

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr David halliday

Address: 137 Waltham Road Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Objection to planning application DM/0650/21/FUL

1) The planned development will increase the volume of road traffic at shift changes and resident changes.

2) The application fails to address fundamental questions that have a direct bearing on the management and therefore the effects on the neighbourhood.

a) Are the proposed residents of single or mixed sex?

b) What is the full operational proposal of the home?

c) Full description of proposed service schedule?

d) Risk assessment process for the residents?

e) Limited facilities or amenities for young people

Ref :- Section 8 national planning framework.. Promoting Health & Safe Community.

3) The location of a residential care home for vulnerable children would be located very close to known area for violence, substance abuse and people with severe mental health problems who live in close proximity to the care home.

4) The proposed development would disrupt the quietude and put at risk the health & wellbeing of young disabled and vulnerable persons already residing in very close proximity.

5) The health & well being of local residence, with the community would be directly affected by the imposed extra density of more vulnerable people in such a specific area.

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Dominic Simpson

Address: 149 Waltham Road Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this proposal as I don't feel it's the correct location for such a care home / residence. This is a quiet peaceful neighbourhood and such a residence I feel would bring disturbance.

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Application Summary

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr David Hickson

Address: 153 Waltham Road Scartho, Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to strongly object to the proposed change of use of this property for the following reasons.

*The property is located in a residential area consisting of retired people and families and should not be considered for any business use.

* The application has already changed from 4 youths to 5 and in future with the property having such a large garden could be further developed to house a lot more youths going forward. This is not why residents chose to move to Scartho.

* Parking and access, it has been stated that the property can accommodate 6 vehicles, 4 in garaging and 2 open parking, in reality staff are not going to park in garages if they are having to ferry youths about all day, it is likely that they will park on the road or in neighbouring streets, unacceptable in both the cul de sacs and the bottleneck in Southfield. Access by numerous vehicles during the day and night onto a road with a bus stop outside is dangerous considering there could now be additional cars parked outside. This is not to mention delivery vehicles to the property which will cause additional hazards.

* I believe that the additional noise generated by a business and traffic coming and going throughout the day and night is unacceptable.

* As stated by Keys, the house will be for 5 youths who are "unable to live in a normal society" I wonder what either Keys or the planning department think that Scartho is other than a normal society, so why consider this application?

Finally I would like to state that I do not consider Keys as a suitable company to be wanting to operate a residential home in Scartho. Searching for information about Keys Group the reviews by current and former staff appeared which filled me with horror and have confirmed the reason for me objecting.

Comments and concerns from current and former staff and managers, this is a selection and I feel this should be considered with the application as this is the company you are considering. There

are dozens of negative reviews online these are just a selection.

- * Atypical day at work is being assaulted by kids, being spat at and verbal abuse. No support from management.

- * I was verbally insulted and severely physically assaulted by the young children. The kids rule the home, they destroy the homes, smoke, steal from shops, smoke drugs and are rewarded the following day. Under reporting of violent incidents against staff. No consequences when the young people beat up the staff or destroy their home.

- * They don't care about the children in their care , the only thing they do care about is profit.

- * No manager for a year

- * The company wants profits . They don't care about the vulnerable young people.

- * I did not work for Keys for long but during that time I was injured twice in the line of duty.

- * Unsupportive management.

- * Whole focus is completely wrong in this company I found it was just a containment for children not actually trying to help them reach their best.

- * The company that puts itself as caring, sharing. Absolute rubbish! It is a business and nothing more and children rule the roost and very little consequences.

- * I have left after being assaulted while working there.

I believe that the planning department should consider all the concerns of the neighbourhood not just the physical constraints of the building. Keys group can put on whatever spin they like on what and who they will be housing at the property but I think it has become quite apparent to me what type of youths will be living there!!! This is something that the residents of Scartho should not have to accept just because a large company think it's a good idea and a way of making additional profits at the expense of the residents of Scartho.

Mr JA + T.V. Dace,
159 Waltham Road,
Grimsby,
N.E. Lincs,
DN33 2NSG.



North East Lincolnshire Planning.

16th July 2021.

New Oxford House,

2 George Street.

Grimsby

N.E. Lincs

Dear Sir

Ref DM/0650/21/FUL - 184 Waltham Rd DN33 2PZ.

Thank you for your notice 6/7/21. We comment as follows;

- 1) We assume that the application for a 'Certificate of lawfulness' has been dismissed, and that you have determined, quite rightly, that any attempt to turn 184 Waltham Road into a 'Home' would require planning for a 'change of use' into a business premises.
- 2) We object to any 'change of use' as this area is purely residential, and should not allow for any business use, including care facilities which have four daytime staff and two night staff, plus potentially visitors and various assessors - as mentioned in the applicants previous applications.
- 3) We further object that 184 Waltham Road is situated very close to the junctions at ~~the~~ Orchards Croft and Southfield Road, almost opposite the latter, which is already a busy junction. Any increase in traffic from 184 Waltham Road will exacerbate this problem. We have

enough difficulty getting in and out of our drive as it is and have
witnessed numerous 'near misses' at the junction.

We trust you will incorporate these reasonable objections
in your deliberations.

Yours faithfully

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr RICHARD APPLETON

Address: 161 WALTHAM ROAD SCARTH GRIMSBY

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We strongly object to this proposal!

Firstly, the whole thing being done 'undercover'... only coming to light 'accidentally' from a Solicitor's unrelated activities, appears to have been arranged furtively by individuals who in all probability would have been well aware that numerous protestations would arise if the details of the whole thing was to enter the public domain. Questions re the Safety and Suitability of the location are many.

For example... How many members of staff would be there at all times to look after 4 individuals (NOW IT'S 5!!!! ... for now... are Keys Group going to guarantee that there will be no 'additions to numbers? ... ever?!') with differing needs? Will there be 2 carers per person? and where would these 'carers' park their vehicles? (especially at Midnight 'Shift Changeover' time when obviously numbers could potentially double) would they park on site? ... only room there for 3 or 4 vehicles at most (NOT 6 or more as Keys would have us believe) ... or down the very 'tight' Orchard's Croft? ... or down the busy bottleneck that is Southfield Road? Or on the extremely busy Waltham Road? ... which has added hazards already of fast traffic, a very busy junction and a Bus Stop used regularly by a great percentage of the 'older generation'... and should any 'service user' ever wander out of the grounds (heaven forbid!) the extremely busy road could be a death-trap to anyone who is anything other than fully alert and in possession of all their faculties ... an accident waiting to happen! I would wager that Keys Group Limited won't have that point high on their agenda when they're presenting their Risk Assessment.

Then there is the question of the potential 'Residents/ Service Users' behavioural problems ... multi-faceted to say the least... We are already informed by Keys Group Limited that residents are unable to live in a 'normal' society... problems they will have will include Drug Abuse, Sexual Exploitation Issues, Behavioural Problems, Eating Disorders and Offending Problems. The Keys Group openly admit this in their brochures. The most disturbing thought is the possibility of the C2 status being regraded to C2A status... a whole new set of disturbance and behavioural

possibilities, not to mention 'dangers' to local properties and to local residents, many of whom are well past the pensionable age. Check up on Keys Group Limited in Google!! Read about the 'mishaps' - the Suicide - the 'escapes' - the 'Gang Rape' the lack of supervision etc... All available on Google! ... Read current and Ex employees statements about how little support for staff there is, how great the turnover of staff is and about how, in some cases, the 'Service Users' virtually 'run the building by themselves'!!!- all things that the Keys Group Limited do NOT mention in their glossy brochures... nor do they mention that the company itself is on the brink of going up for sale! See the report in Laing Buisson by Kelsey Rees, 22nd of July 2020 (Laing Buisson - Business-Care Markets)... Rothschild have been named as the potential advisor, sources have told Mergermarket! <https://www.laingbuissonnews.com/care-markets-content/inbusiness/care-and-education-provider-keys-group-earmarked-for-sale/>

So much for building up a long-lasting, empathic relationship with N.E. Lincs Council!!!!

I am certain other local residents will have plenty of other objections and thoughts on the matter... not least to underline their feelings re the 'cloak and dagger' modus operandi. I feel that our erstwhile N.E. Lincs Councillors are being duped by these Keys group Limited 'Business' people, in no uncertain manner!!!! To the Planning Committee Members I say...PLEASE look after your existing Scartho residents! NOT those who come from afar and have no understanding or empathy with the area whatsoever.

Come on N.E. Lincs Councillors...Prove to us that you have your current Scartho Resident's interests at heart...Please turn down this application

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Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr RICHARD APPLETON

Address: 161 WALTHAM RTOAD SCARTHOS GRIMSBY

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Commenter Type: Neighbour on behalf of Orchard's Croft Neighbour who is currently without computer access.

Stance: Customer objects to the Planning Application

Comment Reasons:

The conversion of 184 Waltham Road ("the Property") to a care home for young people will have a negative impact on the local amenity through an increased risk of crime, antisocial behaviour and noise. Such a change in the use of the property would be materially different from its present use as a family home.

In the application prepared by Emery Planning on behalf of Keys Group ("KG") ("the Application") it states:

"the young people in the care of Keys Group are taken into care for a variety of reasons, but mainly because they are unable to live with their natural parents and are simply not able to live by themselves due to their age, there is not necessarily any behavioural reason why they may be in care."

However, this statement is contradicted by the home page of KG's own website that states that:

"Keys Group provide innovative care and education services to children and young people who have complex needs, emotional and behavioural difficulties or who display challenging behaviour."

The website also states that each service has its own specialism...to support children with issues such as:

- Attachment difficulties and developmental trauma
- Sexual exploitation (CSE)
- Criminal exploitation (CCE)
- Problematic sexual behaviour
- Substance misuse
- Offending behaviour

- Self Injurious behaviour
- Challenging behaviour
- Social and Communication difficulties and Autism
- Complex health needs
- Learning difficulties and disabilities.

The Application does not provide any information as to what type of "specialist home" it is proposed that the Property will be, but the Applicant's description of the type of children and young people that reside at the residential homes it operates is, at best, economical with the truth and, at worst, positively misleading.

The evidence of the increased risks posed by the young people who reside in KG's residential homes can be found in KG's own annual report (that is also on KG's website). In the section headed 'Effectively Managing Our Risks' it states:

For the 12 months to July 2020 there were a total of 12,079 adverse incidents reported and of these 18 were reported as SUIs. Work is ongoing to tackle the root causes of these incidents to reduce their occurrence. By far the largest incident type recorded in the reporting period related to episodes of children and young people's violence and aggression towards other people or property with 4,399 episodes reported in the 12 month period from July 2019."

It will be noted that KG are required to notify OFSTED of serious incidents that occur in their care homes. In 2019/20 KG made 693 such notifications equating to 7.1 notifications per children's' home.

The report also states that the children that KG cares for and supports are at a "higher vulnerability" of "child criminal, sexual exploitation and county lines exploitation" and notes that the "associated violence and drug dealing" of such criminal behaviour has a "devastating impact on young people, vulnerable adults and local communities."

It is clearly wrong for the Applicant to suggest that the proposed use of the Property "would [not] be expected to give rise to antisocial behaviour issues and would not be materially different to what could arise in a "traditional" family home. " (paragraph 5.23 of the application). The evidence from KG's annual report demonstrates that the opposite is true and that there is a very real and very significant increased risk, even likelihood, of crime and antisocial behaviour, particularly given KG's focus on complex cases.

The application suggests that the proposed home "would not be a secure unit," however, it will be noted that:

- the application states that "it is unlikely that the young people would be left unsupervised at any point;"
- Bedrooms will have locks on that staff have a key for;
- One of the rooms will be used as an office. We expect that the office will be locked;
- Although not specified in the application we expect that there will be fire alarms within the premises, reinforced fire doors, health and safety notices and one of the rooms/areas in the house will be used for meetings with professionals.

All of these features are atypical of a family home and far more akin to institutional rather than normal family home life and therefore the proposed conversion of the Property to use as a children's home is materially different from residential use.

It should be borne in mind that KG is a privately run company that is owned by venture capitalists. Its objectives are not altruistic but are, instead, driven by the desire to make profit. I refer you also to the following article:

<https://www.mirror.co.uk/news/uk-news/hell-private-kids-homes-vulnerable-22995562>.

The proposal put forward by KG will clearly be a material change of use. For all of the reasons set out above, the application should be refused. Thank You.

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Case Officer: Owen Toop

Customer Details

Name: Mr RICHARD APPLETON

Address: 161 WALTHAM ROAD SCARTHOS GRIMSBY

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to object to the proposal for exactly the same reasons as put forward regarding the application for the certificate of Lawfulness made by the same people for the same property. I have photographic and video evidence to support this objection.

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Ian Grindle

Address: 163 waltham road Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I moved to this area for the peaceful environment now you are trying to move on young people from a place they are not wanted and place them in another area they are not wanted.

I have 4 young girls and we do not know what they have or have not done but this could put me family in some sort of danger. so I will be strongly objecting for this planning application.

Thanks

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr John Collyer

Address: 167 WALTHAM ROAD Scartho GRIMSBY

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My wife and I live across the road at 167 Waltham Rd.

I am 86 and my wife is 81. We chose to retire here because it is a quiet, pleasant, residential area close to the town boundary.

What does this part of Grimsby have to offer these young people ?

They will be housed in a large house such as professional people would choose.

A part of town where they could find challenges to help them become useful citizens would be more appropriate. They would only find opportunities to cause mischief out here.

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Paul Davidson

Address: 169 Waltham rd Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I understand that some young people need more help than others but without knowing more I just don't think this is the right place to do this and the once quiet rd is now more busy than any other around without another business setting up

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Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mrs Lesley Gregory

Address: 171 Waltham Road Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: After reading the comments about the management in the homes the Key Group run, we have little confidence that they are capable of providing the proper care and stimulus that these young people require. It is for these reasons that we object to the proposal.

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Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mrs G Thomsen

Address: 175 Waltham Road Grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Object to application

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mrs Leanne Thompson

Address: 182 Waltham Road Scartho Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I strongly object on the grounds of:

- Adequacy of parking/loading/turning - unsuitable space for the number of cars for staff and residents even without adding visitor parking
- Highway safety - congestion will cause safety issues along Waltham Road and surrounding
- Traffic generation - from both staff and visitors
- Noise and disturbance resulting from use - staff changeover on 24hr shift would be a huge disturbance, also potential for antisocial behavioural disruption.

We moved here for quiet, for safety, for community- this change of use request causes us great concern.

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Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Paul Markham

Address: 185 Waltham Road Scartho Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This is a quiet and privately owned housing area, with families with children and a lot of elderly residents, this type of project would not fit in with this area and would cause disruption.

People pay a lot of money for homes and council tax in this area and expect a certain level of social safety, it would be irresponsible of the council to allow this type of establishment.

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Miss Donna Baxter

Address: The Laurels 186 Waltham Road Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We would like to object to the proposed change of use of 184 Waltham Road to an adolescent residential home.

Whilst broadly supporting the principles of care in the community, we have the following observations to make:-

This is a quiet area with a large number of bungalows to cater for and specifically selected by an elderly/retired population, with current development of a new group of retirement dwellings approximately 200 metres towards Scartho village. Nearby Springfield and Fairfield has many houses catering for young families, as evidenced by Springfield and Fairfield primary schools. Neither of these factors makes it a suitable area to rehouse troubled adolescents with backgrounds unknown and challenging behaviours.

The parking as it currently stands, in order to accommodate six changing cars would require manoeuvring onto the busy Waltham Road, and in front of the busy junction of Southfield Road, which is the only connection between Waltham and Louth Road, hence in frequent use. It is not possible for this amount of cars to leave the property forward facing unless they have reversed into the driveway which would appear to be dangerous on this busy road, on a bend.

As can be seen from the plans our property has an extremely long boundary with 184 Waltham Road. We are concerned that numbers of adolescents exercising in the garden next door will destroy the peace and quiet of our garden, which was one of the reasons we bought our property initially. Four out of five neighbouring properties of which we share a boundary are owned by retired people who make next to no noise (See above point).

The boundary between 184 Waltham Road and ourselves is approximately 116 metres long. The

boundary is not secured and we are concerned that residents and/or carers could trespass on our property causing damage or that we feel threatened or intimidated by their behaviours.

Taking the above factors into account we do not feel that this site is a suitable location for a development of this kind.

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Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Richard Carr

Address: 188 Waltham Road Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this proposal

It is clear when looking at this property and location and knowing and understanding the current demography, this property and location is not a suitable fit for the type of unit proposed.

The impact of the perceived fear of the mostly above average aged / elderly retired local residents would be tremendous and should be sympathetically considered, assessed, and quantified. The local residents have chosen to live here as it is a quiet and peaceful area.

Although perceived fear by the local community may indeed be perceived, it nonetheless is real fear.

An essential element of a successful residential home business is that children in their care home feel safe and supported by the local community. I believe the comments and objections, including my own, show the amount of discomfort with the prospect of this proposed care home and as such adds to the fact that this is not a good fit for both these children or the local, generally retired and aged community. For the children who will have already had challenging lives this would clearly not be the right environment for them to grow up.

Whilst it is often argued that there is no tangible evidence to show that this type of unit increases crime or unsocial issues in the area, I would suggest that this is untrue and, of similar units I have researched, owned and run by similar profit making businesses in different parts of the country, it is very clear the local areas are negatively affected. It is only right and proper to think long and hard about the impact on the area and on the current residents, particularly the older more fearful who should not have this situation inflicted upon them.

I note the comment by the highways authority that it is content with the proposal and gives approval.

The highways authority may be able to comment on the safety aspects of the positioning of the

property and the comings and goings of traffic to and from this property based on the traffic figures submitted although in truth they may have no true idea of levels of parking required and levels of traffic to and from the property by staff at shift change, by social services, by visitors etc. These future numbers will not be able to be controlled. The property is on a less than altogether safe part of the road as it is on a bend.

This proposed residential care home is at the end of the day someone's profit making business venture. I cannot believe the council would permit any other type of new business with similar quantity of comings and goings of staff, visitors etc in the same hours at this property, so why this one?

Is there a need for a unit of this type in this particular location, 184 Waltham Road Grimsby? I am sure the answer to this question is categorically no.

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Mark Simcock

Address: 194 Waltham Road Scartho Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We object to the proposal on the following grounds:

In our opinion there is insufficient parking for 6 or more independently parked cars, and maintain access for visitors/emergency services. It is opposite a busy junction, on a sometimes busy road, with a bus stop outside the driveway.

We don't feel that a quiet village location of retired/middle aged residents is ideally suited to the proposed care facility for young people with EBD. There are little or no amenities to suit the proposed age demographic, leading to boredom, which in turn leads to anti-social behaviour, as a community we have experience of this!

Keys Group do not instil any confidence (Google them!), they have safeguarding issues for staff, and the children in their care!

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mrs TARNYA / REP FOR DANIEL FARMAN

Address: 2 SOUTHFIELD ROAD N E LINCOLNSHIRE GRIMSBY

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I Believe this is not right for this kind of area ? Because this has lots of elderly people and 4 very vulnerable people young children and adults with special needs ? My son is 1 of these , My son who has learning difficulties and autism would be affected by this ,as there would be a lot more traffic and a lot more noise if these plans go ahead ?

He moved here because it's peaceful and pleasant , but this would possibly change??

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Andrew Breslin

Address: 4 Southfield road Scartho Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Close proximity to families with young children and local school routes parents may feel uneasy and threatened.. A large percentage of retirement aged people live in the area and will feel uneasy at the disruption and anti social behaviour that may occur.

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr kenneth okeeffe

Address: 7 southfield road scartho grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: i would like to object against this proposal. as i moved into this neighbourhood to get away from young people with many social problems, and i cannot afford to move again.

thank you

mr k o'keeffe.

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Application Summary

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Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Sid Mill

Address: 14 Southfield Road Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Whilst I would happily see vulnerable children occupying this house I am concerned that the elderly residents in this area would become victims of abuse either real or perceived. There is little detail of why these children are in care. If the children are victims it could be a good environment for them but if they are the reason they are being put in care, (such as drug use), it could disrupt this area that is occupied by many elderly people. Also as this property has large grounds I could see a further application to extend the building and increase the number of residents.

Scartho is looked on by many as a retirement area with many bungalows for people to retire to to end their days in peace, therefore I see this care home as being put in the wrong place.

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mrs FELICITY CHANDLER

Address: 31 SOUTHFIELD ROAD SCARTH GRIMSBY

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to object to this planning application for the following reasons:

This is a quiet residential area. I have lived here for many years and it has always been a safe and pleasant place to reside.

The thought of the premises at 184 Waltham Road becoming a residential home for 'general miscreants' who are unable to live in a normal social situation at the very best makes me feel very nervous and unsafe.

Regardless of the mental health conditions of the proposed occupants, I feel that it would be most unsafe for both the general public and for them, in that this is a very very busy main road at all times, with lots of heavy traffic and a busy junction to contend with, as well as a bus stop sited directly outside the premises.

There are few, if any, amenities locally that would appeal to the younger generation.

I feel that, although it is something that is needed for these potential 'inmates', it would be unsafe and dangerous, and reckless on the Council's part, to allow 184 Waltham Road to be used for such purposes.

Thank You.

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Ms Donna Humberston

Address: 39 Shaw Drive Scartho

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Scartho has long been a lovely place to live, and long may this continue. Why is it, that whenever there is somewhere lovely, it always has to be brought down like other areas by putting problem people in these areas? It was the same when people were re-housed from East Marsh into Scartho and wherever you could get them. Crime rates went up! Not on! Massively oppose this. House prices for the poor neighbours will crash, elderly people including my parents living around there will be worried, as they already are and rightly so. It's a lovely residential road and area which should remain that way!

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mrs Julie Boxall

Address: 1 Orchards Croft Scartho Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We wish strongly to object to the new planning proposals submitted following the withdrawal of the original application for Certificate of Lawfulness for use as a Class 2 residential care home for children and wish to raise the following objections.

KG are being economical with the truth in their application and at best misleading in respect of the children that will be accommodated in their property and the type of care home they are providing.

The application plan states

"The young people in the care of KG are taken into care for a variety of reasons but mainly because they are unable to live with their parents and are simply not able to live by themselves due to age, there is not necessarily any behavioural reasons they may be in care"

However this is contradicted by evidence on their own website, this demonstrates that KG specialise in providing care for the most challenging, the most troubled children.

Evidence can be found in their own annual reports.

They state that they provide innovative care and education for children and young people who have complex needs, emotional and behavioural difficulties who display challenging behaviour. The children they care for and support are at a higher risk of vulnerability of child and sexual exploitation, county lines exploitation and notes that the associated violence and drug dealing of such criminal behaviour has devastating impact on young people, vulnerable adults and local communities.

It is recognised that that residential care homes housing children with such complex issues are often targeted by organised criminal groups seeking to exploit such children. KG acknowledges these various types of criminal activity whilst noting that their residents are vulnerable to such

exploitation.

Their own reports show that a total of 12,079 incidents were reported in the 12 months to July 2020, 18 serious incidents being reported to SUI. The largest type of incident reported was related to children and young peoples violence and aggression towards other people and property.

The proposal suggests that the type of residential care home will offer constant supervision day and night with specialists visiting daily , this is not a home for children with no home but a specialist unit providing treatment and care to challenging children.

The application doesn't not indicate what type of specialist home will operate and yet their planning statement indicates that there is a 'desperate need ' for this type of accommodation , however this does not appear to be confirmed in any other available documentation.

KG made reference to to the National Planning Policy Framework in support of their application, in particular the need for residential care homes , Again there does not appear to be any evidence of this particular need in local planning that is currently available

Scartho area has a large number of elderly and retired residents, if approval was granted this would lead to a perceived fear and would have a significant impact on the local community. It would not promote the feeling of health and well being and fear from crime or support any economic objectives outlined in local planning. The approval of this residential care home for challenging young people would potentially make the locality less desirable as a community , have an adverse impact on local properties and for any further economic developments, no doubt creating additional problems with traffic and parking on an already busy junction.

However KG would achieve significant financial benefits .

For all the reasons stated above we believe the application should be refused .

Alan and Julie Boxall

29 July 2021

Dear Sir/Madam

Planning Application Reference DM/0650/21/FUL

Proposed change of the use of 184 Waltham Road, Grimsby , from a dwelling to a residential care home for up to 5 young people

We write in connection with the abovementioned planning application (“the Application”). We reside at 2 Orchards Croft, Grimsby and have done so for the past 35 years. Our property shares a boundary with 184 Waltham Road (“the Property”).

We have examined the Application, plans and the planning statement prepared by Emery Planning (“the Planning Statement”). We have also seen, and responded to, the withdrawn application made in respect of the Property for a certificate of lawfulness for the use of the Property as a Class 2 residential care home.

We wish strongly to object to the application for planning permission for the proposed change of use of the Property. We wish to raise objection in relation to a number of material considerations.

Public Law considerations

Before addressing our substantive objections, it is right to point out that the Application and a number of the Local Authority’s comments in response to it, entirely offend basic principles of Public Law. It cannot be reasonable, fair or rational that local residents are expected to respond to an application that refers to and relies upon evidence that is not exhibited, attached or made available for inspection. For example, at paragraph 1.5 of the Planning Statement the Applicant’s asserts that “North-East Lincolnshire Commissioning Service who have identified a need for accommodation to support young people within the area,” yet no evidence has been provided by the Applicant or the Local Authority to confirm such a need. Further, at paragraph 2.5, “Keys is developing a positive

working relationship with North-East Lincolnshire Commissioning Services for Children, who are keen to support this provision for the placement of young, vulnerable people, who are desperately in need of care,” but again no evidence from the Applicant or the Local Authority to corroborate this “support.”

What is worse, is that the Local Authority makes comments in support of the application without providing or appending the evidence upon which its support is based (e.g the Highways Authority’s bald assertion that it supports the Application saying it “has considered issues of highway access, capacity and safety, parking, servicing and sustainability.”)

Increase in crime, disorder and anti-social behaviour and residents’ fear of such matters

The risk of crime, disorder and anti-social behaviour, together with residents’ fear of increases in such matters are material planning considerations that must be taken into account.

Paragraph 92 of the National Planning Policy Framework (“the NPPF”) provides that *“planning policies and decisions should aim to achieve healthy, inclusive and safe places which... are safe and accessible, so that crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion.”*

Paragraph 130 (f) of the NPPF provides that planning policies and decisions should ensure that developments *“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

There is clear evidence that the conversion of the use of the Property to a residential care home poses a significant risk of an increase in crime, disorder and anti-social behaviour occurring in the local area and that local residents’ fears in this regard are fully justified and vindicated.

In the Application it is stated that:

“the young people in the care of Keys Group are taken into care for a variety of reasons.”

This explanation differs from the explanation given by KG in the application for a certificate of lawfulness when it was stated that:

“the young people in the care of Keys Group are taken into care for a variety of reasons, but mainly because they are unable to live with their natural parents and are simply not able to live by themselves due to their age, there is not necessarily any behavioural reason why they may be in care. As referred to above, on maturity they would be expected to live independent adult lives.”

The original explanation was misleading. The present explanation is economical with the truth. The reality is that the children KG specialises in providing care to are the most challenging, the most troubled and, by implication, the ones most likely to engage in crime, disorder and ant-social behaviour. KG’S own website (<https://www.keys-group.co.uk>) states that *“Keys Group provide innovative care and education services to children and young people who have complex needs, emotional and behavioural difficulties or who display challenging behaviour.”*

KG’s brochure regarding its residential homes (copy attached under cover of separate email and found at https://www.keys-group.co.uk/wp-content/uploads/2019/10/A4-8pp_Residential-Brochure-LR.pdf) states on page 3 that each service has its own specialism...to support children with issues such as:

- Attachment difficulties and developmental trauma
- Sexual exploitation (CSE)
- Criminal exploitation (CCE)
- Problematic sexual behaviour
- Substance misuse
- Offending behaviour

- Self-Injurious behaviour
- Challenging behaviour
- Social and Communication difficulties and Autism
- Complex health needs
- Learning difficulties and disabilities.

Children with such issues, clearly and self-evidently, will be at a far greater risk of engaging in criminal behaviour themselves and being subject to criminal exploitation by other criminals. On the basis of the types of ‘complex needs and challenging behaviours’ that KG openly advertises itself as specialising in, and will thus use the Property to accommodate, there is little doubt that conversion of the Property will significantly increase the risk of crime, disorder and antisocial behaviour in the locality and there is, therefore, a clear evidential basis for local residents’ concerns in this regard.

Further evidence of the increased risks posed by the young people who reside in KG’s residential homes can be found in KG’s own annual report (a copy of which is sent under cover of my subsequent email). In this first instance we would refer you to the section headed ‘*Effectively Managing Our Risks.*’ At page 24 of the document, it refers to ‘*adverse incidents*’ which it states are “*Any event or circumstances that could have or did lead to harm, loss or damage to people, property, environment or reputation.*” Also mentioned are Serious Untoward Incidents (SUIs) which are defined as “*an incident where there was a risk of serious harm or actual serious harm to one or more children and young people, staff or others.*”

“For the 12 months to July 2020 there were a total of 12,079 adverse incidents reported and of these 18 were reported as SUIs. Work is ongoing to tackle the root causes of these incidents to reduce their occurrence. By far the largest incident type recorded in the reporting period related to episodes of children and young people’s violence and aggression towards other people or property with 4,399 episodes reported in the 12-month period from July 2019.”

There is, therefore, published evidence, provided by KG itself, that there are thousands of incidents of the children under KG's care committing acts of violence and aggression towards people and property every year. The conversion of the use of the Property to a residential care home will increase the risk that there will be incidents of aggression and violence towards local residents and their property.

At page 35 of the report, it is stated that KG are required by law to notify Ofsted of serious incidents that occur, these include:

- Child deaths
- Involvement in child sexual exploitation
- Child protection enquiries
- The police being called to the home
- Child self-harming
- Allegations of abuse, complaints or
- referrals against people working in the home

In 2019/20 KG made 693 such notifications equating to 7.1 notifications per children's' home. Without wishing to state the obvious, should the application be granted, the local residents can expect over 7 notifiable incidents of serious violence, disorder or criminality to made per year. Anyone with any knowledge or experience of the criminal justice system will be able to attest to the fact that the number of notifiable incidents is ordinarily a small fraction of the number of actual such incidents that occur. Once again, this material provides further clear evidence of a real increase in crime if the Application is granted and an evidential basis that justifies the local residents' fears of an increase in crime, disorder and anti-social behaviour.

The last 10 years have seen an explosion in organised criminal networks engaging in two types of criminal conduct that deliberately target vulnerable children and children in care:

- child sexual exploitation; and
- county lines drug gangs

At page 32 of the report, it is stated that the children that KG cares for and supports are at a “higher vulnerability” of “child criminal, sexual exploitation and county lines exploitation.” The report recognises that:

County lines is a major, cross-cutting issue involving:

- *drugs*
- *violence*
- *gangs*
- *safeguarding*
- *criminal and sexual exploitation*
- *modern slavery*
- *missing persons*

Crucially, for the purposes of the present application, the report also states that *“County lines activity and the associated violence, drug dealing, and exploitation has a devastating impact on young people, vulnerable adults and local communities.”* (our emphasis)

KG prides itself on specialising in providing care for particularly vulnerable children with complex needs. The sad reality is residential care homes housing such children act as a magnet for organised criminal groups who will seek to exploit those children. KG acknowledge in the report the various types of criminal activity that will be involved in such situations; it is the most serious type of criminality and disorder imaginable. KG acknowledge that their residents are particularly vulnerable to such exploitation. The risks this creates are not fanciful, they are not imagined. They are widely recognised throughout the criminal justice system and acknowledged by KG itself that describes the potential impact on local communities as being ‘devastating.’

