Planning statement (including planning operational management plan and London Plan Policy D12 planning fire statement).

Proposal

Change of use from an existing Class C4 House in Multiple Occupation to a Class C2 children's care home for a maximum of two children

At

39 Fairdale Gardens, Hayes, UB3 3JB

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Introduction

This Planning Statement is submitted in support of a full planning application for the proposed change of use of 39 Fairdale Gardens, Hayes, UB3 3JB from the existing Class C4 House in Multiple Occupation (HMO) use relied upon by the applicant to a small Class C2 residential children's care home for a maximum of two children. It incorporates the applicant's planning operational management approach and a proportionate planning level fire safety statement. The proposed use would provide residential care within the existing building, presently used as a Class C4 HMO, without creating a general institutional facility, public clinic or separate office, and without any external enlargement.

The application site comprises a two storey semidetached property within an established residential street in Hayes. The Council's planning maps reviewed for this application do not identify the site as lying within a Conservation Area or an Area of Special Local Character. An Area of Special Local Character exists in the wider locality but does not include the property. The site lies in Flood Zone 1. The current site specific TfL WebCAT evidence supplied for the site gives PTAL 4, accessibility index 17.72. The frontage lies within the HY1 controlled parking zone, where the recorded restrictions apply Monday to Saturday between 09:00 and 17:00. These details are material to the site specific highways and parking assessment, rather than reasons to assume an unlimited capacity for additional vehicles.

Basis of assessment and professional limitations

This Statement has been prepared on the basis of the operational details, accommodation composition, staffing arrangements and other information supplied by the applicant. No independent verification has been undertaken of matters such as past or present activities, occupancy records, or third-party representations. If any of the information relied upon proves to be inaccurate, incomplete or materially different in practice, the planning conclusions reached in this Statement may require reconsideration.

This Statement is confined strictly to planning matters relevant to the proposed development. It addresses the planning merits of the proposal having regard to the Development Plan, other material considerations and the specific facts of the case. It does not constitute advice on or certification of operational care standards, Ofsted registration, safeguarding compliance, staffing regulation, building regulations, fire safety, health and safety, or any other separate statutory or regulatory regime.

The assessment uses the applicant's supplied HMO documents and written account of actual occupation from May 2025 to define the existing planning baseline. Rahul Taheem Ltd is not appointed to independently investigate, verify or certify the lawfulness, continuous use, historic occupancy, operational history or any past building works at this address. HMO licensing and town planning lawfulness are distinct questions; the presence of a licence is relevant factual evidence but is not itself a certificate of lawful planning use. The applicant remains responsible for the accuracy and evidential sufficiency of its existing use instructions.

The applicant and proposed care provider are likewise responsible for establishing the actual intended placement profile, direct personal care, staffing, management arrangements, professional attendance, vehicle demand and service operation. This statement assesses the planning consequences of their declared model only. It does not design, approve, audit, certify or warrant care practice, registration, individual placement suitability, safeguarding, staffing adequacy, regulatory fitness or the commercial viability of the proposed service. The relevant statutory regulators and appointed competent technical designers retain their own responsibilities.

If the historical planning baseline or the intended operational model later proves materially inaccurate or is changed after submission or permission, the planning analysis may need to be reconsidered; a materially different use may require a new planning assessment or a further consent. The Local Planning Authority determines planning merits and the weight given to the evidence. A grant of planning permission is neither an Ofsted approval nor technical Building Regulations or fire safety approval.

The principle of the development – planning policy

The statutory starting point is the development plan, read as a whole, with material considerations including the National Planning Policy Framework (NPPF) published in August 2026. The development plan comprises the London Plan (2021) and the relevant adopted parts of the Hillingdon Local Plan. This application concerns a small specialist community based children's residential home, not a lawful development certificate. The principle of providing needed care therefore engages the full planning balance alongside protection of existing housing, amenity, accommodation, design and transport impacts as well as other material considerations.

The August 2026 NPPF expressly recognises specialist accommodation need. Policy HO1 identifies looked after children among the groups whose accommodation needs should be assessed, including through the relevant local authority children's social care sufficiency evidence. HO1 is a plan making policy, not a substitute for the planning merits assessment. The national decision making policy HO7 requires substantial weight to be given to the benefits of homes contributing towards evidenced accommodation needs. Policy HO9 addresses specialist community based accommodation and expects appropriate living conditions, safe and secure management arrangements and access to frequently used services. Together, those provisions give significant policy support to an appropriately located, well managed and evidenced small children's home, while requiring the Council to assess its individual effects.

Policies S3 and S4 of the August 2026 NPPF establish a positive starting point for development within settlements. Policy S4(1) provides that development proposals within settlements should be approved unless the benefits would be substantially outweighed by adverse effects, assessed against the national decision making policies. Fairdale lies in an established urban residential settlement and involves adaptation of an existing building rather than new development on undeveloped land. Crucially, S4 is not a licence to ignore housing safeguarding. Policy S4(2)(a)(i) identifies a substantial adverse impact on land or buildings safeguarded for particular uses in the development plan as a circumstance which may weigh against approval. However, the loss of a single existing Class C4 HMO under Hillingdon Policy DMH 1 does not automatically establish such a substantial adverse impact. The acknowledged loss of Class C4 residential accommodation must therefore be assessed on its individual merits alongside Policy DMH 8, the evidenced need for specialist residential care and the overall planning balance. The applicant's case is that any adverse effects would not substantially outweigh the benefits of this small two child specialist home. The test remains for the Council to apply to the evidence.

Policy DM7 of the August 2026 NPPF sets a further, important boundary. Planning must assess the acceptability of the land use and any genuine land use effects of matters subject to separate regulation, but decision makers should normally assume that those other regimes will operate effectively. Planning decisions should not duplicate or extend their controls. Accordingly, staffing levels, care delivery, handovers, visitors, parking, local amenity and the internal functionality of this proposed C2 use are considered for planning purposes. The suitability of individual placements, Ofsted registration, safeguarding practice, structural design, detailed fire safety and Building Regulations compliance remain matters for the applicant, provider and relevant specialists or regulators, subject to any actual implications for planning.

Policy GG2 of the London Plan (2021) states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, particularly on sites within and on the edge of town centres, as well as utilising small sites wherever possible. Sites which are well connected by existing or planned public transport should be prioritised, and options to intensify the use of land in well-connected area to support additional homes should be explored, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling. This should align with Policy D3 of the London Plan (2021) by applying a design-led approach to determine the optimum development capacity of a site.

Policy GG4 (Delivering the homes Londoners need) sets out that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered and must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

Furthermore, Policy GG3 of the London Plan (Creating a healthy city) requires developments to address mental and physical health in an integrated and co-ordinated way, reducing health inequality where possible, which includes planning for appropriate health and care infrastructure to address the needs of London's changing and growing population.

Regard is also had to Policy H9 of the London Plan (Ensuring the Best Use of Stock), which promotes the efficient use of existing housing and recognises the role of Houses in Multiple Occupation in meeting local and strategic housing needs. Policy H9(D) provides that HMOs of a reasonable standard should generally be protected. The proposed loss of existing Class C4 accommodation is therefore acknowledged as a material planning consideration, to be assessed alongside Policy H12, Hillingdon Policies DMH 1 and DMH 8, and the evidenced need for specialist residential care for vulnerable children.

Safeguarding existing homes

Policy DMH 1 of the Hillingdon Local Plan Part 2: Development Management Policies (2020) states that the net loss of existing self contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace. Further to this, Paragraph 4.3 states that in order to meet projected housing needs, the Council aims to resist the loss of residential accommodation within the Borough by means of Policy DMH 1: Safeguarding Existing Housing. For the purposes of this policy, residential accommodation includes Houses in Multiple Occupation (HMOs), student accommodation and other uses falling into Use Classes C3 and C4.

Paragraph 4.5 further recognises that exceptional circumstances may exist which outweigh the loss of residential units and deliver other Local Plan policy objectives. Each case for exceptional circumstances is to be assessed on its individual merits.

London Plan Policy H8 (Loss of Existing Housing and Estate Redevelopment) also seeks to safeguard existing housing. The policy supports the replacement of housing at existing or higher densities with at least equivalent overall residential floorspace. This is intended to ensure that the redevelopment and intensification of London's housing stock continues to contribute towards meeting housing needs and does not result in an unjustified reduction in residential accommodation.

The existing Class C4 HMO baseline and Article 4 chronology

Policy DMH 1 cannot be avoided simply by distinguishing a C4 HMO from an ordinary C3 family dwelling. Its supporting text expressly treats HMOs and other C3 or C4 accommodation as residential accommodation for housing safeguarding purposes. Accordingly, the proposal entails loss of an existing C4 residential use, and the applicant accepts that safeguarding existing housing is a material adverse consideration to be balanced against the public benefit of needed specialist care. It is not submitted that the existing use has no housing value; rather, that a tightly managed two child care home can justify the particular change on its individual facts and evidence.

The applicant's HMO licensing application dated 22 May 2025 records that the property was converted to an HMO on 19 May 2025. It records six separate lettings, six households and six residents at that time. The applicant subsequently confirmed in writing that the actual occupation and use as an HMO commenced on 19 May 2025. A further Hillingdon Licensing email dated 17 September 2025 acknowledged receipt of the application and advised that the property could be rented as an HMO while the licensing application was processed. That communication is relevant contemporaneous evidence of the licensing position but is not treated as a planning determination.

Hillingdon's subsequent borough wide HMO Article 4 Direction came into force on 11 December 2025. The applicant's evidence places the May 2025 HMO commencement outside the areas previously subject to the earlier relevant Article 4 controls. Subject to satisfaction of the requirements applicable at the time, a qualifying small HMO change could then be permitted development before the later borough wide direction took effect. An Article 4 Direction does not in itself retrospectively extinguish an existing lawful use. The relevant issue is therefore the factual and legal position when use commenced and whether it remained established, not simply whether a later HMO restriction now applies.

The HMO licence issued on 19 February 2026 runs to 18 February 2031. It authorises a maximum of six people across five households, with five authorised sleeping rooms. Those licence terms differ from the May 2025 application's historic reference to six individual households. The difference in licensing arrangements is identified openly and is not rewritten as though the two documents record the same household configuration. Six residents remain within the numerical scope associated with Class C4, but licensing thresholds, licensing conditions and actual planning lawfulness remain different matters.

This documentary chronology is materially more informative than a bare assertion that the property has been an HMO. It shows a reported starting date, contemporaneous application and correspondence, and subsequent licensing regulation, all preceding or related to the borough wide Article 4 change. The documents nevertheless do not constitute an extant section 191 certificate, and Rahul Taheem Ltd does not certify whether every precondition for a lawful C4 change was met or whether the C4 use has continued without material interruption. If the Council disputes the baseline on identified evidence, the applicant may need to provide further direct factual material or seek specialist lawful use advice separately.

