



Dear Councillor

**DEVELOPMENT MANAGEMENT COMMITTEE - MONDAY, 26 SEPTEMBER
2022**

I am now able to enclose for consideration at the above meeting the following reports that were unavailable when the agenda was printed.

**Agenda Item
No.**

LATE REPRESENTATIONS(Pages 3 - 18)

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DEVELOPMENT MANAGEMENT COMMITTEE – 26th SEPTEMBER 2022

LATE REPRESENTATIONS SUMMARY

3(a) 22/01526/FUL - Change of use of land to domestic curtilage and erection of 2m high fence (and associated landscaping). Demolition of existing car port/garage and erection of single storey extension. 9 Ditchfield Somersham PE28 3HU

Error in paragraph 1.2 of officer report (page 9 of reports pack). The land is not under the ownership of the applicants at present. However, relevant notice has been served on the owners of the land (HDC) and all relevant consultations have been carried out with the Parish Council and Local Ward member. A press notice (in the Hunts Post) has also been issued. The matter has also been through cabinet. An overview of this is provided in the submitted Planning Statement.

4(a) 22/01102/FUL - Construction of new dwelling with associated outbuilding and parking (part retrospective) 9 Alabama Way St Ives PE27 6SH

Response below from the Senior Development Management Officer in regards to the need for an additional condition:

A condition is required to be added at paragraph 7.15 of the officer report in regards to the high level window serving bedroom 4 facing the rear private amenity space of No.7 Alabama Way.

The text should read:

A small High-level window serving a bedroom is shown on the submitted drawings. This window (serving bedroom 4) has a cill height of approximately 1680mm from finish floor level as confirmed by the agent and has potential to overlook the private amenity space of No.7 Alabama Way. To ensure this window does not impact on the rear private amenity space of No.7 Alabama Way a condition will be added

to the decision notice (should members be minded to approve the application) ensuring the window is top hung and permanently fitted with obscured glazing in accordance with Policy LP14 of the Local Plan.

The condition should also be added to the list of conditions at section 8.

4(b) 22/00501/FUL - Change of use from C3 (dwellinghouse) to C2 (care home). 31 West End Brampton PE28 4SD

Paragraph 6.3 of the committee report

To confirm, details of the bin store and cycle parking area are not for consideration at this stage. The recommendation, as set out in Section 8 of the committee report, that details of the cycle and bin storage are required to be approved via planning conditions remains unchanged.

Additional representations received

Further to publication of the Committee Report further representations have been received.

These include 8 of support which are summarised below, but do not raise any additional matters.

- The relevant issues have been carefully considered and the change of use will provide a beneficial service.
- Good to know that the care home is recommended for approval.
- Wish to voice support as all relevant issues have been carefully considered and it will be a beneficial use.
- Will create a vital community service.
- Suitable accommodation for the change of purpose. Large driveway for parking and large garden for children's needs.
- No legitimate reasons given to halt this development.
- Encouraging that a project is being brought about to help the vulnerable in our society.

3 further representations from local residents (including 2 from one address) have been received raising detailed objections. Full copies of these are attached. A verbal update will be provided to Members as part of the Officer's presentation on this Committee item. These representations, however, raise no material planning grounds to alter the Officer's recommendation. Both Senior and Legal Officers of the Council have also been made aware of the contents of these representations.

4(c) 22/00879/S73 - Variation of condition C20 (off site works as per plan prior to commencement) for 17/01375/OUT to reconcile the approved planning drawings pursuant to condition 20 with the associated completed off-site Section 278 works Land North East Of Mandene Gardens Great Gransden

Since the publication of the officer report the following neighbour representation has been received from No.19 Sand Road, Great Gransden.

“Dear Councillors,

I would be grateful if you could please consider the following evidence and question the Officer’s and others’ claims that this junction is safe in its current layout, including their claims that the kerb face acts as a deterrent and thereby affords pedestrians some protection:

#1 shows damage to the kerb and pavement from repeated daily incursions by large vehicles on this blind corner. It also shows vehicle scuff marks on the back wall highlighting the extreme risk pedestrians take when using this pavement in its current layout, exacerbated by the absence of a refuge area for those in immediate danger.

#2 shows the extent of the incursions on the other side of the junction, highlighting the manner in which large vehicles use this junction.

