

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 06 November 2023 21:44
To: Planning
Subject: Planning Application Comments - 3/2023/0712 FS-Case-560056099

Planning Application Reference No.: 3/2023/0712

Address of Development: 20 Preston Road, Longridge, PR3 3AN

Comments: I would like to object to the application on the following grounds:

1 The proposed use of 20 Preston Road, PR3 3AN as a children's care home is not legal under a C3(a) or C3(b) usage classification, contrary to that suggested by the applicant.

Therapeutic Care Ltd, hereinafter referred to as 'the company'. Therefore, the proposed use of 20 Preston Road, PR3 3AN as a children's care home would in fact, fall under a C2 usage.

2. The reclassification of 20 Preston Road, PR3 3AN to that of a C2 classification, to facilitate use as a children's care home, would constitute a significant material change of land use and therefore would require planning permission to be applied for, contrary to that suggested by the company.

3. 20 Preston Road, PR3 3AN is not suitable for use as a C2 care institution, therefore planning permission for the reclassification of 20 Preston Road, PR3 3AN should not be granted.

Business use - this is a residential house and carers cannot be classed as residents due to staff changes and handovers, manages visiting etc.

Parking - the house is situated on a narrow slip road, private to residents, which is inundated by parents in cars waiting to pick up children, or dropping them off in the morning at Longridge High School. The road is inaccessible between 8am-9am and 2.30pm-4pm. This is an escalating problem with the school expanding and these [REDACTED] have no consideration whose drive/house they block and are quite [REDACTED] approached. My [REDACTED] and is [REDACTED] I struggle being able to park outside to drop my [REDACTED] off in a morning and collect at the end of the day. I have to block other users in which causes upset but I have to do this for the safety [REDACTED] There are also cars parked there for family members dropping off and collecting workers from Krempel UK on Queen Street, off Preston Road.

The application states two cars but that is incorrect. 2 cars for staff, one for the manager, then visiting social workers, IRO's, area managers, maintenance, family visits plus police when behaviour is out of control or child 'abscond'. There will be so much traffic on 'handover' with shifts etc, contributing even more to a private residential street, potentially blocking the neighbouring properties.

Anti -social behaviour - troubled young children who have been through trauma and in need of therapy. These traumas result in drug use/alcohol use/bullying, child sexual exploitation(CSE) /child criminal exploitation (CCE). [REDACTED] and I am hugely concerned with County Lines, safeguarding issues with the CSE/CSE, unwelcome adults waiting outside the property and supplying the children with money, drugs, cigarettes. The children are not in a secure unit, therefore free to come and go and meet these adults as and when they please.

The other concern is that this is directly across and in full public view from the High School across the road. These

adults could easily target vulnerable children from the school with gifts etc in return for sexual and criminal behaviour. There are two High Schools within 0.4 miles where majority of young children walk past this location. Longridge Sports Centre is also used by lots of children from the age of 4 years old which is very concerning that this could put them in danger.

I would personally feel very uncomfortable dropping [REDACTED] off [REDACTED] in order for [REDACTED] for them whilst I go to work.

Lack of privacy - due to the residents likely to be awake most of the evening the noise and light pollution is very concerning.

The gardens at the back are 'open' with very low fences with nothing to stop children climbing in, or even into the factory grounds situated behind the properties. The garages are connected which means that the residents could easily access other homes or easily vacate the bedroom widows onto the garages if they become distressed. These 'homes' are not supposed to be on public highways or have a public view - both of which apply. There is no privacy at the front of the house with large windows.

With all this in mind I do not feel that this property should be used as a children's home.

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 05 November 2023 14:12
To: Planning
Subject: Planning Application Comments - 3/2023/0712 FS-Case-559677515

Planning Application Reference No.: 3/2023/0712

Address of Development: 20 Preston Road

Comments: I object to this planning application as I feel the location of the property to be highly unsuitable for the proposed use as a C2 care institution for vulnerable children.

The property is situated on a busy main road and adjacent to the entrance to a busy industrial estate which is used by a large number of vehicles including HGVs daily. The property is also directly opposite a school and there are already a number of issues regarding parking and school drop off and pick up time, with vehicles regularly blocking the road. This has already led to heated confrontations between drivers and residents of the street. Contrary to the application I also believe there would be a significant increase in vehicles to the site via staff, visitors, social workers, health visitors, area managers, police, IROs etc

I feel that the above issues would compromise the safety of any vulnerable residents and lead to safeguarding issues for both them and the wider community such as pupils at the school opposite.