There is thus clear evidence, presented in publicly available documents by KG itself, that, if the Application is granted it will lead to:

- children with the most complex needs being housed at the property, including children who have been involved in criminal, violent and anti-social behaviour;
- a large increase in the number of incidents of violence and aggression towards people and property as compared at a 'normal' dwelling house;
- an increase in criminal activity, disorder and anti-social behaviour caused by the children who will reside at the Property; and
- an increase in criminal activity by criminal groups who will seek to exploit the children who reside at the Property through the County Lines and CSE models and that will lead to an increase in the levels of serious criminality that will occur in the local area.

Noise

Related to the concerns we have highlighted above concerning an increased risk of crime etc, the conversion of the Property into a residential care home will also, it is averred, lead to an increase in noise. It is self-evident that 5 young people, drawn from challenging backgrounds with complex needs, will increase the level of noise that emanates from the Property. To suggest otherwise is disingenuous.

Traffic

Increased traffic generation and issues relating to vehicular access are also well recognised material planning considerations.

The Application lacks clarity regarding the number of staff who would actually be at the Property and the shift patterns. It is proposed that staff will work on shift patterns and that care will be provided "24/7" with 4 carers present in the day and 2 at night. It is clear that there will be (a) a significant number of carers throughout the course of the day and (b) significant comings and goings of the carers. In addition, a manager would 'visit regularly.'

There will be "short and infrequent visits from social workers and other professionals." However, on its own website KG states that it focuses on providing

care to children and young people with “complex needs, emotional and behavioural difficulties or who display challenging behaviour.” It is likely that the visits from social workers and other professionals will be neither short nor infrequent nor limited in number.

As is clear at page 16 of KG’s annual report, KG itself provides teams of clinical advisors, including psychologists, assistant psychologists and therapists as well as specialist advisors - all adding further to the comings and goings from the Property.

When one takes account of the number of carers, visitors and the number of professionals who will attend the Property, there will be insufficient parking space. Waltham Road is double yellow lined so no parking can take place there. The drive is not as large or accessible for vehicles as the Applicant suggests.

The number of adults who will be required to attend at the property, together with ordinary day to day activities, will increase the traffic movements to and from the property significantly and will be substantially different from that of a normal family home. It will generate far more traffic than is presently the case, lead to potential congestion around busy times and have a significantly negative impact on the local area.

The National Planning Policy Framework

You will be aware that you should have regard to national planning statements and policies.

The Planning Statement refers to the NPPF. We note that the authors of that document have referred to the 2019 version of the NPPF. That has been superseded by the 2021 version that was published on 20 July 2021. A version of the updated NPPF is attached under cover of my subsequent email.

It is noteworthy that no mention is made in the Planning Statement to those sections of the NPPF that we have already referred to that require decisions and policies to create places that are safe and that the crime and the fear of crime do not undermine the quality of life or community cohesion and resilience. For the

reasons stated above, there is a significant evidential basis to conclude that the Application if granted would lead to the local area being less safe and that the quality of life of residents and community cohesion would be undermined by an increase in crime and disorder and the fear of an increase in crime and disorder.

The Planning Statement does refer to a number of other sections of the NPPF but the submissions made on behalf of the Applicant in this regard are misconceived.

Section 2 of the NPPF concerns achieving sustainable development. It is stated that this is achieved through three overarching objectives:

- a) **an economic objective** - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **a social objective** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) **an environmental objective**-to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

There would be no economic benefit to the local community or local residents if the Application was granted. The only economic benefit is to KG. It will be borne in mind that LG is a private company owned by private equity investors; its aims are not altruistic. Future potential residents will be dissuaded from moving to the area surrounding the Property. The Application if granted will not achieve

sustainable development. Instead, it will have an extremely negative impact on the local area.

Further, the application will not support a strong, vibrant or healthy community. As is noted above, the risk of an increase in serious crime will have a devastating effect on the local community. The risk of serious crime has the potential to seriously jeopardise the safety, well-being and mental health of present residents.

Section 4 of the NPPF concerns decision making. It provides that local planning authorities should *‘work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.’* The application will clearly not improve the economic, social and environmental conditions of the local area but will have the opposite effect. The local authority is therefore actually obliged to refuse the application on this ground.

Section 5 of the NPPF concerns delivering a sufficient supply of housing. However, no evidence has been presented as to why there is such a significant need for a residential care home for challenged young people with particularly complex needs in Scartho. We note later in this email that North East Lincolnshire’s Local Policy sets out the need for a greater need for housing for the elderly in the area (particularly encouraging independent living) and to improve the perception of the area. The clear increases in crime and disorder and the fear of crime and disorder that the proposed change would result in would mean that fewer elderly people would be wanting to live independently in the area. It would also only further damage the local area’s reputation.

Section 8 of the NPPF concerns the promotion of health and safety of communities. For the reasons already stated it is clear that the Application if granted would have the opposite effect.

It is therefore clear that the Application breaches the sections of the NPPF that provide that policies and decisions should ensure that developments ensure that places are safe that the crime and the fear of crime do not undermine the quality of life or community cohesion and resilience. However, when the facts of this case and the evidence from KG’s own published material are actually examined against

the NPPF in detail, as we hope we have done, it is apparent that the Application offends even those principles of the NPPF that the applicant seeks to rely upon.

Planning Practice Guidance

The Planning Statement refers to those sections of the National Planning Practice Guidance that concern the promotion of healthier communities and healthy places. As noted above, the Application, if granted, would lead to a significantly unhealthier, unsafe community within Scartho and its surrounding areas. Once again, the very policies that the applicant seeks to rely upon provide the evidential basis upon which the application should be refused.

The North East Lincolnshire Local Plan

You will also have regard to the local planning policies for North East Lincolnshire. Contrary to what is suggested in the Planning Statement, when considered carefully and with regard to the practical effect of the Application if granted, it is clear that the Application does not accord with the North East Lincolnshire Local Plan (“the Local Plan”).

Section 12 of the Plan concerns “Building The Economy We Need” but there is no evidence of any economic benefit to the proposal. We would suggest that if granted the Application would have the opposite effect. At section 12.4 of the Local Plan it is noted that there is a negative perception of the area. The conversion of dwelling house into a residential care home for children with complex needs only adds to this perception and will discourage positive investment in the local area. We seriously question what message the Local Authority is trying to communicate to residents, and potential future residents, of Scartho and the surrounding area if the Application is granted. Far from making the area a more desirable place to live in, the Application has the complete opposite effect and if granted, suggests that the Council are only too willing to allow further erosion of the public perception of Grimsby.

The Planning Statement suggests that there is a ‘desperate need’ for this type of accommodation. However, no such evidence has been uploaded to the planning portal and, in particular, we are aware of no evidence as to why there is a desperate need for such accommodation to be located in Scartho. We note that in addition to providing residential care homes, KL provides independent specialist needs schools. KG provides two such schools in Scunthorpe and West Ashby. What, need, therefore, is there in providing a residential care home in Scartho?

In contrast to the suggestion that there is a ‘desperate need’ for the residential home, we again note that ‘residential care homes for children’ is not mentioned anywhere in the Local Plan as being the type of property that is needed in North East Lincolnshire.

Policy 5 of the Local Plan

Policy 5 of the Local Plan concerns developmental boundaries. Despite a large proportion of the Planning Statement being devoted to Policy 5, it is of limited use in assessing the present application. Policy 5 is concerned within the section of the Local Plan headed ‘General Policies’. The introductory paragraph of the section of that part of the Local Plan states that:

“This section of the Plan includes policies which cover subjects that do not relate to specific land uses (such as housing or employment), but have a general application across different aspects of planning.”

Given that the application is specifically concerned with a change of use of a property, the general policies are of little, if any, relevance to your considerations or the Application itself. This is exemplified by a consideration of Policy 5 “Developmental Boundaries” itself and what its purpose is stated as being. At paragraph 11.1 it is stated that *“developmental boundaries distinguish between built up areas and areas of open countryside.”* Further the justification for policy 5 itself is stated as being:

“A number of considerations informed the process of defining the development boundaries, including the nature and form of settlement edges. The Landscape Character Assessment (2015) provides an assessment of the landscape sensitivities and was valuable evidence for:

- 1. considering whether settlements include key characteristics or distinctive features which contribute to their sense of place.*
- 2. identifying features that define current settlement edges and determining whether they are strong or weak; and,*
- 3. assessing opportunities for enhancement through identification of approaches and views, distinctive features, visual open space and sensitivity to change. “*

The Application is not concerned with the development of open countryside, the sense of place of the area, key characteristics of the property or distinctive features. It is concerned with a radical change of use of the property that will have a significant effect on the local residents. If it was considered that aspects of Policy 5 appear not to be breached by the Application, it is because policy 5 was designed for something entirely different than a change of use from a dwelling house to a residential care home. Some of those matters may not appear to be breached by the Application simply because they are of no relevance to it whatsoever.

Policy 15 of the Local Plan

Policy 15 provides that the approach of the local planning authority should be to establish sustainable communities. The change of use of the property will not establish a sustainable community in Scartho but will undermine it. The change of use will not promote local health and well-being (para 13.37) , it will not attract people to live and work locally and support good quality of life (para 13.39), it is not needed for the local area (13.40), it will not support the economic objectives of the area nor provide economic growth (para 13.41).

Policy 16 of the Local Plan

Paragraph 13.44 of the Local Plan provides that:

“North East Lincolnshire has a rapidly ageing population. This has clear implications for the future delivery of housing. It is, therefore, essential that a policy is established to ensure that the needs of older people are met over the plan period. The Plan aims to give all adults that require provision of care more choice and control over where and how they live and how they receive care.”

The Scartho area has a large number of elderly and retired residents. The increase in crime, disorder and antisocial behaviour and the fear of the increase in crime that the Application would lead to if granted will mean that the needs and concerns of these elderly and vulnerable residents would be undermined.

The Application seeks to rely on Policy 16 as a reason for the granting of the Application, suggesting that the council will support the provision of housing that *“maximises independence and choice for older people and other people with specific needs.”* (para 5.43 of the Planning Statement). However, this is a complete misinterpretation of Policy 16. Policy 16 is specifically concerned with the provision of housing for elderly people as its title and all of the contents of that policy suggests. Nowhere in Policy 16, or indeed in the entire Local Plan, are residential care homes for troubled children referred to. The considerations as set out in Policy 16, the objectives of policy 16 and the published justification for policy 16 are all entirely different for children in residential care homes. Contrary to what is said in the Planning Statement, the objectives of policy 16 and the justification for the policy provide clear and convincing reasons as to why the application should be refused.

Conclusion

The present application is legally and factually flawed. An increase in crime and fear of crime are well recognised material considerations and valid reasons to refuse planning permission. In this case, and on the basis of the applicant's own

readily available publications, there is evidence that, if granted, the conversion of the use of the property would lead to an increase in crime, disorder and antisocial behaviour. The concerns and fears of local residents in the present case of an increase of crime, disorder and anti-social behaviour are both justified and supported by evidence. Given the nature of the change to the Property, an increase in the level of noise and disturbance is also inevitable. Further there is ample evidence that the conversion would create problems with traffic and parking.

The change of use is not supported by the guidance and direction set out in the NPPF or the Planning Practice Guidance, nor is it supported by the policies as set out in the North East Lincolnshire Local Policy. As this letter has hopefully demonstrated, the Application, if granted would breach the principles of the NPPF and PPG and the policies in the Local Policy.

The application should therefore be refused as it is entirely misconceived.

Yours faithfully

Mr Geoffrey Hill and Mrs Maureen Hill

2 Orchards Croft,

Scartho

Grimsby



Ministry of Housing,
Communities &
Local Government

National Planning Policy Framework



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1. Introduction

1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied¹. It provides a framework within which locally-prepared plans for housing and other development can be produced.
2. Planning law requires that applications for planning permission be determined in accordance with the development plan², unless material considerations indicate otherwise³. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
3. The Framework should be read as a whole (including its footnotes and annexes). General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making in chapter 3.
4. The Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies in this Framework, where relevant.
5. The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.
6. Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.

¹ This document replaces the previous version of the National Planning Policy Framework published in February 2019.

² This includes local and neighbourhood plans that have been brought into force and any spatial development strategies produced by combined authorities or elected Mayors (see Glossary).

³ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

2. Achieving sustainable development

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs⁴. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection⁵.
8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
 - a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11).

⁴ Resolution 42/187 of the United Nations General Assembly.

⁵ Transforming our World: the 2030 Agenda for Sustainable Development.

The presumption in favour of sustainable development

11. Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; 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.

For **decision-taking** this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, 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 proposed⁷; 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 As established through statements of common ground (see paragraph 27).

⁷ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 180) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 67); and areas at risk of flooding or coastal change.

⁸ This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

12. The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.
13. The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.
14. In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply⁹:
 - a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;
 - c) the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and
 - d) the local planning authority's housing delivery was at least 45% of that required¹⁰ over the previous three years.

⁹ Transitional arrangements are set out in Annex 1.

¹⁰ Assessed against the Housing Delivery Test, from November 2018 onwards.

3. Plan-making

15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
16. Plans should:
 - a) be prepared with the objective of contributing to the achievement of sustainable development¹¹;
 - b) be prepared positively, in a way that is aspirational but deliverable;
 - c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

The plan-making framework

17. The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area¹². These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:
 - a) joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or
 - b) a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred.
18. Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.
19. The development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time.

¹¹ This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

¹² Section 19(1B-1E) of the Planning and Compulsory Purchase Act 2004.

Strategic policies

20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision¹³ for:
 - a) housing (including affordable housing), employment, retail, leisure and other commercial development;
 - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c) community facilities (such as health, education and cultural infrastructure); and
 - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
21. Plans should make explicit which policies are strategic policies¹⁴. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.
22. Strategic policies should look ahead over a minimum 15 year period from adoption¹⁵, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.¹⁶
23. Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)¹⁷.

¹³ In line with the presumption in favour of sustainable development.

¹⁴ Where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies.

¹⁵ Except in relation to town centre development, as set out in chapter 7.

¹⁶ Transitional arrangements are set out in Annex 1.

¹⁷ For spatial development strategies, allocations, land use designations and a policies map are needed only where the power to make allocations has been conferred.

Maintaining effective cooperation

24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.
25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).
26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
27. In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

Non-strategic policies

28. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.
29. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies¹⁸.
30. Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.

¹⁸ Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.

Preparing and reviewing plans

31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements¹⁹. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).
33. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary²⁰. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

Development contributions

34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.

Examining plans

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

¹⁹ The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects.

²⁰ Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²¹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
36. These tests of soundness will be applied to non-strategic policies²² in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.
37. Neighbourhood plans must meet certain ‘basic conditions’ and other legal requirements²³ before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.

²¹ Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework.

²² Where these are contained in a local plan.

²³ As set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

4. Decision-making

38. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and 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.

Pre-application engagement and front-loading

39. Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.
40. Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.
41. The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.
42. The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later stage. Wherever possible, parallel processing of other consents should be encouraged to help speed up the process and resolve any issues as early as possible.
43. The right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessment, Habitats Regulations assessment and flood risk assessment). To avoid delay, applicants should discuss what information is needed with the local planning authority and expert bodies as early as possible.
44. Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions, and should be reviewed at least every two

years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.

45. Local planning authorities should consult the appropriate bodies when considering applications for the siting of, or changes to, major hazard sites, installations or pipelines, or for development around them.
46. Applicants and local planning authorities should consider the potential for voluntary planning performance agreements, where this might achieve a faster and more effective application process. Planning performance agreements are likely to be needed for applications that are particularly large or complex to determine.

Determining applications

47. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.
48. Local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)²⁴.
49. However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:
 - a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

²⁴ During the transitional period for emerging plans submitted for examination (set out in paragraph 220), consistency should be tested against the original Framework published in March 2012.

50. Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.

Tailoring planning controls to local circumstances

51. Local planning authorities are encouraged to use Local Development Orders to set the planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area.
52. Communities can use Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission. These require the support of the local community through a referendum. Local planning authorities should take a proactive and positive approach to such proposals, working collaboratively with community organisations to resolve any issues before draft orders are submitted for examination.
53. The use of Article 4 directions to remove national permitted development rights should:
- where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)
 - in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)
 - in all cases, be based on robust evidence, and apply to the smallest geographical area possible.
54. Similarly, planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so.

Planning conditions and obligations

55. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

56. Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision-making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification²⁵.
57. Planning obligations must only be sought where they meet all of the following tests²⁶:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.
58. Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.

Enforcement

59. Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate.

²⁵ Sections 100ZA(4-6) of the Town and Country Planning Act 1990 will require the applicant's written agreement to the terms of a pre-commencement condition, unless prescribed circumstances apply.

²⁶ Set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.

5. Delivering a sufficient supply of homes

60. 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 and that land with permission is developed without unnecessary delay.
61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
62. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers²⁷, people who rent their homes and people wishing to commission or build their own homes²⁸).
63. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required²⁹, and expect it to be met on-site unless:
 - a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
 - b) the agreed approach contributes to the objective of creating mixed and balanced communities.
64. Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount³⁰.
65. Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to

²⁷ Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.

²⁸ Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.

²⁹ Applying the definition in Annex 2 to this Framework.

³⁰ Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned.

be available for affordable home ownership³¹, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:

- a) provides solely for Build to Rent homes;
 - b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);
 - c) is proposed to be developed by people who wish to build or commission their own homes; or
 - d) is exclusively for affordable housing, an entry-level exception site or a rural exception site.
66. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations³². Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.
67. Where it is not possible to provide a requirement figure for a neighbourhood area³³, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

Identifying land for homes

68. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) specific, deliverable sites for years one to five of the plan period³⁴; and

³¹ As part of the overall affordable housing contribution from the site.

³² Except where a Mayoral, combined authority or high-level joint plan is being prepared as a framework for strategic policies at the individual local authority level; in which case it may be most appropriate for the local authority plans to provide the requirement figure.

³³ Because a neighbourhood area is designated at a late stage in the strategic policy-making process, or after strategic policies have been adopted; or in instances where strategic policies for housing are out of date.

³⁴ With an appropriate buffer, as set out in paragraph 73. See Glossary for definitions of deliverable and developable.

- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
69. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
 - b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
 - c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
 - d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.
70. Neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 69a) suitable for housing in their area.
71. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.
72. Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area. These sites should be on land which is not already allocated for housing and should:
- a) comprise of entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of this Framework; and
 - b) be adjacent to existing settlements, proportionate in size to them³⁵, not compromise the protection given to areas or assets of particular importance in this Framework³⁶, and comply with any local design policies and standards.

³⁵ Entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement.

³⁶ i.e. the areas referred to in footnote 7. Entry-level exception sites should not be permitted in National Parks (or within the Broads Authority), Areas of Outstanding Natural Beauty or land designated as Green Belt.

73. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:
- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
 - b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
 - c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;
 - d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁷; and
 - e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

Maintaining supply and delivery

74. Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies³⁸, or against their local housing need where the strategic policies are more than five years old³⁹.

³⁷ The delivery of large scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset. Anticipated rates of delivery and infrastructure requirements should, therefore, be kept under review and reflected as policies are updated.

³⁸ For the avoidance of doubt, a five year supply of deliverable sites for travellers – as defined in Annex 1 to Planning Policy for Traveller Sites – should be assessed separately, in line with the policy in that document.

³⁹ Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
 - b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan⁴⁰, to account for any fluctuations in the market during that year; or
 - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply⁴¹.
75. A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:
- a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and
 - b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.
76. To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
77. To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why any earlier grant of planning permission for a similar development on the same site did not start.

Rural housing

78. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.

⁴⁰ For the purposes of paragraphs 73b and 74 a plan adopted between 1 May and 31 October will be considered 'recently adopted' until 31 October of the following year; and a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year.

⁴¹ This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

79. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.
80. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:
- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
 - b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
 - c) the development would re-use redundant or disused buildings and enhance its immediate setting;
 - d) the development would involve the subdivision of an existing residential building; or
 - e) the design is of exceptional quality, in that it:
 - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
 - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

6. Building a strong, competitive economy

81. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴², and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
82. Planning policies should:
 - a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
 - b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
 - d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
83. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Supporting a prosperous rural economy

84. Planning policies and decisions should enable:
 - a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
 - b) the development and diversification of agricultural and other land-based rural businesses;

⁴² The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society. HM Government (2017) *Industrial Strategy: Building a Britain fit for the future*.

- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

85. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

7. Ensuring the vitality of town centres

86. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:
- a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
 - b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
 - c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
 - d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
 - e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
 - f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
87. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
88. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
89. This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

90. When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace). This should include assessment of:
- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
91. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 90, it should be refused.

8. Promoting healthy and safe communities

92. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
 - a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
 - c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
93. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
 - a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
 - b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
 - c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
 - d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
 - e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
94. Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.
95. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

96. To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.

97. Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate⁴³. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

Open space and recreation

98. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
99. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

⁴³ This includes transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres.

- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 100. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.
- 101. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.
- 102. The Local Green Space designation should only be used where the green space is:
 - a) in reasonably close proximity to the community it serves;
 - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - c) local in character and is not an extensive tract of land.
- 103. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

9. Promoting sustainable transport

104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - a) the potential impacts of development on transport networks can be addressed;
 - b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
 - c) opportunities to promote walking, cycling and public transport use are identified and pursued;
 - d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
 - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
105. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
106. Planning policies should:
 - a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
 - b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
 - c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
 - d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

- e) provide for any large scale transport facilities that need to be located in the area⁴⁴, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and
 - f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy⁴⁵.
107. If setting local parking standards for residential and non-residential development, policies should take into account:
- a) the accessibility of the development;
 - b) the type, mix and use of development;
 - c) the availability of and opportunities for public transport;
 - d) local car ownership levels; and
 - e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
108. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.
109. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

Considering development proposals

110. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

⁴⁴ Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).

⁴⁵ Department for Transport (2015) *General Aviation Strategy*.

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code ⁴⁶; and
 - d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
111. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
112. Within this context, applications for development should:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
113. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

⁴⁶ Policies and decisions should not make use of or reflect the former Design Bulletin 32, which was withdrawn in 2007.

10. Supporting high quality communications

114. Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).
115. The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.
116. Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:
 - a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
 - b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.
117. Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:
 - a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and
 - b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
 - c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure

and a statement that self-certifies that, when operational, International Commission guidelines will be met.

118. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

11. Making effective use of land

119. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land⁴⁷.
120. Planning policies and decisions should:
- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
 - c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - d) 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 (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)⁴⁸; and
 - e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.
121. Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.

⁴⁷ Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.

⁴⁸ As part of this approach, plans and decisions should support efforts to identify and bring back into residential use empty homes and other buildings, supported by the use of compulsory purchase powers where appropriate.

122. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:
- a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
 - b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.
123. Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:
- a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and
 - b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.

Achieving appropriate densities

124. 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.
125. Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies

and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
- c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

12. Achieving well-designed places

126. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.
127. Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.
128. To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.
129. Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.
130. Planning policies and decisions should ensure that developments:
 - a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
131. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined⁵⁰, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.
132. Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.
133. Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life⁵¹. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local

⁴⁹ Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.

⁵⁰ Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.

⁵¹ Birkbeck D and Kruczkowski S et al (2020) *Building for a Healthy Life*

planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.

134. Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design⁵², taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
 - a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
 - b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
135. Local planning authorities should seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).
136. The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

⁵² Contained in the National Design Guide and National Model Design Code.

13. Protecting Green Belt land

137. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
138. Green Belt serves five purposes:
 - 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.
139. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:
 - a) demonstrate why normal planning and development management policies would not be adequate;
 - b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - c) show what the consequences of the proposal would be for sustainable development;
 - d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
 - e) show how the Green Belt would meet the other objectives of the Framework.
140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

141. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:
- a) makes as much use as possible of suitable brownfield sites and underutilised land;
 - b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
 - c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.
142. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
143. When defining Green Belt boundaries, plans should:
- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
 - b) not include land which it is unnecessary to keep permanently open;
 - c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
 - e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
 - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

144. If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.
145. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
146. The National Forest and Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife. The National Forest Strategy and an approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within the National Forest and Community Forests in the Green Belt should be subject to the normal policies for controlling development in Green Belts.

Proposals affecting the Green Belt

147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
149. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:
 - a) buildings for agriculture and forestry;
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
 - c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
 - e) limited infilling in villages;
 - f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.
150. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
- a) mineral extraction;
 - b) engineering operations;
 - c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
 - 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); and
 - f) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.
151. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

14. Meeting the challenge of climate change, flooding and coastal change

152. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Planning for climate change

153. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures⁵³. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
154. New development should be planned for in ways that:
- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
 - b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
155. To help increase the use and supply of renewable and low carbon energy and heat, plans should:
- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
 - b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

⁵³ In line with the objectives and provisions of the Climate Change Act 2008.

- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.
156. Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.
157. In determining planning applications, local planning authorities should expect new development to:
- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
 - b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
158. When determining planning applications for renewable and low carbon development, local planning authorities should:
- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
 - b) approve the application if its impacts are (or can be made) acceptable⁵⁴. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

Planning and flood risk

159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
160. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

⁵⁴ Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.

161. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:
- a) applying the sequential test and then, if necessary, the exception test as set out below;
 - b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
 - c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
 - d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.
162. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.
163. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.
164. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:
- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
165. Both elements of the exception test should be satisfied for development to be allocated or permitted.
166. Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-

making stage, or if more recent information about existing or potential flood risk should be taken into account.

167. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment⁵⁵. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
 - b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
 - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
 - d) any residual risk can be safely managed; and
 - e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
168. Applications for some minor development and changes of use⁵⁶ should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 54.
169. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
- a) take account of advice from the lead local flood authority;
 - b) have appropriate proposed minimum operational standards;
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d) where possible, provide multifunctional benefits.

Coastal change

⁵⁵ A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

⁵⁶ This includes householder development, small non-residential extensions (with a footprint of less than 250m²) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.

170. In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.
171. Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:
- a) be clear as to what development will be appropriate in such areas and in what circumstances; and
 - b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.
172. Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:
- a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;
 - b) the character of the coast including designations is not compromised;
 - c) the development provides wider sustainability benefits; and
 - d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast⁵⁷.
173. Local planning authorities should limit the planned lifetime of development in a Coastal Change Management Area through temporary permission and restoration conditions, where this is necessary to reduce a potentially unacceptable level of future risk to people and the development.

⁵⁷ As required by the Marine and Coastal Access Act 2009.

15. Conserving and enhancing the natural environment

174. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
175. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵⁸; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
176. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks

⁵⁸ Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

and the Broads⁵⁹. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
178. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 175), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and biodiversity

179. To protect and enhance biodiversity and geodiversity, plans should:
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶¹; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶²; and
 - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

⁵⁹ *English National Parks and the Broads: UK Government Vision and Circular 2010* provides further guidance and information about their statutory purposes, management and other matters.

⁶⁰ For the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

⁶¹ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

⁶² Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

180. When determining planning applications, local planning authorities should apply the following principles:
- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
 - c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶³ and a suitable compensation strategy exists; and
 - d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.
181. The following should be given the same protection as habitats sites:
- a) potential Special Protection Areas and possible Special Areas of Conservation;
 - b) listed or proposed Ramsar sites⁶⁴; and
 - c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.
182. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

⁶³ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

⁶⁴ Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

Ground conditions and pollution

183. Planning policies and decisions should ensure that:
- a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
 - b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
 - c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.
184. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.
185. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life⁶⁵;
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
 - c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
186. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when

⁶⁵ See Explanatory Note to the *Noise Policy Statement for England* (Department for Environment, Food & Rural Affairs, 2010).

determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

187. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.
188. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

16. Conserving and enhancing the historic environment

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value⁶⁶. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations⁶⁷.
190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
 - a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place.
191. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.
192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:
 - a) assess the significance of heritage assets and the contribution they make to their environment; and
 - b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

⁶⁶ Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance.

⁶⁷ The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Proposals affecting heritage assets

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.
197. In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

Considering potential impacts

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
 - a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional⁶⁸.
201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
 - a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing

⁶⁸ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible⁶⁹. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.
206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.
208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

⁶⁹ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

17. Facilitating the sustainable use of minerals

209. It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.
210. Planning policies should:
- a) provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction;
 - b) so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously;
 - c) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas⁷⁰; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);
 - d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;
 - e) safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;
 - f) set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;
 - g) when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and
 - h) ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place.

⁷⁰ Primarily in two tier areas as stated in Annex 2: Glossary

211. When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy⁷¹. In considering proposals for mineral extraction, minerals planning authorities should:
- a) as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage Sites, scheduled monuments and conservation areas;
 - b) ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;
 - c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source⁷², and establish appropriate noise limits for extraction in proximity to noise sensitive properties;
 - d) not grant planning permission for peat extraction from new or extended sites;
 - e) provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions. Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances;
 - f) consider how to meet any demand for the extraction of building stone needed for the repair of heritage assets, taking account of the need to protect designated sites; and
 - g) recognise the small-scale nature and impact of building and roofing stone quarries, and the need for a flexible approach to the duration of planning permissions reflecting the intermittent or low rate of working at many sites.
212. Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.

Maintaining supply

213. Minerals planning authorities should plan for a steady and adequate supply of aggregates by:
- a) preparing an annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years' sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources);

⁷¹ Except in relation to the extraction of coal, where the policy at paragraph 217 of this Framework applies.

⁷² National planning guidance on minerals sets out how these policies should be implemented.

- b) participating in the operation of an Aggregate Working Party and taking the advice of that party into account when preparing their Local Aggregate Assessment;
- c) making provision for the land-won and other elements of their Local Aggregate Assessment in their mineral plans, taking account of the advice of the Aggregate Working Parties and the National Aggregate Co-ordinating Group as appropriate. Such provision should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate;
- d) taking account of any published National and Sub National Guidelines on future provision which should be used as a guideline when planning for the future demand for and supply of aggregates;
- e) using landbanks of aggregate minerals reserves principally as an indicator of the security of aggregate minerals supply, and to indicate the additional provision that needs to be made for new aggregate extraction and alternative supplies in mineral plans;
- f) maintaining landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised⁷³;
- g) ensuring that large landbanks bound up in very few sites do not stifle competition; and
- h) calculating and maintaining separate landbanks for any aggregate materials of a specific type or quality which have a distinct and separate market.

214. Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:

- a) co-operating with neighbouring and more distant authorities to ensure an adequate provision of industrial minerals to support their likely use in industrial and manufacturing processes;
- b) encouraging safeguarding or stockpiling so that important minerals remain available for use;
- c) maintaining a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment⁷⁴; and
- d) taking account of the need for provision of brick clay from a number of different sources to enable appropriate blends to be made.

⁷³ Longer periods may be appropriate to take account of the need to supply a range of types of aggregates, locations of permitted reserves relative to markets, and productive capacity of permitted sites.

⁷⁴ These reserves should be at least 10 years for individual silica sand sites; at least 15 years for cement primary (chalk and limestone) and secondary (clay and shale) materials to maintain an existing plant, and for silica sand sites where significant new capital is required; and at least 25 years for brick clay, and for cement primary and secondary materials to support a new kiln.

Oil, gas and coal exploration and extraction

215. Minerals planning authorities should:
- a) when planning for on-shore oil and gas development, clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for;
 - b) encourage underground gas and carbon storage and associated infrastructure if local geological circumstances indicate its feasibility;
 - c) indicate any areas where coal extraction and the disposal of colliery spoil may be acceptable;
 - d) encourage the capture and use of methane from coal mines in active and abandoned coalfield areas; and
 - e) provide for coal producers to extract separately, and if necessary stockpile, fireclay so that it remains available for use.
216. When determining planning applications, minerals planning authorities should ensure that the integrity and safety of underground storage facilities are appropriate, taking into account the maintenance of gas pressure, prevention of leakage of gas and the avoidance of pollution.
217. Planning permission should not be granted for the extraction of coal unless:
- a) the proposal is environmentally acceptable, or can be made so by planning conditions or obligations; or
 - b) if it is not environmentally acceptable, then it provides national, local or community benefits which clearly outweigh its likely impacts (taking all relevant matters into account, including any residual environmental impacts).