#1 Sand Road/East Street junction – Sept 2022



#2 Sand Road/East Street junction – Sept 2022



The Officer's recommendation pivots on a number of claims that ignore the fact this new pavement is on a blind bend ie it is not a straight stretch of pavement, so neither vehicular nor pedestrians users can see ahead for any real distance to prepare or take evasive action.

We have gone from a dangerous junction to a very dangerous junction; one that is now unsuitable for any level of use, never mind after the addition of 40 new homes.

Please refuse this application and instruct the Officer and the necessary authorities to consult with each other, the developer and the Parish Council to implement a solution that makes this junction much safer than its current state, whilst maintaining two-way access for standard saloon type vehicles. There must be a sensible solution to make this a safe place (ref NPPF2021)."

Officer Response

It is recognised that the new footpath wraps around the bend at the junction of Sand Road and East Street which accords with the layout indicatively shown on the plan submitted with the outline application and that approved by Huntingdonshire District Council under condition

discharge application 19/80334/COND. Visibility around the bend is limited by the private boundary hedging to the adjoining residential property.

The highway safety concerns raised have been addressed within the officer report and consultee comments received from Cambridgeshire County Council Highways dated 18th July 2022. Specifically, as stated by the Cambridgeshire County Council safety auditor, it is considered that while this junction may see some overrun, (indicated by submitted photographs) many junctions do, usually by larger vehicles. However, it is unlikely to happen when occupied by pedestrians. This is because of the position of the driver while undertaking a turning manoeuvre, pedestrians would be clearly visible as it is the rear end of the vehicle that is generally the part of the vehicle mounting kerbing. It is also considered that the scheme improves connectivity and visibility for all users of Sand Road and this junction, seen previously, and is therefore a benefit to the wider community.

It should be noted that the works have been completed under Section 278 of the Highways Act 1980 which is separate to the planning process. However, condition 20 of the outline planning approval secured these off-site footpath works to be delivered as part of the 40-dwelling residential development to make the application acceptable in planning terms. A similar scheme has been approved by Huntingdonshire District Council in consultation with Cambridgeshire County Council Highways under condition discharge application reference: 19/80334/COND. The difference between the approved scheme and that installed and seeking approval under this application is shown on the submitted Section 278 General Arrangement Plan. The differences are a reduction of 3cm – 4cm in width to the section of the footpath along East Street and 1cm reduced width to the section of the footpath along Sand Road. The justification for this reduced width is that a backing slab is required due to the difference in ground level.

Please find attached a technical flood risk appraisal using this link <https://we.tl/t-BxKh9ApH83> that has been prepared [REDACTED] Ambiental in relation to the above application.

This expert technical appraisal confirms that:

1. The existing dwelling/building falls within Flood Zone 3.
2. That the application should not be supported/approved because the proposed development (taking into account the proposed mitigation measures) is not suitable and 'safe for all' for a 1% (1:100) annual exceedance probability flood event, for the lifetime of the development, with appropriate climate change allowances.
3. As it has not been demonstrated that the proposed development will be safe throughout its lifetime, the Sequential Test should be applied, to determine whether there are any suitable sites in the area which are at a lower flood risk than the proposed site, and therefore would provide a better location.
4. The proposed bin and cycle storage associated with the proposed development should be considered as part of the FRA to ensure that they are not affected by flood risk and that the development does not have an adverse impact on the wider flood risk. (And, dealing with the proposed bin and cycle storage by way of a condition would therefore not achieve this, not only in terms of flooding as identified in the attached technical appraisal but also in terms of access and parking/manoeuvrability provision).
5. The flood warning and evacuation plan is not adequate, not appropriate, not safe and not consistent with the current Planning Policy Guidance and Environment Agency Guidance.
6. The flood resilience and mitigation measures in the FRA are all general and their implementation (save for the inadequate and unsafe flood warning and evacuation plan) is qualified by the FRA as they would only actually occur 'where practical'.
7. The existing floor levels are not in accordance with national guidance for more vulnerable developments. For ground floor sleeping quarters/bedrooms it is normally advised they are 600mm above modelled flood levels in the climate change scenario. They should be raised to 11.85m AOD.

8. The flood risk will have a detrimental impact on the proposed children residents' safety and amenity, and there are other safety issues associated with the brook at the rear of the property (located behind a small picket fence).

The above points (amongst others) are set out, and explained in detail, in the attached technical appraisal.