Additionally I also feel [REDACTED] having had [REDACTED] is [REDACTED] only applying for a certificate of lawfulness, which does not require the same levels of scrutiny as to the suitability of the property. [REDACTED]

I am also led to believe that contrary to what is stated within the application, the vendor was not made aware of the purchasers intentions for the property at any point until the after transaction was completed, [REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 06 November 2023 10:05
To: Planning
Subject: Planning Application Comments - 3/2023/0712 FS-Case-559813739

Planning Application Reference No.: 3/2023/0712

Address of Development: 16 Preston Road
Longridge
Preston
PR3 3AN

Comments: Lack of notification - no residents or even the seller of the house have been made aware of the proposals to change use of the property.

Anti -social behaviour - troubled young children who have been through trauma and in need of therapy. These traumas result in drug use/alcohol use/bullying, child sexual exploitation(CSE) /child criminal exploitation (CCE). Coming from [REDACTED] - this results in antisocial behaviour, criminal damage, unwelcome visitors, absconding so police are involved etc etc. [REDACTED] [REDACTED] is concerned with County Lines, safeguarding issues with the CSE/CSE, unwelcome adults waiting outside the property and supplying the children with money, drugs, cigarettes. The children are not in a secure unit, therefore free to come and go and meet these adults as and when they please. The other concern is that this is directly across and in full public view from the High School across the road. These adults could easily target vulnerable children from the school with gift etc in return for sexual and criminal behaviour.

Parking - [REDACTED] are situated on a slip road, private to residents, which is inundated by parents in cars waiting to pick up children, or dropping them off in the morning. This is an escalating problem with the school expanding and these parents have no consideration whose drive/house they block and are [REDACTED] when approached. The application states two cars but that's rubbish. 2 cars for staff, one for the manager, then visiting social workers, IRO's, area managers, maintenance, family visits plus police when behaviour is out of control or child 'abscond'. There will be so much traffic on 'handover' with shifts etc, contributing even more to a private residential street, potentially blocking the neighbouring properties.

Lack of privacy - the gardens at the back are 'open' with nothing to stop children climbing in, or even into the factory grounds [REDACTED] high school with open gardens and driveways. These 'homes' are not supposed to be on public highways or have a public view - both of which apply. [REDACTED] plus my [REDACTED] plus family. [REDACTED] who [REDACTED] and their behaviours could have a profound detrimental effect if they witness anti social behaviours, unwanted adults hanging round and police visits.

Business use - this is a residential house and carers cannot be classed as residents with the amount of coming and going on changeovers etc.

From: [REDACTED]
Sent: 06 November 2023 10:26
To: Planning
Subject: Proposed Certificate of Lawfulness - 20 Preston Road, Longridge, PR3 3AN - app 3/2023/0712
Attachments: DOC061123-06112023092937.pdf; 23_0712_3rd_party_response_021123.pdf



This email originated from outside Ribble Valley Borough Council. Do NOT click links or open attachments unless you recognize the sender and are sure the content within this email is safe.

On behalf of [REDACTED]

With reference to the above planning application, please can [REDACTED] make it clear that [REDACTED] objects on the following grounds. These comments have been submitted on the RVBC planning application. Whilst in favour of integrating the children into society, this is not the property to be invested in - in the middle of a residential area and across from a high school.

Lack of notification - no residents or even the seller of the house have been made aware of the proposals to change use of the property.

Anti -social behaviour - troubled young children who have been through trauma and in need of therapy. These traumas result in drug use/alcohol use/bullying, child sexual exploitation(CSE) /child criminal exploitation (CCE). [REDACTED] this results in antisocial behaviour, criminal damage, unwelcome visitors, absconding so police are involved etc etc. [REDACTED] is concerned with County Lines, safeguarding issues with the CSE/CSE, unwelcome adults waiting outside the property and supplying the children with money, drugs, cigarettes. The children are not in a secure unit, therefore free to come and go and meet these adults as and when they please. The other concern is that this is directly across and in full public view from the High School across the road. These adults could easily target vulnerable children from the school with gift etc in return for sexual and criminal behaviour.

Parking - [REDACTED] are situated on a slip road, private to residents, which is inundated by parents in cars waiting to pick up children, or dropping them off in the morning. This is an escalating problem with the school expanding and these parents have no consideration whose drive/house they block and are [REDACTED] when approached. The application states two cars but that's rubbish. 2 cars for staff, one for the manager, then visiting social workers, IRO's, area managers, maintenance, family visits plus police when behaviour is out of control or child 'abscond'. There will be so much traffic on 'handover' with shifts etc, contributing even more to a private residential street, potentially blocking the neighbouring properties.

