



26<sup>th</sup> June 2012.

Dear Ms. Eastwood

**Re: Planning Application No: 3/2021/0555**

We are writing to express concerns about planning application 3/2021/0555. The application proposes to change of use of 42 Knowsley Road from Residential Class 3 to Institutional Class 2.

Our issues relate to the following:

**1. Planning Classes and Permitted Development.**

We understand that movement within classes, specifically movement between Class 2 and Sub Class 2A is allowed under permitted development. Should this occur on a permanent or even temporary basis, it would change the property from the Children's residential home described in the application to a secure children's institution. Number 42 Knowsley Road is situated in a densely populated area, completely surrounded by family homes and would be entirely unsuitable for a secure institutional residential development. Not only would such a development have a marked detrimental visual impact, it would severely impact on the amenities of the local population in respect of safety and security, increased anxiety and increased traffic.

**2. Suitability of 42 Knowsley Road for Residential Children's Care**

The planning application submitted contains inaccuracies, some which look like careless 'cut and paste' issues such as the local train station being identified as 'Stockport', others however are seriously misleading. According to the Planning Application the home and area are identified as being safe environments entirely suitable for children who have issues adversely affecting their ability to develop into happy, productive, socially capable adults. The planning application identifies that the children the home proposes to help need much support to achieve that aim and a safe, secure environment is integral to this. The National Minimum Standards for Residential Child Care (Taken from Guide to the Children's Homes Regulations Including The Quality Standards 2015) include the following:

**Children are safe from harm**

**Regulation 12 Protection of Children states that 'The Home is located so that children are effectively safeguarded'**

Road Traffic, parking and walking along Knowsley Road all pose problems in relation to this requirement. Problems, which despite suggestions to the contrary in the planning application are likely to be increased should the application succeed. The road is limited to 20 MPH speed, and to some extent looks like a small, quiet, rural road. However the fact that the authorities have deemed it necessary to label the road 'Access only' and fit speed bumps along its entire length give a better picture. In parts the road is reduced to one way traffic because cars are parked on both sides. One of these patches starts at the edge of this property. Additionally the pavement on this patch on the same side as the property is unavailable to pedestrians who have to risk injury by walking in the road. Even without the parking, the pavement does not stretch the length of Knowsley Road on either side, requiring pedestrians to cross and recross to access paved areas the entire length of the road. Additionally the road continues to be used as a 'rat run'; a short cut from Whalley Road to Ribchester Road. Most of these cars are going at speed, slaloming around the speed bumps. Indeed even cars adhering to the speed limit slalom around the speed bumps. Parked cars and garden hedges inhibit the view of the road so that accessing Knowsley road from side roads is particularly hazardous as is crossing the road safely. The road, itself, outside Number 42 is frequently blocked by Refuse Collectors, Farm vehicles, Delivery vans and a very large Morrison's egg collecting vehicle. It all adds to the dangers posed to everyone who uses Knowsley Road in any capacity.

It is likely that the Children's Home will add to these difficulties. The Application states that there is parking for 10 Cars and a Turning Circle meaning that access to the property will not be a problem and local residents will not be inconvenienced by staff and visitors to the Home. This statement is inaccurate to say the least. Stones and Young, Estate Agents who are selling this property identify parking for several cars including an integral garage. There is no turning circle and if six cars are to be parked or even 4, it will be necessary for those nearest the road to leave the property to allow the cars furthest away to depart. If 10 cars are to be parked it will take the entire front garden, drastically reducing the outdoor space available to the property, which is already very small for the size of the property. The Application suggests that in the main there is likely to be 4 cars parked, but indicate that there will be times when additional parking will be required. Indeed **Regulation 5 of the National Minimum Standards states that 'it is crucial that the Home works in close partnership with all those who play a role in protecting and caring for the child, but particularly the Child's Local Authority and Statutory Social Worker.'** In respect of this application at maximum capacity that could be 4 different Local Authorities and 4 different Social Workers. The Application does say that the Home does its best to keep visits to the Home to a minimum when meeting these requirements, but it is clear that this will not be possible on all occasions and therefore the impact on Knowsley Road of even minimal extra vehicles will seriously and negatively impact on local residents.

Additionally in relation to safety, the close proximity of the railway line is a potential hazard, which can be accessed relatively easily by anyone seeking to do so, from more than one different location within a short walking distance from 42, Knowsley Road.

My husband and I have several times reported via the 101 telephone line our suspicions of drug dealing on Knowsley Road, between the Railway Bridge and its junction with Whalley Road. There are no properties on this area and no walking paths and although vehicles park on the

stream side of the road during the day, these vehicles leave by 6pm. We have seen a car parked on the opposite side on several occasions in the evening. The car has an occupant in it and several people approaching the car and its occupant one at a time, leaning in the window and then walking away. We saw it most recently earlier this month. We have no idea whether any action was taken, however if the application proves successful this is something the Home Owners should be made aware of.