For impact assessment purposes, the relevant housing comparison is therefore an existing client-confirmed C4 HMO, potentially accommodating up to six unrelated adult residents within the separate lettings / licensed rooms, rather than a fictitious empty dwelling or a purely theoretical C3 family. A small HMO can generate independent arrival and departure patterns, visitors, deliveries and vehicle ownership among adults. A two child C2 home would have a different type of activity, including staff shifts, management and regulated professional visits. No independently observed movement count for the existing HMO has been supplied, and this statement therefore makes no invented numerical trip reduction claim. It compares the realistic nature of the two uses and addresses the C2 impacts and parking controls directly.

Proposed residential care home

Policy H12 of The London Plan, Supported and specialised accommodation states - The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners (see Policy D7 Accessible housing) within a wider inclusive community setting. Boroughs should undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation within their borough. Supported and specialised accommodation could include: -

1) accommodation for people leaving hostels, refuges and other supported housing, as well as care leavers and people leaving prison to enable them to live independently

2) accommodation for young people with support needs

3) reablement accommodation (intensive short-term) for people who are ready to be discharged from hospital but who require additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation

4) accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible

5) accommodation (short-term or long-term) for people with mental health issues who require intensive support

6) accommodation for rough sleepers

7) accommodation for victims of domestic abuse

8) accommodation for victims of violence against women and girls

Policy DMH 8: Sheltered Housing and Care Homes states A) The development of residential care homes and other types of supported housing will be permitted provided that: -

i) it would not lead to an over concentration of similar uses detrimental to residential character or amenity and complies with Policy DMH 4: Residential Conversions.

ii) it caters for need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the needs identified by the Council or other recognised public body such as the Mental Health Trust;

iii) the accommodation is fully integrated into the residential surroundings; and

iv) in the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport.

B) Proposals for residential care establishments which fall under Use Class C2 must demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).'

Relevant planning policies and their application

Policy / document	Relevance to 39 Fairdale Gardens
Hillingdon DMH 1	Safeguards existing housing, including C4 HMO accommodation. The acknowledged loss is to be justified by evidenced specialist care need and the overall balance.
Hillingdon DMH 8	Principal care home policy: identified need, no harmful concentration, appropriate residential integration and actual Class C2 care.
Hillingdon DMH 4	Referenced by DMH 8 in assessing residential conversions and compatibility with the residential setting, where relevant.
Hillingdon DMHB 11 / 16	Residential character, neighbour amenity and an appropriate quality of accommodation for the proposed C2 use.
Hillingdon DMT 1 / 2 / 5 / 6	Transport effects, safe access, pedestrian and cycle provision, appropriate parking and robust management.
London Plan GG2 / GG3 / GG4	Efficient reuse of urban land, health and inclusive communities, and meeting a range of residential needs.
London Plan H12	Positive support for needed supported and specialist accommodation; form and function must suit its target residents.
London Plan H8 / H9	Relevant background to the safeguarding and effective use of existing housing stock.
London Plan D3 / D6 / D12 / D13 / D14	Appropriate internal environment, design, planning fire safety, residential amenity and management of noise impacts.
London Plan T2 / T4 / T5 / T6	Sustainable access, transport effects, cycle parking and proportionate car parking strategy.
August 2026 NPPF S3 / S4	Development within an established settlement benefits from the positive S3 and S4 approach. The loss of existing C4 accommodation is expressly considered under Hillingdon Policy DMH 1, but does not automatically establish a substantial adverse impact under S4(2)(a)(i). The Council must assess whether adverse effects would substantially outweigh the benefits when considered against the national decision making policies
August 2026 NPPF HO1	Includes looked after children in assessing accommodation need, with due regard to local sufficiency evidence.
August 2026 NPPF HO7	Substantial weight to housing benefits meeting evidenced accommodation needs, including looked after children.
August 2026 NPPF HO9	Suitable living conditions, a safe and secure management plan and practical access to services for specialist community based accommodation.
August 2026 NPPF DM7	Assess land use effects, assume separate regulation ordinarily operates effectively and avoid duplicating Ofsted, fire safety and Building Regulations controls.

Response to principle of development

The proposal would introduce a specialist residential use within an existing building. In broad strategic terms, the introduction of supported accommodation can align with the objective of making efficient use of land and contributing to the range of residential and care provision within the borough. Those strategic aims, however, remain subject to compliance with the more detailed development plan policies, including those concerned with safeguarding existing homes and assessing whether the proposed care use is appropriate and justified in the circumstances of the case.

The applicant acknowledges a policy cost in removing a C4 HMO from the housing stock. Unlike the C3 dwellinghouse baseline in some local care decisions, however, the property currently functions on the applicant's evidence as separately occupied HMO accommodation. The proposed use would remain residential but would provide a materially different public function: direct residential care for two vulnerable children with substantial on site supervision, as part of an intended specialist service. Neither the HMO history nor the public benefit automatically resolves DMH 1, but they are essential to a fair assessment of what is actually being lost and gained.

The Council must weigh the acknowledged C4 housing loss against the evidenced need for children's residential care, the express support for specialist provision in London Plan H12 and Hillingdon DMH 8, and the substantial weight directed by NPPF HO7 to homes meeting demonstrated needs. Under S3 and S4 the principle of suitable development within a settlement is supported unless benefits would be substantially outweighed by adverse effects under the national decision making policies. Safeguarding of existing accommodation is therefore addressed, not bypassed: a single existing HMO would become a purpose managed home for two looked after children, retaining the same physical house and offering a distinct residential care benefit. The applicant submits that the evidenced benefits of the proposed specialist children's home would not be substantially outweighed by the acknowledged loss of existing Class C4 accommodation or by its managed operational effects

To further assess the acceptability of the principle of development, the need for this form of accommodation is a relevant consideration and is addressed below.

Hillingdon's evidenced need for children's residential care

Hillingdon's Care Strategy November 2025-2030

Hillingdon's own Care Strategy sets the scene. It records the Council's commitment to delivering high quality care and support for cared for children and care experienced young people, recognising the distinct challenges they face and the need for an environment which promotes stability, empowerment and belonging. The Strategy explains that relationship-based practice is at the core of the Council's approach, with emphasis on strong, consistent and trusted relationships, comprehensive support tailored to individual strengths and needs, and the provision of safe places to live so as to minimise disruption and promote continuity.

The Strategy also identifies a clear local context in which residential provision remains necessary and under pressure. As of 31 March 2025, Hillingdon acted as corporate parent to 312 cared for children and 602 care experienced young people, with 10.3% of cared for children living in residential children's homes. The document goes on to state that the Council is expanding its in house provision, small residential homes, and supported accommodation, and that ensuring access to a safe, stable, and local home is central to its strategy. It further states that the Council will address gaps in residential provision and increase the availability of high-quality homes within Hillingdon, with the express aim of minimising disruption and promoting continuity for children and young people.

The Care Strategy is important in showing the nature of the support the Council considers necessary. Hillingdon states that children in its care should have access to skilled carers and professionals trained in trauma informed approaches, and records that foster carers and residential care workers are trained in PACE, while social workers have access to the Multi Agency Psychology Service to support decision making and children's emotional wellbeing. In substance, therefore, the Strategy is not merely about providing accommodation. It is about providing small scale, stable, relationship based and trauma informed homes capable of meeting emotional, behavioural and wellbeing needs within the borough.

Children, Families and Education Select Committee, TUESDAY, 15 APRIL 2025

The Children, Families and Education Select Committee minutes of 15 April 2025 provide contemporary evidence of the practical need for appropriate additional children's residential placements in Hillingdon. In its consideration of the Council's budget and spending report, officers explained the pressures on the residential care placement market, the importance of achieving better outcomes while controlling high placement costs, and the residential beds programme. The discussion is valuable because it is an actual Council account of service pressures and planned local capacity, not a general claim made on behalf of a proposed operator. The more detailed corporate parenting figures and the borough's unaccompanied children profile are evidenced separately in the Committee papers for 18 June 2025, addressed below.

Officers reported in April 2025 that the most expensive residential placement offered to the Council had been GBP 28,000 per week and that expensive placements did not necessarily provide better outcomes. They also noted that placing a child outside Hillingdon could mean losing elements of locally available wraparound care. The same meeting recorded that six residential units had been completed at Charville, with plans for opening following the relevant registration processes. These figures describe the Council's circumstances at that date; the present application does not suggest that the units necessarily remained unopened in October 2026 or that it would replace any identified individual placement. Their planning relevance lies in the real cost and sufficiency pressures, and Hillingdon's demonstrable intention to increase local residential capacity.

The April 2025 evidence also recorded that trauma informed training for foster carers and residential workers was being enhanced to support children locally and promote appropriate pathways to foster care or family arrangements. This is consistent with the Council's corporate parenting material, which refers to trauma informed practice and PACE approaches and recognises the complexity of children's emotional needs. Accordingly, this evidence demonstrates the importance of appropriate local residential provision as part of a wider range of care options, rather than suggesting that residential care is necessarily the preferred placement for every child.

Read fairly, the April Committee evidence identifies pressure to secure appropriate, stable and cost effective local placements, with residential care forming part of a wider range of care options. A well managed two child home offering residential support for children with emotional and behavioural difficulties could make a modest but relevant contribution, subject to individual placement matching and the separate regulatory requirements.

Children, Families and Education Select Committee, WEDNESDAY, 18 JUNE 2025

The Council's Children, Families and Education Select Committee material dated 18 June 2025 provides further direct evidence of local need. It confirms that, at the end of March 2025, Hillingdon was corporate parent for 330 children under the age of 18 and a further 766 young people eligible for care leaving services, including 602 aged 18 to 25. This is a substantial local cohort requiring stable, safe and well supported home environments.

The same material also demonstrates that Hillingdon has a particularly significant proportion of unaccompanied asylum-seeking children. It records that 22% of the Borough's looked after children fall within that category, compared with only 9% amongst its statistical neighbours, and that a significant proportion of children entering care in Hillingdon arrive unaccompanied. The Council's evidence therefore points to a local profile of children and young people who are especially vulnerable and who may present with complex emotional, psychological and trauma related needs.

The Committee material is also important in showing the Council's present care priorities. It places emphasis on permanence, stability, continuity of care and supportive home environments, recognising that these matters are central to meeting children's physical, emotional and developmental needs. It further records that carers are supported through trauma informed parenting and PACE training and expressly recognises that care experienced children and young people may carry hidden traumas that are not always readily visible.

Read fairly and as a whole, this evidence does not point merely to a general need for accommodation. It points to a clear local need for small scale, stable and trauma informed homes within Hillingdon for vulnerable children with complex emotional and behavioural needs. It therefore provides further support in principle for carefully managed residential provision of this nature within the Borough.

CABINET Thursday, 22 May 2025 at 7pm

The Cabinet minutes dated 22 May 2025 provide further evidence of the Council's commitment to increasing children's residential care capacity within Hillingdon. On that date, Cabinet formally agreed to lease three further properties to be added to the Council's portfolio for the provision of residential care to support looked after children and care leavers. Cabinet also approved further capital funding for acquisition, set up and works to ensure that the homes are fit for service delivery under Ofsted regulations.

The reasons for decision are material. Cabinet expressly recorded that the purpose of the decision was to increase the capacity and quality of children's homes in the Borough in order to provide better care for looked after children and care leavers.