It is extremely important that the attached technical flood risk appraisal is taken into account by Hunts DC especially as it identifies inaccuracies, and other substantial issues, with the latest FRA and FWEP that have been relied upon in the officer's report.

We should be grateful if you would confirm receipt of this email and its attachment.

Kind regards

Owners/Occupiers of 33 West End, Brampton.

LATE REPRESENTATIONS CONCERNING THE DMC REPORT

The documentation publicly available demonstrates that if the DMC follows the officer's current recommendation of approval in the DMC report, Hunts DC will be doing so knowing that:

- (A) they are relying upon inaccurate and incorrect information submitted in support of the application;
- (B) inaccurate and incorrect information has been provided to those who were consulted by Hunts DC that has clearly been relied upon;
- (C) the FRA relied upon in the officer's report for recommending approval is inaccurate and incorrect and this has been demonstrated with expert evidence;
- (D) **an expert technical flood risk appraisal** confirms that the application should not be approved/supported because the proposed development (taking into account the proposed mitigation measures) is not suitable and 'safe for all' for a 1% annual exceedance probability flood event, for the lifetime of the development with appropriate climate change;
- (E) the Local Highways Authority has relied upon inaccurate and incorrect information in deciding not to object to the application; and
- (F) the vulnerable children the proposed care home intends to accommodate are more vulnerable than those in a typical "family unit" within a residential dwelling.

In these circumstances, an approval of the application by Hunts DC may be successfully challenged by judicial review.

Our further comments on the DMC report follow under the headings below.

1. FLOODING/EXPERT FLOOD RISK APPRAISAL

- 1.1 The FRA relied upon in the officer's report is inaccurate and incorrect. The August 2022 FRA has not used the correct location of the site, not used the correct building footprint and has not correctly applied the current PPG guidance and the Environment Agency Guidance.
- 1.2 Ambiental's Expert Flood Risk Appraisal confirms:
 - (1) The existing house is located partially in Flood Zone 3.
 - (2) The application should not be supported/approved because the proposed development (taking into account the proposed mitigation measures) is not suitable and 'safe for all' for a 1% (1:100) annual exceedance probability flood event, for the lifetime of the development, with appropriate climate change allowances.
 - (3) As it has not been demonstrated that the proposed development will be safe throughout its lifetime, the Sequential Test should be applied, to determine whether there are any suitable sites in the area which are at a lower flood risk than the proposed site, and therefore would provide a better location.
 - (4) The proposed bin and cycle storage associated with the proposed development should be considered as part of the FRA to ensure that they are not affected by flood risk and that the development does not have an adverse impact on wider flood risk.
 - (5) The flood warning and evacuation plan is not adequate, not appropriate, not safe and not consistent with the current Planning Policy Guidance and Environment Agency Guidance.
 - (6) The flood resilience and mitigation measures in the FRA are all general and their

implementation (save for the inadequate and unsafe flood warning and evacuation plan) is qualified by the FRA as they would only actually occur 'where practical'.