Annex 1: Implementation

218. The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. Plans may also need to be revised to reflect policy changes which this Framework has made.
219. However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).
220. The policies in the original National Planning Policy Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned.
221. For the purposes of the policy on larger-scale development in paragraph 22, this applies only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point this version is published (for Spatial Development Strategies this would refer to consultation under section 335(2) of the Greater London Authority Act 1999).
222. The Housing Delivery Test will apply the day following publication of the results, at which point they supersede previously published results. Until new Housing Delivery Test results are published, the previously published result should be used. For the purpose of footnote 8 in this Framework, delivery of housing which was substantially below the housing requirement means where the Housing Delivery Test results:
 - a) for years 2016/17 to 2018/19 (Housing Delivery Test: 2019 Measurement, published 13 February 2020), indicated that delivery was below 45% of housing required over the previous three years;
 - b) for years 2017/18 to 2019/20 (Housing Delivery Test: 2020 Measurement, published 19 January 2021), and in subsequent years indicate that delivery was below 75% of housing required over the previous three years.
223. The Government will continue to explore with individual areas the potential for planning freedoms and flexibilities, for example where this would facilitate an increase in the amount of housing that can be delivered.

Annex 2: Glossary

Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Air quality management areas: Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Ancient or veteran tree: A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Ancient woodland: An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).

Annual position statement: A document setting out the 5 year housing land supply position on 1st April each year, prepared by the local planning authority in consultation with developers and others who have an impact on delivery.

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

Article 4 direction: A direction made under [Article 4 of the Town and Country Planning \(General Permitted Development\) \(England\) Order 2015](#) which withdraws permitted development rights granted by that Order.

Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.

Brownfield land: See Previously developed land.

Brownfield land registers: Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures.

Build to Rent: Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

Climate change adaptation: Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Coastal change management area: An area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion.

Community forest: An area identified through the England Community Forest Programme to revitalise countryside and green space in and around major conurbations.

Community Right to Build Order: An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.

Competent person (to prepare site investigation information): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.

Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Decentralised energy: Local renewable and local low carbon energy sources.

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Design code: A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

Design guide: A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Designated rural areas: National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985.

Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Development plan: Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

Edge of centre: For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Entry-level exception site: A site that provides entry-level homes suitable for first time buyers (or equivalent, for those looking to rent), in line with paragraph 72 of this Framework.

Environmental impact assessment: A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

Essential local workers: Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.

General aviation airfields: Licenced or unlicenced aerodromes with hard or grass runways, often with extensive areas of open land related to aviation activity.

Geodiversity: The range of rocks, minerals, fossils, soils and landforms.

Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Heritage coast: Areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic environment record: Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

Housing Delivery Test: Measures net homes delivered in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November.

International, national and locally designated sites of importance for biodiversity:

All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Irreplaceable habitat: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

Local Development Order: An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Enterprise Partnership: A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local housing need: The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).

Local Nature Partnership: A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it.

Local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

Local plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Major development⁷⁵: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development

⁷⁵ Other than for the specific purposes of paragraphs 176 and 177 in this Framework.

it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Major hazard sites, installations and pipelines: Sites and infrastructure, including licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.

Minerals resources of local and national importance: Minerals which are necessary to meet society's needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), coal derived fly ash in single use deposits, cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including conventional and unconventional hydrocarbons), tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness.

Mineral Consultation Area: a geographical area based on a Mineral Safeguarding Area, where the district or borough council should consult the Mineral Planning Authority for any proposals for non-minerals development.

Mineral Safeguarding Area: An area designated by minerals planning authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.

National trails: Long distance routes for walking, cycling and horse riding.

Natural Flood Management: managing flood and coastal erosion risk by protecting, restoring and emulating the natural 'regulating' function of catchments, rivers, floodplains and coasts.

Nature Recovery Network: An expanding, increasingly connected, network of wildlife-rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.

Neighbourhood Development Order: An Order made by a local planning authority (under the Town and Country Planning Act 1990) through which parish councils and neighbourhood forums can grant planning permission for a specific development proposal or classes of development.

Neighbourhood plan: A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

Non-strategic policies: Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

Older people: People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Original building: A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

Out of centre: A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Out of town: A location out of centre that is outside the existing urban area.

Outstanding universal value: Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site.

People with disabilities: People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Permission in principle: A form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Playing field: The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds

and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Primary shopping area: Defined area where retail development is concentrated.

Priority habitats and species: Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Ramsar sites: Wetlands of international importance, designated under the 1971 Ramsar Convention.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Recycled aggregates: aggregates resulting from the processing of inorganic materials previously used in construction, e.g. construction and demolition waste.

Safeguarding zone: An area defined in Circular 01/03: *Safeguarding aerodromes, technical sites and military explosives storage areas*, to which specific safeguarding provisions apply.

Secondary aggregates: aggregates from industrial wastes such as glass (cullet), incinerator bottom ash, coal derived fly ash, railway ballast, fine ceramic waste (pitcher), and scrap tyres; and industrial and minerals by-products, notably waste from china clay, coal and slate extraction and spent foundry sand. These can also include hydraulically bound materials.

Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future

generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Special Areas of Conservation: Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

Special Protection Areas: Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

Site investigation information: Includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 Investigation of Potentially Contaminated Sites – Code of Practice).

Site of Special Scientific Interest: Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Spatial development strategy: A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan (prepared under provisions in the Greater London Authority Act 1999) and plans prepared by combined authorities that have been given equivalent plan-making functions by an order made under the Local Democracy, Economic Development and Construction Act 2009 (as amended).

Stepping stones: Pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.

Strategic environmental assessment: A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Strategic policies: Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

Strategic policy-making authorities: Those authorities responsible for producing strategic policies (local planning authorities, and elected Mayors or combined authorities, where this power has been conferred). This definition applies whether the authority is in the process of producing strategic policies or not.

Supplementary planning documents: Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not

part of the development plan.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.

Town centre: Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Transport assessment: A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development.

Transport statement: A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel plan: A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.

Wildlife corridor: Areas of habitat connecting wildlife populations.

Windfall sites: Sites not specifically identified in the development plan.

Annex 3: Flood risk vulnerability classification

ESSENTIAL INFRASTRUCTURE

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood.
- Wind turbines.
- Solar farms

HIGHLY VULNERABLE

- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'.)

MORE VULNERABLE

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill* and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

LESS VULNERABLE

- Police, ambulance and fire stations which are not required to be operational during flooding.

- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.
- Car parks.

WATER-COMPATIBLE DEVELOPMENT

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

* Landfill is as defined in Schedule 10 of the Environmental Permitting (England and Wales) Regulations 2010.

Passion

Caring

Excellence

Integrity

Inspiring and supporting young people to
live happy, healthy and successful lives.



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Annual Quality Report **2020**

Introduction

As Chief Executive, I am pleased to share the Keys Group second Annual Quality Report which demonstrates our commitment to delivering safe, high quality care and education to children and young people.


Our report demonstrates not only how far we have come, but also our continuing collective drive to achieving our vision of 'inspiring and supporting children and young people to live happy, healthy and successful lives'. It also identifies the key areas of focus for our quality improvement work over the coming year. Working together, we are using measurement and real time data, to learn and improve at every level of our organisation in order to achieve our objective of delivering excellent care and education.

The coronavirus pandemic of 2020 presented us with major challenges in the delivery of our services to some of the most vulnerable children and young people in our society, and we have had to make significant changes to business as usual at Keys Group. I have seen the determination and resilience of individuals and teams to overcome unprecedented organisational, professional and personal challenges in order to provide the best possible care and education to our children and young people. The pace of change and the need to keep up with the latest guidance has been relentless but the capacity of everyone to maintain focus and stay positive has been inspiring.

At the time of writing we remain in the grip of the pandemic but with hope on the horizon in the form of an approved vaccine. We have coped steadfastly in the face of its challenge, with an unrelenting focus on the safety and wellbeing of our children, young people and colleagues. We are as ready and prepared as anyone can be for any further outbreak.

I would like to take this opportunity to thank all our people for their hard work and continued dedication to providing the highest quality of care and education. I also wish to acknowledge the important role that the children and young people who use our services have had in shaping the way we work and develop.

David Manson Chief Executive Officer



● Inspiring and supporting
● young people to live
● happy, healthy and
● successful lives.

Who We Are

Keys Group is an established independent provider of residential children's care and specialist education with a well-distributed portfolio of homes, schools and other services throughout England and Wales. We were established in 2005 and have grown to become one of the largest providers of residential care to looked after children and young people in England and Wales.

With 125 homes across England and Wales, we are the second largest provider of independent children's homes in the UK and are the fifth largest provider of independent special needs schools in England in share of pupils.

Divisions	Residential			Education	Leaving Care
	Children's Homes	Activity Centres	Family Assessment		
Description	Specialist homes for looked after children and young people with complex needs. Homes provide a nurturing family-like environment and therapeutic care and support	Specialist services providing short term, high intensity intervention programmes which aim to stabilise children and young people in a period of crisis	Parenting Assessment met services to observe the family's parenting skills to enable commissioners to make long term living arrangement decisions	Day school placements for children and young people with complex needs.	Support for young people transitioning to independent living. Offering both accommodation and tailored support.
No. of sites	118	5	2	21	2 offices
Capacity	407	30	13	c.700	c.60

What Drives Us

Our values form the foundations of our work to inspire and support children and young people to live happy, healthy and successful lives.

Excellence

Accountable and intent to achieve the best in all we do. Challenging ourselves to the highest standards of learning, development and performance.

Passion

Committed and ambitious in heart and mind to supporting the best outcomes for young people.

Integrity

Working honestly and transparently sharing our results and learnings.

Caring

Showing compassion and empathy, placing the young person at the centre of all we do, taking their feelings and wishes into account.

excellence

Caring

Integrity

passion

What We Do

We provide services, predominantly for children and young people with social, emotional and mental health needs, severe learning difficulties and autism. We are specialists in caring for and educating children and young people with high severity needs, behaviours of concern and complex care requirements. This year our staff provided care and support to 1250 children and young people.



612

Residential

Number of young people we cared for and supported.



534

Education and Skills

Number of children, young people and adults we educated and provided with work skills.

Leaving Care

Number of young people we supported towards independence.

Other

Number of children and young people supported in other services.



62



42



Our Services

Residential Homes

Our residential houses are not just places to live but are 'homes' for the children and young people we support. We strive to nurture every child and young person to achieve their individual potential. We work with and support each young person to achieve good outcomes.

In 2019/20 we provided a home for 612 children and young people in England and Wales.

Our specialist homes provide dynamic and forward thinking therapeutic approaches in line with each child's or young person's needs. Our expertise includes support in the following areas:

- Exploitation
- Sexually harmful behaviours
- Substance misuse
- Self-injurious behaviours
- Offending behaviours
- Emotional, behavioural difficulties
- Learning difficulties/disabilities
- Autistic spectrum disorders

Regulator Feedback

- "The home is warm and welcoming. It resembles a family home. Staff support children to choose the colour and design of their bedrooms. Children are proud of their rooms and help keep them tidy. The communal areas in the home are bright and attractive spaces, with plenty of toys and games. Both the bathrooms in the home have been replaced since the last inspection, and they are now light and modern spaces. Children want to spend their time in this welcoming environment."
- "Two children have recently moved on from the home to live with foster carers, after living in the home for a number of years. This is a tremendous outcome for them."
- "Children have access to the organisation's therapist, and staff are able to seek advice and guidance from therapists on a regular basis. The registered manager has also sought support from an in-house clinical psychologist, who has provided helpful advice regarding behavioural support strategies for one child who is currently struggling to manage his behaviour."
- "Child-centred planning places the children at the heart of staff practice. Staff work supportively with the children's families, and are respectful of their knowledge of their children's needs. This partnership approach validates and helps to maintain enduring family bonds."



Case Study

Freya was 14 years old when she came to one of our residential homes. She was distressed and frightened and found it really difficult to manage her emotions without lashing out at her carers and taking cannabis to escape from her thoughts. Through a clear agreed plan of care, the staff at the home, her therapist and social worker worked together to support Freya. They all recognised that Freya had an exceptional singing talent, she composed songs and music. It was through music that she was able to channel her thoughts, communicate her feelings and celebrate her successes. The home and social worker worked together to secure a placement in a music school where Freya flourished - her talent growing and the risks she was posing diminishing. After two and a half years and as planned, Freya achieved her goals - moving back to the town she grew up in, continuing to receive support, being near her family and attending college with a clear plan for her future.

Feedback from Children

"Staff made me feel very welcome, showed me around the home and offered me some food and drink. Went through the welcome guide with me."

"Staff helped me feel really welcome and made my bedroom how I liked it."

Social Worker Feedback

- "This is an excellent placement for our young person, the staff and manager are committed to supporting her and manage her complex needs well."
- "The quality of Highcroft in my view is high. I can also be positive about the previous activity and intervention placement provided through Keys, I have noted the same levels of quality across all Keys provision."
- "I am impressed with how settled our young person is since coming to this unit. No reports of her going missing and she is engaging with staff well on the whole."

She is quite strong willed so the only area of improvement I can see is helping her to be less abusive at times to staff in Social Care if she gets frustrated with them for any reason."

- "I find working with the manager and her supporting staff to be of an extremely positive professional approach. I have great respect for the service they provide."
- "I find incidents of a Safeguarding manner to be dealt with promptly. I find all staff members to be positive."
- "The placement was very accommodating to the needs of my young person working in a creative way to ensure he was meeting his developmental milestones and supported towards independence."

Sample Keys Group Smart Survey Children and Young People

During your time were you told about any of these? Please tick			Response Percent	Response Total
1	Your Care Plan	<input type="checkbox"/>	88.24	15
2	The complaints process	<input type="checkbox"/>	88.24	15
3	Results of a room search	<input type="checkbox"/>	94.12	16
4	Your end of month report	<input type="checkbox"/>	88.24	15
5	Rules & boundaries of the home	<input type="checkbox"/>	88.24	15
6	Police involvement	<input type="checkbox"/>	64.71	11
7	Child protection process	<input type="checkbox"/>	76.47	13
8	Your review report	<input type="checkbox"/>	82.35	14
9	Fire evacuation procedures	<input type="checkbox"/>	88.24	15
10	The reasons for a room search	<input type="checkbox"/>	88.24	15
11	Missing from care process	<input type="checkbox"/>	82.35	14
12	The role of Ofsted	<input type="checkbox"/>	88.24	15

We recognise that our system for centrally gathering feedback requires improvement, to engage and encourage children and young people to share their views. We will be working

together with children and young people to design a system that meets their needs and ensures we hear as many voices as possible.

Education and Skills



Our schools strive to support pupils to thrive and achieve their maximum potential. They are environments providing individualised teaching resources and support specifically targeted to meet the educational needs of each and every child and young person.

We are flexible and adaptable in our approach to learning and education.

We understand that each pupil comes with different experiences of education and we are committed to understanding those individual needs and abilities. In that understanding, we individually tailor our encouragement and support to maximise the potential of each pupil to learn and grow. The safe and unique environments that our schools offer builds trust within the school community, works to reduce risks and create spaces where children and young people can develop and prepare for their future.

In addition, we offer the AQA Unit Award Scheme (UAS) inclusive of certification. With UAS, learners have their achievements recognised and are rewarded, no matter how big or small. UAS motivates, encourages and raises self-esteem within young people who can be rewarded for achievements which ordinarily might go unrecognised. We also offer structured day services full of meaningful activities for adults with additional needs.

Keys Group operates a geographically diverse portfolio of 21 schools and 2 adult focused structured day services in England and Wales. In 2019/20 we provided specialist education to 534 children and young people and adults.

In our schools, our children and young people have often faced significant challenges and often with extremely negative learning experiences. However, each year we see them succeeding on their own terms, and within the context of their own lives and journeys. This is shown by our destinations data.





96%

96% of our school leavers move onto a positive destination;

- College Placement
- Work
- Apprenticeship
- Further Study/ Foundation courses to access i.e. armed services etc.

In terms of qualifications, 100% of our Year 11 leavers left with meaningful qualifications – whether that’s GCSEs, BTECs, ASDAN or Functional Skills among others. They have had a grounding in the key subjects of maths, english and science and, importantly are equipped with a range of skills for the next stage of their life journey.

Case Study 1

Zac had never attended school prior to being placed in a Keys school. Aged just 12 and entering Year 8, Zac’s family were extremely worried and thought all hope was lost. Fast-forward to Year 11 and through consistent teaching, building relationships and offering education that truly meets the individual needs and abilities of each child, Zac is due to start a mechanics apprenticeship in autumn 2020. Academic exams were not where Zac excelled, tapping into his interest in taking things apart and putting them back together, the school worked to his strengths and he is excited about his future and the opportunities ahead.

Case Study2

Kassem first came to one of our primary schools aged 7, a boy who presented with behaviours of concern and where teaching opportunities were regularly interrupted to focus on keeping Kassem and other safe. A change in Kassem’s home life meant he had to move away from his Keys school but on his return to the area aged 13 he only agreed to return to a Keys Group school for his education. As a consequence of strong nurturing and support Kassem has settled well into school life. While there are still times when he becomes distressed and upset, these episodes are diminishing in frequency. Kassem told his social worker, ‘this is the place where I can trust people.’ The school is indeed a safe space for Kassem, he enjoys school and is first in the queue for attending new events and joining in with others.

Regulatory Feedback

- Leaders have clear ambition for the school and the pupils. Keys is investing in a complete refurbishment of the current school. Leaders have been involved in designing changes so that the school better meets the needs of the pupils.”
- “The headteacher models the school’s commitment to secure pupils’ achievement and personal development and well-being. Leaders ensure that all the independent school standards are consistently met.”
- “Pupils behave well throughout the day. Pupils’ behaviour improves strongly over time. When they struggle to manage themselves, pupils respond well to staff support. Pupils improve their attendance rapidly after starting at the school.”

.....

Leaving Care



Our leaving care service was registered with the Care Quality Commission in October 2018. This unique service provides support and care to 62 young people during 2019/20, bridging the gap between being looked after in residential care and independent living in the community. Staff provide support or care as appropriate, assisting each young person to transition to independent living.

In 2020, we established a project group to clearly set out a robust transition map, presenting the journey a young person would be supported to take from a residential children's home through to independent living via leaving care services. This project is being supported by Smallfry, a design and development consultancy. They have been tasked with challenging our thinking in creating an innovative pathway that embeds our vision and values that can be easily communicated to young people and all stakeholders.

Case Study

Dylan was cared for at a Keys residential children's home for 4 years before he transitioned to the leaving care service at the age of seventeen. Dylan had a really positive residential placement, staff fondly and proudly speak about how Dylan matured into an ambitious young man who wanted to "make something of himself" and he was ready for the next stage of his journey towards adulthood.

Dylan was one of the first young people to be transitioned from a Keys Group residential children's home to a Keys Group leaving care service. Staff from both services worked collaboratively with Dylan to achieve a smooth move between services. Dylan was involved in viewing his new flat and making it his home after moving in.

Dylan struggled in the early days, the new adjustment to semi-independent living was not always easy and it took time to accept help and form trusting relationships with the support staff. With encouragement, Dylan started an auto-mechanic course which he successfully completed. He went on to secure an apprenticeship at a national auto-mechanics provider where he has been promoted into a supervisory position. Furthermore in February 2020 and after turning 18, Dylan secured his own tenancy. Our leaving care service continued to provide outreach support as he settled into being fully independent. Today Dylan is living successfully and fully independently in his own flat.



Ofsted Consultation - Unregulated Provision for Children in Care and Care Leavers¹

In February 2020 Ofsted launched a consultation into the unregulated provision for children in care and care leavers. This consultation was coupled with the release of a Department for Education research report 'Use of unregulated and unregistered provision for children in care', February 2020. The majority of children living independently and in semi-independent accommodation (99 per cent and 97 per cent respectively) at 31 March 2019 were aged 16 and over, with a small number of children in the 10 to 15 age group (1 per cent living independently and 3 per cent in semi-independent accommodation).

The number of children in care aged 16 or 17 placed in unregulated settings has increased from 2,900 in 2009 to 6,100 in 2019. Proposals to tackle poor quality provision include:

- Banning using this provision for under 16s.
- Introducing national quality standards.
- Ensuring independent reviewing officers represent young people's interests.
- Requiring local authorities and police forces to cooperate with each other.
- New legal powers for Ofsted to take action against illegal providers.

Keys Group responded to this consultation supporting the implementation of proportionate measures to ensure that services for young people transitioning to independence are of good quality.



Other Services

Case Study

The National Three Peaks Challenge involves climbing the three highest peaks of Scotland, England and Wales. The total walking distance is 23 miles (37km) and the total ascent is 3064 metres (10,052ft). A challenge that leaves most adults quaking in their hiking boots but not for Lee an energetic young person who was not only keen to do the challenge but wanted to raise money for charities at the same time. By offering activities and opportunities that would otherwise not have been available to Lee, staff supported Lee over 4 days, walking for more than 13 hours and driving over 950 miles to achieve this tremendous goal and the feeling of success through grit and determination. The attributes that have been forged with Lee are supporting him to apply the same principles to his life and future goals and ambitions.

CIW Feedback

"The home enables young people to fulfil their potential. The outdoor activities and the AQA awards allowed young people to receive recognition for their successes. Consequently, staff had focussed on young people's interests and supported them to apply their new hobbies and skills to college courses and potential access to work experience."

Parents Feedback

"Thank you for all the time, energy and patience you have shown Katlyn whilst she's been with you. Your service has helped in many ways and I am grateful for all your support." Nicola - Katlyn's mum.

"I just wanted to say thank you to you and all the wonderful staff. I know that if Sam had not come to you something bad would have happened and Sam has said that too. He has opened up a bit and said that he would have been criminalised if he had not come to you. We are so pleased to have Sam home. We know we are still on a journey to bring him back to the right path again...and he can reach his potential." Judith - Sam's mum.

Activity and Intervention Services

We also operate five centres providing emergency activity and intervention placements, offering short term specialist care with the objective of supporting young people to settle back into longer term placements. The engagement of young people in outdoor adventurous activities, with the help and guidance of expert staff, provides opportunity for them to benefit not only from physical activity but also to grow as a consequence of improved self-esteem and confidence.

Family Assessment

Our well established family assessment centres, Crown House and Victoria Villa have been operating successfully for a number of years. Our specially qualified staff carry out parenting assessments on behalf of local authorities and other relevant agencies with the purpose of supporting the decision making processes relating to the long-term living arrangements for children.

Case Study

Following a residential family assessment placement at one of our centre's an informed, evidence based recommendation was made that it was in baby Carrie's best interests not to live with her parents. This difficult recommendation was made following close observation by a highly qualified team of her parents' abilities to provide adequate and appropriate safe care for her. It was deemed that the opportunities given to her parents, to reflect and learn from previous mistakes and focus on new ways to appropriately care for Carrie in the future were not fulfilled in spite of their absolute desire for Carrie to remain in their care.

The staff team recognise the overwhelming impact of the assessment process on each and every family and through regular, sensitive and informative communication, were able to present Carrie's parents with an honest appraisal throughout their stay and ultimately with the recommendation being made in her best interests. The importance of building trusting relationships with parents is essential to ensure the right evidence based parenting assessment. In this case, following Carrie's removal from her parents care, Steve her father continued to seek support from the team he had built a trusting relationship with enabling him to gradually understand and come to terms with the outcome for the family.

Ofsted Feedback

"Highly experienced and skilled staff make families feel extremely welcome when they arrive and provide them with strong support throughout their demanding placements."



Growth and Investment

In 2019/20 we have continued to identify opportunities for growth with the aim of offering more vulnerable children and young people access to our services.

Acquisitions

During the reporting year we welcomed three new businesses to Keys Group:

• Build A Future

An alternative education provision with capacity for 125 learners operating over two sites in Lincolnshire.

• Unique Care Homes

5 residential children's homes and an independent special school with capacity for 42 learners, operating in East Anglia.

• South West Child Care Services

9 residential children's homes and 4 leaving care services operating principally in Plymouth.

The Management of Integration Risk

Following acquisition of a business a systematic integration process plan is put in place to ensure the Keys Group management processes, therapeutic model and policies

are embedded. This integration process is time limited and is designed to minimise risk, to enhance operational performance and to ensure the children and young people are supported and safely welcomed into Keys Group along with our new colleagues.

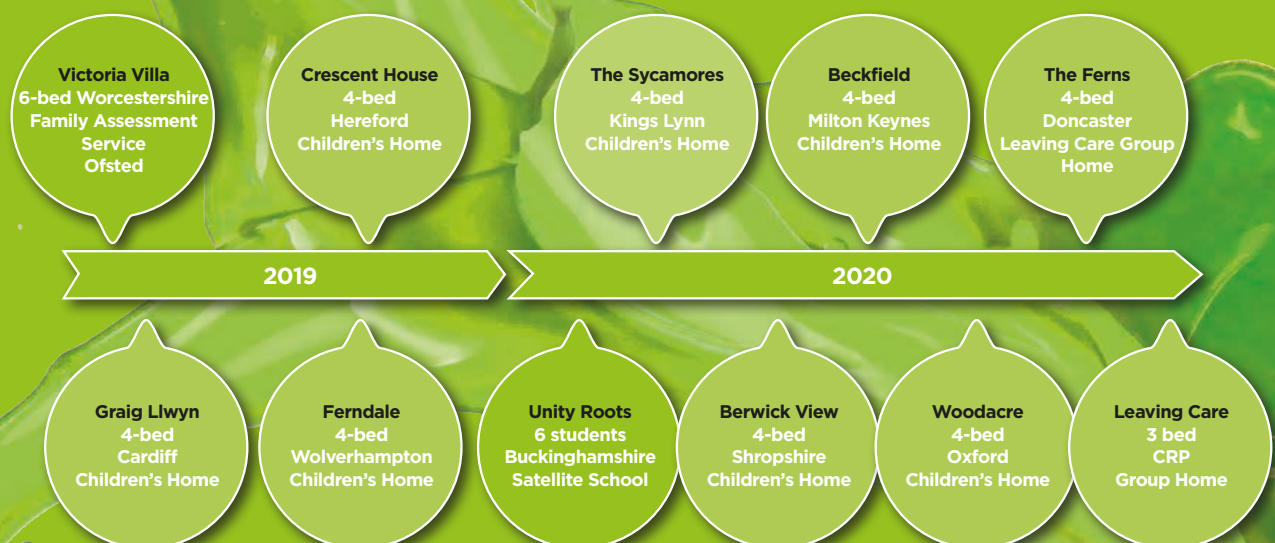
The integration process is highly visible to the senior leadership team and those involved and is facilitated through the use of a robust shared on line integration plan. The plan breaks down integration activities by function (e.g. People, Property, Quality etc.) and allocates tasks to appropriate individuals with target dates set for completion. Weekly integration meetings chaired by a lead Director are held until all integration actions are concluded.

Organic Developments

We continued to open new services in response to demand over the course of the year:

- 7 Residential Homes
- 2 Leaving Care group living homes
- 1 Family Assessment Service
- 1 satellite school Unity Roots

Organic Developments



The Cross Regional Project

We have worked hard during 2019/20 with our four local authority partners to embed this unique partnership contract. Keys Group successfully secured the contract in 2019 after operating the innovative project for eight years previously. The service provides therapeutic residential care and education to young people with complex emotional and behavioural needs within the boundaries of the four commissioning authorities (Oxfordshire, Buckinghamshire, Hertfordshire and Milton Keynes).

The contract required an increase in the number of placements for young people in both residential and education services, as a consequence Keys opened 2 new four bed residential children's homes and the satellite school Unity Roots.

We are currently working to open another four bed children's home in Hertfordshire and most recently opened a leaving care provision to support the transition pathway for young people supported within the project.

Investment in Existing Services

In 2019/20 we invested £4m in the improvement of the physical infrastructure of our services with the aim of enhancing the experience of the children and young people we support.

Case Study

One of our most significant investments in the past 12 months was the refurbishment of Denby Grange School at circa £0.6m. The school which has operated for approximately 20 years is rated 'Good' by Ofsted and at the time of refurbishment was registered for a maximum capacity of 36 students. Everyone at the school, the property team and a range of external contractors worked to deliver a transformation of the school environment which has had a significant impact on student morale, improved learning and supported a reduction in behaviours of concern.



Our Clinical Team and Specialist Advisors

Our Clinical Team and Specialist Advisors

We have a dedicated clinical team consisting of psychologists, therapists and specialist advisors. This team work alongside our staff teams enabling them to effectively deliver care and support.

Clinical Team

Our clinical psychologist, assistant psychologists and therapists specialise in understanding the thought processes and actions of children and young people and interpreting them to guide appropriate care support and interventions.

Clinical Director	Clinical Psychologists	Assistant Psychologists	Therapists
<ul style="list-style-type: none"> Provides strategic and operational leadership and governance to the clinical department. Advises the senior leadership team on the impact of clinical service delivery. Oversees, evolves and further embeds the clinical model. Designs and is responsible for the delivery of the clinical strategy across the Keys Group national footprint. 	<ul style="list-style-type: none"> Chair multidisciplinary formulation meetings as part of the Psychologically Informed Care Planning Intervention (PICI) process and identify the key areas of focus for the young person's development. This determines the appropriate focus for the staff teams interventions Provide consultancy to the staff team. Provide one to one therapy for children and young people as required. 	<ul style="list-style-type: none"> Work under the direction of psychologists. Work with the multidisciplinary team to gather information on the children and young people's history. Complete psychological screening. Assist in the configuration of individualised care and support plans. 	<ul style="list-style-type: none"> Provide a therapeutic process giving the young person the opportunity to express difficult or confused feelings in a safe environment with clear boundaries. Examples of the spectrum of therapy; <ul style="list-style-type: none"> Cognitive Behavioural Play Bereavement Art Mindfulness Etc.

Specialist Advisors

Our five national subject matter specialist advisors provide training and guidance to our

staff teams as well as undertaking direct work with children and young people.

