Land lord: Pan property investment Limited

Concerns	Response	evidence
1. **Parking/Highways** Reconsultation with the Highways Authority has been arranged. At least 3 weeks needs to be allowed for this, but I should make you aware that their responses have been delayed recently due to unplanned staff absence. You also refer to 2 vehicles being accommodated but show three spaces on the drawing. This needs to be clarified.	**1. Parking / Highways** I am confirming that the Highways Authority will be reconsulted. There will be no obstruction or causing of traffic because the no work to be carried out, I acknowledge that a further response from traffic flow consultant, particularly given the staffing issues you have highlighted. Staff does not always drive as carers are low income workers and they will be encouraged to use public transport as bus stop is around the corner. Regarding the parking provision, I would like to clarify that the intention is to provide parking for a maximum of two vehicles associated with the property's proposed use. The third parking space shown on the drawing is not intended to represent an additional operational parking requirement but is included to illustrate the available parking arrangement. I trust this clarifies the position. Please let me know if an amended drawing or further clarification is required to ensure that the parking provision is accurately reflected in the planning application. I would also appreciate being kept informed of the Highways Authority's response once the reconsultation has been completed.	Awaiting traffic consultant report.
2. **Pollution (Noise/Behaviour Management)**	**2. Pollution (Noise / Behaviour Management)**	

Reconsultation will also be arranged with Environmental Health. However, before I do so, the provided information in relation to staffing needs clarification.	Thank you for confirming that Environmental Health will be reconsulted. I would be happy to provide further clarification regarding the staffing arrangements to assist with this process. The staffing provision will be appropriate to the needs of the children and the nature of the proposed use of the property. Staff will be responsible for supervising the children at all times and ensuring that appropriate behaviour management procedures are followed to minimise any potential disturbance to neighbouring properties. There will be no loud music or parties from the teens. The operation will be managed in accordance with relevant Children's Services requirements, with appropriate procedures in place to manage noise, outdoor activities and the general conduct of children within the property. The intention is to operate the property in a responsible and considerate manner, respecting the amenity and privacy of neighbouring residents. Please could you clarify which specific aspects of the staffing information require further explanation so that I can address these fully before the Environmental Health reconsultation?	
Pollution (Noise/Behaviour Management)	**2. Pollution (Noise / Behaviour Management and Staffing Arrangements)**	

Reconsultation will also be arranged with Environmental Health. However, before I do so, the provided information in relation to staffing needs clarification.	Thank you for confirming that Environmental Health will be reconsulted. I would like to clarify the staffing and visiting arrangements to address any concerns regarding potential noise, disturbance and traffic generation. The property will not have a manager permanently residing or working on site 24 hours a day. Staffing will be arranged according to the needs of the children and the operational requirements of the property, with appropriate staff supervision in place at all times. Visits from professionals and family members will be planned and scheduled in advance wherever possible. Appointments will be staggered to avoid multiple visitors arriving at the same time. This approach will help minimise traffic movements, prevent congestion on the surrounding roads and ensure that sufficient parking is available on site for visitors and staff. Family contact and professional visits will be managed through an organised booking system, ensuring that arrivals and departures are coordinated and that the parking facilities are used efficiently. In addition, appropriate management procedures will be implemented to minimise noise and disturbance to neighbouring properties, with particular consideration given to outdoor activities, visitor arrivals and departures, and the general operation of the property. The intention is to operate the property in a controlled, responsible and considerate manner, while meeting the needs of the children and complying with Children's supported living Services requirements.	

	I trust this clarifies the proposed staffing and visiting arrangements and provides sufficient information for you to proceed with the Environmental Health reconsultation. Please let me know if any further specific details are required.	
My understanding of what you have written is that there will only be one member of staff present from 10am until 9am the following day when handover will occur and the procedure will be repeated.	I would like to clarify that the proposed staffing arrangements should not be interpreted as meaning that only one member of staff will be responsible for the property and the children throughout the entire period without appropriate support or cover. The property will operate as a children's residential care setting, with staffing arrangements determined by the individual needs of the children, their care plans, safeguarding requirements and the relevant Children's Services regulations and standards. The proposed shift pattern will include a handover between staff to ensure continuity of care, effective communication and consistent supervision. Staff will be responsible for maintaining a safe, settled and appropriately managed home environment. There will not be a manager permanently based at the property 24 hours a day. Management oversight, however, will be provided through the organisation's management structure, with staff having access to appropriate management support and professional assistance when required. Professional appointments and family visits will be arranged in advance wherever possible, with visits	