- (7) The existing floor levels are not in accordance with national guidance for more vulnerable developments. For ground floor sleeping quarters/bedrooms it is normally advised that they are 600mm above modelled flood levels in the climate change scenario. They should be raised to 11.85m AOD. However, the FRA confirms that the existing floor levels will not be raised.
 - (8) The flood risk will have a detrimental impact on the proposed children residents' safety and amenity, and there are other safety issues associated with the brook at the rear of the property (located behind a small - 3 foot high - picket fence).
- 1.3 The planning statement was also prepared on the basis that the site was entirely located within Flood Zone 1. Whilst the planning statement refers to the applicant already having "*several properties similar to the application site in similar locations with similar backdrops*", this statement was clearly made on the basis that the site was located within Flood Zone 1.
 - 1.4 We have also provided evidence that demonstrates how the statement in the paragraph immediately above is incorrect and that there are more suitable sites located within Flood Zone 1 in the area (which is relevant to the Sequential Test). However, the officer's report states that the location of other care facilities operated by the applicant, and alternative sites that are available in the village in Flood Zone 1, are not relevant.
- ## 2. ACCESS, PARKING AND HIGHWAY SAFETY ISSUES
- 2.1 **Inaccurate and incorrect existing plans, proposed plans and parking plan** - these do not reflect the site survey and all the inaccuracies are favourable to the application.
 - 2.2 **Correct and accurate plans would show that the driveway will not be able to adequately accommodate 3 vehicles parked side by side.** In addition to the front porch being omitted, a large tree and the raised sleeper bedding area has been removed from the plans: the site survey shows all this. If the existing driveway could adequately accommodate 3 vehicles parked next to each other in the manner indicated on the inaccurate parking plan, photos would have been submitted in support of the application showing this. Instead, only a carefully taken panoramic photo showing 2 cars parked in this area has been provided by the agent.
 - 2.3 The public concerns in relation to there not being sufficient manoeuvrability on the existing driveway for vehicles to safely enter and leave in a forward gear has been ignored. A vehicle swept path analysis has not been provided and the parking plan is inaccurate and incorrect as mentioned above. Whilst the officer's report refers to there being no specific parking standards in local policy, LP17 confirms the development must include adequate parking for vehicles and cycles. Furthermore, page 87 of the Huntingdonshire Design Guide (2017) provides that "*Where on-plot parking is provided, including the use of tandem parking bays, layouts must be designed to ensure that there is sufficient space to provide access to rear gardens, to consider refuse collection requirements and comfortably open car doors on both sides in garages and driveways*". In view of the parking plan being inaccurate and incorrect, no cycle parking being indicated, and the "on-plot parking guidance" within the Huntingdonshire Design Guide (2017) not being adhered to in terms of refuse collection requirements and comfortably opening car doors on both sides, it is not considered that adequate parking for vehicles and cycles has been demonstrated.
 - 2.4 The Local Highways Authority (LHA) response is not accurately set out in the officer report. The LHA states "*Following assessment of the planning statement and the Agents response to*

comments received, I would have the following comments” and “Given the **information provided** in relation to the operation of the care home and the vehicle movements associated, which are not significantly different from a large family home.” The LHA (and consequently the officer who prepared the report) have therefore relied upon the accuracy of the information provided by the agent (which the site survey confirms is incorrect).

- 2.5 Furthermore, the LHA has not provided the confirmations that the officer’s report refers to at paragraphs 7.43 and 7.46.
- 2.6 It is also apparent that the LHA has not reviewed/taken into account the public comments and concerns that have been raised. Hunts DC has also not confirmed if the LHA was provided with the photographic evidence and/or video evidence prior to the LHA’s consultation response.
- 2.7 In addition, paragraph 7.34 of the officer’s report confirms that the proposed children’s home would have separate staff accommodation areas, including all the rooms on the second floor. It is unclear if the LHA is aware of this and whether the LHA would accordingly look to seek improvement of the existing position.
- 2.8 There are issues with the visibility at the existing access to the site. The proposed change of use does not address the existing visibility issues for vehicle and pedestrian access. The proposal is for a children’s home registered under Emotional Behaviour Disorder that intends to accommodate vulnerable children that are more vulnerable than children/users in a typical “family unit” within a residential dwelling. These vulnerable children would therefore be significantly disadvantaged in terms of pedestrian safety.
- 2.9 It is also unclear if Hunts DC and/or the LHA have taken into account the ongoing highway safety issues, including the 3 recent RTAs that have occurred in the immediate vicinity of the site. This compounds the above concerns in relation to the site’s access.

3. VULNERABILITY OF PROPOSED RESIDENTS/CHILDREN

- 3.1 As mentioned above, the proposed use of the site as a children’s care home registered under Emotional Behaviour Disorder is more vulnerable than a conventional dwelling even if classes C2 and C3 are contained within the same vulnerability classification (national guidance also confirms there can be different levels of vulnerability within the same vulnerability classification).
- 3.2 In view of the safety and suitability issues identified with flooding and highways safety, parking and access above, it is not in the best interests¹ of the proposed vulnerable children for the application to be approved.

4. PRINCIPLE OF DEVELOPMENT/LP16/LP17/LP26

- 4.1 Paragraph 7.66 of the officer’s report states that “*the development would contribute to a local requirement for specialist housing and support of young persons*”. However, this is contrary to (i) paragraph 7.19 of the report that states “*no evidence has been submitted that demonstrates a specific need in this location*”, and (ii) paragraph 7.12 of the report that states “*Some objections have been raised that occupiers will be schooled in Bedfordshire and thus will not be sustainable. It is not known where the children will be schooled and may be subject to change and decided on a child-by-child basis*”.
- 4.2 It follows that a local requirement for the proposed development has not been demonstrated,

¹ <https://www.gov.uk/guidance/determining-a-planning-application>

especially when considering that the applicant is not an approved care home provider of Cambridgeshire County Council. In addition, it would not be appropriate to rely upon the applicant's proposed purchase and this planning application to demonstrate a local requirement, especially when the objections to this application have explained (with supporting evidence) that the government reforms/policy to the provision of childcare is against accommodating children in care homes away from their home area/families/support network. And, that is also not in the best interests of the vulnerable children.