Self Injurious Behaviour Specialist Advisor	Child Exploitation Specialist Adviser	Police Liaison Specialist Advisor	Substance Misuse Specialist Advisor	Head of Positive Behaviour Support
<ul style="list-style-type: none"> Delivers training and develops staff teams Visits services, providing and overseeing the use of risk assessments, and close monitoring tools to support positive outcomes for young people. Provides advice and strategies to managers, staff teams and young people Monitors events on Radar and supports multidisciplinary teams in the review of individual care plans 	<ul style="list-style-type: none"> Delivers training and develops staff teams Visits services, provides advice on risk assessments, to support positive outcomes for young people. Provides advice and strategies to managers, staff teams and young people Monitors events on Radar and supports multidisciplinary teams in the review of individual care plans 	<ul style="list-style-type: none"> Delivers training and develops staff teams Works with police services at a national and regional level to improve multiagency working, supporting positive outcomes for children and young people Provides advice and strategies to managers, staff teams and young people Supports multidisciplinary teams in the review of individual care plans 	<ul style="list-style-type: none"> Delivers training and develops staff teams understanding of substance abuse and changes to commonly used substances and associated risks Engages young people in psychosocial interventions to address substance misuse Provides advice and strategies to managers, staff teams and young people Monitors events on Radar and supports multidisciplinary teams in the review of individual care plans 	<ul style="list-style-type: none"> From late 2020 our Head of Positive Behaviour Support will be implementing our strategy called 'Keys Connect' to develop and embed positive behaviour strategies Delivers training and develops staff teams to effectively manage behaviour of concern through de-escalation techniques. Works directly with teams to minimise the use of physical intervention. Provides advice and strategies to managers, staff teams and young people Monitors events on Radar and supports multidisciplinary teams in the review of individual care plans

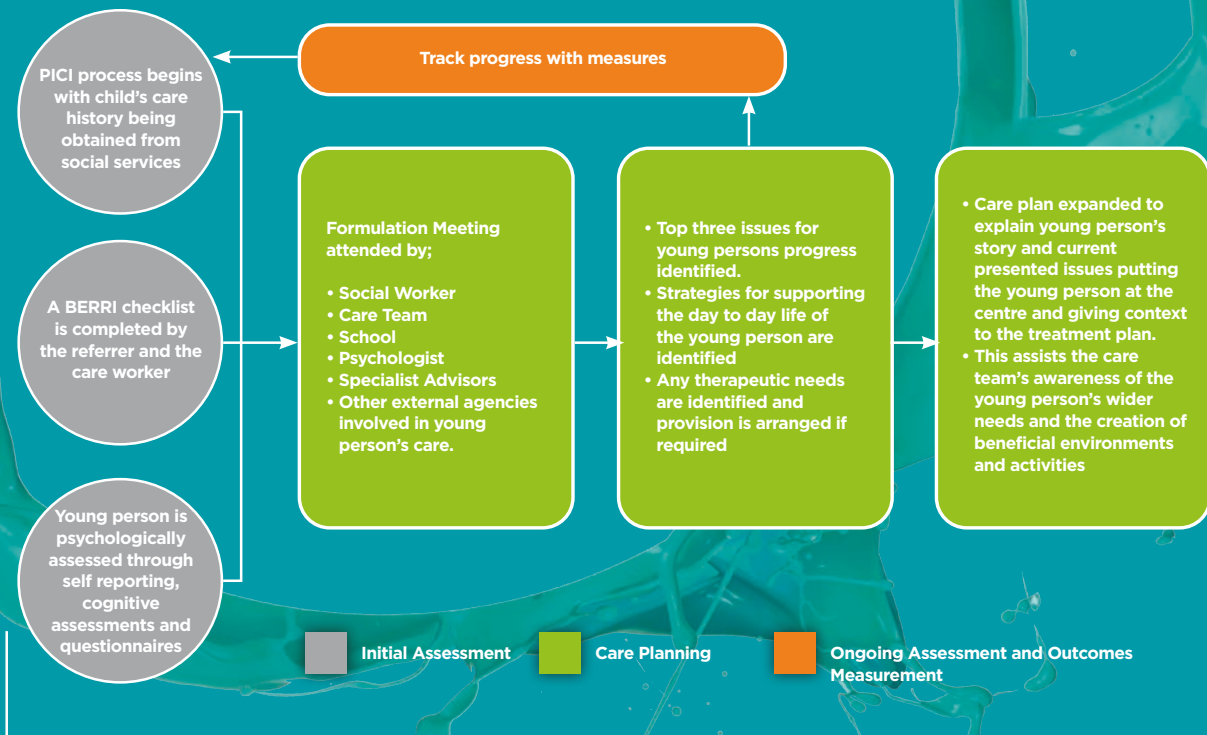
Achieving Outcomes

Psychologically Informed Care Planning

In our residential children's homes we deliver a unique therapeutic model called Psychologically Informed Care Planning and Intervention (PICI) which includes an assessment called BERRI (Behaviour, Emotional Well-being, Risk and

Relationships Indicators). We developed this model to facilitate the:

- Provision of interventions appropriate to the individual needs of each child or young person.
- Effective measurement of the outcomes of these individualised interventions.



In parallel to PICI a 'Safe and Sound' programme is delivered to staff. This programme provides staff with an understanding of the impacts of childhood trauma, attachment theory and mechanisms to support children and young people in their care.



BERRI

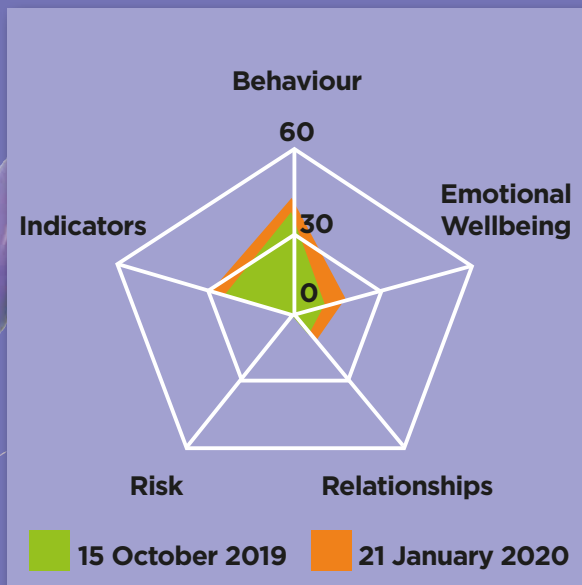
BERRI is a clinical evaluation tool to support the tracking and monitoring of outcomes for children and young people.

BERRI is a comprehensive online questionnaire which is completed by the therapeutic team with input from the young person. The data is used to track each young person's progress to help inform when additional support or alternative interventions may be required. The data can be viewed on an aggregate level for all children and young people in Keys Group care.

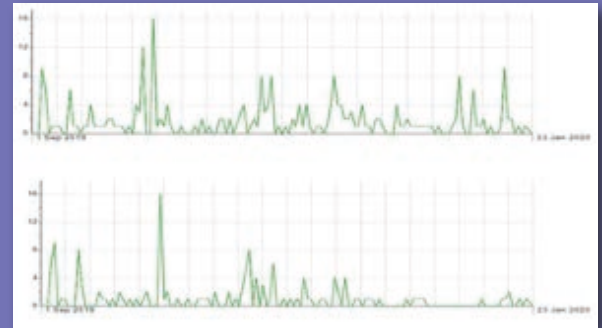
The five broad categories monitored through BERRI are:

- Behaviour
- Emotional Wellbeing
- Relationships
- Risk (to self or others)
- Indicators of psychiatric or neurodevelopment conditions

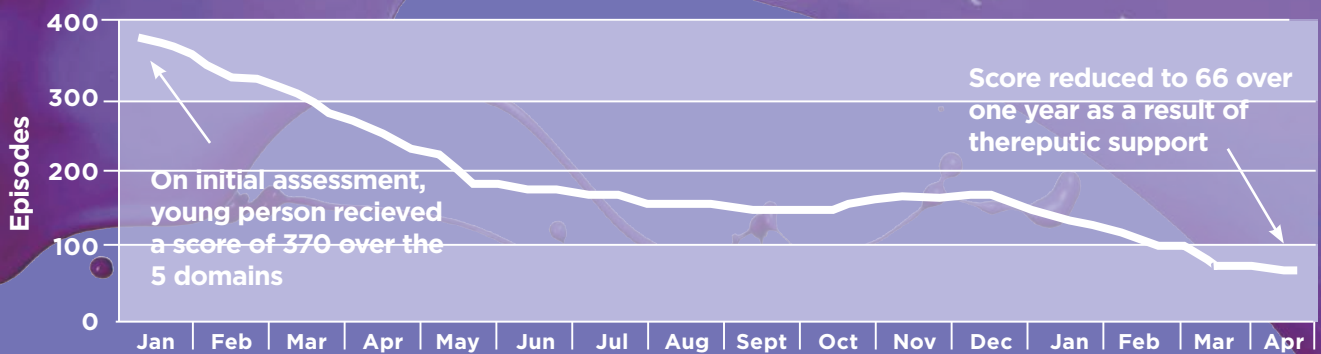
Example - BERRI Outcome Monitoring Scores for Child 'A' (2019/20)



Example - BERRI further monitoring of 'non-compliance' (top) and 'argumentativeness' (bottom) for Child 'A' (2019/20)



Example - BERRI Score Progression Over Time for Child B



Dates	Behaviour	Emotional wellbeing	Relation-ships	Relation-ships	Indicators	Totals
09/01/18	75	60	63	24	148	370
14/03/18	49	29	67	4	126	275
24/05/18	49	23	37	7	53	169
29/08/18	46	17	31	2	39	135
29/11/18	35	24	48	3	59	169
26/03/19	13	8	18	2	25	66

Young People's Outcomes Star

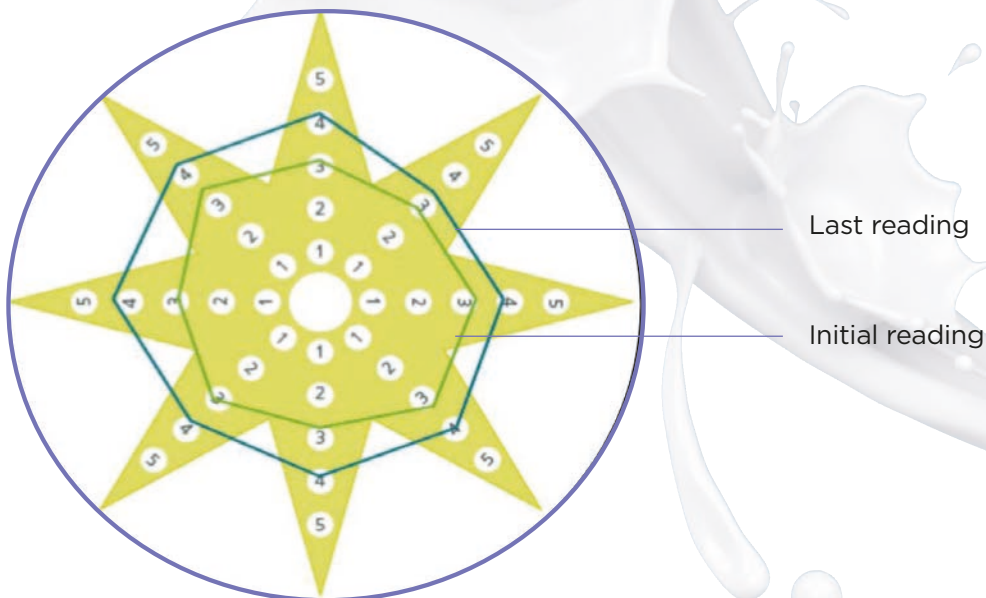
The Outcomes Star tool is used within our leaving care services to monitor the progress young people are making towards independent living. The Outcomes Star tool was implemented in 2019 and all staff were trained in the use of the tool.

Progress is tracked among eight key metrics which are essential for young people to effectively and safely move to independent living:

- Accommodation
- Working and Learning
- People and Support
- Health
- How You Feel
- Choices and Behaviour
- Money and Rent
- Practical Life Skills

Over the past year we have been able to demonstrate an increase in outcomes for each of the tracked metrics.

Example - Consolidated Leaving Care Consolidated Metrics



Leaving Care - Not in Education, Employment or Training (NEET) Statistics

A key objective for all young people engaging with our leaving care services is to support them to actively engage in education, employment and training. Whilst many will be keen to engage and already be in education, employment or training with aspirations for their future, others, often due to multiple and complex reasons, find it difficult to focus on their future.

Our leaving care service has introduced AQA Unit Awards - these awards are designed to be easily administered and offer a route to engage young people and reward them for progress. The aim is to encourage young people to use these awards as a stepping stone to more permanent and long term education, employment or training.

On average over half our young people accessed education, training or employment throughout the 2019/20 period, with approximately 30% of these young people accessing education or training and 20% employment. We will continue our work through 2020/21 to ensure that 100% of those young people we support engage in education, training or employment in order to improve their life chances.

Period	Initial reading	Last reading	Average increase
April 2020	3.1	3.8	0.7
May 2020	3.1	4.0	0.9
June 2020	3.1	3.9	0.8

Our Quality and Governance

The senior leadership team play a vital role in creating a supportive culture and environment for quality improvement. The quality department is responsible for maintaining the integrity of Keys Group quality processes and ensuring that operators at all levels are aware of their responsibilities and roles within this. The department champions quality and provides leadership with the aim of gaining continuous commitment from operating services whilst assuring compliance to commissioners, regulatory and statutory requirements. Whilst the role of the quality department and the senior leadership team is key, responsibility for leading quality improvement is distributed within the Group.

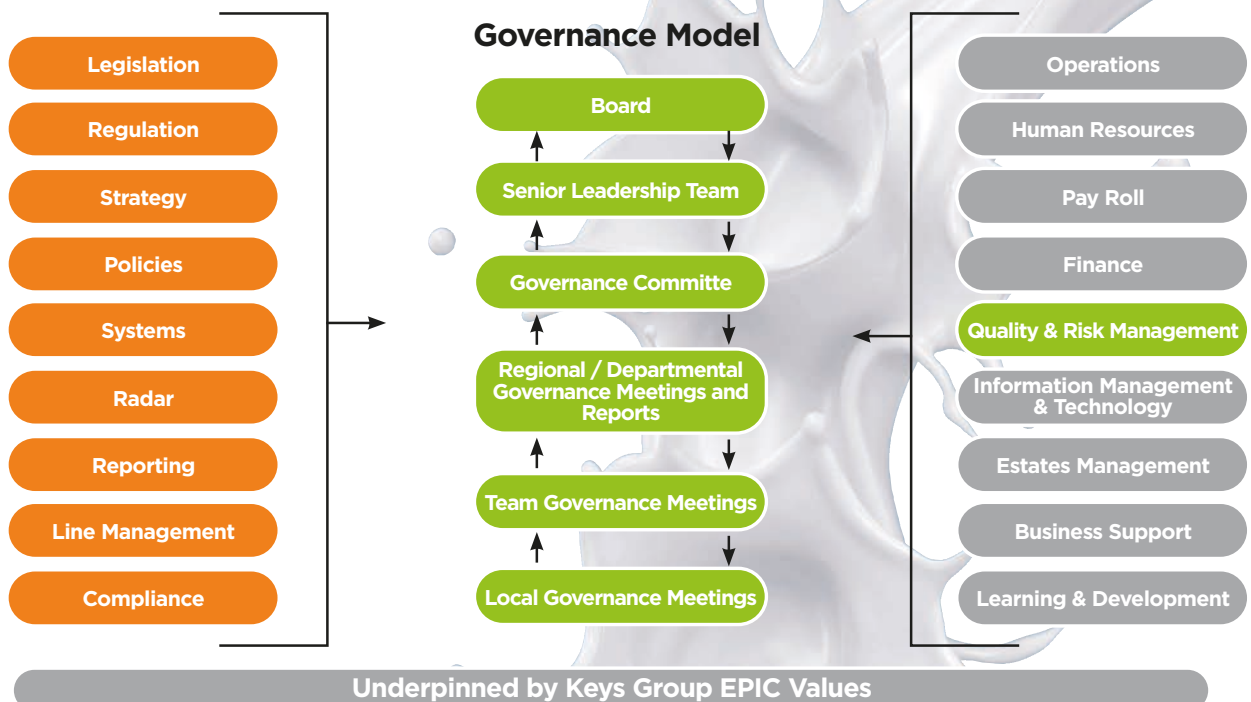
A clear, unifying vision for improving quality is delivered at multiple levels, with co-ordination and alignment between teams, departments and individuals in the business units. The department's key functions are to maintain the quality management system as well as providing guidance, advice, support and training to staff at all levels on any issues relating to quality compliance, improvement and best practice. The quality department operates independently of operations which is critical to supporting the integrity of its internal audit function and the independence of its Regulation 44 Independent Visitors.

The Group's risk management and health and safety functions are also directed and co-ordinated from within the department.

The quality system is interconnected across business unit teams, departments and business functions:

- The quality director produces a monthly report of quality metrics which is discussed at the monthly senior leadership team meeting.
- The board receives a monthly summary of the key quality indicators to provide insight into the integrity of operations and to highlight areas for improvement.
- The quarterly governance committee meetings allow for detailed review of incidents and quality indicators and assessment of actions taken as well as resolutions. A corporate risk register is in operation and is used to document risks and identify actions to reduce or eliminate risks.
- The separate safeguarding committee also meets quarterly to examine safeguarding concerns, policy, training and best practice.

Annual quality plans are developed outlining key activities and objectives for performance improvements and embedding of best practice.



Education Governance

Keys Group schools are governed by an education governance board which meets each school term. A framework of six key domains supports this structure:

- Strategic Leadership
- Accountability
- People
- Structures
- Compliance
- Evaluation and Oversight.

Head teachers produce a report covering each of the six domains for the board

meeting, these are reviewed and any consequential actions are agreed with each head teacher for inclusion within each individual schools improvement plan.

Our Year 2019 to 2020 – Review of Quality Commitments

We have continued to make progress against prior year quality commitments with many achieved and others progressing and set for delivery next year. We will continue with these ongoing activities in addition to the new commitments made at the end of this report for 2020/21.

Domain		Priorities for 2019/2020	Status	
			Achieved	In progress
Our Services	1	Continue to grow and provide more high quality services for children and young people to achieve great outcomes	✓	
Therapeutic Approach	2	Establish a psychological informed process in our schools and for our children and young people with learning difficulties		✓
Outcomes for Children and Young People	3	Implement the Young Person's Star outcomes tool in leaving care services	✓	
	4	Implement a system to establish clear education outcome data including children and young people who are not in education, employment or training		✓
	5	Continue to develop mechanisms to demonstrate the effectiveness of our care, support and education to the lives of children and young people	✓	
Keeping Safe	6	Through the collection of data, be able to demonstrate that children's and young peoples safety has been improved through a reduction in risk	✓	
Quality and Governance	7	Continue to develop Radar as a system for untoward event reporting, compliance and to continually improve risk management	✓	
	8	Establish a Safeguarding Committee	✓	
	9	Embed and test our business continuity plans	✓	
Listening		Expand our online survey to include all service provision		✓
	11	Improve co-production and participation opportunities across all services		✓
Inspection and Regulation	12	Improve our inspection ratings across all services to further exceed the national average		✓
Infrastructure	13	Continue to improve our pre-planned maintenance programme to provide the required assurances	✓	
Leadership and People	14	Develop value based recruitment tools and link to our vision and values		✓
	15	Implement new development pathways for our staff in education	✓	
	16	Offer Level 5 vocational training programmes to all deputy managers in residential children's homes	✓	
	17	Revise our supervision and appraisal process linking it to our vision and values		✓
	18	Celebrate manager and senior manager completing the Future Leaders Programme and Visionary Childcare Programme	✓	

Our response to COVID - 19 and the impact on our services

Covid-19 has had a huge impact on everyone's lives and likewise the children, young people and adults we support and our people.

We are incredibly grateful to all our colleagues during the pandemic, their attitude and dedication has seen Keys Group respond well and continue providing care and education in the best possible way. Our pandemic response team was convened on 6th March 2020 to provide the initial co-ordination of our response.

Regular and clear communications were essential to keeping our staff updated, informed and focused on; knowing how to identify symptoms, adopting good hand hygiene and knowing where to seek guidance. Daily messages were established and underpinned by a hub of information on our intranet including health and wellbeing information for colleagues, children and young people.

The pandemic response team provided a mechanism for escalating risks and threats, providing situation reports, and receiving direction at local, regional and national level.

Keys Group had to make the difficult but necessary decision to temporarily close its two adult education sites whilst continuing to support trainees from the services remotely. These sites are now open again with a flexible mix of onsite and remote care and support being provided. All our other residential, education, leaving care and family assessment services have continued to operate throughout the pandemic.

Advocacy for our Children and Young People

Throughout the pandemic we have championed our children and young people. We lobbied the Department for Education, the Children's Commissioner, Public Health England and Wales, Care Inspectorate Wales, Ofsted and Government with a particular focus on:

- Ensuring that the needs of children and young people in residential homes were considered.
- The development of specific Covid-19 related guidance for children's care homes.

- The supply of personal protective equipment to children's homes.
- Access to education for children looked after in residential homes.

Access to Advice and Resources

We worked hard to ensure our services were in receipt of the most recent information in relation to the pandemic and the numerous Government updates in relation to the provision of care and education through lockdown and beyond. We created a central resource repository with information accessible to services on issues pertinent to those we support including information on supporting children and young people's health and wellbeing, healthy living and education.

Working through the Pandemic

As we look towards the next steps of restoration and recovery, there are many opportunities for providing services in different ways and embedding the positive changes throughout 2020/21. Three specific examples are:

- We have recognised that technology can support us in our work, to enable us to connect with services, avoid physical contact when necessary, and minimise travel. It has enabled children and young people to stay connected to the people that matter to them most.
- It has helped us re-think how we provide learning and development opportunities for our colleagues, in particular arranging workshops, tutorials and training opportunities remotely.
- It has helped us streamline internal management and operating processes and consider new ways to arrange how we do things whilst still maintaining the quality of our services





Reflections and taking stock

Most of us agree that the Covid-19 pandemic has been an unprecedented event on a global scale. We wanted to capture and record the stages of this outbreak, to reflect on what has gone before and what may still be to come. We asked our services to complete a workbook recording the journey they had taken since March 2020 and alongside this we produced a journal for each service with an additional journal for each child and young person. These journals plot the stand out events that have taken place, globally, nationally and locally where young people can add in their own pictures, reflections and thoughts and which will serve as a reminder to us all in years to come of this moment in our history.

Building our Quality Improvement Capability

Over the past three years we have been on a transformational journey embedding continuous quality improvement into all our operations. We have made significant progress and this year the quality department undertook a series of projects including:

- **Risk assessment and risk management improvement**

Knowledge and skills in identifying and managing risk are central to all our work in Keys Group to keep children, young people and staff safe. We recognised the importance of developing our expertise in risk management and as such, through a clear terms of reference, established a working group that is using best practice in the sector to inform our learning and development, policy, procedures and recording systems.

- **Co-production – the role of the child in the audit process**

We want to actively involve the children and young we care, support and educate in examining our services and helping us know what changes we need to make to improve 'through their eyes'. A programme to support their involvement has been created and is planned to be piloted within our Cross Regional Project in the first instance, before wider national implementation.

- **Reviewing the Howard League for Penal Reform report on the "Criminalisation of Children in Residential Care, Victims not Criminals: Protecting Children Living in Residential Care from Criminal Exploitation"**²

Further detail of our review of this study and its implications for Keys Group is included on page 38 of this document.

How We Monitor Performance

Improvements in Data Quality

During 2018/19 we committed to make further improvements in data quality through a number of initiatives. This specifically included the continued development of our Radar system for untoward event reporting, compliance and improved risk management. The collection and management of data surrounding our activities allows us to understand the needs of the children and young people, to manage risk and effectively develop our services.

We have worked hard to improve our data quality, consistency of reporting and more importantly data analytics skills and implementation of a streamlined data interrogation and reporting module within Radar.

Effectively Managing Our Risks

Sound risk management principles are used in a co-ordinated way throughout Keys Group. We view good risk management as a continuous journey of improvement.

We carefully identify, monitor and manage risks which may impact on our ability to continue providing high quality care and support to children and young people. We do this through a detailed risk register and our governance processes.

Our most fundamental risk is that we fail to provide high quality or effective care and support, resulting in serious harm.

We continue to focus on the quality and effectiveness of our services, children and young people and staff engagement, culture and values and the effectiveness of our governance structures.

Adverse Incidents / Serious Untoward Incidents

An Adverse Incident is defined as: "Any event or circumstances that could have or did lead to harm, loss or damage to people, property, environment or reputation." Adverse Incidents happen in all organisations providing health and social care. Keys Group meets this challenge through the promotion of a culture

and system of reporting all incidents when they occur to learn from them and to prevent re-occurrence.

The objective of the incident reporting system is to encourage an open reporting and learning culture, acknowledging that lessons need to be shared to improve safety and apply best practice in managing risks. It also provides feedback on high-level analysis and themes arising from reported incidents.

A Serious Untoward Incident (SUI) is a classification of incident that will include 'an incident where there was a risk of serious harm or actual serious harm to one or more children and young people, staff or others.'

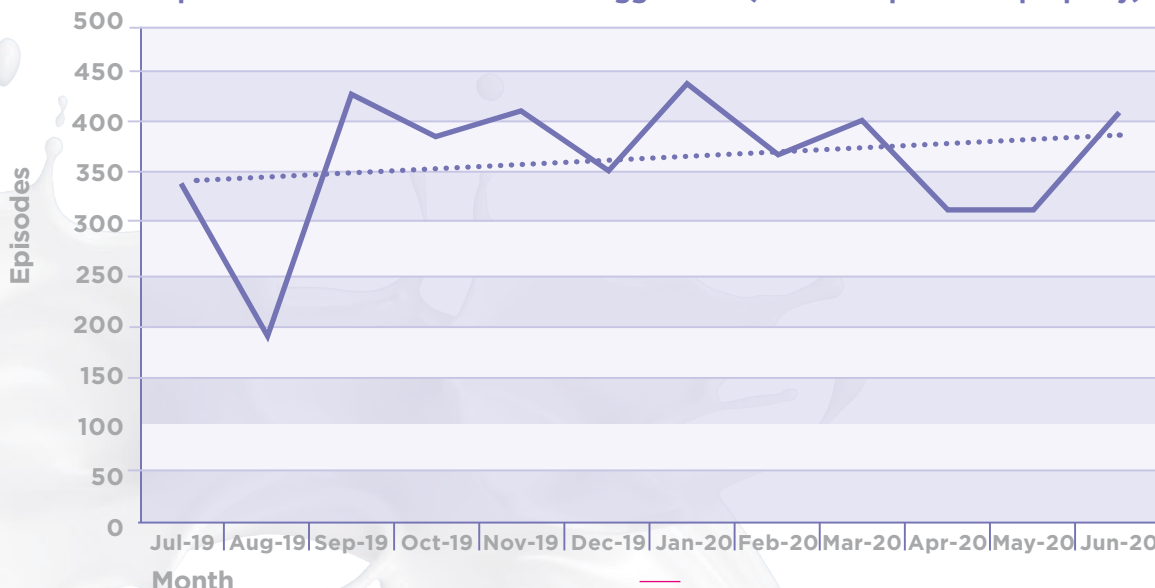
Facts and Figures

For the 12 months to July 2020 there were a total of 12,079 adverse incidents reported and of these 18 were reported as SUIs. Work is ongoing to tackle the root causes of these incidents to reduce their occurrence.

By far the largest incident type recorded in the reporting period related to episodes of children and young people's violence and aggression towards other people or property with 4,399 episodes reported in the 12 month period from July 2019.

"To err is human, to cover up is unforgivable, to fail to learn is inexcusable" Sir Liam Donaldson, former Chief Medical Officer, England.

Reported incidents of violence and aggression (towards a person or property)



Initiatives to Address the Increasing Trend of Violence and Aggression

As stated above violence and aggression is by far the most significant incident type and challenge for the organisation in supporting the children be young people in its care.

Violence and aggression can include a wide range of behaviours: explosive temper tantrums, physical aggression, fighting, threats or attempts to hurt others, use of weapons, cruelty toward animals, fire setting, intentional destruction of property and vandalism.

Numerous research studies have concluded that a complex interaction or combination of factors leads to an increased risk of violent and aggressive behaviour in children and young people. These factors include:

- Previous aggressive or violent behaviour
- Being the victim of physical abuse and/or sexual abuse

- Exposure to violence in the home and/or community
- Being the victim of bullying
- Exposure to violence in media (TV, movies, etc.)
- Use of drugs and/or alcohol
- A combination of stressful family socioeconomic factors (poverty, severe deprivation, marital breakup, unemployment, loss of support from extended family)

Its impact on and risk to the young person involved and indeed our staff teams is significant.

The National Institute for Health and Care Excellence Guidelines offers best practice guidelines to safeguard both young people and staff by helping to prevent violent situations and providing guidance to manage them safely when they occur. Keys Group management of violence and aggression is currently based on these principles:

Staff Training

1. To understand and apply the Human Rights Act 1998, the Mental Capacity Act 2005 and the Mental Health Act 1983.
2. Trauma and attachment training
3. De-escalation training including the use of physical intervention
4. Implementing positive behaviour support through Keys Connect

Improving the Young Person's Experience

1. Adopting approaches to care that respect young peoples' independence, choice and human rights
2. Working in partnership with the Young Person
3. Ensuring the safety of both young people and staff
4. Minimising the use of restrictive interventions

Involving the Young Person in Decision Making

1. Involving young people in all decisions about their care, support and education and developing care, support and risk management plans jointly with them.

Protecting the Young Person's Rights

1. Ensuring the young person's rights are protected and respected making any adjustments that are required.
2. Training staff in cultural awareness and in the organisation's duties under the Equality Act 2010.

Working with the Police and Other Agencies

1. Developing policies and procedures for joint working.

Reducing the Use of Restrictive Interventions

Keys Group staff receive training in both de-escalation techniques and in psychosocial methods to avoid or minimise restrictive interventions. This training enables staff to develop:

- A person-centred, values-based approach to care, in which personal relationships, continuity of care and a positive approach to promoting health underpin the therapeutic relationship.
- Skills to assess why behaviour is likely to become violent or aggressive, including personal, constitutional, mental, physical, environmental, social, communicational, functional and behavioural factors.
- Skills, methods and techniques to reduce or avert imminent violence and defuse aggression when it arises (for example, verbal de-escalation).
- Skills, methods and techniques to undertake restrictive interventions safely when these are required.
- Skills to undertake an immediate post-incident debrief.

Restrictive Intervention Reduction Programme in Partnership with British Institute of Learning Disabilities (BILD)

In 2020, Keys Group funded a new restrictive intervention programme in association with BILD with the aim of reducing the incidence of violence and aggression and the use of restrictive interventions. Through this initiative we will implement a Positive Behaviour Support organisational approach as outlined in 'Reducing the Need for Restraint and Restrictive Intervention' HM Government June 2019.

Our key aims are to:

- Improve outcomes for children and young people.
- Improve staff wellbeing.
- Reduce the number of incidents of violence aggression.
- Reduce the use of restrictive practices and specifically the frequency and duration of any form of restraint by improving our ability to manage behaviours of concern.

We will achieve these aims by:

- Improving the understanding, knowledge and skills of all colleagues in all our services.
- Retaining and developing staff (including home managers and head teachers) as members of the UK Coaches Network.
- Sharing good practice.
- Improving post incident continual learning and support.

This exciting project will be implemented in 5 phases and will take between one and two years to complete. The first phase will commence at the beginning of 2021 will act as a pilot phase enabling the programme to be reviewed prior to the commencement of the further phases.

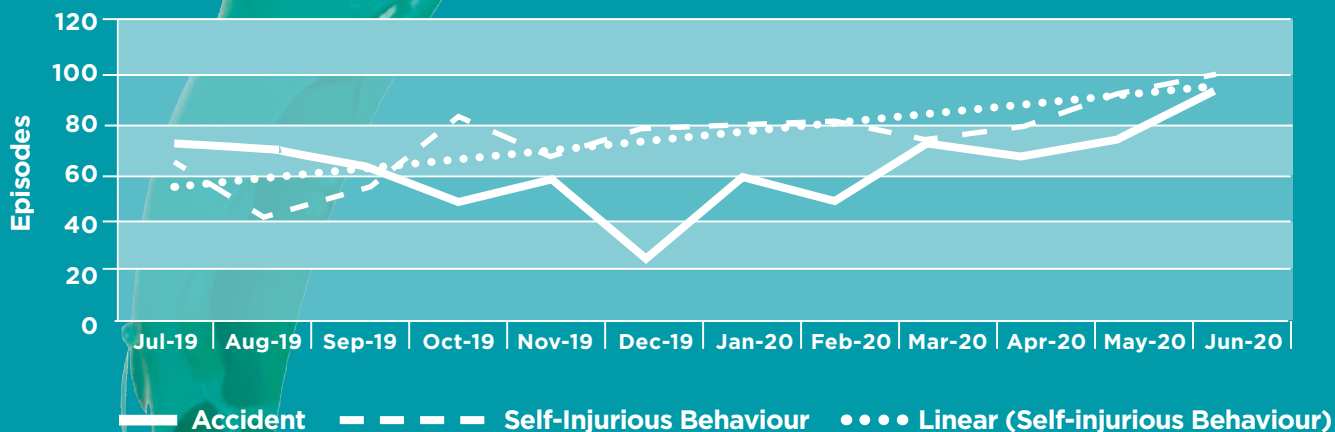
In support of this initiative and our commitment to developing our capabilities in the management of violence and aggression we have appointed a national Head of Positive Behaviour Support who will develop, lead and implement our strategy.