Lack of privacy - the gardens at the back are 'open' with nothing to stop children climbing in, or even into the factory grounds situated [REDACTED] high school with open gardens and driveways. These 'homes' are not supposed to be on public highways or have a public view - both of which apply.

[REDACTED] plus [REDACTED], plus family, [REDACTED] and their behaviours could have a profound detrimental effect if they witness anti social behaviours, unwanted adults hanging round and police visits.

Business use - this is a residential house and carers cannot be classed as residents with the amount of coming and going on changeovers etc.

Please find enclosed supporting information composed by [REDACTED]
[REDACTED]

Not included as already received in next email

The following comments form my objection to planning application 3/2023/0712 on the following grounds:

1. The proposed use of 20 Preston Road, PR3 3AN as a children's care home is not legal under a C3(a) or C3(b) usage classification, contrary to that suggested by the applicant, Therapeutic Care Ltd, hereinafter referred to as 'the company'. Therefore, the proposed use of 20 Preston Road, PR3 3AN as a children's care home would in fact, fall under a C2 usage.
2. The reclassification of 20 Preston Road, PR3 3AN to that of a C2 classification, to facilitate use as a children's care home, would constitute a significant material change of land use and therefore would require planning permission to be applied for, contrary to that suggested by the company.
3. 20 Preston Road, PR3 3AN is not suitable for use as a C2 care institution, therefore planning permission for the reclassification of 20 Preston Road, PR3 3AN should not be granted.

The company is applying for a CLUPOD (Lawful Development Certificate For Proposed Use or Development), relying upon one of two arguments:

- a) The proposed use falls within the currently assigned usage classification of C3(a) or C3(b) or;
- b) The proposed use does in fact fall under that of a C2 usage classification, but that the proposed use is not materially different from that of the existing family dwelling, therefore would be deemed to not require a planning permission application and the usage would be lawful.

I would like to present my comments as to the fact that the proposed usage neither falls under C3 usage, and would be materially different to the current use therefore is not lawful and should not be granted a certificate of lawfulness.

Definitions:

Name	Definition	Source
C3(a) Dwellinghouse use	by a single person or by people living together as a family;	The Application - Supporting Statement
C3(b) Dwellinghouse use	Up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.	The Application - Supporting Statement
C2 Residential Institutions	Use for the provision of residential accommodation and care to people in need of care (other than the use within	The Application - Supporting

	Class C3) use as a nursing home, use as a residential school, college or training centre.	Statement
Household	A "household" is (current definition, from 2011) one person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room, sitting room or dining area.	Office for National Statistics
The Working Directive	You cannot work more than 48 hours a week on average - normally averaged over 17 weeks. This law is sometimes called the 'working time directive' or 'working time regulations'.	UK Government - https://www.gov.uk/maximum-weekly-working-hours
Material Change Of Use	There is a material change of use where there is a change in the purposes for which or the circumstances in which a building is used, so that after that change: (d) the building is used as an institution, where previously it was not; (i) the building, which contains at least one room for residential purposes, contains a greater or lesser number of such rooms than it did previously;	UK Government Legislation https://www.legislation.gov.uk/uksi/2010/2214/regulation/5/made
Institution (noun - (PLACE))	A building where people are sent to be cared for, especially a hospital or prison.	Cambridge Dictionary
Family	a married, civil partnered or cohabiting couple with or without children, or a lone parent with at least one child, who lives at the same address; children may be dependent or non-dependent.	Office for National Statistics
Akin	of similar nature or character.	Oxford Dictionary

1) The proposed use of 20 Preston Road, PR3 3AN as a children's care home is not legal under a C3(a) or C3(b) usage classification and does in fact, fall under the classification of a C2 usage:

A key factor in determining whether the proposed usage falls under C3(b), is the definition of household. The application is not clear as to whether the 'household' consists of:

- a) all carers rotated to work at the property plus the two children, or;
- b) a few main carers plus the children at the property, or;
- c) it is expected that the two under 18 year old children solely form the 'household'.

Firstly, the company states, in point 19 of The Application, that the categorization of the property should be C3 because: "there would not be more than six residents living together and they are arguably living together as a single household, and various care is being provided for the residents".