Read fairly, those minutes demonstrate more than a general aspiration. They show an active and recent strategic decision by the Council itself to expand in borough residential provision for vulnerable children and young people, and improve the quality of that provision. That is consistent with the wider evidence base pointing to a clear local need for additional small scale residential homes within Hillingdon capable of providing stable and appropriate care for looked after children.

The Hillingdon Safeguarding Partnership Annual Report 2023–2024

The Hillingdon Safeguarding Partnership Annual Report 2023 to 2024 provides further evidence of local need for additional residential provision for vulnerable children within the Borough. The report records that placement sufficiency is both a national and local issue and states that securing appropriate placements for young people, especially within the residential sector, became increasingly difficult during the year. It notes that the scarcity of suitable placements has significantly increased costs, with placement costs nearly doubling over the year, and confirms that the Council responded by embarking on an ambitious project to increase the availability of residential placements within Hillingdon. That evidence provides further support for additional small scale in borough provision.

The report also identifies the nature and complexity of the cohort for whom provision is required. At the end of the financial year, Hillingdon remained corporate parent for 329 looked after children and was supporting 765 young people as care leavers into independence. It records that 49% of those care leavers had entered care as unaccompanied asylum-seeking children. The report further refers to a continuing increase in the complexity of needs, including increases in poor mental and emotional health, wider family pressures, and rising demand for intensive support and statutory intervention. Read fairly, that evidence points to a local cohort of children and young people who are especially vulnerable and who may present with complex emotional, psychological and trauma related needs.

The report is also important in showing the Council's present strategic response. It records that Hillingdon is commissioning service wide training to embed PACE methodology and trauma informed practice, and places emphasis on relationship-based practice, early support, resilience and child focused intervention. Taken together, the report demonstrates not merely a general need for more accommodation, but a clear need for stable, small scale and trauma informed residential provision within the Borough for children with complex emotional and behavioural needs.

In summary, the Annual Report reinforces the conclusion that Hillingdon faces both a shortage of appropriate residential placements and a cohort of children whose needs are increasingly complex. Additional local provision of the type proposed could contribute to addressing those pressures by providing stable, carefully managed and trauma informed care within the Borough.

Summary of Hillingdon's identified need and relevance to the proposal

The Care Strategy, Select Committee proceedings, Cabinet decisions and Safeguarding Partnership Annual Report collectively demonstrate a consistent and substantial need for appropriate residential accommodation for vulnerable children within Hillingdon. Although the documents relate to different reporting periods and cohorts, their findings are consistent in identifying pressures on residential placements, increasingly complex emotional and behavioural needs, and the benefits of stable, locally based accommodation which promotes continuity of care, established relationships and access to support services.

Against this established evidence base, the proposed development would contribute a maximum of two residential care places within a small, domestic Class C2 children's home specifically intended for children with emotional and behavioural difficulties. The scale and residential character of the proposal align closely with Hillingdon's stated objectives of providing stable, individually supported and appropriately managed accommodation within the Borough. The proposal would therefore make a positive contribution towards meeting evidenced specialist accommodation needs, consistent with Hillingdon Policy DMH 8 and London Plan Policy H12. Substantial weight should be afforded to this benefit in accordance with Policy HO7 of the August 2026 NPPF. In meeting this evidenced need, the proposal would also support social inclusion and community integration for vulnerable children, providing further public benefits which weigh positively in the planning balance against the acknowledged loss of existing Class C4 HMO accommodation.

Recent Hillingdon approvals provide direct corroboration from the Council's own Children's Services. At 54 Beechwood Avenue (46227/APP/2025/3264), Children's Services stated: "I agree that residential homes are needed in the borough and in the region." The delegated reports for 11 Charville Lane (10364/APP/2026/241) and 76 Whitehall Road (79986/APP/2026/732) each record: "Children's Services confirm such facilities are required in the borough." This is direct evidence from the Council's specialist service and reinforces the Care Strategy, committee, Cabinet and safeguarding evidence above. Borough-level need for children's residential provision is therefore strongly evidenced and independently corroborated; Fairdale would contribute two small-scale EBD placements to that identified need. In accordance with NPPF Policy HO7, substantial weight should be given to that contribution.

Taken together, this evidence goes materially beyond a generic market proposition. It combines Hillingdon's own Care Strategy, committee and Cabinet evidence, the Safeguarding Partnership evidence, and three recent 2026 planning decisions recording express confirmation from Children's Services that children's residential homes are required within the Borough. That combination directly addresses Policy DMH 8(A)(ii): the identified need is Council-led, expressly corroborated by the Council's specialist service, and the Fairdale proposal responds to that need through two small-scale EBD residential places. Policy DMH 8 does not state that a commissioning contract or guaranteed referral must already exist.

The existence of borough-level need is therefore firmly evidenced; the remaining planning judgement is whether this particular site and defined operating model are acceptable. Under NPPF Policy HO7, substantial weight is then to be afforded to the benefit of contributing towards that evidenced accommodation need.

Applicants model

The proposal is for one small children's care home falling within Class C2, providing personal residential care to a maximum of two children. The intended age range is 8 to 17 years, with occupation ending on or before the child's eighteenth birthday. The intended placement profile is emotional and behavioural difficulties (EBD). The property would be the children's home; it is not a public day care service, clinical treatment centre or wider administrative base for the operator.

The proposed use would fall within Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended), providing residential accommodation and personal care for a maximum of two children with emotional and behavioural difficulties. Care and support would be provided throughout the day and night by dedicated care staff, with additional oversight from the Registered Manager and Responsible Individual. The proposed operational arrangements, staffing levels and residential care model are described in further detail below. The proposal therefore represents a genuine residential children's care home within Class C2, consistent with the requirements of Hillingdon Policy DMH 8(B). Matters concerning individual care plans, safeguarding, staffing competence and regulatory compliance remain the responsibility of the care provider and Ofsted.

Defined operational model

Operational matter	Model advanced for planning assessment
Resident capacity	Maximum two children only.
Age range	Children aged 8 to 17 years, leaving by their eighteenth birthday.
Placement profile	Emotional and behavioural difficulties.
Daytime carers	Maximum of two routine carers physically present during the daytime, excluding the additional Registered Manager and genuine short staff handover overlaps.
Overnight carers	Two physically present overnight, comprising one waking night carer and one sleep in carer.
Routine shift pattern	Approximately 08:00 to 22:00 day shift and 22:00 to 08:00 night shift.
Handover	Approximately 15 minutes at the 08:00 and 22:00 shift changes, principally indoors. Short overlaps may temporarily involve the incoming and outgoing care teams; this is not an additional permanent staffing shift.
Registered Manager	Additional to the two routine daytime carers. The Registered Manager would ordinarily attend the home approximately three to four days per week, with attendance varying according to operational requirements. Usual working hours are typically 08:00–16:00 or 09:00–18:00, with some duties undertaken remotely. Occasional weekend attendance may occur where necessary.
Responsible Individual	Normally approximately one visit each week, varying from a couple of hours to a full working day.
Regulation 44	Normally at least monthly, typically about three to five hours.
Social worker	Normally approximately one visit every six weeks, with some contact or activity conducted away from the property.
Therapy / healthcare / education	Routine appointments principally off site; children ordinarily attend suitable education away from home on weekdays.
Family contact	Ordinarily off site at an agreed location, with staff arrangements determined by the individual care plan.
Visit times	External professional visits ordinarily arranged within daytime business hours, avoiding handovers where practicable. Necessary statutory, unannounced or urgent attendance is not excluded.
Office and staff use	An ancillary staff office with kitchenette and associated facilities, only to support this home. No independent staff accommodation, regional office, recruitment hub or training venue.
Training and meetings	Training and recruitment principally away from the property or online; no regular large team meetings or organisational activity at the site.
Home vehicle	One dedicated company/home vehicle ordinarily kept at the site and used for children's day to day activities.

Operational matter	Model advanced for planning assessment
Parking	Only two spaces: one for the dedicated home vehicle and one for at most one staff or Manager car. No routine reliance on extra driveway or kerbside capacity.
Deliveries and servicing	Ordinary domestic shopping, parcels and periodic maintenance; no commercial catering, laundry or large vehicle servicing operation.
External appearance	No commercial signage and no material exterior building alteration proposed. Domestic style CCTV.

The operational ceiling is important. The application cannot properly be judged on the assertion that a home would ordinarily have two carers while simultaneously assuming an unrestricted ability to add further routine carers, visiting staff or vehicles whenever management wishes. A short and genuine handover overlap is distinguishable from a permanent third or fourth routine care post. Equally, the Registered Manager is additional to the two core carers and cannot be treated as already included within the two person staffing model. The submitted assessment identifies those differences rather than obscuring them.

The approximate shifts and 15 minute handovers are intended to provide continuity of care while keeping arrivals brief and predictable. Two incoming and two outgoing carers may therefore temporarily overlap, with the Registered Manager potentially attending at other times; that brief overlap must not be mistaken for four permanent carer positions. Equally, it must not be ignored when assessing arrivals, residential amenity or parking. These are not 48 hour rosters, and the proposal makes no claim to travel savings associated with longer shift patterns. Children would undertake education, family contact, appointments, outings and ordinary activities; some would involve the home vehicle, and others could be undertaken on foot or by public transport. A care placement does not eliminate travel. The management approach is to contain the activity within a scale demonstrably compatible with the site.

The proposed children's home would provide a domestic residential environment for a maximum of two children with emotional and behavioural difficulties (EBD). The defined daytime and overnight staffing arrangements, together with Registered Manager and Responsible Individual oversight, would support the day to day residential care use. The proposed accommodation is deliberately small in scale and would operate as a home for the children, rather than as a wider institutional or administrative facility.

Hillingdon's Care Strategy, Select Committee proceedings and other published evidence identify a need for suitable local residential accommodation for vulnerable children, including those with emotional and behavioural difficulties. The proposal would contribute two residential care places within the Borough, consistent with the Council's objectives of supporting locally based care, stability, continuity and integration within established communities. Its contribution towards meeting that identified need represents a material planning benefit, as considered in the preceding sections.

The defined operational model supports the Class C2 classification because its primary function would be the provision of residential accommodation and personal care for children through a continuously staffed care service, rather than the separate occupation of rooms by adult HMO tenants. The property would retain its domestic residential character, with care staff, management and professional visitors forming an integral part of the proposed residential care use. The associated planning implications, including movements, parking and neighbouring amenity, are considered in the subsequent sections.

Distribution and overconcentration of similar uses

Policy DMH 8 requires assessment of whether the proposal would cause a harmful overconcentration of comparable residential care uses, not merely whether other children's homes exist elsewhere in a large London borough. The correct focus is whether any immediate grouping of similar uses could cumulatively change the residential character or give rise to materially harmful combined effects. An approval list alone cannot establish that test, and the absence of an exhaustive register must not be presented as proof that no other home exists.