- 4.3 Paragraph 7.8 of the officer's report quotes LP26(f) but no assessment of it is carried out. The public objections have referred to the legislation and guidance² that sets out the standards set by the Care Quality Commission regarding the safety and suitability of premises. However, the relevant legislation and guidance is stated as not being relevant to the determination of the application at paragraph 6.5 of the officer's report?
- 4.4 The proposal does not satisfy that legislation and guidance. For example, the safety and suitability issues identified with flooding, highways safety, parking and access are inconsistent with Regulation 15(1)(f). And, another example is that the guidance to Regulation 15(1)(c) provides that "*People should be able to easily enter and exit premises and find their way around easily and independently. If they can't, providers must make reasonable adjustments in accordance with the Equality Act 2010 and other current legislation and guidance*". In addition, the FWEP submitted in support of the application confirms that users of the premises with mobility issues may not be able to independently exit the premises (and the FRA states that all existing access to the property will be retained). This therefore shows how the application does not comply with LP26(f) as it does not (i) meet the safety and suitability issues identified with flooding, highways safety, parking and access, and (ii) include any provision for users with mobility issues to independently enter and exit the premises.
- 4.5 The officer's report also relies upon the proposed development having access to public transport when considering LP26(e), LP16 and LP17, namely the 66 bus route/service provided by Stagecoach. However, since the officer's report was prepared it has been announced that 21 of Stagecoach's existing bus routes in Cambridgeshire, including the 66 bus route/service, have been cancelled³ and the 66 bus route/service will cease on 30 October 2022⁴.

5. PROPOSED BIN AND CYCLE STORAGE/PARKING

- 5.1 Paragraph 3.10 of the planning statement stated that no external alterations to the property were proposed, and the Application Form (i) did not identify any existing cycle storage/parking spaces, and (ii) stated the waste storage and collection would be "*As existing*" (and that is all currently located at the driveway entrance to the site),
- 5.2 However, an unworkable and misleading proposal for bin and cycle storage plans were submitted. The misleading and unworkable plans were commented upon by the public but were subsequently removed from public access by Hunts DC on the basis that they had been superseded. Unfortunately, the public have not been provided with any superseded plans and/or details of what is proposed.

² Namely regulation 15(1)(c) and (f) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 No. 2936 (<https://www.legislation.gov.uk/ukdsi/2014/978011117613/regulation/15>) together with the Care Quality Commission's guidance to that regulation (<https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-15-premises-equipment>).

³ <https://www.cambsnews.co.uk/2022/09/18/exclusive-stagecoach-axe-21-cambridgeshire-routes/>

⁴ <https://www.vehicle-operator-licensing.service.gov.uk/search/find-registered-local-bus-services/details/601601/>

- 5.3 The officer's report proposes to deal with the bin and cycle storage/parking by conditions and also indicates that clarification relating to the design and location of these is being sought from the agent. Whilst the current position is far from transparent:
- 5.3.1 the design and location of the bin and cycle storage/parking will have an impact on flooding and should be considered as part of the FRA to ensure that they are not affected by flood risk and that the development does not have an adverse impact on wider flood risk; and
- 5.3.2 the design and location of the bin and cycle storage/parking will also have an impact parking/access/manoeuvrability.
- 5.4 It follows that the design and location of the bin and cycle storage, should not be addressed as conditions, especially when an unworkable and misleading proposal and plans have already been submitted.
- 5.5 The indicated detached outbuildings on the existing site plan (that hasn't been removed from public access) to the side of the house is also misleading. The site survey shows the actual position: the majority of the indicated detached outbuildings to the side of the house actually comprise a canopy covered veranda and canopy covered walkway.