	staggered to avoid unnecessary traffic movements, congestion or pressure on the available parking spaces. The intention is to provide a stable, safe and well-managed residential environment that meets the children's needs while minimising any potential impact on neighbouring residential properties. I hope this clarifies the proposed arrangements. We are keen to work constructively with the Local Planning Authority and Environmental Health to address any concerns and provide the necessary reassurance that the proposed C2 use can operate appropriately within the residential setting.	
In addition to this, the registered manager will be in attendance from 9am to 6pm Monday to Friday only.	For further clarification, the Registered Manager will be present at the property from 9:00am to 6:00pm, Monday to Friday, providing direct management oversight, staff support and supervision, and ensuring that the home operates in accordance with the required Children's Services standards and safeguarding procedures. Outside these hours, the home will continue to operate under the established staffing arrangements, with appropriate staff cover, handovers and management support available as required. The Registered Manager will retain overall responsibility for the effective running of the home. This arrangement will ensure consistent management oversight, continuity of care and appropriate supervision while maintaining a stable and well-managed residential environment for the children.	

However, you also refer to day and night shifts which would imply a second handover at some point, but that staff will typically work 2 days and 2 nights and then a handover. Are you saying that the staff member would be on shift for 48 hours and then changed?	To clarify, staff will work on a planned shift rota, with separate day and night shifts and formal handovers between staff members to ensure continuity of care and the safe operation of the home. The reference to staff working two days and two nights relates to the overall staff rota pattern and does not mean that an individual staff member will be expected to work continuously for 48 hours. Each shift will have clearly defined start and finish times, with appropriate handovers to ensure that relevant information regarding the children's welfare, daily routines, appointments and any safeguarding matters is communicated between incoming and outgoing staff. The Registered Manager will provide additional management oversight from 9:00am to 6:00pm, Monday to Friday. These arrangements are intended to ensure that the home is consistently staffed, professionally managed and operated in accordance with the children's individual care needs and relevant regulatory requirements.	
It is important that this is clear and fully understood as this may form part of the conditions relating to any planning permission granted.	**Noise and Behaviour Management – Staffing, On-Call Arrangements and Management Oversight** Thank you for highlighting the importance of clarifying these arrangements, particularly as they may form part of the conditions attached to any planning permission.	

	We fully understand the need for the staffing and management arrangements to be clearly defined and are happy to provide further clarification. The property will operate under an established staffing rota, with designated day and night shifts and formal handovers between staff to ensure continuity of care and supervision. Staff will not be expected to work continuously for 48 hours. Each shift will have clearly defined working hours and responsibilities. The Registered Manager will visit at the property from 9:00am to 5:00pm, Monday to Friday, providing management oversight where necessary , staff supervision and operational children supported accommodation service. Outside these hours, including overnight, staff will have access to an on-call management arrangement to provide advice, guidance and assistance whenever required. This will ensure that staff are not left without management support should an incident or situation arise. In relation to noise and behaviour management, the home will adopt a proactive approach rather than relying solely on retrospective reporting. This will include: • Individual care and behaviour management plans tailored to each child's needs. • Staff supervision and intervention to prevent or minimise disruptive behaviour. • Appropriate management of evening and overnight routines to maintain a quiet residential environment.	

	• Procedures for responding promptly to any noise or disturbance. • Recording, monitoring and reviewing incidents to identify patterns and implement preventative measures. • Clear expectations for staff regarding consideration for neighbours and the surrounding residential community. Professional and family visits will also be arranged in advance wherever possible, with appointments staggered to minimise traffic movements, congestion and parking pressures. We recognise that the property is situated within an established residential area and are committed to ensuring that its operation respects the privacy, amenity and reasonable expectations of neighbouring residents. We hope this provides the necessary reassurance that the proposed C2 use will be appropriately staffed, managed and supervised, with effective arrangements in place during both daytime and overnight hours.	
It would also be helpful if the noise and behaviour management section included more than simply retrospective reporting. Are there any overnight on-call arrangements?	**Noise and Behaviour Management – Overnight On-Call Arrangements** Thank you for your comments. I agree that noise and behaviour management should be addressed through proactive measures rather than relying solely on reporting incidents after they have occurred. The home will have clear procedures in place to manage behaviour and minimise any potential noise or	

	disturbance to neighbouring properties, particularly during evening and overnight hours. These arrangements will include: • Staff will be present and responsible for supervising the children and managing any behavioural issues as they arise. • Individual care plans and behaviour management strategies will be followed to address each child's needs. • Evening and overnight routines will be structured to promote a calm and settled home environment. • Staff will take immediate and appropriate action should any behaviour result in excessive noise or disturbance. • Any incidents will be recorded, monitored and reviewed to identify patterns and introduce preventative measures where necessary. In addition, **overnight on-call management support will be available to staff**, providing access to advice and guidance whenever an incident or operational concern arises outside the as already mentioned Registered Manager's normal working hours of 9:00am to 5:00pm, Monday to Friday. The purpose of these arrangements is to ensure that staff have appropriate support at all times and that any concerns are dealt with promptly and effectively, rather than simply being recorded retrospectively. We are committed to operating a supported living service accommodation responsibly and sensitively, maintaining	