A review of identified children's home addresses across Hillingdon provides a useful starting inventory for checking locality and distribution from the application address: 53 Paddington Close, Hayes (approximately 2.6 miles); 36 Moor Park Road, Northwood (10 miles); 6 Langley Crescent, Harlington; (3.1 miles); 2 Wimborne Avenue, Hayes (1.3 miles); 391 Lansbury Drive, Hayes (2.6 miles); 24 Douglas Crescent, Hayes (1.9 miles); Charville Lane, Hayes (3.4 miles); 49A Chiltern View Road, Uxbridge (4 miles); 9 Chestwood Grove, Hillingdon (3.9 miles); 166 Woodrow Avenue, Hayes (2.1 miles); 91 Wimborne Avenue, Hayes (1.6 miles); 206 Nestles Avenue, Hayes (1.4 miles); 54 Beechwood Avenue, Hayes (1.4 miles) and 76 Whitehall Road, Uxbridge (4.1 miles). The list is illustrative and drawn from identified planning decisions rather than a certified live register of care operations.

A separate review of the Council's planning register for Fairdale Gardens itself has identified no other children's home or comparable Class C2 residential care use on the street. The wider approvals identified above are geographically dispersed. On the evidence available, there is no local grouping of similar uses and no basis for concluding that Fairdale would create a harmful overconcentration under Policy DMH 8(i).

The street-level audit directly addresses the spatial purpose of Policy DMH 8(A)(i). The policy is concerned with harmful overconcentration and cumulative effects on residential character or amenity, not the mere existence of other care homes elsewhere in Hayes or Hillingdon. No other children's home or comparable Class C2 residential care use has been identified on Fairdale Gardens. The nearest identified examples in the wider planning inventory are approximately 1.3 miles and 1.4 miles away, with the remaining identified uses more widely dispersed. There is therefore no identified cluster on the street or in its immediate residential setting whose cumulative effects could alter local character or amenity. On the evidence available, one small two-child home retaining an ordinary domestic appearance and residential rhythm provides a clear basis for concluding that the proposal would not give rise to harmful overconcentration and accords with Policy DMH 8(A)(i).

The existence of one or several approved or operating children's homes in a borough does not automatically demonstrate an overconcentration. The policy requires a detrimental effect on residential character or amenity. This development would occupy one existing building without exterior institutionalisation, with no more than two children and a defined staff and parking model. There is no presently identified site specific basis for concluding that the particular addition would create a harmful cluster. Should the Council identify a relevant nearby concentration not presently recorded, its location, capacity and likely cumulative effects should be considered on their evidence rather than by assumption.

Recent Hillingdon decisions and site-specific planning context

The Council has decided materially comparable applications both positively and negatively. Most significantly, 9 Chestwood Grove, Hillingdon (52087/APP/2025/774), was approved on 6 June 2025 for change from a five person Class C4 HMO to a Class C2 children's home for up to three children. It is a direct positive example of the very use class transition sought here. It does not establish a blanket rule that the loss of HMO housing must be accepted, and the detailed conditions and site circumstances differ. Its proper value is to demonstrate that an individual HMO to specialist care conversion can satisfy the applicable planning balance.

At 33 Lavender Rise, Yiewsley (32849/APP/2025/2628), refused on 30 January 2026, the report identified gaps in evidence on the C4 baseline, Article 2 care, management, need, accommodation and transport. Fairdale is materially different: it is supported by dated HMO evidence, a defined two-child care model, specified staffing and visiting arrangements, two individual child bedrooms, a separate quiet room, dedicated sleep-in and staff facilities, and a defined parking management approach. The relevance of Lavender Rise is therefore limited to demonstrating the importance of a fully evidenced, site-specific case - the approach adopted here.

A further refused application at 16 Gledwood Crescent (23664/APP/2025/2264) concerned a materially larger four-child model and raised issues relating to housing loss, need, accommodation quality, staffing clarity and transport management. Fairdale differs materially in scale, layout, PTAL and its defined two-space parking strategy. The relevant lesson is that parking should be assessed against the actual operational model, site geometry and accessibility rather than treated as a fixed PTAL-derived numerical rule.

The borough has also granted a two child C3 to C2 children's home at 166 Woodrow Avenue, Hayes (2563/APP/2026/561), decided 17 June 2026. The approved four child C3 to C2 proposal at 64 Chapel Lane (22536/APP/2026/369), decided 20 May 2026, subsequently obtained approval of details addressing cycle storage and a Parking Management Plan on 20 August 2026. These permissions are different sites and operational models; they are not substitutes for proper evidence. Read alongside Lavender and Gledwood, they show that Hillingdon's approach is fact sensitive and that residential care proposals can be approved when their specific impacts are understood and managed.

Non-borough residents

The Council's evidence identifies real pressures on residential placement sufficiency and a clear policy objective to make appropriate placements available closer to children's established support networks. That objective is a material reason to support suitable additional capacity in the borough. The applicant does not claim a formal commissioning agreement with Hillingdon or a present guarantee of referrals, and no unsupported exclusive placement commitment is asserted. An additional small EBD home in Hillingdon can contribute to the range of appropriate placements potentially available to commissioning authorities, including Hillingdon. The weight of the benefit comes from its genuine capacity to meet the types of needs identified by the Council, rather than from any assumed contract, exclusive referral entitlement or claim that every available bed will necessarily be filled by a borough resident. Individual matching, commissioning and registration remain operational or regulatory matters. In judging DMH 8, the Council can reasonably consider whether this proposed service responds to its documented need, while avoiding the unsupported assumption that a commercial agreement with the Council must already exist before planning permission can be granted.

Operation management

The planned operation is small and residential. Two children would live in the house as their principal home. During the day two core carers would ordinarily be present; overnight a waking night worker and separate sleep in carer would be physically present. The Registered Manager would attend around three or four days weekly in addition to that core team and would also carry out some administrative tasks remotely. This does create professional staffing movements and should not be represented as identical to a conventional family or the existing HMO. It is nevertheless a bounded staffing pattern, with identifiable shift times and a short planned handover.

Shift changes would occur at approximately 08:00 and 22:00, with a short handover of approximately 15 minutes. Handovers would take place predominantly indoors, with vehicles managed so that no additional regular frontage parking is assumed. The approximately 22:00 change is later than conventional business hours and is expressly recognised; practical management therefore includes quiet arrival and departure, no prolonged conversation or idling outdoors, doors closed quietly and avoidance of unnecessary multiple vehicle arrivals. The provider must reconcile the travel choices of both incoming and outgoing teams with the two available parking spaces rather than silently assigning a parking space to every carer.

The Responsible Individual would normally attend about once each week, with attendance potentially lasting from two hours to a full working day. Regulation 44 visitors would normally attend at least monthly, typically for three to five hours. Social workers would ordinarily attend around once every six weeks, while therapeutic support, healthcare appointments and mainstream education would predominantly be arranged away from the property. Family contact would also ordinarily take place away from the home. Where external professional visits are necessary on site, they would normally be arranged during daytime business hours where practicable and, insofar as possible, away from staff handovers. Necessary urgent, statutory or unannounced attendance cannot responsibly be ruled out.

Activities would resemble the ordinary routines of a small home: meals, school preparation, study, appropriate play, recreation, appointments, family contact and daily living support. The operator does not intend to run public treatment sessions, offer open access to the premises, host routine professional training or use the staff office as a regional business centre. The home vehicle would support everyday child related trips. Ordinary parcels, groceries, refuse and periodic maintenance would continue at a domestic scale, and team organisational activities would principally take place elsewhere or online.

The house is intended to operate as one residential home. Children would have individual bedrooms upstairs, an additional quiet room and normal communal areas. A separate ground floor sleep in bedroom, associated facilities and ancillary staff office with kitchenette would support the care service. These are not independent dwellings, separate lettings or a commercial office suite. The intensity must be judged by the integrated care operation and the actual numbers of people normally present, including Manager and visitor attendance, not by treating every labelled staff room as an extra residential unit.

Planning Management Plan

This section forms the Planning Management Plan for the proposed use. It is embedded within the Planning Statement so that the planning case, operational land use assumptions and management commitments are contained in one coherent document. The measures below address the specific features of the Fairdale proposal: a maximum of two children, two distinct daily shifts, a waking night and sleep in carer, additional Manager attendance, professional visits and only two frontage parking spaces including the dedicated home vehicle. In accordance with August 2026 NPPF Policy HO9, the Plan addresses the domestic living environment, access to frequently used services, transport, neighbour amenity, and review of material land use effects. Under Policy DM7, it does not replace the operator's Statement of Purpose, child care and safeguarding arrangements, Location Risk Assessment, Ofsted requirements or separate technical fire and Building Regulations processes. The measures are presented as the proposed provider's planning management arrangements.

Planning matter	Management arrangement
Resident scale and room use	Maximum two children aged 8 to 17, on the basis that each leaves by their eighteenth birthday. The two first floor bedrooms, quiet room and bathroom, and ground floor living, kitchen, dining, sleep in room, staff office with kitchenette and sanitary facilities retain their assessed functions. No separate adult occupation, additional child bedroom or independent letting.
Domestic living environment	One integrated domestic home. Shared meals, study and recreation take place in the communal living space, with private child bedrooms, a quiet room and garden offering privacy, calmer activity and ordinary recreation. Staff facilities remain ancillary.
Care and placement profile	EBD residential care for up to two children. The home will not operate as a public clinic or day service. Individual placement suitability, care practice and safeguarding remain the provider's and Ofsted's separate responsibilities.

Planning matter	Management arrangement
Daytime and overnight staffing	Two core carers during the day; overnight one waking night and one sleep in carer. The Registered Manager is additional when attending. Extra routine care posts or a materially more intensive staffing model are not assumed.
Shift pattern and handover	Ordinary shifts are approximately 08:00 to 22:00 and 22:00 to 08:00, with a 15 minute handover principally indoors. Brief overlap of incoming and outgoing carers is acknowledged. Staff will avoid outdoor discussion, horns, loud music, engine idling or unnecessary door slamming, especially at 22:00.
Registered Manager attendance	The Registered Manager is additional to the two core carers and ordinarily attends three to four days weekly, principally during normal daytime working hours. Occasional weekend attendance may occur where necessary. Some management duties are undertaken remotely. Attendance and travel will be coordinated with parking and visitor arrangements.
Responsible Individual and Regulation 44	The Responsible Individual ordinarily attends weekly for a few hours up to one working day. Regulation 44 visits ordinarily occur monthly for approximately three to five hours. Neither is a separate office or regular large group meeting use.
Other professional attendance	Social workers ordinarily attend about every six weeks. Therapy, health and education appointments are primarily off site. Necessary visits at the property will ordinarily be daytime business hours where practicable, avoiding handovers. Statutory, urgent or unannounced attendance is not prevented.
Education and family contact	Children ordinarily attend education outside the property during weekdays, and family contact usually occurs off site. Any exceptional home based tutoring or family visit relates to the resident children only and will not establish a public educational or contact centre.
Access to frequently used services	Education, healthcare, shopping, activities and community services will be accessed using the home vehicle, accompanied walking or public transport as appropriate. The site has PTAL 4. Journeys will reflect the needs of actual placements; no unverified school or journey time is assumed.
Dedicated home vehicle	One dedicated vehicle for school journeys, appointments, activities and other child related trips will ordinarily be kept on site. When present it occupies Space 1. It forms part of the two space limit and is not an additional vehicle.
Core staff travel and parking	Space 2 accommodates no more than one staff or Manager vehicle. Staff will use non car modes, car sharing and coordinated travel where practicable. No individual bay is assumed for every carer, and no third or fourth frontage space is proposed.
Manager parking and visit scheduling	A Manager vehicle may use Space 2 only when available. Visits will be coordinated with core staff travel and handovers where practicable. Manager attendance does not create a further parking bay.
Handover vehicle management	At the 08:00 and 22:00 handovers, incoming and outgoing teams cannot each assume a parked car while the home vehicle occupies Space 1. Non car travel, sharing or staggered arrivals must reconcile movements with Space 2. No vehicle may obstruct the footway, neighbouring access or highway.
Evening, weekend and exceptional peaks	Routine evening and weekend demand will be the home vehicle and at most one staff or other authorised vehicle. Additional planned visits will be timed to reduce peaks. No third on site space or guaranteed street overspill is relied upon.
Controlled parking zone and visitor travel	The HY1 controlled parking zone operates permit restrictions Monday to Saturday, 09:00 to 17:00. Staff and visitors will be informed about permitted parking and non car travel. Neither street availability nor eligibility for permits is guaranteed.
Frontage access and highway safety	No new vehicular crossover or additional hardstanding is proposed. An indicative low-level frontage wall is shown, with its precise location, dimensions and relationship to the existing crossover proposed to be agreed through an appropriate planning condition, subject to the Council's acceptance and site verification.
Cycle parking and EV provision	Secure and covered cycle parking and an electric vehicle charging point will be provided within the site, as shown on the proposed planning drawings. These facilities will be arranged so as not to compromise the two designated parking spaces, pedestrian access or highway safety
Staff office and organisational activity	The ancillary staff office, kitchenette and facilities serve this home only, not a regional office, recruitment venue or training hub. Staff training, interviews and wider organisational meetings will generally take place online or away from the property.

