designed and built to the Care Quality Commission's Fundamental Standards and the proposed scale, design, form and use would be wholly compatible with the established care facility at Sandgate Manor.
- 8.8 The proposed lodges would be set away from the shared boundary to safeguard the amenities of the neighbouring properties, there would be no increase in vehicle parking and level pedestrian access would link up with existing pedestrian routes within the site.
- 8.9 In summary, the proposal would provide good quality additional assisted living accommodation to support and enhance the established care facility at Sandgate Manor. The proposals would be in full accordance with Local Plan policy HB12 and the aims and objectives of the NPPF, in particular para. 63.
- 8.10 The benefits of the proposal include the social and economic benefits of additional C2 residential accommodation in a sustainable location. This should be afforded significant weight when determining the application and tilt the balance in favour of granting permission.
- 8.11 In addition, the proposals would make the most efficient use of the wider care home site by providing quality additional living accommodation which is in high demand, which would meet the environmental objective at paragraph 8 of the NPPF. The environmental benefits of the proposal should also be afforded significant weight when determining the application and tilt the balance in favour of granting permission.
- 8.12 The Council are unable to demonstrate a 5-year supply of housing and the NPPF and NPPG indicates that C2 accommodation counts towards the Council housing land supply, therefore the titled balance is engaged in favour of granting planning permission for the type of residential development proposed in a sustainable location such as this. In the absence of any adverse impacts, the social, economic and environmental benefits associated with the proposal clearly dictate that planning permission should be granted.
- 8.13 We therefore respectfully request that planning permission is granted for the proposal.