If all carers working at the property, plus the two children are deemed to form a 'single household,' they will be a household greater than 6, please see the following:

- a) Assuming the rota pattern defined within the supplementary information document is correct, and that all carers are "residents" in the household, 4 carers, 2 children and 1 manager would be present in any 24 hour period. This already is above the maximum number of residents in a household which is defined by a C3(b) usage.
- b) We could assume that the manager does not "reside" at the property, therefore bringing the number of 'residents' present at the property at any one time down to 6, however, unless the company's business model relies upon the same 4 carers working 12 hours, 7 days a week, 52 weeks a year, (far exceeding the working time directive and highly improbable), the household will not consist of the same 6 people, but instead a large team of people.
- c) I believe a household is defined as the total number of people at a property over a prolonged period of time, not at any one single time.
- d) The number of household members under a typical family scenario would not be determined by how many people were in the property at any one time, but by how many individuals spend a significant amount of time in the property and consider it to be their home. For example, take a family of five consisting of a mother, father, and three children. Should the mother be out of the household working elsewhere, the household would not reduce in size for the time she was out, it would remain one of 5 and she would still consider herself to have responsibility for and to the household.
- e) The proposed way of calculating members of the household as carers and children present at the property at any one time (attempting to allow multiple carers to work at the property without making it a C2 residency) by the company, differs greatly to how the number of residents in a typical C3 dwelling house would be calculated.

Secondly, the company suggests, in Point 20 of The Application, that the household may consist of some carers and the two children, but that some carers would not be resident: '*Other members of staff providing care would be utilised as necessary, without their being resident in any way*'. This statement appears to try to mitigate the requirement to use the same 4 carers consistently (to remain a household of 6) by somehow differentiating between carers.

I do not believe that there would be any difference in residential classification from carer to carer, if one carer is classed as a resident, then any other carer carrying out the same role, on a

different day, would also be classed as resident, therefore the 'household' size would still exceed the maximum allowed number of 6 residents.

Finally, I don't believe it is reasonable to classify any of the carers working at this property under the proposed plans as part of the 'household' due to the following circumstances that will apply to all working there:

- a) Carers' will not be registered at that property for council tax purposes.
- b) Will have a main residence, and potentially a family, elsewhere.
- c) The 'household' is their place of work which they are paid to attend.
- d) 'Household' bills will not be in the name of the carers, therefore they would, in the eyes of the law, have no proof of address for residing at 20 Preston Road.
- e) Carers' cars will not be registered to that address.
- f) Carers' will not have continual responsibility for the household; they will only have responsibility when on shift.

It can therefore be assumed, that it is not reasonable to include any of the carers as 'residents' in this household, and that the household is merely their place of work. This means that in the proposed plans, the household is defined as having only two residents: the two under 18 year old children.

The responsibilities of running a household exceed that reasonably expected of two under 18 year old children, therefore they cannot form a household without the carers.

The definition of 'care' in the context of the C3(b) Dwelling House categorisation is as follows, 'personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs, or past or present mental disorder.' In the context of C2, this also includes 'the personal care of children and medical care and treatment'. It is clear that the proposed use lies within C2 and is not legal under the current C3 classification, as it involves the care of children.

Whilst it is clear this plan is not legal under the C3(b) classification, I would like to also highlight the reasons that it is not legal under C3(a):

Use as a class C3(a) dwelling house relies on the household being made up from either a single person, or a family. A family is defined legally as 'a married, civil partnered or cohabiting couple with or without children, or a lone parent with at least one child, who lives at the same address; children may be dependent or non-dependent.'

- a) The company states in the questions and answers document, 'There will be a maximum of two children in the house, and both will be selected based on referrals to be mutually supported and therefore be more akin to family members rather than two separate individuals', suggesting that individuals, not guaranteed to be legally defined as family, would hope to be placed in the home, together.

- b) To reference the application on point 13: 'Certificate applications are said to be a matter of fact and law':
 - i) The definition of akin is 'of similar nature or character'. Whilst trying to place children sensitively, in a situation 'akin' to a family is admirable, this does not fall within the legal definition of 'family'.
 - ii) Therefore the proposed use of this property is neither legal under C3(a) or C3(b) classification.