Planning matter	Management arrangement
Garden and external activity	The private rear garden will be used for normal domestic recreation, managed with regard to adjoining residents, particularly in the morning and evening. No public events or amplified outdoor functions are proposed.
Refuse, deliveries and servicing	Household bins, recycling, deliveries and maintenance will be managed without obstructing parking, the frontage or pedestrian access. Servicing will remain domestic, without commercial catering, laundry or regular large delivery operations.
Security, lighting and appearance	The property will have no commercial signage. Any CCTV, external lighting or security measures will be domestic in character. No unshown external works or safeguarding certification is implied.
Neighbour relations and contact	A practical contact route to the Registered Manager and, if needed, an operator escalation route will be provided for genuine concerns about parking, noise or external activity. Complaints will be logged and considered; neighbours will not be expected to approach resident children.
Monitoring and correction	The operator will review handovers, car use and neighbour feedback and correct recurrent avoidable disturbance. The Registered Manager and operator implement this plan; Rahul Taheem Ltd is not appointed to monitor the operation after the planning decision.
Material change in operations	A sustained material increase in children, carers, visitors, vehicle demand, independent office use or other change to the assessed operation would prompt a fresh planning review and, where necessary, a further planning application.

Policy HO9 looks to the practical management of specialist community based accommodation and residents' ability to access frequently used services easily and safely. Here the site is an existing HMO in an established urban area with PTAL 4. Children would ordinarily travel to education, healthcare, ordinary shops and community activities with appropriate staff support using a combination of the home vehicle, public transport and walking as the circumstances permit. Individual schools, specialist appointments and routes will depend on the actual placements; no unverified walking time or service distance is asserted. The Management Plan addresses the land use implications of travel, supervision, staffing and contact. Under policy DM7, planning does not replace Ofsted's responsibility for care, registration or safeguarding, nor Building Control or competent specialists' responsibility for technical compliance.

The operator would remain responsible for implementing the management arrangements in practice. The planning statement may support proportionate controls directed at occupancy, approved plans or a site specific parking management scheme, but the existence of these proposed measures is not evidence that all future breaches are impossible. The Council should assess whether they are sufficiently reasonable, clear and enforceable for the actual scheme, and should not impose speculative or unnecessarily prescriptive controls over care and safeguarding functions properly governed by the separate regulatory regime.

Fire safety

London Plan Policy D12 requires fire safety to be considered as part of development proposals, including appropriate means of escape, fire detection, measures to limit fire spread and access for emergency services. The proposal involves the internal adaptation of an existing two storey property to provide a small Class C2 children's care home accommodating a maximum of two children. The existing principal entrance, hall, staircase and rear garden access would be retained, with no external enlargement of the building or alteration to the existing highway access arrangements.

The proposed internal arrangement allows for the incorporation of appropriate passive and active fire safety measures. These may include fire resisting doors, fire resisting stud partitions enclosing the hall and staircase, potentially providing 30 minutes fire resistance where technically appropriate, together with suitably positioned smoke detection, kitchen heat detection and associated alarm arrangements. The proposed fire safety arrangements would also have regard to the residential care use, including the presence of a waking night carer and separate sleep in carer, suitable means of escape for residents and staff, emergency evacuation arrangements and appropriate external assembly provision. Existing access from Fairdale Gardens would remain available for emergency attendance, with the frontage managed to avoid unnecessary obstruction.

The detailed specification of fire resisting construction, doors, detection and alarm systems, means of escape and evacuation arrangements would be determined through the relevant fire safety and Building Regulations processes by the applicant's appointed competent specialists. The proposal is therefore capable of accommodating appropriate fire safety measures within the existing building, consistent with the objectives of London Plan Policy D12, subject to the necessary detailed technical assessment and approvals.

Care and regulatory framework

The proposed operation is intended to function as a residential children's home registered with and regulated by Ofsted under the statutory framework applicable to children's homes in England. This framework provides for oversight of care standards, safeguarding, staffing competence, individual care planning and the overall management of the home. The applicant's intention is to establish a properly regulated children's home providing residential care to a maximum of two vulnerable children with emotional and behavioural difficulties. The provider would be responsible for obtaining the necessary Ofsted registration before commencing operation and maintaining compliance with the applicable regulatory requirements.

The provider's described structure includes two routine carers on duty during the day, a waking night and sleep-in member overnight, Registered Manager supervision, Responsible Individual visits, Regulation 44 visits and engagement with social workers. These arrangements demonstrate the intended structured and supervised nature of the residential care service. They are also relevant planning facts because they affect the use and its intensity. The associated staffing, visiting and management arrangements are assessed within this Statement and the Planning Management Plan.

The Children's Homes (England) Regulations 2015 contain nine Quality Standards covering the quality and purpose of care, children's views, education, enjoyment and achievement, health and well-being, positive relationships, protection, leadership and management, and care planning. For planning purposes, the proposed layout and declared operating structure broadly align with the physical and organisational principles in the statutory Guide. Regulation 6 requires premises to be designed and furnished to meet each child's needs and enable participation in the daily life of the home; the Guide also emphasises a homely domestic environment, individual personal space, shared space, and appropriate accommodation for staff who sleep in overnight. Fairdale provides two separate child bedrooms of approximately 13.5 sq.m and 14 sq.m, a distinct quiet/private room, approximately 47.5 sq.m of shared living/kitchen/dining space, a private rear garden, a dedicated 14.5 sq.m sleep-in room and separate ancillary staff office, kitchenette and sanitary facilities. The declared structure - two routine daytime carers, one waking and one sleep-in overnight, Registered Manager oversight, Responsible Individual involvement and Regulation 44 monitoring - is likewise a coherent framework for a regulated two-child home. Staffing sufficiency, individual placement matching, workforce planning and full regulatory compliance remain matters for the registered provider and Ofsted; however, in planning terms the layout and operating structure provide a credible, fit-for-purpose framework for a genuine Class C2 residential children's home.

For the limited purpose of the planning assessment, the statutory framework is relevant because it helps explain the nature of the proposed land use and whether the premises are capable, in broad physical and organisational terms, of accommodating the declared two-child Class C2 model. The statutory Guide explains that children's homes should ordinarily provide a homely, domestic environment; that children should have personal space, usually their own bedroom; that the premises should provide shared space which enables participation in daily life; and that staff who sleep in the home overnight should have appropriate accommodation and facilities. The submitted Fairdale layout responds directly to those planning-relevant features through two separate child bedrooms, a distinct quiet/private room, substantial shared living/kitchen/dining accommodation, a private rear garden, a dedicated sleep-in carer bedroom, separate staff sanitary facilities and an ancillary office/kitchenette. The proposal therefore presents a coherent domestic layout capable of supporting the stated residential care function without creating an institutional building form. This is a planning assessment of capability and land-use character only; it is not certification that the premises satisfy every regulatory requirement for registration.

The declared management structure is also consistent, at a broad organisational level, with the framework described in the statutory Guide. The model identifies a Registered Manager, Responsible Individual, routine care staff, waking-night and sleep-in provision, professional liaison and Regulation 44 independent monitoring. The Regulations do not impose a single universal staff-to-child ratio for every children's home; the registered person must ensure that staffing is sufficient for the assessed needs of the particular children and must maintain appropriate workforce, supervision and continuity arrangements. Accordingly, this Planning Statement fixes the staffing and attendance model only to the extent necessary to assess intensity, movements, parking, amenity and the residential character of the use. It does not determine whether the staffing is sufficient for any particular child, approve individual placements, prescribe care practice or replace the provider's Statement of Purpose, workforce plan, safeguarding procedures or other Ofsted-regulated documents.

The August 2026 NPPF Policy DM7 recognises the distinction between planning considerations and matters governed by separate regulatory regimes. Planning should consider noise, external lighting, arrivals, parking, safe access, residential character and whether the premises provide accommodation appropriate to the proposed use. However, the separate statutory framework administered by Ofsted addresses the provider's suitability, care standards, safeguarding and detailed operational requirements. NPPF HO9 and DM7 are therefore complementary: planning can assess the land-use implications and secure proportionate management arrangements without duplicating the separate regulatory processes.

The distinction is especially important under the August 2026 NPPF. Policy HO9 requires specialist community-based accommodation to be supported by a management plan or other evidence showing how a safe and secure residential environment will be provided; the embedded Planning Management Plan addresses that requirement through occupancy limits, room use, staffing presence, handovers, visitors, travel, parking, neighbour relations and external activity. Policy DM7 then establishes the boundary: development is to be assessed as an acceptable use of land, separate regulatory regimes are ordinarily to be assumed to operate effectively, and planning decisions should not duplicate or extend controls imposed by those regimes. Ofsted is the registration and inspection authority for children's homes. It follows that the Local Planning Authority may properly assess the planning consequences of the proposed care use, but it is neither necessary nor appropriate for the planning decision to determine detailed compliance with the nine Quality Standards, child-specific safeguarding, staffing competence, workforce sufficiency, placement matching, care planning or the provider's ultimate fitness for Ofsted registration, except where a clearly evidenced matter has a genuine land-use implication.

The proposed Class C2 use is based upon providing residential accommodation and personal care to children requiring that care. The defined staffing arrangements, management structure and intended Ofsted-regulated operation support the conclusion that the proposal represents a genuine residential children's care home rather than an alternative form of independent residential occupation. The detailed adequacy and regulation of the care service remain the responsibility of the provider and relevant statutory regulator.