Top Two Incident Categories After Violence and Aggression

The following two incident types were the most prevalent after violence and aggression:

- Self-injurious behaviour
- Accidents

Accident and self Injurious Behaviour Trends



Self-Injurious Behaviour Analysis, Learning and Actions

There are lots of reasons why a child or young person may choose to self-harm and many ways they may do it. In most cases there is an underlying reason why a young person would choose to self-harm. Negative experiences from their past, such as a family bereavement, bullying, or sexual abuse, are often to blame for self-harming behaviours. Mental health conditions such as anxiety, depression, low self-esteem, as well as sexuality, gender identity and body image issues are also associated with a young person wanting to hurt themselves physically.

The children and young people admitted to and supported by Keys Group are more susceptible to self-injurious behaviour examples of which include:

- Cutting
- Burning
- Poisoning (often with excessive alcohol or illegal drugs)
- Scratching or biting
- Punching or kicking walls or other hard objects
- Overdosing on prescription or over-the-counter medication
- Head banging

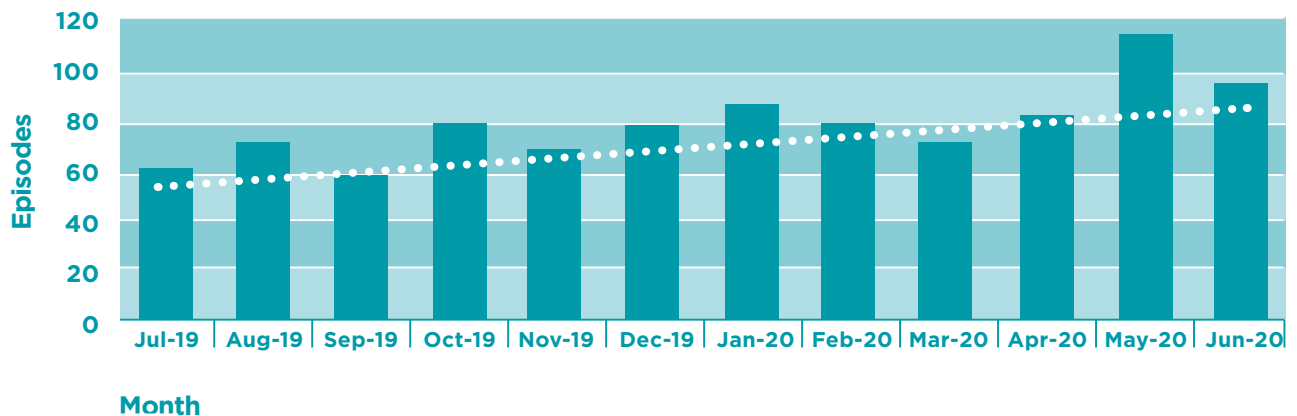
Children and young people may use one or more forms of self-harm to control their emotions, with cutting being reported as one of the most common ways of inflicting physical pain.

There are also less obvious behaviours which are classed as self-harm, including over or under eating, exercising excessively to the point of exhaustion, drinking heavily or taking drugs, or having regular unprotected sex with strangers. These forms of self-harm, though less obvious than those listed above, still show an intent to cause pain through potentially harmful physical behaviour.

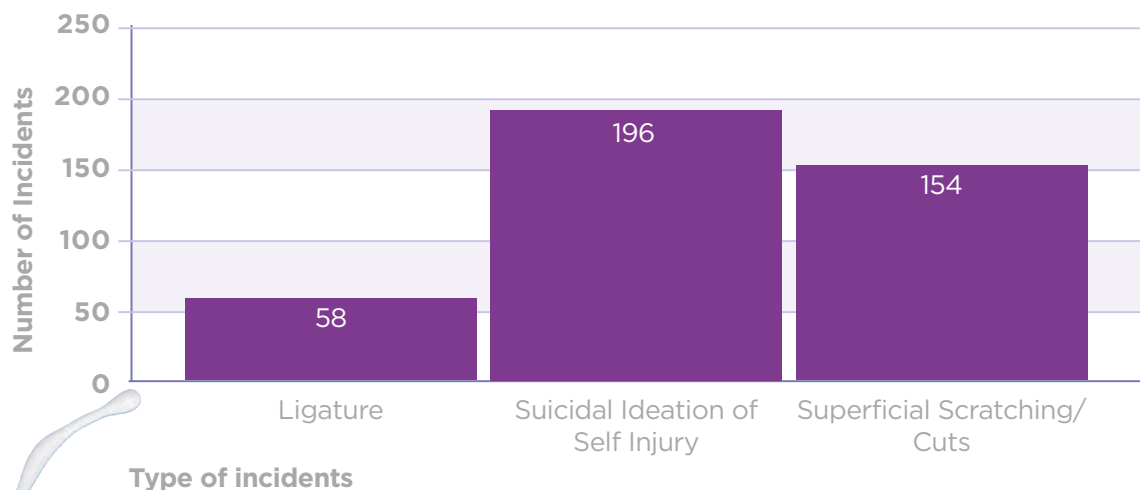
In the 12 months to July 2020, 960 episodes of self-injurious behaviour were reported within Keys Group.

Forty three percent of all reported incidents of self-injurious behaviour fell into three specific categories: suicidal ideation/threats of self-harm, superficial scratching and cuts and ligaturing.

Self-Injurious Behaviour Trend 12 months to July 2020



Self-Injurious Behaviour 12 months to July 2020



Young people who self-harm have a substantially increased risk of adverse non-fatal and fatal outcomes, including suicide, compared with those who do not self-harm. A person-centred approach to the provision of services is therefore fundamental to the delivery of high-quality care to young people who self-harm. Therapeutic approaches for working with young people who self-harm in Keys Group include effective risk-management planning, developing and practicing effective emotional regulation strategies, and reducing reactivity to triggers for self-harm.

We provide training for our staff teams working with children and young people who self-harm, ensure appropriate individualised therapeutic input and have a national specialist advisor in self-injurious behaviours to assist teams in assessing risk and developing appropriate support strategies. We work as part of a multidisciplinary team which will include as appropriate NHS primary care and specifically child and adolescent mental health teams.

In assisting services to ensure the safety and wellbeing of children and young people with a history or presentation of self-injurious behaviour, the specialist advisor supports staff teams to employ temporary assessment periods in response to risks being presented. This system involves a clear and accurate individual description of a child/young person's presentation when they are happy, settled and engaged against a series of indicators that would give rise to concern and the need for further intervention, reporting

and or seeking other assistance. This system is monitored by the specialist advisor for each individual child and young person and in agreement with their multi-disciplinary team.

Accident Analysis, Learning and Actions

Studies relating to accident statistics demonstrate that slips, trips and falls, falling objects, unintentional contact with sharp or hot objects, moving vehicles and machinery are the largest cause of work-related accidents in all industries or activities. Studies also show that human factors are a major component of the causes of work-related accidents and making errors is a constant feature of human behaviour.

For the 12 months to July 2020 a total of 795 accidents were reported on our RADAR system. The vast majority were minor events, causing 'no harm' to children and young people or staff. Accidents include for example: minor grazes, falls from play equipment and bicycles, minor bumps, slips, trips.

There were 15 accidents reported under the 'Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013' (RIDDOR). RIDDOR places duties on employers to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences (near misses).

The majority of reports related to staff injuries including:

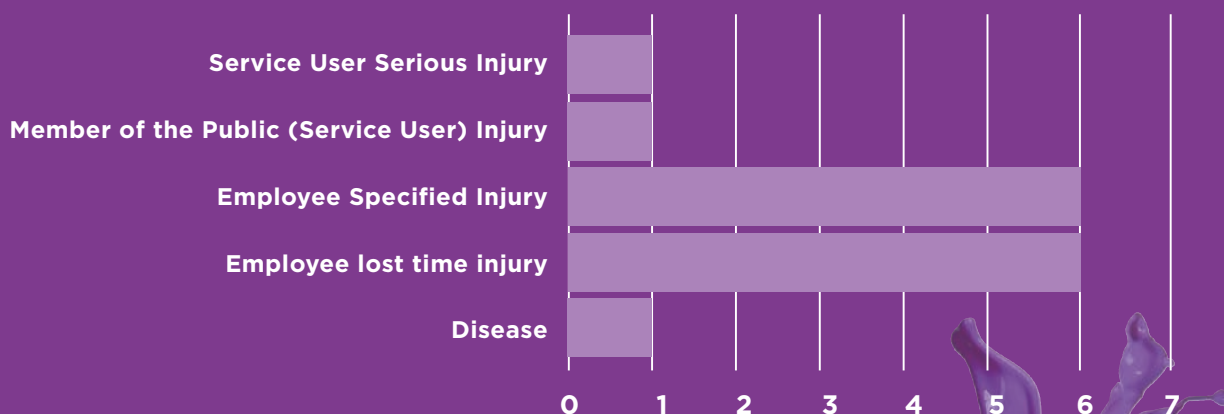
- Fractures and soft tissue injuries predominantly due to slips, trips and falls.
- Injuries following assault by a young person.

Two incidents involving young people were an ankle fracture as a consequence of a fall from a wall and a burn as a result of a young person touching a hot hob.

Both were appropriately investigated and managed in line with our normal protocols.

There was one report in the disease category relating to a Covid-19 outbreak in a school.

RIDDOR Report by Type 12 Months to July 2020



How Positive Outcomes from Incident Investigations can make Significant Contributions to Safety and the Reduction of Avoidable Harm

In line with our value of integrity, we strive to work honestly and openly, sharing our learnings when things go wrong. We investigate all incidents to understand them more fully, to consider the risk mitigation measures we already have in place and to learn and make improvements when necessary, driving

forward safety improvements and reducing the risk of avoidable harm. In the last year we have carried out 18 internal significant incident investigations with 2 reports being shared with safeguarding partners within Local Authorities as part of local child safeguarding practice reviews in accordance with Working Together to Safeguard Children (2018).

Lessons Learned from Incident Investigations	Actions
Improvements need to be made in risk assessment and risk management	Established a risk management working group that is using best practice in the sector to inform our learning and development, policy, procedures and recording systems.
Improvements need to be made in incident reporting and recording.	A workshop and workbook to support staff understanding of reporting to teams across the Group.
Improvements need to be made in ensuring effective communication, including collaborative working with multi-agencies.	Procedures have been revised to strengthen communication channels and to seek to build robust relationships with external partners.
Improvements need to be made in challenging others in advocating for the needs of children and young people.	The escalation process has been revised to provide clarity on roles and responsibilities within the team in challenging others.

Being Open

Keys Group is committed to improving the safety and quality of the care and support we deliver to children and young people. 'Being open' is a set of principles to provide open and honest communication between staff, the children and young people supported (and their family and carers) and other external agencies e.g. commissioners when anyone has suffered harm. Keys Group has a 'being open' policy and training available for all staff. Promoting a culture of openness is vital to improving safety and the quality of care and support systems.

A culture of openness is one where:

- Staff are open about incidents they have been involved in.
- Staff and organisations are accountable for their actions.
- Staff feel able to talk to their colleagues and superiors about any incident.
- Organisations are open with children and young people, the public, other agencies involved in care and support and staff when things have gone wrong and explain what lessons will be learned.
- Staff are treated fairly and are supported when an incident happens.

How the Organisation Learns

Keys Group is committed to being a 'learning organisation', that means one that is continually seeking to share best practice, to share learning when the care and support we have provided could have been better and also to proactively identify risk and to be a 'problem solving' organisation. We share learning in a number of ways:

- Internal learning templates arising from an incident, complaint, case management review etc - 18 issued across the Group in 2019/20.
- Safety messages issued across the Group each week.
- Quarterly and annual complaints, incident and SUI (serious untoward incident) reports.
- Implementing recommendations from reviews and enquiries.
- Incidents and SUIs are themed in categories to enhance learning opportunities.

Systems Methodology Training

Systems methodology is an approach to organisational process modelling and can be used both for general problem solving and in the management of change.

- The 'systems' model helps identify which factors in the work environment support good practice, and which create unsafe conditions in which poor practice is more likely.
- It provides a way of thinking about front-line practice and a method for conducting case reviews.
- It produces organisational learning that is vital to improving the quality of work with children and young people.
- It supports an analysis that goes beyond identifying what happened to explain why it did so - recognising that actions or decisions will usually have seemed sensible at the time they were taken.

This year we trained 13 senior managers in systems methodology with a resultant review of five areas of our work including:

- The use of physical restraint and the effectiveness of the Groups current Positive Behaviour Support Policy and de-escalation training.
- The management and effectiveness of interventions with children and young people using cannabis.
- Whether leadership and staff awareness of gangs and county lines is sufficient to take account of the risks presented to children and young people supported by Keys Group.
- A review of how information from placing authorities is received and whether the current referral process captures all the necessary and relevant information about a young person prior to admission.
- Following missing from care episodes how our return home interviews are used to inform organisational learning across Keys Group.

One of the most beneficial and enduring outcomes of systems thinking and modelling is team and organisational learning. The consistent methodological approach determines the skeleton of decision making and problem solving, so managers benefit from knowing the boundaries, requirements and expectations within which they can carry out their managerial duties and responsibilities. We intend to continue to use the process over the coming year and train further members of our team in the approach.

Safeguarding

A culture that safeguarding children and young people is everybody's responsibility permeates across all Keys Group teams and the staff who work in them. Keys Group has a clear governance structure in place for safeguarding children and young people.

Effective safeguarding is built around ensuring that practice is up to date and cognisant of current research, legislation and statutory guidance.

From July 2019 – July 2020 there were 431 safeguarding concerns recorded as primary events in RADAR, 3.6% of all untoward events recorded.

In addition, there were 446 events where safeguarding was identified as a consequential element of a primary event in one of the following categories:

- Accident
- Financial/theft
- Fire
- Inappropriate use of information technology
- Medical emergency
- Self-injurious behaviour
- Service user absent
- Service user missing from care
- Substance misuse
- Vehicle related event
- Violence and aggression

The table below identifies a sample of our lessons learnt following analysis of safeguarding events.

We are excited this year to launch our first Annual Safeguarding Report which provides greater detail on our approach to safeguarding, our learning, achievements and plans for the future including our ongoing commitment to protecting those entrusted to our care and support.

Probationary Period	Revised human resource systems for monitoring the probationary process.
Induction Process	Standardised induction process introduced for agency staff.
Children Missing Education	Policy revised to ensure process for reporting a child missing more than 10 consecutive days and education is being reported as a safeguarding concern.
Compatibility Assessment	Assessment of children and young people being referred to residential homes enhanced to ensure full consideration of compatibility between children and young people.
Safeguarding Training	Training programme revised to further enhance the skills staff require in responding to a disclosure of prior abuse.
Improving risk assessment and risk management	Established a risk management working group that is using best practice in the sector to inform our learning and development, policy, procedures and recording systems.



Child Criminal and Sexual Exploitation and County Lines

Criminal exploitation of children and young people is a geographically widespread form of harm that is a typical feature of county lines activity.

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. County lines is a major, cross-cutting issue involving:

- drugs
- violence
- gangs
- safeguarding
- criminal and sexual exploitation
- modern slavery
- missing persons

And the response to tackle it requires a multiagency response including the police, National Crime Agency and a wider range of government departments, local authorities and providers of services to vulnerable children and young people. We continue to work closely with multiagency partners to address the risks County Line activity presents to the children and young people we care for and support given their higher vulnerability to this illegal activity.

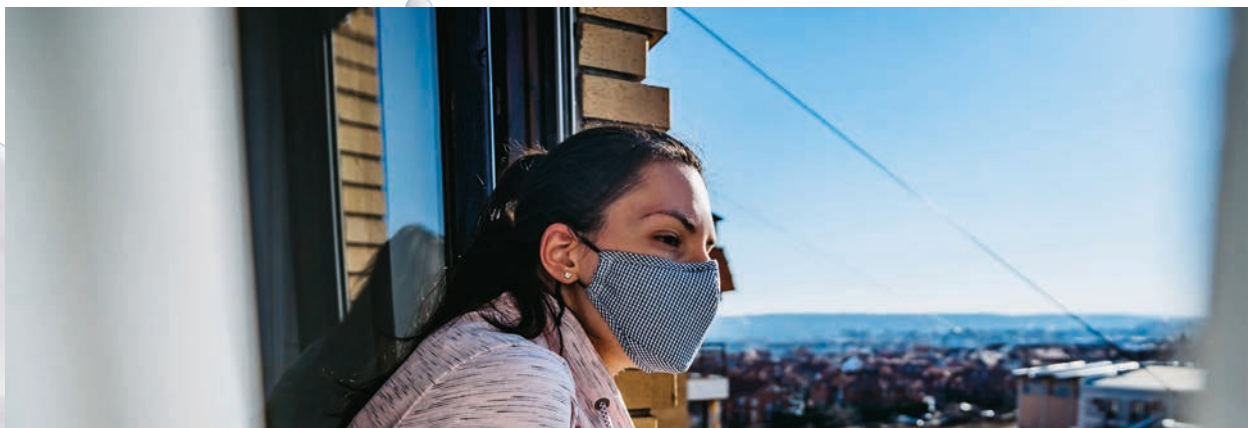
Case Study – Police National Specialist Advisor

When the national Covid-19 lockdown took effect, a small number of our young people really struggled with these new rules and despite the best efforts of staff would go missing or go out and about in their local community. Understandably everyone was

anxious about the risks to their safety, health and wellbeing but also the risks to the other young people living in these homes, the staff team and wider family and community. As we all tried to manage to keep our distance, employ good hygiene practices, in not doing so our young people were risking contracting Covid-19 and/or spreading it to others. The police unfortunately were required to intervene in a couple of cases of young people going missing as there were no quick fixes to support the young people to remain safe and to stick to the Covid-19 rules. Our police specialist advisor spent time with the staff teams 'virtually' to understand the risks the young people were posing and met with the relevant local police forces to discuss the risks. Through this process a joint understanding was developed that every situation would require to be managed differently as at this point of the pandemic there was little or no guidance available to support good decision making in these situations.

Acknowledging this gap our specialist advisor set about creating a guidance document identifying what responses staff in homes should take if children went missing during the lockdown. This document was shared with all Keys Group homes and the relevant local police.

The specialist advisor sits on the Police National Working Group for Best Practice for Children who go Missing from Care which is led by an Assistant Chief Constable who is the National Police Chiefs Council lead for missing from care. The guidance was shared at this forum and in turn has been shared, as best practice, nationally across all police forces to enable the same approaches to be taken in keeping children and young people safe.



Performance Analysis

We continue to perform well against our regulatory and internal targets. We have some areas where focused improvement is required and have plans in place to achieve these.

We are dedicated to ensuring that our services meet and exceed all regulatory standards.

All our regulators produce reports following inspection, many of which are available online or by request.

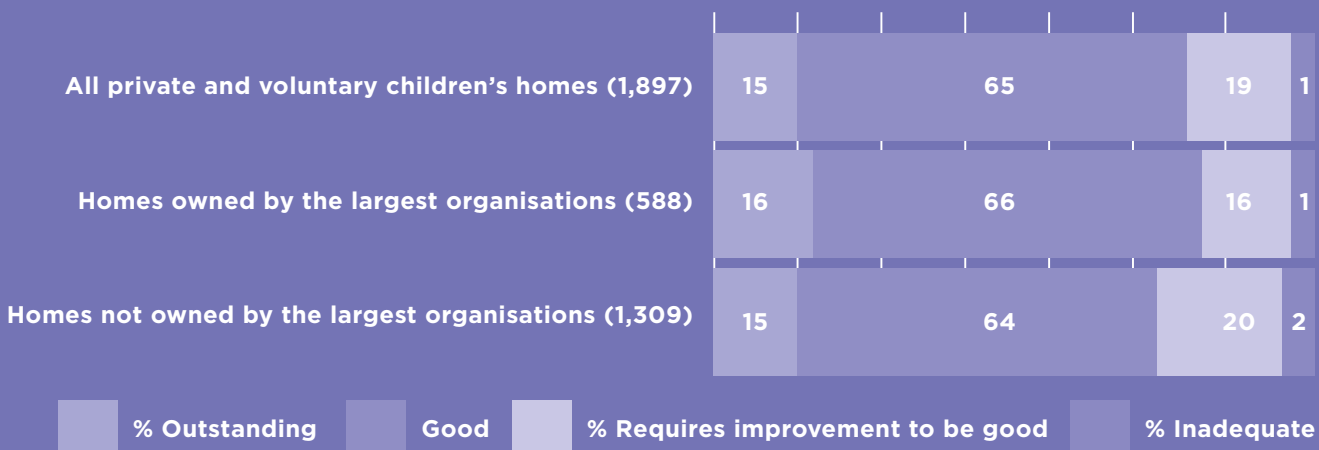
We are regulated by the following bodies:

- Ofsted is the Office for Standards in Education, Children's Services and Skills. They inspect services providing education and skills for learners of all ages. They also inspect and regulate services that care for children and young people. Ofsted's role is to make sure that organisations providing education, training and care services in England do so to a high standard for children and students. Ofsted inspects all our residential children's homes in England at least annually and all our schools and family assessment centres at least every 3 years.
- CIW is the Care Inspectorate Wales. They register, inspect and take action to improve the quality and safety of services for the well-being of the people

of Wales. CIW inspects all our residential children's homes in Wales at least annually.

- Estyn is the office of Her Majesty's Inspectorate for Education and Training in Wales. They are independent of, but funded by, the National Assembly for Wales. The purpose of Estyn is to inspect quality and standards in education and training in Wales. Estyn inspects our school in Wales.
- CQC is the Care Quality Commission, the independent regulator of health and adult social care in England. They make sure health and social care services provide people with safe, effective, compassionate, high-quality care and encourage care services to improve. In 2018, we registered our leaving care service with the Care Quality Commission (CQC). This registration means that we can provide care services to young people who are moving on from being looked after children.

Our Residential Children's Homes in England are inspected by Ofsted. At 31 March 2019, 80% of all Keys Group homes were rated Good or Outstanding. This compared favourably to the Ofsted average across all residential children's home provider types of 78%³.



Ofsted published inspection profiles for the 10 largest private and voluntary providers of children's homes in July 2019, which between them own just under 30% of all private and voluntary-owned children's homes. This showed that homes owned by the 10 largest providers performed better than all other private and voluntary homes, with

82% judged good or outstanding compared with 78% for all other providers. Keys Group achievement of 80% fell 2% below the average for all large providers but was higher than the average for providers of all sizes by 2% in the reporting period. An improvement in ratings will continue to be driven over the course of the next 12 months.

'Inspection profiles of the largest private and voluntary providers of children's homes March 2019', Ofsted, July 2019⁴

	Outstanding	Good	Requires improvement to be good	Inadequate
All private and voluntary children's homes (1,897)	15	65	19	1
CareTech Holdings Plc (188)	14	66	20	
Keys Group Limited (G Square Healthcare Private Equity Up)	12	68	20	
The Priory Group (Partnership in Care UK 1 Ltd) (61)	21	59	15	5
The Outcomes First Group (Sacp Spring Topco Limited) (51)	22	61	16	2
Horizon Care and Education Ltd (43)	12	63	26	
Hexagon Care Services Limited (Hcs Group Limited) (35)	17	83		
Sandcastle Care Ltd (Sc Topco Limited) (29)	17	79		3
The Partnership Of Care Today (32)	13	78	6	3
Esland Group Holdings Ltd (28)	18	57	21	4
Homes2Inspire Ltd (The Shaw Trust Limited) (26)	31	54	15	

% Outstanding

Good

% Requires improvement to be good

% Inadequate



⁴Ofsted Transparency data; Inspection profiles of the largest private and voluntary providers of children's homes March 2019 (Updated 23 July 2020) www.gov.uk/government/publications/inspection-outcomes-of-the-largest-childrens-social-care-providers/inspection-profiles-of-the-largest-private-and-voluntary-providers-of-childrens-homes-march-2019

Ofsted Regulatory Notifications

We are required by law to notify Ofsted of serious incidents that occur, these include:

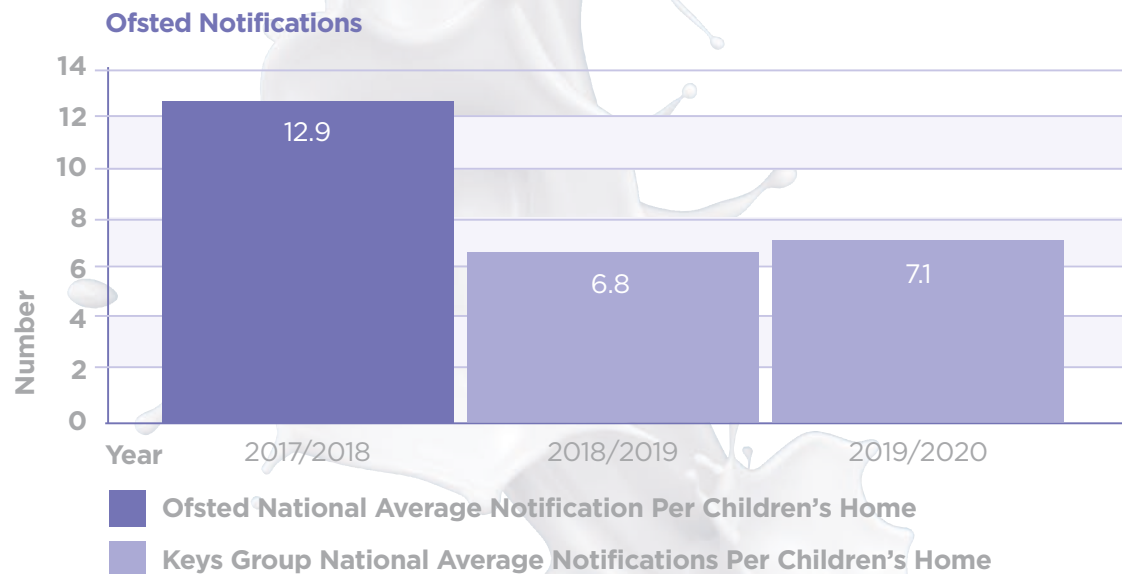
- Child deaths
- Involvement in child sexual exploitation
- Child protection enquiries
- The police being called to the home
- Child self-harming
- Allegations of abuse, complaints or referrals against people working in the home

Ofsted reported in 2017/18 that they had received 27,530 notifications by 2,135 children's homes, equating to 12.9 notifications made per children's home. Data has not been released on notifications for 2018/19 or 2019/20.

In 2018/19, Keys Group made 698 notifications to Ofsted equating to 6.8 notifications per children's home.

In 2019/20, Keys Group made 693 notifications to Ofsted equating to 7.1 notifications per children's home.

In this coming year we will continue to work to reduce the number of notifications to Ofsted continuing to provide expert support to children and young people to prevent any serious incidents triggering a requirement for Ofsted notification.



Missing from Care and Police Involvement

In recent years, greater attention has rightly focused on the issue of children who go missing from state care. The risk factors for running away from home or state care are multifaceted. Research suggests that there are some factors that may increase the likelihood that a child will go missing including:

- Multiple placements: while in their first state placement young people are not likely to go missing (especially younger children), the greater the number of placements, the greater the likelihood of running away.
- Family attachment and separation: children in care may run away from their placements

to reconnect or reunite with their non-custodial family.

- Gender-related experiences: research suggests that girls are disproportionately more likely to run away from home or state care, as well as run away at an earlier age compared to boys. This difference between the genders may be explained by factors that are disproportionately experienced and/or reported by girls such as sexual abuse and family instability.
- Involvement in gangs or child sex trafficking: in 2016, 11% of endangered runaways reported to the National Centre for Missing and Exploited Children were believed to be involved in gangs, with an additional 18% of children likely victims of child sex trafficking.

We have a duty under each local authority's 'Runaway and Missing from Home and Care Protocol' to report children that are missing from care to the police. We also have a duty to report to Ofsted any event requiring police attendance at a home. In this year, 33% of our notifications to Ofsted were in relation to police being contacted regarding a young person missing from care.

Missing from care episodes continue to be the most significant reason for police involvement

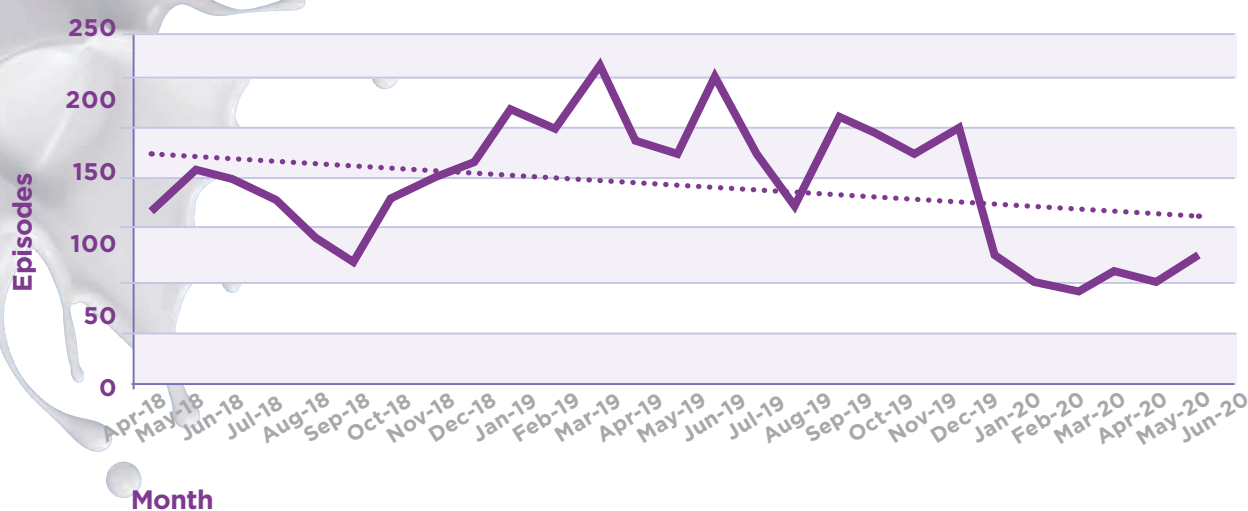
with young people supported by Keys Group with a continuing downward trend in police involvement since April 2018.

For the 12 months to July 2020 the most common reasons for police involvement with children and young people supported by Keys Group were as shown in the chart below. Missing from care/education continues to be the most significant reason for police involvement.