	a peaceful residential environment and minimising any impact on neighbouring properties. I trust this provides reassurance regarding the proposed noise and behaviour management arrangements and the availability of management support overnight on call service.	
Biodiversity Net Gain (BNG) – Evidence of Exemption	**Biodiversity Net Gain (BNG) – Evidence of Exemption** In relation to the proposed development at **DE56 0PR**, please clarify the basis on which the applicant considers the development exempt from the statutory Biodiversity Net Gain (BNG) requirement. Under Schedule 7A of the Town and Country Planning Act 1990, development is generally required to deliver a minimum 10% biodiversity net gain unless a specific statutory exemption applies. In particular, since 6 August 2026, developments on sites measuring 0.2 hectares (2,000m^2) or less may qualify for an exemption, provided the relevant statutory conditions are satisfied, including the absence of any impact on onsite priority habitat. I would therefore request that the applicant provides: • A site plan confirming the total area within the red-line application boundary. • Confirmation of whether any priority habitats are present within the site. • Evidence demonstrating that the proposed development meets the criteria of the specific exemption being relied upon.	

	• Confirmation of the relevant planning application date, where applicable. A general statement that BNG is not required is insufficient without identifying the applicable statutory exemption and demonstrating that its criteria are met. If no statutory exemption can be established, the applicant should demonstrate how the mandatory minimum 10% biodiversity net gain requirement will be achieved. I would ask the Local Planning Authority to verify this information before accepting that the development is exempt from BNG requirements.	
+ I would consider that the 'de minimis' exemption applies, i.e. the development will impact less than 25 square metres of on-site habitat, or 5 metres of on-site linear habitat (i.e. hedgerow).	The property is not intended to undergo any physical alterations, construction works or structural changes. The application is solely seeking a change of planning status/use to enable the property to operate in compliance with the requirements and standards set by Children's Services. The proposed change of use will have no material impact on the physical structure or external appearance of the property. Any associated changes will affect an area of less than 5 square metres. In view of the above, I would ask the Planning Officer to take these circumstances into consideration when assessing the application, particularly in relation to the Biodiversity Net Gain (BNG) requirements and whether the development qualifies for a relevant statutory exemption. I do not consider that the suggested biodiversity enhancements would be practical or appropriate in this	

	instance, given that the application relates solely to a change of planning use/status and does not involve any physical alterations, building works or changes to the existing property or its surroundings. The installation of hedgehog gaps, bat or bird boxes, or additional native planting would therefore appear disproportionate to the nature and scale of the application. I would be grateful if you could provide a written statement explaining why biodiversity enhancements are considered necessary in this particular case and whether the Local Planning Authority would accept that no additional enhancements are reasonably achievable or proportionate. I would also appreciate clarification of the specific local planning policy or requirement being relied upon to request these enhancements, given that the application does not propose any physical development or loss of existing habitat.	
If you do not consider that any of this would be possible, please could you provide a statement justifying why no enhancement is possible? However, in addition to this national requirement there is a local requirement for measurable and proportionate net gain to be delivered. As I wrote previously, this is often through the addition of appropriately positioned hedgehog gaps in fencing, installation of bat or bird boxes, or native species planting	I do not consider that the suggested biodiversity enhancements would be practical or appropriate in this instance, given that the application relates solely to a change of planning use/status and does not involve any physical alterations, building works or changes to the existing property or its surroundings. The installation of hedgehog gaps, bat or bird boxes, or additional native planting would therefore appear disproportionate to the nature and scale of the application.	

	I would be grateful if you could provide a written statement explaining why biodiversity enhancements are considered necessary in this particular case and whether the Local Planning Authority would accept that no additional enhancements are reasonably achievable or proportionate. I would also appreciate clarification of the specific local planning policy or requirement being relied upon to request these enhancements, given that the application does not propose any physical development or loss of existing habitat.	
4. **Climate Change** An explanation as to how you have considered climate change is needed. This is not about your company policy or care responsibilities. I have set out the policy below. One example you could include is that you are converting an existing building rather than demolition and rebuild, which reduces the carbon footprint of the development. You may also be retaining or planting new green infrastructure, for example, or providing secure cycle storage to encourage residents to use active transport measures. Please be aware though that these need to be actual measures, not simply ideas, as they are likely to form part of the conditions of any permission.	The proposal relates solely to a change of use/status of an existing property, with no demolition, rebuilding, structural alterations or significant physical works proposed. The existing building will therefore be retained and reused, avoiding the additional carbon emissions and environmental impact associated with demolition and new construction. Given the limited scope of the application, I would be grateful if you could clarify what further climate change measures or supporting information the Local Planning Authority considers necessary and proportionate. Please also confirm whether the retention and continued use of the existing building, rather than demolition and redevelopment, can be recognised as a positive contribution towards reducing the development's carbon footprint.	