Accordingly, the planning conclusion advanced is deliberately confined. The submitted plans and declared operating model demonstrate a genuine, small-scale residential care use with a domestic layout and a defined management structure capable of accommodating the proposed two-child Class C2 function. Detailed regulatory fitness remains for the registered provider and Ofsted to determine through the separate statutory process. In the absence of a specific evidenced land-use harm, regulatory matters that fall within that separate regime should not be treated as an additional planning test or used to duplicate the controls that the 2026 NPPF directs decision-makers to leave to the relevant regulator.

Quality of Accommodation

Policy D6 of the London Plan requires housing development to provide high quality internal environments with layouts that are fit for purpose. Policy DMHB 16 of the Hillingdon Local Plan similarly requires an adequate provision of internal space to secure an appropriate living environment. Whilst the proposal is for a Class C2 children’s home rather than conventional self-contained housing, the same broad principles of functional layout, adequate space, privacy, shared living and overall suitability remain relevant. This application is for up to two children only. The proposed drawings show two individual first floor children’s bedrooms of approximately 13.5 square metres and 14 square metres, respectively, together with a separate first floor bathroom and a discrete quiet or private room of approximately 5 square metres. Each child would have an identifiable private sleeping and personal space rather than sharing an adult bedroom or relying on an improvised staff room. These sizes and room roles are planning drawing information rather than independently certified measured accommodation.

At ground floor level, the proposed living, kitchen and dining accommodation is approximately 47.5 square metres, providing substantial shared domestic space for ordinary meals, recreation, homework and engagement with carers. The proposed layout also identifies a separate sleep in carer bedroom of approximately 14.5 square metres with associated sanitary accommodation, an ancillary staff office with its own kitchenette and access to staff sanitary facilities, and children's WC / washing facilities. These functions are deliberately separated so that the children's principal domestic living space is not relied upon simultaneously as a sleeping room, office and meeting facility. The property would retain its private garden for informal outdoor activity and recreation.

The Nationally Described Space Standard and related conventional housing design guidance do not impose a straightforward mandatory room schedule on this particular Class C2 home. Nevertheless, the generous child bedroom areas compared with normal single bedroom benchmarks, the approximately 47.5 square metre communal space, the separate quiet area and dedicated staff facilities are useful planning indicators of a functional, appropriately scaled small home. It would be wrong either to apply a conventional C3 numerical standard mechanically as if it were a C2 regulatory requirement, or to argue that the C2 classification removes all obligation to provide suitable space, natural light, privacy and domestic amenity.

In assessing accommodation quality, the Council should distinguish its planning assessment from requirements under the separate children’s homes regulatory regime. In particular, neither Regulation 6 nor paragraphs 3.17 to 3.26 of the statutory Guide impose any blanket requirement that each child must have an en suite bathroom. The relevant test is whether the premises are designed and furnished so as to meet the needs of each child and enable them to participate in the daily life of the home pursuant to Regulation 6(2)(c). In this case, the dwelling provides ordinary domestic bathroom facilities of a type commonly found within family housing. For a home limited to two children only, that arrangement is plainly capable of functioning appropriately. The absence of en suite bathrooms does not, without more, demonstrate that the accommodation is unsuitable.

The proposed operational model expressly includes a sleep in member of overnight staff. The proposed dedicated staff bedroom and separate facilities respond to that operational fact; they are not incidental spare accommodation. The separate quiet room is also a material distinction from the four child Hillingdon schemes criticised where children had no clear ability to withdraw from other people. The two individual bedrooms provide additional personal space. Whether the rooms meet all separate regulatory requirements and technical fire specifications is not certified in this statement, but the planning layout plainly identifies the necessary functions rather than leaving them unresolved.

The layout is also appropriate having regard to the limited scale of the proposal. This is not a home for four children or a larger and more intensive institutional operation. It is a home for up to two children only. That reduced scale is material because it lessens pressure on shared facilities, reduces internal intensity and makes the existing domestic arrangement far more readily capable of accommodating the intended use.

Turning to the level of outlook, daylight and privacy afforded to the dwelling, an acceptable number of windows would be provided in locations conducive to providing outlook and maintaining internal privacy. All windows are noted to be existing.

The rear garden would remain available as private outdoor amenity space. Although the space standards applied to conventional dwellinghouses are not directly determinative in a C2 case, the retained garden materially supports the quality of the living environment by providing outdoor space for recreation, informal play and general wellbeing within the curtilage of the property.

The plans demonstrate a coherent family scale arrangement with shared domestic activity, individual children's space, a distinct quiet room and properly identifiable staff functions. They are materially stronger than an undifferentiated HMO bedroom layout relabelled as a children's home. The quality of the proposed accommodation is an affirmative part of the planning case under London Plan D6, H12 and Hillingdon DMHB 11 and 16, while the final technical works remain separately controlled.

Design and Quality of Materials

Hillingdon Local Plan Part 1: Strategic Policies (2012) Policy BE1 states 'The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long term needs of all residents. All new developments should achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place.' Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states:

All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: i) harmonising with the local context by taking into account the surrounding scale of development, height, mass and bulk of adjacent structures; building plot sizes and widths, plot coverage and established street patterns; building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment. No additional massing, roof alteration, extension or external commercial signage is proposed as part of this change of use application. The semidetached house would retain its present street facing composition and residential appearance, with the previously existing single storey accommodation remaining as observed. The external arrangement is shown for planning purposes as observed; no independent certification of historic planning or construction compliance has been undertaken under this planning appointment.

The proposed change of use would not alter the character of the dwelling with the overall appearance remaining as existing. The host building remains well integrated with its surroundings. Overall, the development will not harmfully impact the character or appearance of the street scene and is in accordance with the relevant local plan policies.

Impacts to Neighbouring Amenity

Policy D3 of the London Plan requires development to deliver an appropriate standard of privacy, outlook and amenity. Policy D13 requires noise and other nuisance generating development to incorporate suitable measures to avoid or manage adverse effects. Policy DMHB 11 of the Hillingdon Local Plan seeks to ensure that development does not adversely affect the amenity of neighbouring occupiers or the character of the area.

It is acknowledged that the proposal would introduce a materially different planning use from the existing HMO. The issue is not whether a professional care home has the same workforce or shift pattern as a family or shared house: it plainly does not. The question is whether the defined two child activity, considered against the property's existing residential use and surroundings, would generate unreasonable noise, disturbance, loss of privacy or a harmful intensity of activity. That evaluation must be evidence based and should not assume that children in care necessarily behave in a disruptive way. The proposal is for a home for no more than two children only. That limited scale is of central importance. It materially reduces the likely level of activity within and around the property

when compared with larger children's home models and means that the use would operate within a modest and readily understandable domestic framework. The home would not function as a larger institution, nor as a high turnover facility with multiple resident groups, extensive staffing or unrestricted visiting.

The home would accommodate no more than two children aged 8 to 17. The core staffing pattern is two carers during the day and two overnight, one awake and one sleeping, with the Manager in addition on three or four days per week. Daily handovers are proposed at approximately 08:00 and 22:00, lasting about 15 minutes. Those timings are relevant because they introduce predictable additional arrivals and departures compared with a single stable household; the Management Plan therefore requires quiet evening movements and limits the scope for unnecessary congestion and outdoor discussion.

The anticipated daily rhythm is still centred upon residential living. Children would attend appropriate education, have routine family style meals and activities, undertake homework and outings, and receive care and supervision. Most therapeutic, health and family contact is proposed away from the site. RI visits would normally be weekly, Regulation 44 visits monthly and social worker visits approximately six weekly. Such visits are not interchangeable with unrestricted drop in activity by a large number of professional staff. Where they occur on site they would normally be arranged at practical daytime hours and separated from busy handover periods.

The existing HMO baseline is relevant but should not be misrepresented. The property was previously described as having six unrelated occupants in separate lettings and now benefits from a licence permitting up to six people across five households. Independent adults could arrive, depart and receive visitors at different times and might individually own cars. The proposed residents would be two children, but the care arrangement includes additional adults and planned professional movements. It is not sound to assert either an automatic reduction in movements because two is smaller than six, or an inevitable major increase because care staff are present. Without observed existing HMO counts, the proper approach is the detailed prospective operating assessment and its proportionate management.

External appearance and built form would remain domestic. The proposal does not add a public entrance, waiting room, commercial advertising, external treatment facilities or an intensification of built footprint. The ordinary residential garden would remain available for recreation at a scale associated with two children. The care team would be responsible for reasonable control of outdoor noise and for respecting surrounding households. Planning cannot guarantee complete silence from any lawful dwelling or care home, but it can assess whether there is a real likelihood of unacceptable effects.

The management approach is important. The home would operate with controlled visitor arrangements, staff oversight, complaints procedures, neighbour awareness, location risk assessment and continuing review. Visits would generally be arranged in advance where possible and managed so that they do not overlap unnecessarily with shift handovers or create avoidable disturbance. The home would not operate as a premises of open ended visiting or uncontrolled comings and goings.

There is also no sound basis for assuming that the use would generate a materially greater level of noise and disturbance than a range of lawful domestic living patterns. An ordinary family dwelling may generate overlapping adult and child routines, visitors, carers, social worker attendance, deliveries, school related movements, home working, domestic noise and general day to day comings and goings. That does not mean a C2 use should be treated as equivalent to a C3 use for all purposes. It does, however, mean that alleged amenity harm must be demonstrated by reference to the actual scale and likely operation of the proposal, not by unsupported speculation.

There is no evidence specific to this operator or these future children that would justify assuming a propensity for antisocial behaviour, crime or sustained nuisance. Those concerns can nevertheless be raised legitimately if supported by facts demonstrating a likely planning harm. The approach here is not to dismiss neighbours' interests, but to demonstrate a limited two child service, resident supervision, defined staff and visitor numbers, structured handovers and a practical response route for substantiated neighbour complaints. The small scale and absence of outward institutionalisation materially reduce the likelihood of residential amenity harm.

Taking the actual model and the particular existing HMO baseline together, there is a reasonable planning basis for concluding that the residential amenity impact can be acceptable under Policy DMHB 11 and London Plan D3, D13 and D14. That conclusion is contingent on the operator genuinely delivering the model assessed, especially its resident limit, staff presence and controlled travel rather than an undisclosed expansion to four children or multiple routine staff cars.

Location and highways including travel plan

Policy T2 of the London Plan seeks development that supports sustainable travel by walking, cycling and public transport and requires the impacts of development on the transport network and highway safety to be properly taken into account. Policy T4 requires transport impacts to be appropriately assessed, whilst Policy T5 addresses cycle parking provision. Policy T6 supports a car-free and car-lite approach in appropriate locations, with parking provision considered having regard to public transport accessibility, connectivity and the particular characteristics of the development. At local level, Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan Part Two require the Council to consider traffic generation, highway safety, pedestrian accessibility and the provision of appropriate parking and servicing arrangements. The application concerns a small-scale children's home accommodating no more than two children. The relevant consideration is therefore the parking and transport demand associated with this particular operational model, rather than an assumption that the development should provide the same parking capacity as a larger residential institution.