Much is made in the application of the security afforded by what is described as a large electric gate. There is indeed an electric gate but it is a convenience rather than security. It is not large, being approximately 1 metre high. There is also a very small garden gate leading directly to the road which can be used if one didn't wish to climb over the electric gate. It should be noted that these gates are wide, approximately 2 cars wide. They open inwards on to the property into the parking spaces and reduce the number of cars that can be parked if the gates are to be opened.

**Regulation 6 requires that the Home offers A Welcoming Environment, including a requirement that the Home must meet children's basic day to day needs and physical necessities.**

The Ofsted report on the Company's other Children's Home, Aurora House is excellent and clearly the Company cares about the children in its care. However the internal plan of 42 Knowsley Road does have some issues in relation to meeting the hygiene and privacy requirements of the children. The plan shows a family bathroom and a cloakroom (toilet and hand basin) accessible by all. There is another bathroom, however this is an ensuite room accessed via a bedroom and adjoining dressing room. This bathroom is only accessible by the occupant of the bedroom it adjoins. The regulations under **Providing Personal Space** are clear that 'A child's bedroom should not generally be entered without their permission' thus this bathroom is only available to either one child or the staff. The Home intends to cater for up to 4 children and at full occupancy could have 4 unrelated children of differing ages and gender and we do not think one bathroom is appropriate in terms of their privacy and hygiene needs. If my reading of the proposed staffing rota (as outlined in the planning application) is correct there will be only 2 members of staff, even when the home is at full capacity, on duty between 8am and 10 am. The very time when bathroom usage is likely to be at a premium. The staff are on call between the hours of midnight and 8am and may not be supervising children before 8am.

It is likely that the ensuite bathroom could be made accessible by all via some internal alterations, but these should be done before children are placed in the Home.

**Regulation 6 also requires that 'The Home should be located in an area that supports children's safety, wellbeing and personal development'. Regulation 9 - Enjoyment and Achievement requires staff to 'develop a child's interests and hobbies and help children to participate in activities they enjoy and that each child has access to a range of activities'**

It seems to us that Wilpshire is not particularly conducive to the achievement of these Regulations. Whilst the planning application suggests that there is much for children in the local area, it is likely that the definition of 'local' in the planning application takes in Blackburn with

Darwen and is not confined to Wilpshire. There are no children's play areas, the nearest is more than 1.5 miles away at Roe Lee. As far as we are aware there is no local swimming pool, gymnasium, trampoline park, nature reserve and the only tea room/café I am aware of is sited on the very busy Whalley Road by the traffic lights. There are several however, in Great Harwood a few miles away. We have recently lost our post office, although there is talk of a 'pop up' one being located in the village hall for 2 hours per week. The Application also makes much of the availability of schools and whilst they have provided evidence in the list of schools, it should be noted that only 2, one primary and one secondary are actually located in the Ribble Valley. All the rest are in Blackburn with Darwen.

The above lack of Children's play areas would be less of a problem if the property had sufficient garden area for children to play in, but despite the claims of the application form it doesn't. Accessing Google Earth aerial view of the property (taken some time since 2012) it is clear to see that the plot is large, mostly taken up by the property itself. The front garden seems to be the largest area, but the majority is taken up by parking. To the side of the property not taken up with parking there is a narrow strip of grass mostly occupied by a large tree. This leaves the back of the property which is formed of a narrow strip of lawn. Not enough for four children, particularly children who are in need of additional support and care and perhaps space for themselves.

### **3. Issues with the Application Form.**

There are inaccuracies in the proposal which give rise to concern, which may signpost issues, be poor 'cut and paste' efforts or over enthusiastic efforts to present the best picture. In the first place there seems to be a question mark over ownership.

The Application clearly states that the owner is Mr. Mark Twiname, one of the Company Directors, however the For Sale sign is still displayed outside the property and more concerning to us, the Estate Agents web site states that the property is currently 'Under Offer'. It does not say Sold.

The Application form says that there will be 4 part time employees amounting to 2 whole time equivalent (WTE) staff, but later in the application it states that there will be 10 staff when fully occupied. We assume that 10 is more likely to be accurate since 2 WTE staff is clearly going to be insufficient, but it needs checking.

The Application states that the company runs another Children's Home, Aurora House, which had an outstanding Ofsted report on opening which has been retained ever since. According to Ofsted website, they inspected in December 2019 and reported in January 2020. The report was indeed outstanding and the Home still retains it. However Ofsted have never so far re inspected the Home, so it would have been retained.

We apologise for the length of this letter, but felt it important to explain the reasons for our objections. We are concerned that Brinscall Care Ltd have not been in business very long and it is very important for the wellbeing of the children the Company cares for that the Home succeeds as

well as Aurora House. Running two such homes will be a much, much bigger undertaking and will require sufficient available funds to ensure that the property meets the needs of the children and supports the requirements of the legislation.

Yours sincerely

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