Self-Injurious Behaviour 12 months to July 2020



Police Involvement Trend to June 2020



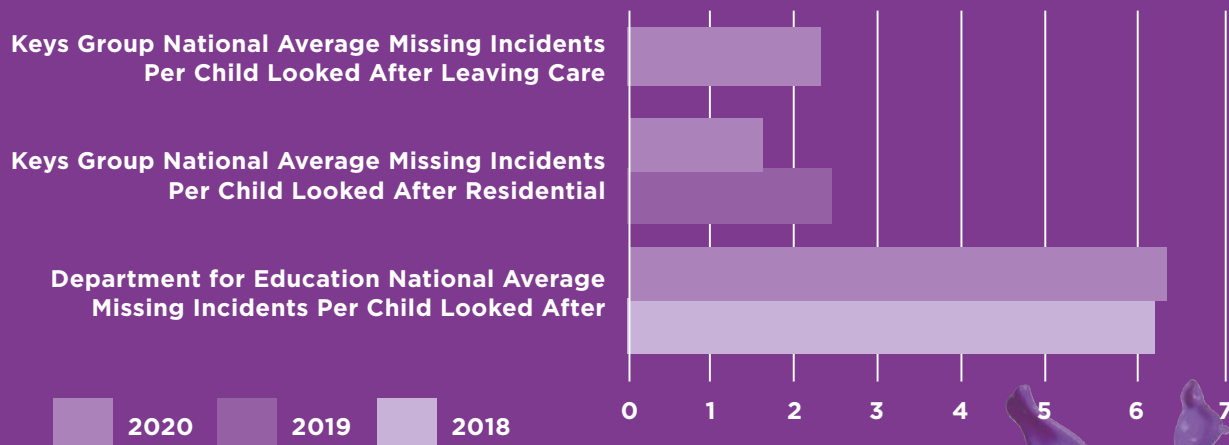
For the year ending March 2019, the Department of Education reported that there was an average of 6.2 missing incidents per looked after child in this period. This equates

to 73,470 missing incidents for the 11,830 looked after children, including: secure units, children's homes, foster placements and semi-independent living arrangements.⁵

For the 12 month period to March 2020, Keys Group recorded 931 missing from care episodes for the 612 children we provide care and support to in our residential children's homes, this equates to an average of 1.5 missing incidents per child.

For the 12 month period to March 2020, Keys Group recorded 138 missing from care episodes for the 62 children we provide support to in our leaving care services, this equates to an average of 2.2 missing incidents per young person.

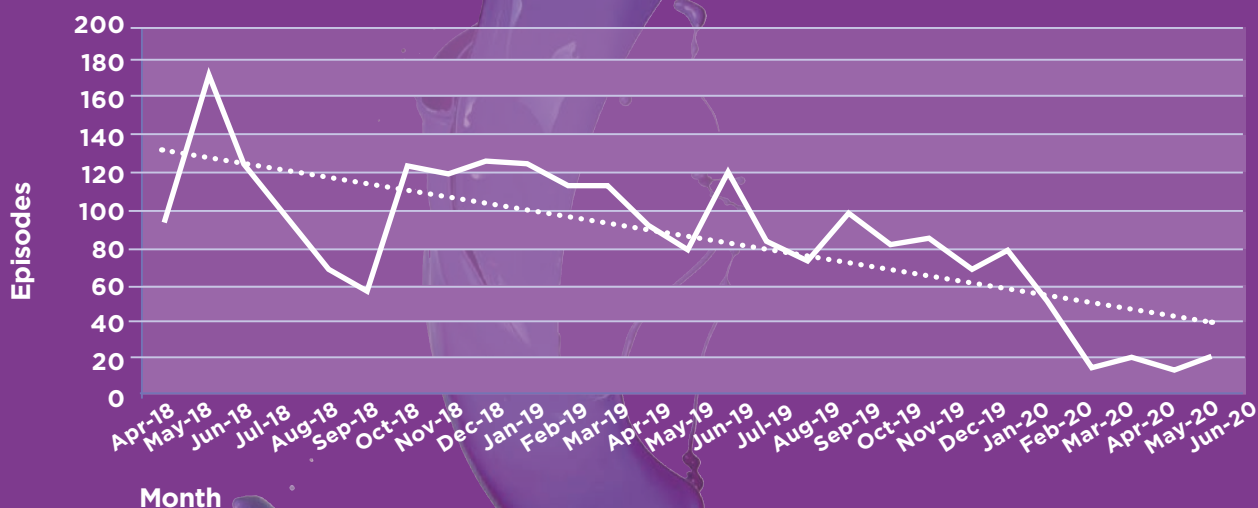
National Average Missing Incidents Per Child



75.4% of our children never go missing from our homes, for those that do, these young people (generally older teenagers) come to live with us presenting with this risk having previously been missing from care while residing at their family home, in another children's home or foster care. We are always very concerned for the safety and welfare of any young person who goes missing. We work within the

regulations and with our multi-agency partners to prevent young people going missing and when they do, to return them safely. We work therapeutically with the young person to understand the triggers to missing from care episodes, to address the causes, to avoid patterns of unsafe experiences and to prevent further placement disruptions.

Missing from Care Trend to June 2020



Case Study

Our team of specialist advisors work together as a team which is critical to ensuring that the complex needs of the young person are met. This combined approach including working with professionals from the local authority and health care teams leads to effective and consistent support resulting in reduced risks.

When Kiera came to live in one of our homes she had been smoking cannabis for some time, had regularly gone missing and had been at risk of sexual and criminal exploitation. She initially struggled to form friendships with the other children in the home and would run off to seek the company of other young people whose influence would result in increased cannabis use and missing episodes. Recognising these complex needs, our specialist advisors worked with the home manager, therapist and social work team to develop a plan with the objective of supporting Kiera to reduce the presenting risks to her health and wellbeing.

Being clear on each of their roles, this multi-agency team set in motion step-by-step intervention to support and care for Keira, including individual therapy, education regarding substance misuse, working with the local police force to support a reduction in her engagement with others who posed a risk and helping her understand how she could be kept safe. The staff team supporting Kiera, received specialised learning and development and supportive group consultations to ensure consistent approaches were employed when working with Kiera. Challenges and barriers were frequently placed before Keira, the whole team kept together, communicated effectively, supporting and often challenging each other to decide upon the next steps.

Over 12 months Keira had taken big steps towards keeping healthy and staying safe. She was a more informed young person with an increased confidence in making good choices. Within 2 years Keira returned to living with her father. Her risk taking concerns have been eliminated and she is engaged in a college, studying health and social care and eager to use her life lessons to benefit others in the future.

Pass the Parcel – Children Posted Around the Care System Children’s Commissioner for England (December 2019)⁶ and The Howard

League Report: ‘Criminalisation of Children in Residential Care, Victims not Criminals: Protecting Children Living in Residential Care from Criminal Exploitation (March 2020)⁷

Pass the Parcel

This report notes that there are over 30,000 looked after children living ‘out of area’ in England. This is 41% of all children in care and has risen by 13% since 2014. Over 11,000 of these children are more than 20 miles from what they would call home, with over 2,000 further than a hundred miles away.

Children living far away are known to be at much higher risk of going missing and their vulnerability also means that they can be easy targets for exploitation by criminal gangs, who are expanding drugs markets through ‘county lines’ activity into semi-rural areas.

Out of county placements happen for a number of reasons. It may be that children need to be kept safe from criminal gangs or sexual predators who pose a serious threat to them. Often, however, it is simply because there is nowhere suitable for them to live locally. The numbers of older children going into care have risen year on year and the report alleges that this results in cash-strapped local authorities making out of county placements in children’s homes run by private companies, often operating in cheaper and less ‘desirable’ parts of the country.

Criminalisation of Children in Residential Care, Victims not Criminals: Protecting Children Living in Residential Care from Criminal Exploitation

The Howard League report speaks about ongoing failings in children’s social care exacerbating the risks of criminal exploitation of children and young people in the care system. The Howard League attributes some of these failings to privately owned companies dictating where care homes are located. The report suggests that privately owned children’s homes are often located in less expensive, more deprived areas on the basis of maximising independent companies opportunities for profit. Furthermore, the report highlights that these areas often experience much greater crime rates, placing vulnerable children at greater risk of becoming victims of criminal exploitation.

⁶Pass the Parcel – Children Posted Around the Care System Children’s Commissioner for England (December 2019) www.childrenscommissioner.gov.uk/report/pass-the-parcel-children-posted-around-the-care-system/

⁷The Howard League Report: ‘Criminalisation of Children in Residential Care, Victims not Criminals: Protecting Children Living in Residential Care from Criminal Exploitation (March 2020). www.howardleague.org/news/more-focus-needed-to-protect-children-in-residential-care-from-county-lines-criminal-exploitation/

Keys Group Response

Given the allegations made in both these reports Keys Group internally commissioned a report to consider if Keys Group disproportionately operates services in areas of England and Wales where higher deprivation rates are observed. The review examined and analysed deprivation data relevant to the location of all Keys Group residential services including;

- Residential care homes.
- Houses of multiple occupancy (HMO).
- Leaving care provisions.
- New services developed over the preceding 12 months, as well as those in development at the time of the review.

The report identified that in terms of the IMD - Quality of Life Indicator;

- The highest proportion (53%) of Keys Group homes fall into the areas ranked in the 51-100% range of all other areas in England and Wales.
- A significant proportion of service (25%) locations fall into areas ranked between the 31%-50% range of all areas in England and Wales.
- The smallest proportion (22%) of service locations fall into areas ranked up to 30% decile of all areas in England and Wales.

The report identified that in terms of Crime Indicators

- The highest number (49%) of Keys Group service locations are in areas that are ranked in the 51-100% of all other areas in England and Wales for the crime indicator.
- A significant proportion (25%) of service locations fall into the 31%-50% of all areas in England and Wales.
- The smallest proportion (21%) of service locations fall into the locations ranked up to the 30% decile of all services in England and Wales.

As an organisation we continue to grow our business, both through acquisition and organic development. In the last 12 months Keys Group developed nine new services. Seven of these services are in locations that are in the top 70% of all areas in England and Wales in terms of

the IMD Quality of Life Indicator. For the crime indicator, 6 locations are in the top 70% of all areas in England and Wales.

Finally, Keys Group referrals data was examined to understand the proportion of children placed locally and out of county within Keys Group. The analysis of placements made within Keys Group identified that over 60% of the children and young people supported were in local placements. In line with the findings of the Children's Commissioner for England report circa 40% of children supported were placed out of county.

In summary;

- The majority of Keys Group services are not located in deprived areas of England and Wales, with half of all services located in areas that are better than fifty percent (or more) of all areas in England and Wales on both the overall quality of life indicator and the crime indicator (a derivative of the quality of life indicator).
- Our governance systems require a full assessment of risk factors (including location) prior to making a decision to invest in the development of any new service or importantly to place any child in a service out or in county.
- Decisions to invest in particular locations are made on the basis of a detailed business analysis and often in order to support local authority demand for children's homes located within the commissioning authority boundaries, the ultimate objective being to keep children and young people close to their social networks and to reduce risk.

Care Inspectorate Wales and RISCA

2018 also heralded the introduction of the new registration process for residential children's homes in Wales under the Regulation and Inspection of Social Care (Wales) Act 2016. In May 2019 all Keys Group homes were successfully registered under the new RISCA regime.

In Wales, 100% of our residential children's homes were rated as compliant with RISCA by Care Inspectorate Wales.

Ofsted Inspections Education

At 31 March 2020, 90% of Keys Independent Schools were rated as Good or Outstanding. This compares favourably to the most recent national picture for independent schools of 75% and 83% for independent special schools (The Annual Report of Her Majesty's Chief

Inspector of Education, Children's Services and Skills 2018/19). We are continuing to strive and aspire to see 100% of our schools rated good or outstanding.

Overall effectiveness of non-association independent schools: 31 August 2019⁸

Number of schools in brackets (rounded)

All non-association independent special schools (1,040)

Independent special schools (470)

Other independent special schools (570)



1. Includes inspections carried out by 31 August 2019 with a report published by 30 September 2019

2. Percentages are rounded and may not add up to 100%

Source: Ofsted

Education Inspection Framework

In 2019 Ofsted introduced a new inspection framework for education – from early years through schools and on to adult learning. Judgements will now be made by shifting the focus from results onto “what is being taught and how schools are achieving a good education”. However, outcomes will still be taken into consideration. In the new framework inspectors will be looking closely at how the behaviour of learners is being managed and the strategies the school has to develop alternative options to exclusion. Importantly, inspectors will look for evidence that the school is taking account of any safeguarding risks to pupils who may be excluded. The new Education Inspection Framework has four judgements:

- Quality of Education
- Behaviour and Attitudes
- Personal Development
- Leadership and Management

In preparation for the implementation of the new inspection framework, the following initiatives were undertaken:

- Workshops focusing on the new judgements were provided by our school improvement partner to all head teachers.

- We appointed subject specialist leads in each school to evaluate each curriculum subject, identifying actions for improvement in each school.
- We held subject specialist workshops to share best practice.
- Culture capital initiatives have been threaded through the curriculum within schools, focusing on the child's personal development, through learning new skills, realising talents, developing character and resilience and learning about British values and culture as well as diversity mental health and wellbeing.
- Head teachers and subject specialist leads have attended training outlining the new inspection approaches.
- Additionally there has been investment in the International Primary and Middle Year Curriculum which delivers the curriculum thematically, leading to improved engagement of pupils as opposed to traditional taught subjects. Children are provided with individualised bespoke timetables which are arranged to meet their learning needs.
- Our Education Business Partner has provided additional support and conducted audits of our schools.
- We have trained and developed staff in mental health awareness to provide support and guidance to staff and pupils.

Off Rolling

Over the past year, Ofsted have continued to be concerned about the number of pupils leaving schools without another school to go to and without a formal exclusion process. Twenty thousand pupils left their state-funded secondary schools between Year 10 (2017) and Year 11 (2018). It is noted that vulnerable students with SEND or other needs are more likely to

be affected and this is predominantly the group of children and young people supported in Keys Group schools. We work tirelessly to ensure that the children and young people we support are not permanently excluded from our schools recognising the unique needs of those we support and their particular vulnerabilities.

Listening

Cross Regional Project

In August 2019 we created a participation and inclusion strategy. This three year strategy sets out Keys Group commitment to the vision for all children, young people, adults and families we support to be listened to and involved in all aspects of service delivery that affects their lives. Our services actively engage with all individuals so that their participation and involvement informs the plans for their care and education and achieves good outcomes for all. The strategy seeks to work to ensure that better systems are established to support participation, that our culture embraces participation and that we can demonstrate the effectiveness of involving children and young people.

To support this strategy an annual operational plan was compiled to describe all the separate individual actions needed to achieve our shared objectives and the following has been achieved in its first year:

- The definition and importance of Co-Production has been shared and understood by all teams working within the Cross Regional Project and







is incorporated into communication, meetings and decision making.

- All services have a Co-Production Lead – a participation and inclusion champion.
- A Young People's Co-Production Forum has been established.
- All services with the participation of young people have reviewed their Children's Guides and Development Plans.
- Positive multiagency working has taken place with Oxfordshire Local Authority Co- Production Team, sharing expertise, good practice and adopting tools and resources developed by SCIE (Social care Institute for Excellence).

The second year annual operational plan is being written with input from the children and young people supported.

Stakeholder Survey

86.52% of statutory professionals agree or strongly agree that children and young people supported by Keys Group are making progress towards their goals.

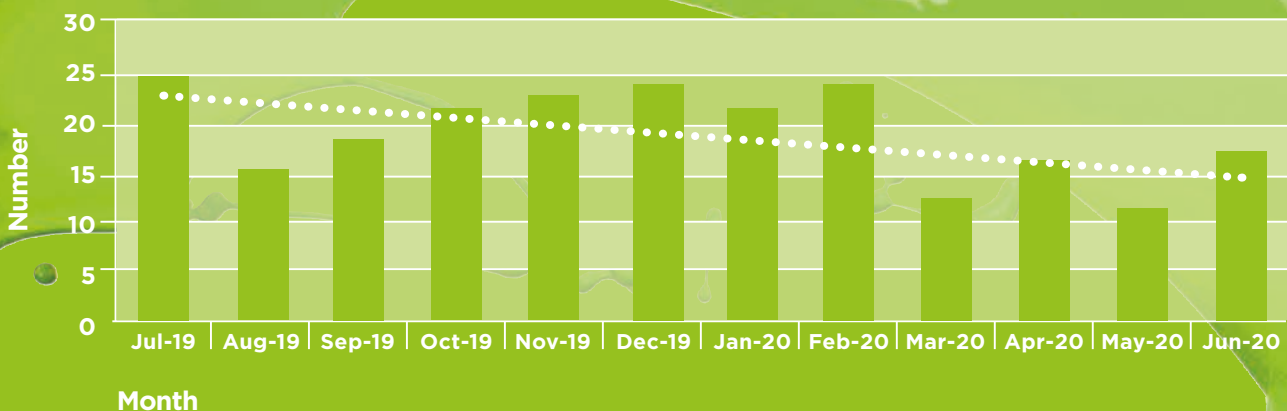
As a result of the work of the team at Keys Group (including Care, Education, Therapy and Specialist Support Services) is progress towards the child's young persons placement goals being made?			Response Percent	Response Total
1	Strongly disagree		4.49	4
2	Disagree		2.25	2
3	Agree		35.96	32
4	Strongly agree		50.50	45
5	Neither agree or disagree		3.37	3
6	Other (please specify)		16.85	15

Complaints and Compliments

In the period July 2019 to June 2021

complaints and 132 compliments were recorded in our RADAR quality system.

Complaints



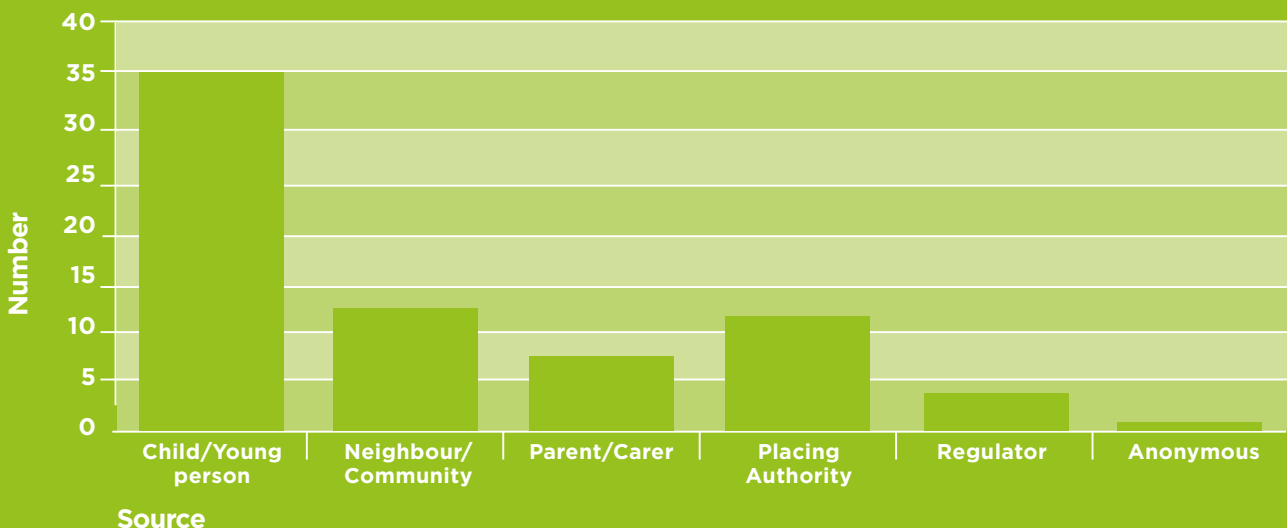
Over the coming year we will continue to work on developing our complaints and compliments processes, procedures and analysis to support our commitment to active listening, learning and continuous improvement.

Keys Group has a two stage complaints procedure. Stage 1 complaints are normally

resolved at local level. Where they are unable to be resolved or are a more serious complaint they proceed to Stage 2 for a formal investigation.

77.5% of all complaints were resolved at Stage 1, 65% of these complainants were from children and young people. 22.5% proceeded to Stage 2.

Source of Stage 2 complaints



Active Offer in Wales

Keys Group has continued to deliver on the 'more than just words' Welsh Government Strategic Framework by promoting and offering the use of the Welsh Language. Recognising that language is an integral part to the support

and care we provide to our children and young people we have actively supported our staff to gain a better understanding of the legal and cultural requirements be able to make the offer without our children or young people having to ask for it.

Our People

We have continued to make significant investments in our people over this past year, achieved successes in recruitment and retention, as well as engaging with, inducting and developing existing people to have the skills required to provide excellent care and support to children and young people.

“We will provide the right education, training and support to deliver high quality services. We will develop leadership skills at all levels and empower our colleagues to take decisions and make changes.” **

Making Sure People Feel Safe, Supported, Respected and Valued at Work

Keys Group is committed to the continual development of its people. Our Academy continues to offer dedicated training for everyone across a wide range of accredited programmes. These programmes support the achievement of Keys Groups objectives and enable everyone to provide the best care and support to children and young people. We spent more than £1,000,000 on direct training costs in 2019/2020.

Statutory and Mandatory Training

Recognising the vital importance of Statutory and Mandatory Training in the provision of

safe, high quality services to children and young people Keys Group has progressed the following;

- Ensuring colleagues can complete statutory and mandatory training through a blended learning approach including in-house face-to-face learning, e-learning, development programmes and external training courses. We are committed to ensuring that everyone has completed the required mandatory training.
- During 2019/2020, revised induction programmes have been developed for everyone we employ. All frontline staff undertake an initial 2 week induction prior to working in our services.
- Following induction service practitioners have a core training programme which it is a requirement to complete within 6 months of appointment. This core training uses a blended learning approach.
- Service Managers have additional training relevant to their role.

Our current levels of compliance with mandated training is detailed in the table below.

Mandated Training Compliance as at July 2020	
Course	% Compliance
Equality & Diversity - 36 Month	91.06
Fire Safety - 12 Months	87.62
Food Safety & Hygiene foundation - 36 Months	92.01
General Data Protection Regulation (GDPR) - 0 Months	89.19
Health & Safety - 36 Months	91.75
Induction Programme - 0 Months	90.27
Manual Handling - 36 Months	88.41
Safeguarding foundation - 0 Months	90.97
Infection Control - 6 Months	80.37
Safeguarding foundation - 0 Months	77.12
Grand Total	87.86

Following completion of our induction programme, mandatory training and

probation period colleagues are enrolled on an appropriate vocational qualification.

Management and Vocational Qualifications

It is a regulatory requirement that all residential managers achieve a level 5 diploma and likewise that all residential care staff achieve a level 3 qualification as minimum. Ofsted collect data on the levels of qualifications held by everyone working in children's homes⁹. The 2018-19 data shows;

- That over half of people employed in children's homes had achieved a required level 3 qualification (61%). This was an increase of eight percentage points from 2017-18. A further 21% were undertaking a level 3 qualification.

As at July 2020 71% of our residential support workers were qualified or in learning with a further 27% in probation or pending a start date. At the point of reporting 50% of Keys Group Residential Support Workers had achieved the level 3 qualification. We will continue to support colleagues over the course of the next year to complete the qualification with the aim of reaching at least the national average of 61%.

- The percentage of managers with a level 5 diploma continued to increase, reaching 51% in 2018-19. Managers are allowed up to three years to gain the level 5 diploma. This means that many start in post with level 4. 72% of managers had at least a level 4 diploma in 2018-19.

As at July 2020 98% of Keys Group managers (England and Wales) were qualified or in learning for the level 5 diploma with 80% of our managers having achieved a level 5 qualification, 18% in learning and 2% in probation and awaiting enrolment.

Our education support workers are not required to have a qualification but all are encouraged and supported to undertake a level 3 apprenticeship. 24 have already completed the qualification (21%) and a further 32 (27%) are currently in learning. We will continue to promote the take up of the level 3 apprenticeship over the coming year.

In addition the level 5 qualification in leadership and management is now offered to all deputy managers in our residential children's homes or schools with the aim of supporting their career progression to registered manager or head teacher posts.

Introduction of Technology Enhanced Learning (TEL) Tools and Training

The Learning and Development team are embracing technology and digital innovation to deliver a range of modern, responsive and effective learning solutions.

Learning Management System

In 2019/20 we invested in the development of a bespoke learning and development system. This includes an on-line booking system enabling managers to directly book people onto training courses. The system additionally monitors all learning activity, supporting the Keys Academy team to manage training events and to record attendance and outcomes.

The system also allows for the integration of training information from a variety of different sources such as specialist e-learning systems, vocational and management training plus individual bespoke training events. This enables service managers to proactively manage and monitor individual team members training at a local level.



Leadership Development

Keys Group is committed to developing a culture of collective leadership and to growing our community of leaders. This means having leaders at all levels of the organisation working together towards achieving high performance and improvement for children and young people. This idea is fully embedded in all leadership programmes. Keys Group delivered several leadership programmes in 2019/20 as follows:

- Future Leaders – 62 managers have enrolled since the course commenced in 2018/19 with 30 managers in two cohorts being supported through the course in 2019/20.
- The Visionary Childcare level 6 programme continues providing our senior managers with the skills, knowledge and expertise in strategic management.
- “Excellence in Leadership”, a 3 day residential programme was delivered to Regional Managers. 23 participants were selected to attend in two cohorts in 2019. The programme provided attendees with the tools to prepare and present a regional business plan.

Resilience Training – Challenge of Change

Resilience is the ability to cope under pressure and recover from difficulties. Working in social care and education can be hugely rewarding. But, like all jobs, care work can be stressful at times. Our staff need to be resilient, to help them to cope better under pressure and continue to deliver high quality care, support and education to children and young people. Good emotional resilience amongst our people also results in, improved morale, reduced absenteeism, better retention levels and improved team relations.

In 2019/20 the senior leadership team and 23 managers attended Challenge of Change resilience training to support them to:

- Learn about stress management and resilience and strategies to develop resilience in themselves and others.
- Examine their experience of emotions and how this impacts on performance and to improve well-being and organisational effectiveness.

Managers Workshops – Quality Department Led

Twice each year all service heads are invited to attend regional workshops led by our Quality Director. The workshops this year were held in October 2019 and March 2020. The themes of the workshops were:

- Overview of inspection activity and outcomes over preceding 6 months
- Keeping Safe Environments
- Assessing and Managing Risk
- Exploring the Mental Capacity Act
- Managers oversight – critical thinking and reflective practice
- Achieving excellence – good to great

2019/20 Leadership Conference

The 2019/20 Leadership Conference took place in February 2020 with over 175 senior leaders in attendance. The theme of the conference was “Good to Great”. During the conference, the key messages delivered were that good to great transformation in Keys Group:

- Requires disciplined people, disciplined thought and disciplined action.
- Requires professional will from all leaders. Professional will:
 - creates and is a catalyst for superb results
 - requires unwavering resolve to do whatever must be done to ensure excellent outcomes for children and young people.
 - looks in the mirror (not out the window) to take responsibility for poor results, never blaming external factors, or bad luck.
- Requires a focus on our core values of excellence, passion, integrity and caring.

Staff Recognition and Achievements

The EPIC awards are company awards which recognise, reward and share outstanding work by individuals and teams who have made a real difference to the lives of children and young people. The 2019/20 winners in each category were:

• Excellence Award – Tourmaline Children's Residential Home

In recognition of the exceptional care and support delivered by a dedicated and highly attentive team. The home has achieved an outstanding rating from Ofsted in each of its last four inspections.

• Passion - Tees Valley School

In recognition of the exceptional drive and passion of the head teacher and the Tees Valley school to improve performance. In 2019/20 the school moved from an Ofsted requires improvement grade to good with outstanding features.

• Integrity – Crown House Family Assessment Centre

In recognition of the service's ethos of kindness in its daily activities even when this may lead to a recommendation for a family not to stay together. In particular the commitment to ensuring honest, open and trusting communications with families through all phases of assessment and that all people coming into contact with it know that they as individuals matter.

• Caring – Fernbank Residential Children's Home

In recognition of creating a feeling of family and care not only for the young people but also the staff team. The team had reached their goal of achieving an outstanding rating from Ofsted.

Two further awards were made this year to services demonstrating Incredible resilience:

• North Bridge College

In November 2019 the college was impacted by the national emergency which saw large areas of Doncaster flooded. The scale of the flooding resulted in the entire school and its contents being lost. The staff and students with local authority partners demonstrated

incredible teamwork and resilience in implementing disaster recovery plans and reinstating the school in a new location within a matter of weeks.

• Leaving Care, South

In recognition of the team's incredible compassion, integrity and resilience following the death of a young person.

Awards were also presented to fifteen homes and schools rated outstanding or equivalent by our regulators.

Recruitment, Retention and Turnover

The Ofsted Annual Report 2018/19¹⁰ notes that having consistent, suitably qualified staff and managers is an important part of effective social care provision. Staff can provide better support to the children they care for if they have the right qualification. Ofsted therefore collect data on staff in children's homes when they inspect. An important factor in support for children is consistency of staff. Over the last year Ofsted reported that;

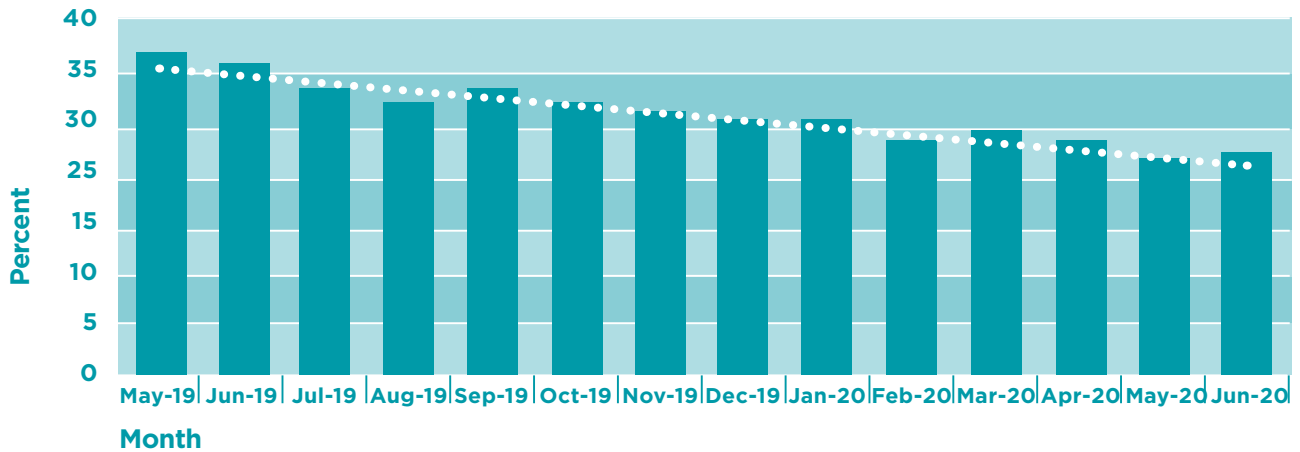
- 34% of children's homes have had new managers.
- The average number of staff per children's home has stayed fairly static over the last four years, at around 13 members of staff per home. However, numbers of both leavers and joiners have generally increased up to 2017-18, although the number of leavers per home dropped in 2018-19.
- Across the four years of data collection, the number of agency staff working in each children's home has also stayed relatively static. There are around 0.2 agency staff per permanent member of staff.

In Keys Group;

- We had greater stability of managers in our children's homes, than the Ofsted reported national average with 20% of our homes having new managers.
- We have continued to see a downward trend in our employee turnover with consequential greater continuity of support for our children and young people.
- Likewise over the year we have continued to see a significant reduction in the utilisation of agency staff as a result of reducing turnover, greater stability and improvements in recruitment and retention generally across our portfolio of services.