Public transport accessibility

The property occupies an established residential location with good access to public transport and local services. The Transport for London WebCAT assessment for the relevant site grid identifies a Public Transport Accessibility Level (PTAL) of 4, with an accessibility index of 17.72. This represents good public transport accessibility and is a material consideration when assessing the appropriate level of on-site parking. Importantly, this is supported by identifiable transport services rather than reliance on a PTAL classification alone. The Fairdale Gardens bus stop is approximately 183 metres walking distance from the property. The TfL assessment identifies bus route 140, with an indicated weekday morning peak frequency of approximately 7.5 services per hour. This represents a frequent and readily accessible public transport option for staff and other visitors. Hayes & Harlington railway station is also approximately 923 metres walking distance from the property. The station provides a further practical public transport option, supplementing the local bus network and extending the range of locations from which staff may reasonably travel without reliance on a private car.

The combined availability of frequent bus services, rail connections and established pedestrian routes materially supports the use of sustainable transport. It is therefore reasonable to conclude that the site is not dependent on each member of staff or visitor travelling independently by private motor vehicle. This is particularly relevant to the applicant's proposed staffing and travel management arrangements.

The applicant recognises that PTAL measures accessibility to public transport and does not, by itself, guarantee that every individual journey can be made without a car. The operational travel arrangements must therefore be compatible with actual staff recruitment, shift patterns and available transport services. The operator has confirmed that its proposed arrangements have been considered on that basis.

Applicable parking standards and proportionate provision

The London Plan does not prescribe a specific numerical car parking standard for specialist children's homes within Use Class C2. The appropriate provision therefore requires assessment having regard to the characteristics of the development, transport accessibility and relevant local parking standards. Appendix C of the Hillingdon Local Plan Part Two identifies an approach for residential institutions, including care homes, whereby parking may be assessed through a transport assessment and travel plan or by reference to a numerical standard of one space per four dwelling units, subject to a minimum of two spaces, together with an additional space for a warden. The latter numerical approach would ordinarily produce a figure of three spaces. However, that is not an absolute requirement irrespective of the actual scale, staffing arrangements or transport characteristics of a particular proposal.

Policy DMT 6 expressly provides scope for the Council to agree variations to its parking requirements where the variation would not result in unacceptable effects on street parking, congestion or local amenity, and/or where an appropriate transport appraisal and travel plan supports the proposed provision. The present application advances a site-specific parking and travel management case. The applicant does not seek to maximise the number of vehicles that might physically be accommodated across the frontage. Instead, the proposal provides two practical on-site parking spaces, assessed in conjunction with the applicant's defined vehicle use, staffing and travel arrangements. Given the limited two-child occupancy, good public transport accessibility and the proposed operational controls, the applicant considers that two spaces represent a proportionate level of provision. Requiring a third space solely by applying the numerical standard, without considering the actual anticipated parking demand or the alternative transport appraisal approach, would not reflect the site-specific circumstances of the proposal. The additional space is not demonstrated to be necessary for the intended operation, and the application does not seek to introduce further frontage parking at the expense of safe access or manoeuvring arrangements.

The operator has confirmed in writing that its proposed staffing, management, handover and visitor arrangements can be accommodated within two on-site parking spaces, including the dedicated home vehicle, with staff using public transport where appropriate.

Existing frontage and parking management

The frontage is physically presented and illustrated as providing two practical side-by-side vehicle spaces. The application deliberately assesses two on-site spaces only, including the dedicated children's home vehicle. It does not rely upon a third or fourth space being created through the obstruction of access or manoeuvring areas. The first space is reserved for the dedicated children's home vehicle, which would ordinarily remain at the property and be used for journeys associated with the care of the children. The second space would be available for no more than one staff or Registered Manager vehicle at any one time. The applicant therefore assesses a maximum of two vehicles parked on the property, including the dedicated home vehicle.

Where the Registered Manager attends by car and occupies the second space, no additional staff vehicle would be permitted to park simultaneously at the property. The operator has confirmed that the proposed staffing and travel arrangements can be managed within that capacity. The application does not suggest that the existence of a large or open frontage automatically establishes additional lawful or safely usable parking spaces. Any physical alteration to the frontage, crossover or parking geometry would require separate assessment and any necessary consent. The proposed low-level frontage wall is shown indicatively and addressed separately below. No enlargement of the existing crossover or additional parking spaces is proposed.

Staff travel and shift arrangements

The operational model has been designed to make practical use of the site's public transport accessibility. Staff recruitment, shift allocation and travel arrangements would be coordinated by the operator so that routine attendance does not depend on every member of staff independently travelling to and parking at the premises in a private car. The provider would coordinate staff travel arrangements, with public transport used where appropriate and walking, cycling, lift-sharing and car-sharing considered where practicable. The nearby bus services and Hayes & Harlington railway station provide practical alternatives to routine single-occupancy car travel. The operation would also be managed to avoid unnecessary vehicle overlap during staff handovers.

The proposed handover periods at approximately 08:00 and 22:00 would involve brief operational transitions. They would not create an entitlement for additional staff vehicles to remain parked at the site. The provider would coordinate the travel arrangements of incoming and outgoing staff so that the two-space parking limit is respected. Where public transport is impractical for a particular journey, the operator would need to make alternative arrangements compatible with the agreed parking capacity. The proposal therefore does not depend upon routine staff overspill parking on surrounding streets. This is an operational commitment forming part of the proposed management arrangements, rather than a general assertion that sustainable transport may be used in principle.

Controlled Parking Zone and visitor arrangements

The property lies within Hillingdon's HY1 Controlled Parking Zone, which imposes relevant daytime parking restrictions. The surrounding permit-controlled parking arrangements operate Monday to Saturday between 09:00 and 17:00, subject to the applicable signs and traffic orders. The presence of a Controlled Parking Zone does not guarantee that additional staff or visitor vehicles can lawfully obtain permits or find available on-street spaces. The applicant's case does not rely on routine overspill parking, unrestricted kerbside availability or any assumption that additional residential parking permits would be granted. Instead, the proposed operation is based upon a managed level of parking demand, supported by public transport accessibility and coordinated staff and visitor arrangements.

Professional visitors would attend periodically and would generally be scheduled in advance. The Registered Manager and Responsible Individual would attend in accordance with their identified management responsibilities and are not intended to generate unrestricted office-type visiting activity. Where professional or family visits take place at the property, these would be coordinated to minimise unnecessary overlap with staff handovers and other activities. Where a visitor travels by car, any parking away from the property would need to comply with the applicable highway and Controlled Parking Zone restrictions. Availability of such parking is not assumed or guaranteed.

The principal planning case remains that the development would generate a modest and managed level of vehicle demand, rather than relying upon the wider highway to accommodate routine additional staff parking.

Children's journeys and vehicle movements

The dedicated children's home vehicle would provide transport for school attendance, appointments, activities and other journeys where appropriate. Children's weekday school attendance and ordinary activities would generate vehicle movements where necessary, alongside journeys undertaken on foot, by public transport or through arrangements involving staff. The proposed residents would not own or drive private cars. It is not necessary to assume that every ordinary activity requires a separate private vehicle or that all journeys would occur simultaneously. Equally, the applicant does not seek to present unsupported numerical trip-generation assumptions as verified transport evidence. The relevant planning consideration is whether the actual anticipated pattern of movements and parking demand can be managed within the proposed operation. The dedicated home vehicle, coordinated staff travel, limited visiting arrangements and the accessibility of the location provide a reasonable basis for concluding that the proposed use would not generate unacceptable parking or highway impacts.

Relevant Hillingdon planning decisions

Hillingdon's consideration of comparable children's homes demonstrates the importance of assessing parking provision against the particular operational and transport circumstances of each proposal.

At 16 Gledwood Crescent, Hayes (23664/APP/2025/2264), the Highway Authority considered a proposal for a larger children's home accommodating up to four children. Although that application was ultimately refused, the Highway Authority's consultation response is relevant to the present assessment. The Highway Authority objected to the proposed arrangement involving up to five vehicles and identified concerns regarding the existing crossover and the ability to accommodate additional parking safely. However, having regard to the proximity of bus services, proposed staff travel arrangements and the nature of the use, the Highway Authority indicated that no more than two on-site parking spaces would be acceptable, subject to appropriate revisions and other highway requirements being addressed. That observation does not amount to an approval of the Gledwood Crescent proposal. The final assessment raised further concerns regarding the adequacy of the submitted operational and transport evidence.

Nevertheless, the consultation response demonstrates that the Highway Authority does not simply seek to maximise on-site parking provision for children's homes. It considers whether the proposed capacity is appropriate and safe, having regard to the particular staffing arrangements, transport accessibility and site geometry.

The present proposal differs materially from Gledwood Crescent. Fairdale Gardens would accommodate only two children, has a higher PTAL of 4, benefits from a bus stop approximately 183 metres away and is supported by a defined two-space parking and travel management approach.

Further relevant evidence arises from the Council's assessment of 11 Charville Lane, Hayes (10364/APP/2026/241), involving a proposed C2 children's home for up to two children. In that case, the Highway Authority raised no objection to the retention of one existing off-street parking space, notwithstanding the site's significantly lower PTAL of 1b. The assessment took account of the limited scale of the use, managed staffing arrangements and nearby bus accessibility. This is a particularly relevant example of Hillingdon adopting a site-specific approach rather than insisting that every children's home must provide the same numerical parking provision.

Neither case establishes a binding precedent or removes the need to assess Fairdale Gardens on its own merits. However, read together, they support the principle that an appropriately managed two-child children's home can be acceptable with fewer than three on-site parking spaces where the circumstances justify that arrangement. Fairdale Gardens offers two on-site spaces and materially better public transport accessibility than the Charville Lane example.

Cycle parking, electric vehicle charging and access

The proposal would provide two secure and covered cycle parking spaces, together with one active 7kW electric vehicle charging point, as indicated on the proposed planning drawings. These measures support sustainable travel and respond directly to the matters identified by Hillingdon's Highway Authority in its assessment of comparable children's home proposals. Safe pedestrian and emergency access would remain available. Routine domestic deliveries, servicing and waste collection would continue to be managed using the existing access arrangements. The two parking spaces would not be operated so as to obstruct the public footway, vehicle crossover or necessary access arrangements. The proposal does not require a new public entrance or commercial servicing bay. The operator would ensure that vehicles, visitors and refuse containers are managed so that safe access is maintained.

Frontage boundary treatment and pedestrian safety

Historic street imagery shows that the property previously benefited from a low front boundary wall, which has subsequently been removed, leaving a largely open paved frontage. The application retains two on-site parking spaces and proposes no enlargement of the existing vehicular crossover.To improve pedestrian and highway safety, the applicant proposes the introduction of a low-level frontage wall, shown indicatively on the proposed planning drawings. The principal purpose of the wall is to discourage vehicles from crossing sections of the public footway outside the existing vehicular crossing, thereby providing a practical improvement over the current open frontage arrangement. The proposal does not seek to replicate the precise historic wall alignment or suggest that all potential unauthorised vehicle movements would necessarily be eliminated.