Further evidence of this can be seen during an almost identical application for a certificate of lawfulness, recently submitted to Blackburn and Darwen council by Possibility Care Group Ltd under application reference 10/22/0945. Where it was quoted that:

"In North Devon, 2 non-resident staff were to be on duty at all times. The house was under the supervision of a team of 6 or 7 adult carers operating in 8 hour shifts. It had been argued that the children would constitute a single household within Class C3(b) living together and the staff would provide care but would not be regarded as being part of the household. Mr Justice Collins rejected that, saying: "Children need to be looked after. They cannot run a house. They cannot be expected to deal with all the matters that go to running a home. It seems to me that in the context "household" means more than merely the bodies. You have to consider whether the bodies are capable of being regarded in the true sense as a household." He went on: "The question then arises whether carers who do not live but who provide, not necessarily through the same person, a continuous 24 hour care can be regarded as living together. In my view, the answer to that is no. what is required is indeed residential care with a carer living in full-time and looking after those in the premises who otherwise would be unable to live as a household.".

In this context, the definition of "care" in the Order should be recognised. It is defined as: "personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment;"

A subsequent appeal decision taking into account the principle's involved in the North Devon case and material circumstances somewhat consistent with this assessment is also relevant. The appeal relates to an application for a Lawful Development Certificate for a proposed use of a property as a single dwelling house for not more than 5 residents for the purposes of operating a children's care home within Use Class C3 (ref: APP/N4720/X/13/2201154). In this appeal, the Inspector accepted that the children would live in the house and that the house would be their home, for the duration of their stay. The carers would not, however,

live full-time at the property, it would rather be their place of work with some carers being on duty through the night and some asleep / resting in the allocated staff bedroom. Consequently, it was said that the carers would not live at the property, rather they were employed as carers, working shift patterns, and their homes would be their own households elsewhere, meaning that staff could not reasonably be said to be residents living together with the children in their care, as a single household. The use would, therefore, be a C2 residential care home.

As aforementioned, the proposed development indicates accommodation for children with three staff carers present at all times, sleeping overnight, who would operate in a shift / rota pattern. They will be employed by 'Possability Care Group Ltd' (the applicant) and their place of permanent residence would be their home address, rather than the application site.

It is recognised that the aforementioned definition of care, within the context of a C2 use, includes the personal care of children.

Applying the principle of North Devon and the cited appeal decision; based on the information presented, it is considered that the proposed use would not fall within Use Class C3b. It would not involve up to six people living as a single household and receiving care, as children are unable to run a functioning household and the carers present, as non-resident employees, would fail to contribute to the formation of a single household.

Moreover, the care definition attributed to a C3b use; ie supported living for people in need by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental health problems, is considered to fall outside of the scope of care relating the application, as the submitted detail does not indicate that the child residents would be in need of that type of care. The care element would rather be of a managed, supervisory / guardian nature, akin to a C2 residential care home.“

This application for a certificate of lawfulness was subsequently denied in the above case.

2) The reclassification of 20 Preston Road, PR3 3AN to that of a C2 classification, to facilitate use as a children's care home, would constitute a significant material change of land use

The definition of material change of use can be seen within the definitions section. If it is found that the building cannot be used as a C3 dwelling for the purposes of a children's care home and therefore must be recategorised to a C2 usage to continue with the proposed plans, I believe this would constitute a significant material change and therefore would be required to submit a planning permission application for such. Please see the following:

a) In reference to point d) in the definition of material change: The proposed use as a children's care home would mean the property being used as an institution, where previously it was not.

- i) An institution is defined by the Cambridge dictionary as "A building where people are sent to be cared for, especially hospital or prison".
- ii) As the company is defined as a "ChildCare Provider", as quoted from their own website, this suggests the proposed plans would, in fact, form an institution, constituting a material change of use.
- iii) One of the defining characteristics of an institution is in the fact that the residents (in this case, the children) who are cared for, are being "sent" there. The social services authority has a legal obligation to care for children under the age of 18, therefore, although the children may have some input as to where they reside, the final decision will be made by the social services authority who would, in this case, opt to pay to send the children to this home to be cared for by the company. This can be confirmed by the first point raised in the Questions Answers section of the application where the company states that: "They will have been taken into care by the social services authority".

The proposed use of this property, as an institution, clearly consists of a change in material use and therefore to change the use without planning permission should be seen as unlawful.

b) In reference to point i) in the definition of material change: The proposed use as a children's care home would alter the number of rooms in the property for residential purposes, reducing the number from 4 to 2.

- i) The existing use of the property is as a four bed C3 dwelling house, as per the existing floor plan.
- ii) The proposed plan states that the home would be for two children under the age of 18, assisted by carers (who are not to be classed as residents).
- iii) To support this plan, the company has stated they will convert the fourth bedroom (downstairs) into a staff office, and the third bedroom (upstairs) into a room for staff to sleep in whilst on shift.
- iv) This reduces the rooms available for residential purposes from 4 rooms, to 2.
- v) Even if the carers (staff) are classed as residents (above points highlight this is unlikely), the number of rooms available for residential purposes will be reduced from 4 to 3.