¹⁰Ofsted Annual Report 2018/19. January 2020 www.gov.uk/government/collections/ofsted-annual-report-201819

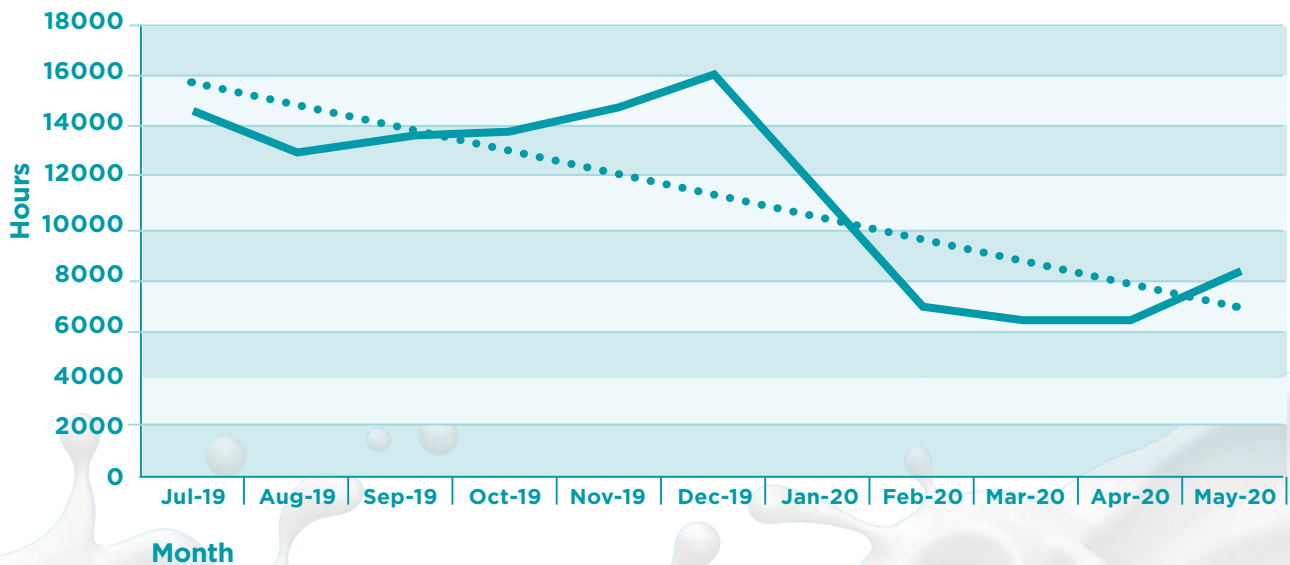
Group Turnover



*National Average for direct care workers in any type of institution (e.g. public, independent, residential, day etc.) - average

for care workers in the independent sector is likely to be higher. (Source; Skills for Care)

Agency Trend Monthly Hours Utilised All Services



Whistleblowing Protection

Most issues raised by employees are easily resolved. However, there are times when concerns are of a more serious nature. Keys Group has a policy, which provides a clear and easily accessible route for raising these types of whistleblowing concerns.

The overarching aim of the policy is to demonstrate Keys Group commitment to openness and accountability through:

- The provision of a safe environment to raise concerns at work.
- Reassurance for colleagues that it is safe and acceptable to speak up.
- Reassurance for colleagues that they can raise a concern at an early stage and with clarity about the process.

The policy is supported by an internal reporting system (RADAR) and an externally

hosted whistleblowing hotline to enable employees to report malpractice, unlawful or unethical behaviour within the workplace.

RADAR – Internal System

Employees can raise concerns (anonymously if desired) through our RADAR system.

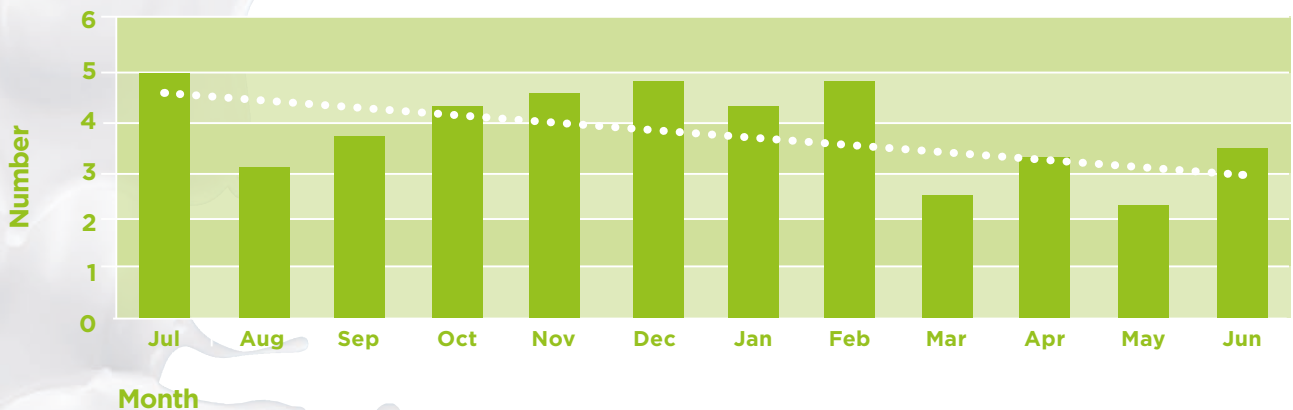
Navex Global – Externally Administered Whistleblowing

Concerns can be reported on an anonymous basis either by telephone or on-line, thereby allowing employees to raise issues that they may feel uncomfortable discussing with a manager.

This can help expose important issues that would otherwise remain undisclosed and help reassure employees that their concerns will be taken seriously.

There were 30 whistleblowing reports in the 12 months to July 2020, 5 through Navex Global, and the remaining 25 through our internal system.

Total Whistleblowing Reports 2019/2020



Of the 30 notifications made, 43% related to allegations of 'unprofessional/inappropriate behaviour or a conflict with a general understanding of what is right or wrong'. All

allegations made were investigated in line with company policy and procedure with action taken as appropriate to address any substantiation of the allegations made.

Diversity and Inclusion

Being an inclusive employer is fundamental to creating an environment where we can all thrive at work. Engaging with and obtaining a better understanding of diversity helps us:

- Design and deliver more effective care, support and education for the children and young people we support.
- Value the contributions of everyone ensuring equality makes a positive difference to organisational innovation, efficiency and performance.
- Develop a positive reputation internally and externally improving our ability to attract and retain the best talent and have stronger relationships with our stakeholders.

In 2020 we reviewed our diversity and inclusion strategy and committed to a

three year action plan that will build on our current work. The three year action plan is designed to:

- Create greater transparency.
- Equip all staff, managers and leaders through training, information and highlighting role models to build equality, diversity and inclusion into the work they do and the way they work.
- Raise awareness of equality, diversity and inclusion and involve staff through the staff networks and team discussions.
- Build shared responsibility and accountability for achieving improvements by explicitly embedding inclusive leadership into the performance management process and creating Keys Group specific equality, diversity and inclusion objectives.
- Embed equality, diversity and inclusion into recruitment, training and promotion.

Key First Year Targets



Ethnicity Profile

Work undertaken in 2020 has Keys Group staff ethnic diversity as:

Keys Group Staff Ethnicity	
Asian	2.2%
Black	3.5%
Mixed Race	3.2%
White	82.1%
Not declared	9%

Age Profile

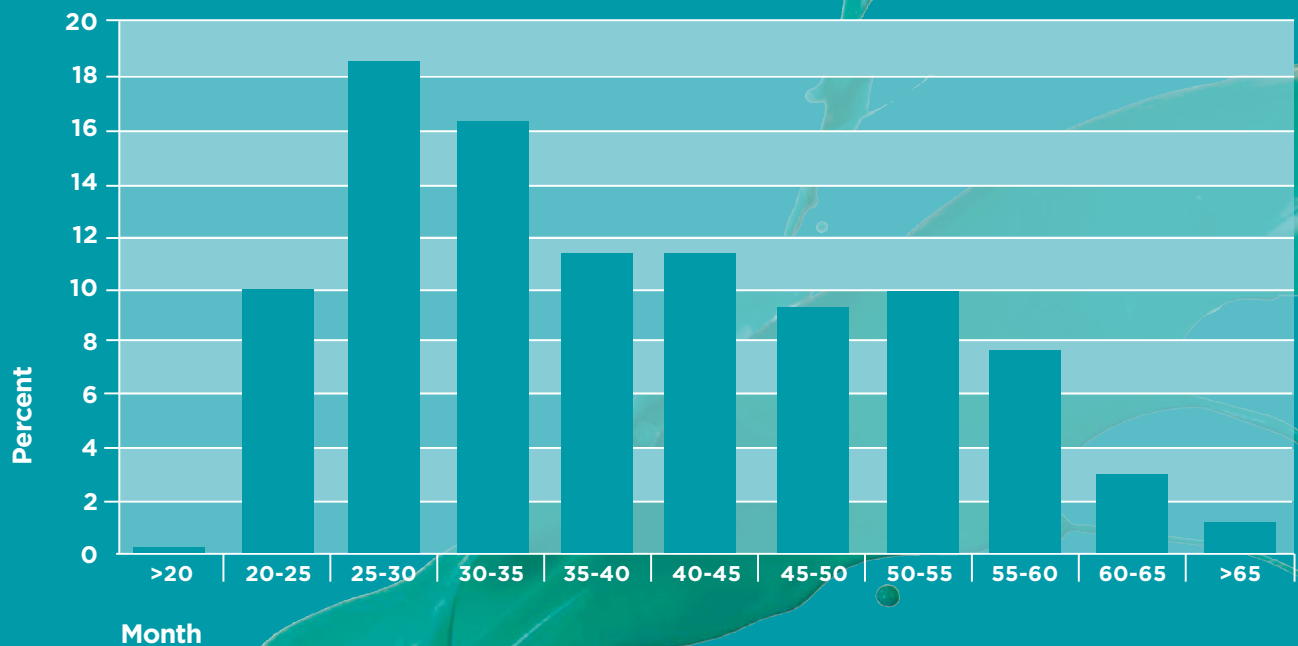
The age profile of the people we employ shows that the largest proportion of people are aged 25-30 (18%) with those aged 30-35 being the second highest proportion at (16%).

Our strategy is a commitment to a five year journey to improve diversity and inclusion for the working lives of all of our staff and the experience of the children and young people we support.

We will measure the impact of our activities with four specific goals:

- Better outcomes for children and young people
- Improved experience for children and young people
- A representative and supportive workforce
- Inclusive leadership
- Colleague survey specific measures including engagement
- Training attendance data reflects the diverse workforce
- Bespoke questionnaires and focus groups

Age Profile



Gender Pay Gap

As of 2017 all UK companies with over 250 employees are required to report on their gender pay gap. This measures the difference between the average pay of all men and women employed, whatever their role in the organisation.

It is important to make the distinction between gender pay and equal pay. Equal pay looks at whether men and women receive equal pay for equal work and is legislated under the Equality Act 2010. A gender pay gap may still exist where there is equal pay, for example, if there are more men than women employed in higher earning roles.

At Keys Group, 67% of the people we employ are female and 33% male. We are confident that our pay structure ensures that there is no discrimination in remuneration for men and women in the same roles.

The structure of the Keys Group means there is no statutory requirement for the Group to report its gender pay gap. However we are voluntarily reporting our gender pay gap on the basis that this aligns with our core value of acting with integrity.

At the end of March 2020 our mean gender pay gap (the difference between the average hourly earnings of men and women) is minus 10.32% meaning that on average females in Keys Group have a higher hourly rate than males. This is the opposite of the 2019 national figure reported by the government of 17.3% i.e. women had a lower hourly pay rate than men. When comparing the median figures (the difference between the midpoints in the ranges for hourly earnings of men and women) the figure is reduced considerably to minus 1.12% but again meaning that pay is higher for women than it is for men.

Our pay gap reflects the mixture of female and male employees in the childcare sector. Given there is a larger proportion of females working in the childcare sector there are a larger proportion of females in managerial and senior manager positions within Keys Group than in other non-care sector organisations.

Modern Slavery

We acknowledge that modern slavery often takes place in the course of employment however the vulnerable people we support may also be exposed to modern slavery, human trafficking and (in the case of young people) child sexual exploitation and criminal exploitation. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We do this by:

- Building open and transparent relationships with our partners and make our professional expectations clear.
- Having a whistleblowing policy which encourages concerns to be raised by employees whether full-time or part-time, self-employed contractors, agency workers, volunteers, applicants for employment, people we support and their families, relations and friends, suppliers, commissioners, contractors and the general public.
- Confirming the identities of all our new employees and their right to work in the UK and our recruitment process complies with our regulatory guidelines.
- Facilitating access to an independent whistleblowing service.
- Internally monitoring the quality of our service provision.

During 2019 we introduced a centralised agency staff procurement process to further enhance our stringent assurance checks for agency staff including right to work and advanced DBS checks. Only agency suppliers capable of evidencing agency staff compliance with these stringent requirements are added to the agency system as a potential provider of services to Keys Group.

All our operational colleagues are required to undertake mandatory training in relation to child safeguarding, whistleblowing, child sexual exploitation and criminal exploitation.

Over the last twelve months our IT team have been working on initiatives to ensure that internet activity is strictly filtered to remove as much harmful material as possible to give the young people we support a safe internet experience. This includes investment in specialist software.

Specialist Support Team

We have a dedicated specialist support team of advisers to act as a resource for our services and to work directly with young people. Our specialist team includes an exploitation specialist adviser, a substance misuse adviser, a police liaison adviser and a self-injurious behaviour adviser. The specialist team offer advice, consultation, risk management support and training to all of our services. They also liaise with external agencies to ensure a joined up multi- agency and collaborative response.

The exploitation specialist adviser has developed packages of training around child sexual exploitation and child criminal exploitation all of which encompass the current modern slavery legislation. This will be rolled out to all services operated by Keys Group during 2020 and comes with a package of resources of preventative work for young people. This training seeks to empower staff to identify and report concerns of modern slavery in line with national legislation and company policy.

Direct preventative work for children and young people around the risks of exploitation have also been developed to be included as part of the educational provision, key work sessions and group work within services. The exploitation specialist adviser works nationally with specialist forums, policing teams and also with the National Modern Slavery team to promote the Home Offices initiative around use of the National Referral Mechanism ("NRM"). The NRM looks to promote wrap around support for victims of modern slavery, advocacy support through criminal justice proceedings and a proactive track and trace system for high risk victims of trafficking. All homes are sent guidance regarding the NRM process where there is evidence of exploitation taking place and signposted to the National Modern Slavery team for additional support where a young person is high risk.

Throughout 2020 our national police liaison specialist adviser has worked closely with staff teams and local police forces to ensure young people identified as being at risk of criminal, sexual, or economic exploitation and trafficking are appropriately supported to mitigate risks to the young people and to support efforts to identify and bring perpetrators of such crimes to justice. The police liaison specialist adviser has also contributed at a national level to work aimed at minimising the exploitation of vulnerable young people and young people missing from care.

Information Governance

We continually work to identify and reduce risks to information and increase data security. We have a nominated Data Protection Officer. There were three potential data breaches in 2019/20 which met the criteria to self-report to the Information Commissioner's Office. All were fully investigated internally, action plans developed and mitigations identified and implemented and the information shared with the Information Commissioner's Office. All were closed by the Information Commissioner's Office with no further regulatory action.

VM Ware Horizon Roll Out

Through 2019/20 we continued to roll out Horizon cloud allowing the business to deploy virtual desktops and applications to all services/sites. Additionally it allows the ability to deploy, manage, maintain and monitor desktops running across the business in all locations. All business acquisitions have been moved onto the platform rapidly following deal conclusion to enhance data security including the latest acquisition of South West Childcare Services.



Case Study 1

On 7th November 2019 parts of northern and central England saw a month's rain fall in a day. On 8th November 2019 the River Don bursts its banks in Doncaster after reaching its highest recorded level, the resulting flood water submerged most of our Northbridge College site under metres of water. The school's contingency plan swung into action, clear leadership, excellent collaboration with Doncaster Local Authority and with the help from a local school, education was resumed at an alternative site within 9 days. The 50 children who attend the college were provided with remote education whilst all the logistics, equipment and resources were put into place resulting in minimal disruption to the education and learning provision. This temporary site has now become the new permanent site for Northbridge College staff and pupils. The Horizon virtual desktop system ensured there was no data loss and that the IT environment was available immediately the new site opened.

Case Study 2

On January 31, 2020, the first two cases of COVID-19 in the UK were confirmed. But despite a growing number of coronavirus cases in the UK, it wasn't until March 23rd 2020 that Prime Minister Boris Johnson announced people should "stay at home" during a televised address. People were told to work from home wherever possible, and that they should only leave their homes for essential purposes. In response to this Keys Group immediately moved its support centre staff team and support service functions to home working. The investment in the Horizon platform allowed for the smooth transition to home working arrangements with minimal disruption to the business thereby ensuring ongoing support for our front line services.

Independent Inquiry Child Sexual Abuse – The Internet Investigation Report March 2020¹¹

This investigation focused on the growing problem of online-facilitated child sexual abuse. In particular the misuse of

the internet by a section of society to distribute indecent images of children, groom and manipulate children in order to commit sexual acts on them and livestream the sexual abuse of children from around the world.

Several police forces have reported a rise in offences of online grooming. According to the National Society for the Prevention of Cruelty to Children (NSPCC), between April and September 2018, police recorded more than 10 grooming offences a day. Facebook, Instagram and Snapchat are frequently named as the most common platforms where grooming takes place. However, the true scale of offending and the number of children who have been victims of online-facilitated child sexual abuse is likely to be far higher than the number of reported offences.

The government response includes the introduction in September 2020 of compulsory education in both primary and secondary schools that will help teach children about the need to stay safe online. The government also published its Online Harms White Paper aimed at tackling a wide range of online harms, including the threat of online child sexual abuse and exploitation. The Queen's Speech in December 2019 included reference to the introduction of legislation to establish a new regulatory framework. In response Keys Group has:

- Worked on initiatives to ensure that internet activity is strictly filtered to remove as much harmful material as possible to give the young people we support a safe internet experience. This includes investment in specialist software.
- Raised awareness amongst its staff teams and provided training in ensuring safe internet access for children and young people.
- Continued to teach and support children and young people to stay safe on the internet.

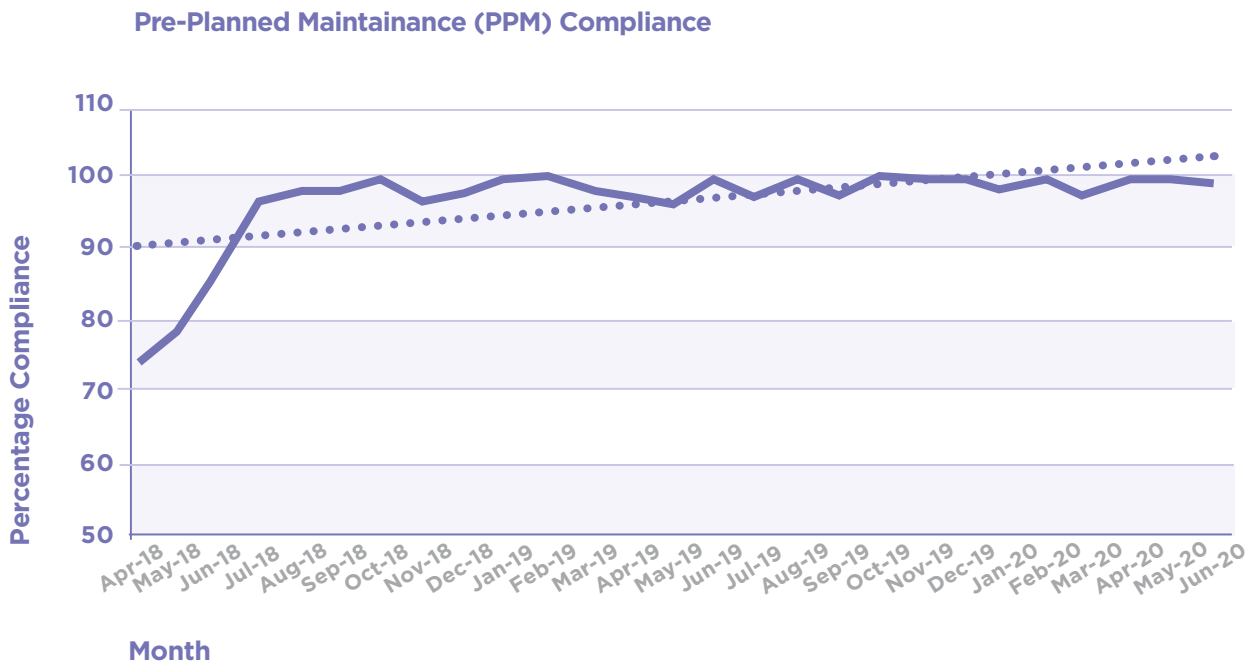
Property

Our property department provides a range of services and support across the portfolio to ensure statutory compliance and that the build environment is fit for purpose and managed effectively.

The department is responsible for all reactive maintenance in services. A central property department helpdesk receives requests from services via email and telephone, prioritises work with the assistance of the operating units and allocates work to either the regionally

based, inhouse mobile maintenance operatives or a panel of approved external contractors as appropriate.

The central team is also responsible for managing and instructing all planned, preventative maintenance as per the requirements of legislation ensuring all buildings are compliant and to reduce the amount of reactive maintenance visits. As at June 2020 our compliance with planned preventative maintenance across the estate was 98.6%.



Environmental Sustainability

Keys Group takes environmental sustainability seriously, whether it is carbon emissions, climate change, global warming or landfill and we know our children and young people share our concerns.

While many of these issues are tackled at a global level there are things we can do as individuals and as an organisation to lessen the impact of environmental change. For instance, we can choose environmentally friendly suppliers and products, dispose of our waste responsibly and manage our energy supplies more effectively.

Information Technology

We continue to source energy-efficient IT hardware for the Group. Purchasing recycled low powered terminals and laptops ensures we not only benefit from lower costs but also continue to support an environmental strategy. The roll out of these terminals across the business is now 90% complete.

Over 95% of the equipment we purchase comes from approved UK recyclers. We only buy new equipment when essential. Over the past 12 months, we have made use of over 300 recycled items - every PC, terminal and laptop purchased by Keys is recycled.

We have also upgraded the cooling in our data room with a 20% more energy efficient system solution.

We continue to replace old inefficient printers with ECO printers. This project has driven down ink use and costs by 60%. We also discourage printing and since March 2020 we have reduced printing done by formerly office based staff by 90%.

We have in place video conferencing capability using Microsoft Teams and Skype and this is leading to significant savings in travel costs. Since March 2020 we have used on average 5,000 litres less fuel per week compared with the same time in 2019.

Fleet

We continue to replace our ageing vehicles with more modern, fuel-efficient models. Last year we replaced 86 vehicles.

Energy

From 1st August 2020 100% of electricity used by Keys will be from renewable sources; wind farms, solar farms, hydropower plants or bio mass plants. Green energy is produced with minimal impact on the environment and this move will mean that no carbon is released into the atmosphere from Key's Group electricity consumption.

From 1st August 2020 100% of natural piped gas will be green gas. This means our suppliers source green gas from UK-based producers through the digestion of products, residues and/or waste. Green gas is labelled electronically with a unique identifier known as a Renewable Gas Guarantee of Origin (RGGO).

For each kWh of gas, this identifier contains information about where, when and how it was produced including the technology used.

Our future plans

We will continue to deliver on activities still in progress as identified on page 21 and over the coming year will conclude the development and review of the following strategies, resulting in a synchronised and systematic approach to achieving our mission and organisational objectives.

- Quality Strategy
- Positive Behaviour Support Strategy
- Clinical Services Strategy
- People and Organisational Development Strategy
- Involvement and Co-Production strategy

Therapeutic Approach

1. Develop a Clinical Services Strategy describing how Keys Group will provide the best possible clinical, therapeutic and specialist services with the aim of keeping our children, young people and adults safe whilst delivering the right interventions to support delivery of their agreed outcomes.

Outcomes for Children and Young People

1. Develop and embed the model of Positive Behaviour Support implementing a strategy to further develop knowledge and skills across the company in supporting children, young people and adults to lead happy, healthy and successful lives.
2. Develop an innovative transition model for children and young people progressing from residential services into leaving care services.

Keeping Safe

1. Conclude the work of the risk assessment and management working group to carry out a systems based review within Keys Group.
2. Deliver the objectives identified in our first Safeguarding Annual Report.
3. Covid-19 – continue to operate to pandemic contingency planning protocols across the business in accordance with relevant government guidance.
4. Systems methodology – to employ this best practice model across all internal learning reviews.

Listening

- Expand the Co-Production Strategy from the Cross Regional Project across all Keys Group services, using learning from the first year to improve implementation.







2020 Annual Quality Report



**Inspiring and supporting
young people to live
happy, healthy and
successful lives.**

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Residential

Providing a nurturing, safe and positive
environment for every child




keys
group

Keys Group provide innovative care and education services to children and young people who have complex needs, emotional and behavioural difficulties or who display challenging behaviour. We try and make every day extraordinary for the children we care for and support, because we believe in every single one of them.

We also believe that every young person we look after has the potential to achieve great

things, so by working closely with the children to provide a stable, safe and happy environment for them, we are able to nurture their development, enrich their lives and help them to fulfil their potential.

By working closely with Local Authorities and professional bodies we provide a “joined up” approach to the children and young people we work with. This enables everyone to have the right support in place, which in turn makes a real difference to their lives.

We believe that every young person we look after has the potential to achieve great things





Any young person would be privileged to live in this home. The care provided to my child and to us as parents has been exceptional. Parent, Topsgate



Not just places to live

Our residential services are “homes” for our children, not just places to live. Every child or young person we look after deserves to have the very best care and support regardless of their disability or difficulty. We aim high and strive to reach every child’s potential to grow and develop socially, emotionally and educationally.

Decorated to a high standard and tastefully furnished, there is a real sense of comfort, security and positivity within every one of our services as we strive to nurture every individual, promote their self-esteem and

praise their achievements. We work tirelessly to make a real difference to the life of every child living in our homes, by creating positive experiences every day and supporting children to make positive steps, no matter how big or small.

Keys Group has a reputation for providing bespoke, child-centred, high quality support packages for children with complex needs that provide excellent value - as such it means we are a trusted provider for many Local Authorities looking for the best service for their young people.

Each service has its own specialism and has a dynamic, forward thinking approach to supporting children and young people with issues such as:

- Attachment difficulties and developmental trauma
- Sexual exploitation (CSE)
- Criminal exploitation (CCE)
- Problematic sexual behaviour
- Substance misuse
- Offending behaviour
- Self Injurious behaviour
- Challenging behaviour
- Social and Communication difficulties and Autism
- Complex health needs
- Learning difficulties and disabilities

We also offer respite and short breaks and have a number of specialist homes for young people who have learning disabilities, complex health needs and Autism.

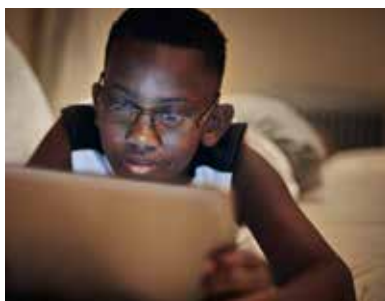


“Our residential services are ‘homes’ for our children, not just places to live.”

Our homes

Our homes can support young people requiring single occupancy as well as dual placements and multi bed homes ranging in size from 3 to 8 placements. We have both single and mixed gender homes across England and Wales. We also offer short term emergency placements in our Crisis Intervention/Activity homes where high staffing ratios and adventurous activities are an integral part of the package. Our staff teams work flexibly to meet the needs of every child placed with us.

All our homes have input from our Clinical Team and Specialist Support Team who provide bespoke training and support in relation to positive behaviour management. The team are experienced and trained in areas such as CSE, CCE, missing from care, problematic sexual behaviour, self injurious behaviour, substance misuse, and police liaison.



“I have been impressed with all staff members who I have communicated with regarding my young person. There is regular communication and sharing of safeguarding. My young person really has been put first at all times and all staff have been so proactive in trying to engage him and keep him safe.”

Social Worker, Red Oaks



I enjoy living here. It's a good place. They take your feelings into consideration and try to understand what's wrong. They help you as much as they can. I get a lot of support.

Young person, Laurels





The manager is inspirational and leads by example. The manager is supported by an experienced deputy manager, who assists her in the running of the home. The leadership team has established a culture of positivity. Managers have excellent oversight of the home and the exceptional progress that the children continue to make. **OFSTED, High Trees**



Our approach

The Keys approach to nurturing and developing children and young people is to;

- Provide a high level of care and a daily routine that creates structure to the day and promotes a sense of purpose
- Provide care that meets a child's functional age as well as their chronological age
- Provide compensatory experiences for children that have missed out on so much
- Support children and young people to be more resilient and develop coping strategies to manage problems and difficulties as and when they arise
- Create a perfect balance between care and control – enabling the child/young person to develop their independence within a safe environment, where risks are managed effectively
- Offer 1-1 direct work where children/young people are supported to come to terms with their previous experiences
- Agree clear and realistic goals with the child/young person to create a sense of direction, encourage them to act in a positive manner and feel a sense of fulfilment and achievement
- Channel the young person's energies into positive activity and outcomes

PICI

PICI (Psychologically Informed Care Planning and Intervention) is an innovative and forward thinking approach which means that the care of every child is individually, psychologically informed and therapeutically minded. Keys Group use PICI to provide a structured approach to achieving evidence based outcomes for young people which focus on supporting them to make significant and sustained progress in their health, education and emotional well being.

PICI has two components:

- A psychologically informed care pathway with assessments and outcome measurement
- A model of care with a comprehensive training programme that underpins the approach (Safe and Sound model)



The young person lives in a home that is safe, homely and provides him with space to grow and develop. Staff have paid attention to detail in respect of furnishings and design, which means that the young person has personalised space that he is proud of and that very much reflects his individuality.

OFSTED, Brooksmoot.







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**Inspiring and supporting young people to live
happy, healthy and successful lives.**

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Residential



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Residential

PROVIDING A NURTURING, SAFE AND POSITIVE ENVIRONMENT FOR EVERY CHILD

Every child or young person we look after deserves to have not only the very best care and support, but also the very best quality of life, regardless of their disability or difficulty. We aim high and strive to reach everyone's potential to grow and develop socially, emotionally and behaviourally.

Our residential services are “homes” for our children, not places to live. Decorated to a high standard and tastefully furnished, there is a real sense of comfort, security and positivity within every one of our services as we strive to nurture every individual, promote their self-esteem and praise their achievements.

Keys' reputation for providing bespoke, child-centred, high quality, value for money support packages for children with complex needs and behaviours means we are a trusted provider for many placing authorities looking for the best service for their young people.

Each service has its own specialism, and has a dynamic and forward thinking approach to the child or young person's issues such as:

- Sexual exploitation
- Sexually harmful behaviour
- Substance abuse
- Offending behaviours
- Eating Disorders
- Emotional, behavioural difficulties

We also offer respite and planned breaks and have a number of specialist homes for young people who experience learning difficulties/disabilities, social and communication difficulties including Autistic Spectrum Disorders.

Our homes can support young people requiring single occupancy through to single-sex or mixed gender homes for up to 9 people and our staff team will work flexibly to meet the needs and wants of children and young people living in the home. Everyone chooses how to furnish their own private bedroom and make it their own by having their own personal belongings and putting their stamp on it.



[Download Our Residential Brochure](#)

[Gender Pay Report Click to Download](#)

[Now available 19/20 Annual Report Click to Download](#)

[18/19 Annual Report Click to Download](#)

What People Say

Albert Drive

Staff are positive role models. They understand the diverse communication styles of each young person, whether this is through hand signals, pictorial images or spoken word. This allows the staff to gain young people's views and helps young people to make good choices. Ofsted

News

Ofsted awards Cherry House fourth outstanding grading

Ofsted has awarded residential children's home Cherry House its fourth outstanding grading in a row ... [\[Read More...\]](#)

'Outstanding' Ofsted rating – Begdale House

A residential children's home where children make “impressive and exceptional” progress has been ... [\[Read More...\]](#)

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Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Michael Vipond

Address: 6 Orchards Croft GRIMSBY

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The following comments were originally submitted in response to the earlier submission DM/0347/21/CEA and remain relevant.

Regular continuous access to the property will no doubt be required to attend to the needs of the residents in the care home. The property is situated opposite the Southfield Road junction and within a very short distance from the Orchards Croft turn in on Waltham Road. Visibility for traffic joining Waltham Road from the property is poor. With very limited parking available at the property and the difficulty rejoining the main road, the carers and support staff will resort to indiscriminate parking at the head of Orchards Croft, increasing the risk of vehicle collision at the junction for traffic entering and leaving the cul-de-sac.