6. LOCAL RESIDENT CONCERNS

- 6.1 Unfortunately, many of the local resident concerns appear to have been omitted from the officer's report. Those concerns include Hunts DC being informed that all the FRAs submitted in support of the application have located the site incorrectly and not used the correct footprint of the main building. This may potentially be in view of the previous case officer leaving Hunts DC. It is unclear whether any case officer currently employed by Hunts DC has reviewed the concerns of local residents and/or carried out a site visit. Paragraph 7.32 of the officer's report states "*although neighbours may have the opportunity to increase the boundary height to 2 metres to the side/rear...*". This statement demonstrates that no site visit has been carried out by Hunts DC to assess the side/rear boundaries of the proposed development.
- 6.2 In our late Queen's last speech on 10 May 2022⁵ it was stated that "*The planning system will be reformed to give residents more involvement in local development [Levelling Up and Regeneration Bill].*" This emphasises the importance of the views of local residents that live in the immediate vicinity of the proposed development.
- 6.3 The officer's report may currently give the DMC the impression that there are 41 objections and 27 comments in support from local residents. That however is not the case. The majority of the letters in support of the application are not from local residents but have been received from members of the public outside of Brampton, including Watford, London, Lancaster, Scarborough and Bristol etc. Many of the comments in support also include the following identical wording "*there is absolutely no reason why this application for change of use should not be approved and wholeheartedly welcomed by the council and the community*".

7. CONCLUSION

- 7.1 For the above reasons, we consider that Hunts DC should refuse planning permission.

**Owners/Occupiers of 33 West End, Brampton
19 September 2022**

⁵ <https://www.gov.uk/government/speeches/queens-speech-2022>

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Planning Application:- 22/00501/FUL

From: 44 West End, Brampton PE28 4SD – 16/09/2022

Further to, and in respect of the DMC detailed report and prior to the meeting of 26th September, I would like to address the following:

1. The Expert flood report by Ambiental provided which is on the portal (commissioned on behalf of 33 West End) proves conclusively that the applicant's agent's Flood Risk Assessment and Evacuation plan of 10th August are inaccurate. It shows grounds at the rear and side, and parts of the rear of the house (including the kitchen and the utility of the main house, and the dining room, cloak room and kitchen of the annex) are in Flood Zone 3 with a small area in flood zone 2. This has not been addressed in the DMC report.
2. You have not investigated nor acknowledged that The Highways Report is based on wholly inaccurate and misleading data submitted by applicant's agent. Highways should have provided an independent report taking into consideration not only that West End is a bus route but, that there is frequent HGV's using this route and additional parking issues due to a new post office, a convenience store and a school which has more than doubled in size in recent years. It has not further addressed the fact that there has been 3 recent accidents in the immediate vicinity of the site; a collision opposite the site, a cat being run over and a car crashing into the front garden of the house next door to the proposed site – all mainly due to speed and lack of visibility. Nor has the lack of visibility exiting the site been addressed.
3. Plans have been submitted without dimensions, against your regulations of (October 2021) displayed on the HDC Planning website which; had they have had measurements included would have shown they were totally unworkable. 6.3 on the DMC Report states "an update on this matter will be provided in the update report published prior to the DMC meeting being held". This appears to be decisions being made behind closed doors as the public will not have the opportunity to study the new proposal for parking, bike rack and bins in detail.
4. The Detailed report from DMC shows that there are 41 objectors and 27 submissions in support of this application, but do not note that only 7 out of the 27 live in Brampton, this represents just 26% of letters received in support. The other 20 supporters are spread across the country and it's entirely possible have never set foot in Brampton. In real terms, this means that 83% of letters received object to this application.
5. It was brought to your attention that plans that had been submitted, accepted, placed on the planning portal, commented upon by the public, had then been subsequently removed. Your reply to this was that the plans had been superseded so were not pertinent. It is unacceptable to remove plans that are in the public domain – all plans should remain on the portal in the interests of transparency and freedom of information. If they are to be superseded then the new plans should have been posted on the portal. To this date this has not happened.

At no point has the Applicant demonstrated a need for this type of establishment in Brampton (which is acknowledged in 7.19 of the DMC Report). In fact, current thinking about profit making homes of this nature, is that they are contrary to children's welfare and as a society we should be finding other solutions.

As a group, we have now collated sufficient expert proof that this site is unsafe in terms of both flooding and highway safety. There is also now sufficient documented evidence that current regulations have not been applied in accordance with an application for change of use; this evidence will enable us to proceed to Judicial Review if this case is Approved, as recommended by the Officer's report, knowingly taking into account all the documentation in the Officer's possession at this time.

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