The proposed use of this property, including a reduction in rooms available for residential purposes, clearly consists of a change in material use and therefore to change the use without planning permission should be seen as unlawful.

Finally, on the topic of the proposed plans constituting a material change of use, I would like you to also consider the application 10/22/0945 to Blackburn and Darwen council for "Proposed development: Use of a C3a dwelling for a children's / young persons (aged 11-21) home for a maximum of three children, with three carers sleeping overnight, working on a rota basis (C3b)." A further example of an almost identical CLUPOD application which does also consider the material change of use from a C3 to a C2 usage.

See below:

"Although not explicit to the CLUPOD, it is considered prudent to address whether or not a material change of use to C2 would occur.

As a place of residence and work, with the extent of associated comings and goings, the type of transient carer occupation and inclusion of a manager's office would result in a change of character from that of a typical family dwelling to a more intensified use of a more commercial nature.

Other material factors such as potential impacts on service delivery and the ability to meet needs arising from residents placed from outside the borough.....

On balance, it is considered that a change of use to C2 would be materially different from a C3 use. Accordingly, it is considered that a Certificate of Lawfulness for the proposed use should not be granted."

This application rejection further demonstrates how the sheer nature of changing a residency from C3 to C2 does constitute a material change and therefore requires planning permission.

3) 20 Preston Road, PR3 3AN is not suitable for use as a C2 care institution, therefore planning permission for the reclassification of 20 Preston Road, PR3 3AN should not be granted.

I would like to draw your attention to the planning application: 23/01062/CU made to Lancaster Council. This was an application made by the same company, Therapeutic Care Ltd. to convert a C3 categorized dwelling into a C2 usage which was rejected with the following statement:

"I passionately believe we have a duty to support and facilitate these homes that support vulnerable children but the area where it will be located is a concern due to the location on a busy road which has problems in regard to speeding, and the already existing issues of properties for vulnerable people who need support."

This property is positioned in a similar position to 20 Preston Road, situated on a busy road, with ongoing parking issues. The parking issues caused by the property being situated opposite Longridge High School have already been outlined by other concerned residents, but can be summarized as the service road being regularly blocked, with cars frequently driving across property's front gardens (I understand you already have images of this), and residents being [REDACTED] when asked if they would be able to move their vehicle to allow access to the properties. It is hard to believe that if this example were to require planning permission, that the company would have this granted on similar grounds. I therefore do not see how this decision can in any way be lawful.

I would like to conclude my objection by emphasizing the immoral approach taken by the company by attempting to carry out the proposed changes on a certificate of lawfulness, as opposed to a full and thorough planning application. [REDACTED] a planning application, the company [REDACTED] but [REDACTED]

A common reason for rejection on similar planning applications within this area was due to concerns raised around children's safety and the lack of suitability of proposed properties to form a home environment for the children, by industry experts. It is the responsibility of the council to ensure that companies do not place very vulnerable children in places not suited to their needs. By granting a certificate of lawfulness you would be allowing the company to bypass the correct channels and potentially place vulnerable children in a harmful environment.

With regards to the planning application above, the following comment was given by the Senior Commissioning Manager Policy, Commissioning and Children's Health of Lancashire County Council

"Thank you for asking for my comments on the above planning application.

Lancashire Children's Services do struggle to source smaller homes that are able to care for children with more complex needs and behaviors and we welcome providers who are commissioned to provide local homes for Lancashire children, which I note this provider states they will do as part of the cascade planning condition.

However, I am aware that there are concerns in relation to the West End of Morecambe and the suitability of this area for our children in our care, due to their higher levels of vulnerability. The type of children who this home would be aimed at are likely to have very high levels of vulnerability due to the nature of their more complex needs and behaviors.

Lancashire Children's Services therefore does not support this planning application. "

Had the above application been for a certificate of lawfulness, the lack of suitability of the property may very well have been missed and the plans pursued, placing vulnerable children in a less than satisfactory location. It is evident by these comments that by granting this certificate

of lawfulness, you are not allowing the correct process to proceed to ensure the safety and security of very vulnerable people, this is something we all should care about.

When reviewing the evidence, it is clear that the company has had a number of planning applications, such as above, [REDACTED] submit [REDACTED]

[REDACTED] I believe that not only should this application be denied, but the principle of avoiding consulting the proper [REDACTED]

[REDACTED]