Whilst this proposal is to solely modify the property internally to now accommodate 5 juveniles, I am

seriously concerned that this initial submission is a "Trojan horse" which would open the way for further development of the site as a larger care facility for multi-occupants - there is a large plot of land attached to the rear.

Finally, in my view, care homes for juveniles with complex needs should not be sited in a long established residential area

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Robert Giles

Address: 7 Orchards Croft Scartho Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Objection to proposal on the basis of increased parking in the area.

Orchards Croft already suffers from residents from other roads using it as a free carpark, and as it is a narrow road this causes access issues to residents.

If more carparking provision was made for the staff and visitors of this facility, I would be in support of it.

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Richard Daniels

Address: 8 Orchards Croft Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Living close to the property in question, myself and my wife have concerns regarding the proposed change of use of the property.

Due to the extra traffic generated by the type of proposal there is likely to be increased risk of traffic accidents at this location, the close proximity to Southfield Road and Orchards Croft already causes difficulties due to the bend in Waltham Road.

Any extra vehicles parking in Orchards Croft will increase the difficulty in safely entering or exiting this narrow road.

The potential for further expansion of the facilities is a major concern. Why else would they be buying a property with such a large garden. The proposal has already changed from four residents to five.

I note that the people who seem to be in favor of this proposal live a considerable distance away from this property.

Finally the likelihood of the residents attracting large numbers of `friends' leading to noise, litter, vandalism and other forms of antisocial behavior is very worrying .

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr Michael Huxtable

Address: 1, Heatherdale Close Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I strongly object to the above proposal on the grounds of parking facilities and shift changes. You state that the property may have up to 6 cars in attendance at any one time, the property itself has parking for 6 vehicles four of which are garage space. Are you telling me that staff will be garaging their cars whilst at work without any changing over of vehicle space throughout the day? Cars will be forever juggling around or using neighbouring parking areas. Their convenience for our inconvenience!

The original application was for 4 young people, now it is to accommodate 5 teenagers. Will there be further applications for expansion. The shift changes are every 12 hours meaning a shift change at midnight causing noise from car doors and running engines. Waltham Road is a busy road at the best of times and with the property being on top of a bus stop causes more concern with traffic movement.

The children occupying the property may not be trouble makers but their presence may attract trouble from other areas, another worry.

The vicinity of the area around the property is mainly occupied by retired professionals who do not want the disturbance of potentially troublesome teenagers.

Scartho is a close knit village style community of generations of families and does not want this to change, please look elsewhere for a more fitting environment.

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mrs Cynthia Cowie

Address: 4 HEATHERDALE CLOSE Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I totally object to this current proposal. This is a quiet affluent residential area with a number of retired residents. I have a grave concern regarding the noise and disruption that this may have to the area, not only for parking but the amount of calls that the police may have to attend all hours of the day and night as it happens in other types of establishments like this proposal in other grimsby areas.

There is no guarantee who will be visiting the area to see these individuals which also in turn could potentially increase the risk of antisocial behaviour and crime. I strongly suggest that the company involved in this proposal look closer to their own door step and not ours.

This is not a case of Nimbyism it is a genuine concern for local residents who all pay their council tax for this area to be highly maintained and settled in this area for a normal residential environment.

I would also like to know should this proposal go ahead are you personally going to guarantee any house price decline to be paid as compensation when the area gets reputation where nobody wishes to reside.

Owen Toop,
Planning Officer,
N. Evans Planning,
New Oxford House,
GRIMSBY
DN31 1HB

5 HEATHERDALE CLOSE,
GRIMSBY,
DN33 2PX.

23.7.21

Re: DM/0650/21/FUL



Dear Sir

I am writing to oppose the above Planning Application on the following grounds:

This is a quiet residential neighbourhood and is totally unsuitable for the rehousing of young people whose needs prevent them from living in a normal residential environment.

What is required is the right purpose built amenity in the right place; not in a quiet neighbourhood where the majority of people are elderly / retired or living on their own.

There is going to be chaos and noise as changes of shift for the carers and staff will be at "unsociable times" of day and night.

There is limited parking on the property and no "on street" parking as it is a main road with a bus stop right outside.

A genuine concern for the much appreciated standards of living that we have in Seatho: - it is after all the reason we chose to live here in the first place.

Residents in the small side roads are concerned extra parking might be taken up by staff/visitors to the property creating inaccessibility to their own homes.

Please consider very seriously these points made: -

It is not a case of being a "Ninby" just a genuine fear that our quiet much loved neighbourhood is under threat.

Yours faithfully

East (Mrs)

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mr david acton

Address: 3 , wood close scartho Grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Certainly not the right location for this kind of development . It is not just the problem residents but also their associates who visit . Why encourage problems in an area which is settled and causes no problems .

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Miss Rachel Abba

Address: 77 Waltham Road Grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Happy to see a local property utilised for such a good reason - hopefully the young people who stay here will enjoy their time in this area

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Ms Ruth Steyert

Address: 9 Westkirke Avenue Scartho Grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I think young people in need of residential care would benefit from being placed in our area.

Comments for Planning Application DM/0650/21/FUL

Application Summary

Application Number: DM/0650/21/FUL

Address: 184 Waltham Road Grimsby North East Lincolnshire DN33 2PZ

Proposal: Change of use of dwelling to a residential care home for up to 5 young people

Case Officer: Owen Toop

Customer Details

Name: Mrs Elaine Hulme

Address: 23 Ferriby Lane Scartho Grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Scartho is a caring community for the most part and people are tolerant and inclusive.

I was born without arms in 1960 and brought home to my parents Scartho home. I was raised in the village and the community gave me great support and never left me to struggle, nor pamper me. Eventually I went on to Wintringham Grammar School and, aged without any support other than that of my community. For me it's now time to repay that kindness and I welcome this project with open arms and would say the same if it was next door to me.

Good luck with your planning request.



Humberston Village Council

Clerk to the Council – Mrs. K. Peers

TO: planning@nelincs.gov.uk

Planning Consultation Comments

20th May 2021

Dear Sirs,

The Parish Council considered the following applications at its meeting held on Wednesday 19th May 2021 and wishes to submit the comments as shown:

Planning Application Reference: DM/0433/21/FUL

Proposal: Erection of a residential care home for the elderly and associated external works

Location: Land Off Blackthorne Avenue Humberston

The Village Council has objections to the proposal due to it being two storey and feel that this would be out of character with the overall feel of the site – the Village Council would prefer to see the proposal as single storey only.

Yours faithfully,

KJ Peers

Clerk to the Council

*1 Beach View Court, Norfolk Lane, Cleethorpes
NE Lincs. DN35 8BT*

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Tim Mickleburgh

Address: 11 Boulevard Avenue Grimsby

Comment Details

Commenter Type: Councillor

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to replicate the comments I made regarding DM\0419\21\FUL here. I do not believe that new care homes should be anything other than single storey.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mrs Sylvia Goodwin

Address: 1 Hawthorne Road Humberston Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I moved here after a bereavement for peace and quiet. This is going to cause a lot of upset and disruption, with extra traffic and noise, and it is not wanted, for both Carrington Garden residents, but also for Glebe Road residents.

This land was originally earmarked for more bungalows to be built for the over 55's, so why cannot that continue.

Do we need another care home here as there are 3 others in Humberston, and are they full? I also understand that a new one is to be built in New Waltham.

I do not recall anyone notifying me of any future plans to build a care home, when I purchased my property.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mrs Julie Patterson

Address: 4 Hawthorn Road Humberston Ave Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It seems all of the people who bought properties here have been lied to.

I was told there would be a continuation of the bungalows on the site that is now being proposed as a care home.

I object to this proposal on the grounds that the increase of traffic coming into the site is not feasible, due to the narrow entry point.

The number of parking spaces for the building is not sufficient, and we will get people parking all over the place, and everyone and his dog walking about and the added noise pollution.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Ian Smallwood

Address: 14 Hawthorne Road, Carrington Gardens Humberston Grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I Mr Ian Smallwood have lived here at 14 Hawthorne Road, Carrington Gardens, Humberston, with my wife for 2 year's, wish to oppose the proposed building of the care home for the following reasons:-

The entrance/access is too small to handle the volume of extra traffic eg waste trucks, deliveries, staff, ambulances and visitors etc.

Adequacy of parking, loading & turning?

The site has already issues with parents parking to collect school children

Could the overspill infringe on residents parking areas, during the early hours and late nights, making parking dangerous and risk of residents vehicles being hit, particularly in Hawthorne Road, which is a cul-de-sac and is clearly marked "Residents Only".

Increase of noise pollution

Nothing was mentioned to us before purchasing our forever home, by solicitors, that this land would ever be used for anything except the continuation of bungalows for the over 55's.

This is a dominant structure with upstairs windows which overlook properties and also create loss of light

It is overbearing and stands out

Makes significant changes to the landscape

Significantly larger than any other development in the street

Spoils the look of the development and will create problems

Building will be overpowering and create a feeling of claustrophobia

Ian Smallwood

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mrs Rosalind Drinkwater

Address: 15 Hawthorne Road HUMBERSTON HUMBERSTON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this Planning Application on the grounds that the land was sold without consultation with the residents of Carrington Gardens (of which I am one) and that this land was originally for the last two phases of this development. At no stage were we told that there was a possibility of a Care Home being on the site instead of the bungalows for this over 55's "luxury, quiet, very expensive development". Added to this, the drains are at capacity, and there is already congestion due to cars going to and from Humberston Academy to pick up or drop off their children. The two storey building will also be an eyesore for the residents of Glebe Road as they were promised that only bungalows would be built on this site. I think I can speak for most of the Residents here and say that we feel very upset about the whole situation as we came here for peace and quiet in our retirement and that's is what we were promised.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Bob De La Cruz

Address: 17, Hawthorne Road Humberston Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

Comment: Planning permission

My name is Robert De La Cruz and I live, along with my wife at 17, Hawthorne Road, Carrington Gardens and have done so for over two years. We decided to move to this development because it afforded us some security, peace of mind and tranquility for the rest of our lives , unfortunately this is not going to be the case if this proposal goes ahead, the site now designated for this care home was originally earmarked for further development by Longhurst group to build further single storey bungalow accommodation, it seems now that a change of usage is being sort from single home dwellings to what is effectively a very large business.

Whilst understanding the need for this type of development, I question the validity of the proposal, it seems what was once going to be a development for the over 55s is now being used quite differently.

There are a number of questions I have regarding the proposal :-

Material planning considerations.

1. When was this development first envisaged, time and dates would be appreciated because searches by our solicitors did not reveal this and no mention of this development was apparent prior to us purchasing our property.
2. The proposed development will bring more traffic to Humberston Avenue and consequently to Carrington Gardens what proposals have you to safeguard the residence already living on site from air pollution, litter and noise pollution, security, and road safety.
3. Whilst the plans for the new site include landscaping the fundamental question still exists that the residence of Blackthorn Road will be affected in a large part by a not inconsiderable elongated

two storey building no more than fifty yards from the road, thus impinging upon their privacy and visual amenity.

4. How will the issue of highway safety, noise and disturbance be resolved.

5. There are 31 allocated parking spaces, is this sufficient for residents, visitors and staff? And if these become overwhelmed is there be any facility or space for any overflow parking, without using the surrounding roads which would not and could not support high levels of street parking and far more importantly would impinge upon the lives of the residence living on and around the facility

6. I don't believe the design and layout of the building has been thought out coherently and is definitely not been influenced by site context, whilst all but the hub are single storey dwellings the proposed building is two storey and bares no relationship to the surrounding properties.

Regards

Bob De La Cruz

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

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Comment Details

Commenter Type: Neighbour

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Regards

Bob De La Cruz

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Ms LYNN VERITY

Address: 21 Hawthorne Rod Humberston

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the proposed building of a care home as I feel it is not in keeping with the other properties on Carrington Gardens where I live with my partner, and where the emphasis was put on building bungalows designed to promote and encourage independent luxury living. I am also concerned with regard to the parking facilities at the care home as I feel there is not enough to cover both staff and visitors, and worry this will mean that they will encroach on our properties parking, and along with the extra traffic this will bring onto the site throughout the day, causing disruption and more noise.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Stuart Cook

Address: 31 Hawthorne Road Humberstone GRIMSBY

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would like to voice grave concern over this "planning Application" on the grounds of the accessibility to and from the proposed site and future parking.

Considering this is a 70 bed proposal, where are all the visitors and service vehicles going to park? With such a large volume of daily traffic the proposed access is totally inadequate. The access road on to the proposal is currently not wide enough for such a high volume of traffic. If and when the proposal is up and running vehicles will be parked all over the estate. Access to the estate is nearly opposite Humberstone School, getting onto and off Humberstone Ave is going to be a nightmare. Can an alternative access be considered, avoiding the residential area altogether?

My wife and I have spent a life time of savings to reside and settle on this development. The quiet and peaceful surroundings was one of the main reasons we moved here. Another reason was public parking. People in the N.E. Lincs Council Area show complete lack of respect where they leave their vehicles and I feel this estate will become the same if this proposal goes ahead under its present plan. Please learn lessons

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Jonathan Cole

Address: 35,Hawthorne Road, Carrington Gardens, Humberston

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:The plan shows a two storey development with the reason that there is already precedent set, a two storey development on Carrington Gardens and two storey to the east of the development. However, the largest mass of the footprint is next to bungalows/single storey as will future development to the south of the proposed plans. The two-storey development proposed, has significant/substantial overlooking to properties east and west.

The laundry and kitchen are situated awfully close to the properties on Blackthorne Avenue and as such will create noise, starting very early and finishing late. It will have an impact on the environment creating smells which will impact on all residents of Carrington Gardens.

Requirements will be needed for these matters to be addressed by way of air filters/scrubbers etc. Humberston Village council is against a two storey development.

The proposed application will have: -

- Detrimental Impact on Amenity it basically means the quality of life of neighbours to the development, as stated above.
- Negative Effect on Character and Appearance of Carrington Gardens which is designed and approved by NELC as an area for over 55 living in previous plans that were granted.
- Traffic and parking pressures :-31 parking spaces/26 staff/72 residents, the sums do not add up. Visitors to the residents would not be able to park in the limited spaces and in turn would either park along Blackthorne Avenue or other roads in the Carrington Garden development. Parking should be seriously re assessed with a minimum of 50 spaces.
- Lack of need---there may be a requirement in the NELC for more bed space but Humberston already has 3 care homes with another planned 2 miles away from Carrington Gardens in Waltham. Is Humberston to become the care home ward of NELC?
- Badly planned location---as mentioned above , overlooking and not in keeping with the majority of buildings on the Carrington Gardens development

It is also noted that there will be 'service' vehicles coming on and off site and conditions for times of arrivals and departures must be part of the planning conditions if any application is granted.(8am-5pm) as that is the main time traffic movements occur on the development and anything regular outside those hours will have an impact on the Amenity.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Peter Fearn

Address: 21 Glebe Road Humberston Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The rear of our property in Glebe Road faces onto the proposed development. The original agreed development of the field was an over 55's retirement complex consisting of single storey dwellings.

After looking at the proposed plans and pictures there are several first floor glass balconies around the building which directly overlook our property and others.

An enormous building such as this does not fit in with the ethos of the living style sold to those who reside at Carrington Gardens.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

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Case Officer: Emily Davidson

Customer Details

Name: Mrs Lorraine Carberry

Address: Apartment 1 3 Blackthorn Ave Humberston Grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: As I live opposite the planned new care home I am concerned about the light as I watch the sun rising every morning so my concern is how high will the new building be. As I live on my own it is one of my simple pleasures that I look forward to. I would appreciate you getting back to me. Thank you in anticipation. Lorraine Carberry

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Walter Sleight

Address: 31 Blackthorn Ave Carrington Gardens Humberston N E Lincolnshire

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I believe there will be insufficient parking spaces available on the proposed site taking account of use by staff, visitors and others. The neighbouring roads, particularly Blackthorn Avenue and Hawthorn Avenue are narrow to the extent that on road parking is currently prohibited. The Carrington Gardens development was conceived to be a refuge, a quiet safe haven for the elderly and the reason we bought into it. I therefore object to the proposal

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Walter Sleight

Address: 31 Blackthorn Avenue Carrington Gardens Humberston N E Lincolnshire

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It is noted that the plans show a bin area, laundry, kitchen and garden store in what can be referred to as the industrial part of the proposed development. In addition a staff room. There will undoubtedly be refuse collections, deliveries and members of staff going outside for a smoke. The residents of Blackthorn Avenue in particular will have this imposition a few yards from their homes. There will be noise and smells and increased traffic. This not what these residents were led to expect

Should this development be allowed the more thought should go towards the siting of the more offensive elements.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr John Sparling

Address: 11, Sycamore Way Humberston Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

Comment: We moved to Carrington Gardens for peace and quiet after our retirement . We paid a substantial amount for Luxury Living experience! My observations if this application goes ahead as per its present plan are as follows:

There will be a an increase in noise and disturbance from additional pedestrian and vehicle traffic

Access is inadequate as is parking Visitors will be likely to park on Carrington Gnds roads and paths Safty hazard - we have residents who are mobility, hearing , sight impaired

Humberston Ave very busy at this point - 5 entrance/exits existing /proposed with this proposal sharing Carrington Carden's

No mention that I can see re Smoking Policy. Hope its not a free for all adjacent to my home- just across the road from Staff Room, bins etc.

Thank you for your attention to these issues

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mrs Susan Sparling

Address: 11, Sycamore Way Carrington Gardens Humberston

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My husband and I accept that the proposal to build a Care Home on this land meets the existing requirement to provide for over 55s

However the current plan raises serious concerns :

The only single storey of the home seems to house domiciliary support provision eg bin store (presumably general, food, and clinical waste) and kitchens both of which are likely to be noisy, and potentially smelly, plus a laundry.

The need for service vehicles/goods inwards , staff parking on and off shift, bins banging,

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mrs L Jon

Address: Humberston Grimsby

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The new residential home is not needed.!! Plenty of homes around the area

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr Ryan French

Address: 5 Beech Lane Humberston Meadows Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I fully support this proposal, we have an ageing population with a lot of elderly residents in the area who would benefit from having ability if required to reside in a local residential home.

Whilst I appreciate there are a lot of elderly and residential care facilities in the area most of these are at capacity.

The only negative comment I have is the lack of parking, there are 70+ bedrooms, I assume there will be ample staff working here who will drive as well as visitors to the residents. I feel more than 31 parking spaces are required. It would also be nice to see some electrical charging points for vehicles installed.

Comments for Planning Application DM/0433/21/FUL

Application Summary

Application Number: DM/0433/21/FUL

Address: Land Off Blackthorne Avenue Humberston North East Lincolnshire

Proposal: Erection of a residential care home for the elderly and associated external works

Case Officer: Emily Davidson

Customer Details

Name: Mr James Hudson

Address: Apartment 2 3 Blackthorn Ave Humberston

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

Comment: I would like to know:

1. How far the buildings are going to be set back from my property/road.
2. The security and street lighting for the building. I do not want bright lights lighting up my property/bedrooms all night.
3. The height of the buildings.

Originally, when I bought my apartment I was assured by L&H that this piece of land would be entirely bungalows. Now L&H have sold it on, so I would like to see how this affects me.

I am not against the use of this land for the new purpose. However, as you can see, I have concerns about how it affects my home.

From: Bill Parkinson
 Sent: 09 August 2021 16:04
 To: Lauren Birkwood (Engie) <Lauren.Birkwood@nelincs.gov.uk>
 Subject: Proposed bar at 3 KingsWay Cleethorpes

Mr Bill Parkinson
 122 Middlethorpe Rd
 Cleethorpes

Dear Lauren

I would like to object to the proposed bar at number 3 Kingsway Cleethorpes . I am the owner of 1 and 2 Kingsway which contain four flats next to the proposed bar with three of the flats having bedrooms at the front. Flat one, the nearest to the proposed bar is not yet fully converted and I think that the viability of this as a flat will be greatly impaired .

The use of the forecourt as a drinking area will impact badly on all four flats particularly those with bedrooms at the front. Flat two has the only terrace on the entire seafront in Cleethorpes and the use of this unique recreational area would be severely impacted particularly in the evening. The noise from the beer garden at the rear of the Kingsway club already creates a nuisance for the flats on both sides of the club and to the houses alongside it in Brighton Street.

Pubs and bars set amongst domestic accommodation can be a huge problem and the committee will remember refusing permission for a new bar in Seaview Street on the grounds of residential amenity .

I would like to point out that a planning condition was placed on the café called the Helm at number 6 Kingsway following a few complaints from neighbours who were not particularly close to the café garden , the condition being that their garden area had to close at 6 pm !

The other major problem is the arrival of taxis to pick up customers. The last thing on anyone's mind is the amenity of neighbours and people talking loudly or even shouting and there is the persistent banging of car doors.

It seems that pubs and bars are now the "in" business and everyone seems to want one, in addition to which we have cafés that are gradually being converted into bars. I do fear that the seafront is in danger of becoming like Cleethorpes High Street and not what a seafront should be like.

B Parkinson .



Flat 1
1 Brighton Street
Cleethorpes
North East Lincolnshire
DN35 8QU

North East Lincolnshire Council
Grimsby

11 July 2021

Planning Application DM/0554/21/FUL Kingsway Club, 3 Kingsway, Cleethorpes

Dear Ms Birkwood

I have recently moved into Flat 1, which despite the Brighton Street address has a frontage over number 1 Kingsway. I already experience noise loud at busy times from the large beer garden at the rear of the Kingsway Club. I have a rear bedroom and the noise can be overbearing.

The front of my flat which is over number 1 Kingsway is next door but one to the proposed bar frontage. When busy and later in the evenings the noise from drinkers will be unbearable in my flat and especially on my terrace at the front.

My flat has the only terrace on this part of the sea front and the use of the Kingsway Club forecourt will ruin it. Sadly when people are drinking the last thing on their mind is the welfare of neighbours.

If this is to be passed can you put on a condition that music cannot be played outside and a time limit on drinking outside.

Yours sincerely

Renu Thongkorn

FLAT. 3. 1 BRIGHTON ST.
CLEETHORPES



I would like to object to the plan for a new pub at 3 Kingsway

- ① there is already a lot of noise from the beer garden at the back of the premises also used by the Kingsway club. if the new pub customers use this area noise will increase. The noise can be loud and disturbing now and goes on quite late
- ② A new drinking area at the front will mean I get noise front and back making my life hell with my bedroom being at the front
- ③ Noise from people waiting for and getting into taxis, is also a great annoyance. Very few drinkers ever consider those living nearby. A new bar below the club will increase this and probably go on later. Banging car doors and shouting when your trying to get to sleep should not be allowed to happen.
- ④ There is no curfew on the club or rear garden but the Helm Cafe at 6 Kingsway had a condition to shut its rear garden at 5 or 6 PM. after a few people objected when it got its permission

P.T.O

if this were to granted some
time limit is needed.

T.A.A.

Flat 4, 1 Brighton Street
Cleethorpes
North East Lincolnshire
DN35 8QU

10 July 2021



Engie
North East Lincolnshire Council Planning
New Oxford House
2 George St
Grimsby

Dear Miss Birkwood

Planning Application Number DM/0554/21/FUL Re Kingsway Club, 3 Kingsway, Cleethorpes DN35 8QU Partial change of use at ground floor from office to bar and creation of outdoor seating area

My flat is next door to the Kingsway Club and it is already very noisy from people in the beer garden at the back. If people are also drinking at the front I will be bombarded with noise from both ends.

The Kingsway is not a quiet place to live without having a new pub next to me.

Two years ago I objected to a similar plan where the bar developer wanted to open while 3am. Luckily this plan was withdrawn.

Bars do not usually take enough care of their neighbours and really do not fit so well so close to living accommodation. I strongly object to the change of use to the above building

I hope you can put peoples quality of life above yet another pub. It is the use of the forecourt which would be the main problem.

Please note that this building is surrounded by residential properties , the noise from taxis coming and going cannot really be contained enough to allow the present standard of amenity to continue.

If granted strict conditions must be applied and closely monitored.

Yours sincerely

Steve Deveroux

Comments for Planning Application DM/0554/21/FUL

Application Summary

Application Number: DM/0554/21/FUL

Address: Kingsway Club 3 Kingsway Cleethorpes North East Lincolnshire DN35 8QU

Proposal: Partial change of use at ground floor from office to bar, alterations to doors and windows and creation of outdoor seating area to front with associated works

Case Officer: Lauren Birkwood

Customer Details

Name: Mr Stephen Briant

Address: 11 Edward Street Cleethorpes

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I fully support this application as by adding a downstairs bar area it will make the premises accessible to disabled and less mobile customers enabling them to have more choice on where they can socialise.

The outdoor seating area is in keeping with all the other venues in this part of Cleethorpes

Comments for Planning Application DM/0554/21/FUL

Application Summary

Application Number: DM/0554/21/FUL

Address: Kingsway Club 3 Kingsway Cleethorpes North East Lincolnshire DN35 8QU

Proposal: Partial change of use at ground floor from office to bar, alterations to doors and windows and creation of outdoor seating area to front with associated works

Case Officer: Lauren Birkwood

Customer Details

Name: Mrs Megan Briant

Address: 11 Edward Street Cleethorpes

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: The change of use proposed in this application will enhance the facilities available in this part of Cleethorpes for both local residents and visitors to the resort. The Kingsway Club is a well managed, friendly establishment which has been vastly improved by the current owners.

The seating area at the front is in keeping with all the pubs, cafes and restaurants along the Kingsway and High Cliff Road which all have seating areas at the front with residential properties adjoining them.

I support anybody trying to enhance this town and urge that this application is approved.

Kind regards

M E Brisnt

Comments for Planning Application DM/0554/21/FUL

Application Summary

Application Number: DM/0554/21/FUL

Address: Kingsway Club 3 Kingsway Cleethorpes North East Lincolnshire DN35 8QU

Proposal: Partial change of use at ground floor from office to bar, alterations to doors and windows and creation of outdoor seating area to front with associated works

Case Officer: Lauren Birkwood

Customer Details

Name: Mrs Sarah Smith

Address: 57 Humberston Fitties Cleethorpes Lincolnshire

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Other businesses have set a presidency which have outside space and downstairs facilities to no impact on residential premises. Outside space already available. Downstairs space would provide access to disabled people and families which cannot be accommodated at present without these changes providing equal rights

Laceby Parish Council

Mrs N Ashton, Clerk to Laceby Parish Council
2 Church Lane, Laceby, Grimsby, DN37 7BW
Email: lacbypcclerk@gmx.co.uk



Planning Department,
Origin One, Origin Way,
Europarc,
Grimsby,
DN37 9TZ

6th August 2021

Dear Sir/Madam

DM/0529/21/FUL – retrospective application for erection of a summerhouse and decking; 3 Blyth Way, Laceby.

The above planning application was discussed at the Parish Council Meeting on the 3rd August 2021. The plans and details of the application were scrutinised by Councillors attending the meeting and no objections were recorded.

Yours faithfully,

N J Ashton

Mrs N Ashton
Clerk to Laceby Parish Council

Bethany Loring (Engie)

From: John Payne
Sent: 08 August 2021 21:55
To: Bethany Loring (Engie)
Subject: Planning Application Ref DM/0529/21/FUL
Attachments: DM052921_01.jpg; DM052921_02.jpg; DM052921_04.jpg; DM052921_05.jpg; DM052921_03.jpg; DM052921_06.jpg; DM052921_07.jpg; DM052921_08.jpg; DM052921_09.jpg; DM052921_10.jpg; DM052921_11.jpg; DM052921_12.jpg; DM052921_13.jpg; DM052921_14.jpg

To: Ms Bethany Loring

NELC Planning Department

Re Planning Application Reference: DM/0529/21/FUL

(Also enforcement ref EN/0132/21)

Thank you for your letter dated 21st July in which you informed me about the above retrospective planning application for the erection of a summerhouse and decking at 3 Blyth Way, Laceby. I am writing to strongly object to this planning application.

Number 3 Blyth way backs onto my property which is the first house as you enter Arnold Close. I had contacted the planning department in February 2021 once I had realised the size of the building being constructed at number 3 Blyth Way as it concerned me about the scale and purpose of the development. My reasons for objecting to this application are as follows;

- The development has a negative visual impact on the surroundings and will harm the residential amenities of the neighbouring properties.
- It is not in keeping with, nor respects or enhances the surrounding area.
- It is out of character with the neighbourhood.
- It has an overbearing presence due to its size, particularly its height especially due to its proximity to the boundaries adjoining my property and the roadway entering Arnold Close.
- The development is visually overwhelming and inescapably dominant.
- The height of the development is excessive given where it is situated adding to its overbearing presence.
- The orientation of the development (it's constructed at an angle) adds to its negative visual impact on the surrounding properties.

- The overall size, design and location is oppressive and intruding as it is 'in your face' all the time as it is not sympathetic to the surrounding properties.
- The position of the development is such that it extends well forward of the front elevation of my property as well as the side elevation of 3 Blyth way which adds to its overbearing presence.
- At its closest, the corner of the development is approximately 20cms from the boundary wall between my property and 3 Blyth way ~ the roof is actually overhanging the wall onto my property.
- Due to the developments close proximity to my property and is of wooden construction I am concerned that if it was to catch fire it would cause damage to my property.

I hope that you will take these objections into consideration and refuse planning permission for this inappropriate construction.

J S Payne

1 Arnold Close

Laceby

DN37 7FB



Virus-free. www.avast.com













Comments for Planning Application DM/0529/21/FUL

Application Summary

Application Number: DM/0529/21/FUL

Address: 3 Blyth Way Laceby North East Lincolnshire DN37 7FD

Proposal: Retrospective application for the erection of a summerhouse and decking

Case Officer: Bethany Loring

Customer Details

Name: Mr John Robinson

Address: 4 Arnold Close Laceby Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The structure in question does not impact upon my property, however I do have sympathy with the neighbour whose property the building encroaches both with regards to roof overhang and also visually. The main issue appears to be the excessive height of the roof.

Comments for Planning Application DM/0529/21/FUL

Application Summary

Application Number: DM/0529/21/FUL

Address: 3 Blyth Way Laceby North East Lincolnshire DN37 7FD

Proposal: Retrospective application for the erection of a summerhouse and decking

Case Officer: Bethany Loring

Customer Details

Name: Miss ANGELA WICKS

Address: 14 Arnold Close Laceby GRIMSBY

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Previously the occupant of 3 Blyth way had an open sided wooden pergola in the same location as the proposed summerhouse. This blended in with the environment and was unobtrusive.

Unfortunately the new summerhouse, already partially built, is extremely imposing. It seems too close to the boundary wall of the property, but my main objection is the height of the structure. I cannot fathom why such a height is required, considering it is only single storey and is now not in keeping with the neighbourhood. It can be clearly seen from the plan that the height of the roof itself is almost the same as the main body of the summerhouse.

I appreciate an angled roof is required for water drainage, but something less imposing, particularly height wise, would be more acceptable.

Comments for Planning Application DM/0529/21/FUL

Application Summary

Application Number: DM/0529/21/FUL

Address: 3 Blyth Way Laceby North East Lincolnshire DN37 7FD

Proposal: Retrospective application for the erection of a summerhouse and decking

Case Officer: Bethany Loring

Customer Details

Name: Mr Phil James

Address: 8 Blyth Way Laceby Grimsby

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My main objection is the positioning of the building. It looks directly at my house and I believe it could invade our privacy. I would suggest that if the doors for this building were facing their own property and in a different angle to the current one I wouldn't need to object. I also really don't think that it needs to be the height that it is for the sake of the neighbours directly behind the property.