The precise location, length, height, materials and relationship of the proposed wall to the existing vehicular crossover have not been definitively established. Accordingly, the applicant would accept a proportionate planning condition requiring these details to be submitted to and approved by the Local Planning Authority, having regard to any relevant Highway Authority requirements and appropriate site verification. The final arrangement would need to preserve safe pedestrian visibility, the existing vehicular access and the practical use of both proposed parking spaces. The indicative alignment may therefore be adjusted where necessary to achieve these objectives, subject to the Council's agreement. No independently verified vehicle-tracking assessment or certification of the precise extent of the vehicular crossover is implied by the indicative drawing.

The proposed boundary treatment represents a proportionate measure intended to improve control over vehicle movements across the frontage, without introducing additional parking spaces or proposing an enlarged crossover. The applicant considers that its precise details can reasonably be addressed through an appropriately worded planning condition, provided the Council is satisfied that a workable arrangement can be achieved.

Highway impacts and planning conclusion

The application advances a defined two-space parking arrangement supported by a site-specific operational travel plan. The applicant acknowledges that Hillingdon's numerical care-home parking standard provides a relevant starting point. However, the applicable policies also permit the consideration of alternative parking arrangements where supported by the circumstances of the development and appropriate transport evidence. The site benefits from good public transport accessibility, including PTAL 4, frequent bus services within approximately 183 metres and rail services within approximately 923 metres walking distance. The proposed use is limited to two children, neither of whom would generate private car ownership demand.

One on-site space would be reserved for the dedicated children's home vehicle, whilst the second would be available for a staff or Registered Manager vehicle as required. The operator's staffing, handover and visitor arrangements would be coordinated around that capacity, with routine non-car travel forming an integral part of the management approach. The proposal therefore does not assume that a third parking space is necessary merely because the numerical standard might ordinarily produce that figure. Rather, the applicant submits that the actual anticipated parking demand can be accommodated through the two available spaces and the proposed travel management arrangements. The relevant planning test is whether this arrangement would create unacceptable highway safety impacts, parking stress, congestion or harm to neighbouring amenity. On the evidence presented, the applicant considers that it would not.

The proposal would not result in an enlargement of the parking frontage or encourage unsafe additional vehicle parking within the site. Nevertheless, the combination of the site's good public transport accessibility, limited occupancy, controlled on-site parking capacity, dedicated children's home vehicle and realistic staff and visitor management arrangements provides a reasoned basis for concluding that the proposed two-space provision is appropriate.

The applicant therefore submits that the proposal would not give rise to unacceptable parking or highway safety impacts and would accord with the objectives of Policies T2, T4, T5 and T6 of the London Plan and Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan Part Two.

Other Matters Raised (Anti-social, security, crime and other social issues)

Concerns are sometimes raised in cases of this nature regarding anti-social behaviour, crime, security or wider social effects. Those matters must, however, be approached on an evidential basis and not by stereotype or generalised assumption. The planning system is concerned with whether there is a proper evidential basis for concluding that the proposed use would be likely to give rise to material harm of that kind.

In the present case, no such evidential basis is identified. The proposal is for a small-scale children’s home for up to two children only, operating within a structured and professionally managed framework. The home would be continuously supervised by staff in accordance with the defined operational model, including day staff, waking night staff and management oversight.

The children would therefore not be occupying the property in an unsupervised or unmanaged manner. The proposal is not for a larger institution or a use involving uncontrolled movements or unrestricted activity.

There is no proper planning basis to assume that children living in residential care are inherently more likely to generate crime, anti social behaviour or disorder. Such an approach would be speculative and would fail to recognise the actual characteristics of the proposal, namely a small and supervised setting designed to provide stability, care and support. If any criminal or anti social conduct were ever to arise, those matters would fall to be addressed through the relevant regulatory, safeguarding and general legal regimes, rather than by refusing an otherwise acceptable planning application on the basis of unsupported fear.

The proposal should therefore be assessed by reference to its actual land use characteristics. On that basis, there is nothing to indicate that it would result in material crime, anti social behaviour, security problems or wider social harm so as to justify refusal.

The applicant has identified an operation based upon limited occupancy, direct staff supervision and continuing management. Concerns about neighbourhood safety or young people's vulnerabilities should be distinguished from objective evidence of harmful land use effects. Matters relating to individual safeguarding risks and care standards belong principally to the separately regulated children's home system; the planning assessment remains entitled to consider genuine external effects such as repeated noise, gatherings, criminal activity or traffic if supported by evidence. No such site specific effect has been established merely by naming the proposed class of resident.

Other Issues

The application proposes no new building volume, significant external alteration or tree works. The existing building footprint and garden would remain. The site is in Flood Zone 1, and no material drainage or flood risk impact has been identified from the change of use and internal reconfiguration. No protected tree works, material external lighting installation or landscape disturbance forms part of the application. Should any such work later be proposed it must be checked separately against the relevant requirements. The present statement does not seek retrospective approval or certification of any historic extensions or planning use.

Normal domestic refuse storage, deliveries and servicing would continue, with the operator expected to prevent accumulation of rubbish or obstruction to the frontage. Any discrete secure bicycle facility, electric vehicle charger or security equipment must be confirmed and correctly reflected in the application, including any separate consent issue if relevant. Planning obligations or CIL consequences, if raised by the Council, fall to be determined under the proper statutory process and remain the applicant's responsibility in accordance with the appointment terms; this statement does not certify an exemption.

The application is for a change of use accompanied by internal rearrangement. Accordingly there is no proper basis to suggest that the mere grant of C2 permission determines Building Regulations approval, the adequacy of structural alterations, fire engineering, ownership, private legal rights or Ofsted registration. Those distinct matters must be dealt with by the parties and regulators responsible for them. Planning permission may be granted subject to proportionate conditions addressing only genuine planning concerns.

Response to likely objections

Potential concern	Response on the Fairdale evidence
A house or HMO is being lost.	The loss of existing C4 accommodation is acknowledged under DMH 1 and the S4 safeguarding consideration is addressed. The dated HMO evidence, locally evidenced care need and HO7 substantial weight support the particular planning balance. No exemption from housing policy is claimed.
The C4 use may not be lawful.	The May 2025 licensing application, written commencement confirmation, September 2025 correspondence and February 2026 licence are presented chronologically against the December 2025 Article 4 commencement. A licence is not represented as an LDC. Any specific factual dispute must be addressed by the applicant.
This is really a C3 dwelling loss.	The Council must evaluate the actual, supported existing planning baseline, including the qualifying pre Article 4 C4 history. If disputed, documentary evidence should be tested rather than assumed away. The applicant has not instructed the agent to certify lawfulness.

Potential concern	Response on the Fairdale evidence
Care is not shown for Article 2 C2.	The proposal involves direct residential care with two day carers, waking night and sleep in support, and management. Ofsted registration and planning classification are different questions. The proposed physical layout and management structure also reflect the planning-relevant principles of the Children's Homes Regulations and statutory Guide, including individual bedrooms, shared domestic living space, quiet/private space, dedicated sleep-in accommodation, Registered Manager and Responsible Individual oversight.
The accommodation need is generic.	Hillingdon's 2025 to 2030 Care Strategy, April and June 2025 Children, Families and Education Committee papers, May 2025 Cabinet decisions and the safeguarding evidence show local placement pressure and expansion plans. The proposal adds two appropriately managed EBD places without claiming a Council commissioning contract. Recent 2026 Hillingdon approvals at Beechwood Avenue, Charville Lane and Whitehall Road record direct Children's Services confirmation that children's residential homes or such facilities are needed in the borough. Policy DMH 8(ii) does not require a commissioning contract or guaranteed referral. The Council's own published needs evidence and the three recent Children's Services confirmations together provide a current Hillingdon evidential basis for borough need to which this defined two-child EBD proposal directly responds.
A care home is inappropriate in a family street.	The home would remain outwardly domestic and house two children, with no public service, office hub, new massing or commercial sign; actual amenity effects, not labels, determine compatibility.
Noise, late handovers and antisocial behaviour.	The 22:00 handover is identified openly, lasts approximately 15 minutes and would be indoors with quiet arrivals. Routine external visits are managed; no adverse child behaviour is assumed without evidence.
Too many carers and visitors.	Two routine daytime carers and two overnight carers (one waking night and one sleep-in) are proposed. The Registered Manager is additional, ordinarily attending three to four days weekly, principally during normal working hours, with some duties undertaken remotely and occasional weekend attendance. Brief handover overlaps, weekly Responsible Individual visits, monthly Regulation 44 visits and approximately six-weekly social worker visits are identified. Other routine professional visits would generally occur during daytime business hours, avoiding handovers where practicable.
There is no quiet room or staff accommodation.	The drawings provide two substantial first floor child bedrooms, a separate first floor quiet room, approximately 47.5 sqm communal LKD and a separate approximately 14.5 sqm sleep in carer bedroom plus office and facilities.
Two parking spaces cannot meet the demand.	Exactly two spaces are proposed, including the home vehicle; the second is available for only one staff or Manager car. PTAL 4 offers realistic non-car options, while the HY1 CPZ rules out reliance on unrestricted daytime kerbside parking.
Larger homes have been refused by Hillingdon.	Gledwood and Lavender refused materially larger or under-evidenced schemes; their lessons are addressed. Chestwood approved a directly comparable C4 to C2 proposal and Woodrow Avenue a two-child home. Each decision remains site and fact specific.
Building Regulations, fire or safeguarding are unresolved.	Planning level accommodation and land use implications are assessed. Technical fire design, Building Control, structural safety and Ofsted / safeguarding remain separate statutory processes under the 2026 NPPF DM7 approach and are not certified by this statement.

Potential concern	Response on the Fairdale evidence
C2 concentration or parking stress is inevitable.	Overconcentration requires evidence of detrimental local clustering and cumulative effects, not merely the existence of children's homes elsewhere. The identified planning decisions and their distribution have been considered in assessing the proposal against Hillingdon Policy DMH 8. No site-specific evidence of harmful overconcentration has been identified. The two-space parking strategy, including the dedicated home vehicle, has been expressly confirmed by the operator. A review of the Council's planning register for Fairdale Gardens has identified no other children's home or comparable Class C2 residential care use on the street. The road-level register audit identifies no comparable Class C2 children's residential care use on Fairdale Gardens, while the nearest identified wider examples are approximately 1.3 and 1.4 miles away. There is therefore no identified local cluster capable of producing cumulative character or amenity harm.

Planning balance

The application seeks permission to change 39 Fairdale Gardens from the existing client-confirmed C4 HMO use to a small residential children's care home within Class C2 for a maximum of two children. The correct starting point is the development plan, and the proposed change unavoidably engages Policy DMH 1 because an HMO provides an existing form of residential accommodation. This statement does not attempt to erase the housing loss through terminology. It identifies the applicant's documented May 2025 HMO commencement, pre December 2025 Article 4 history and later licensing as material to the correct baseline, while recognising that those documents do not themselves establish a lawful development certificate.

Against the acknowledged housing loss stands the evidenced public benefit of additional accommodation suitable for vulnerable children, supported by Hillingdon's Care Strategy, April and June 2025 Committee records, Cabinet decisions and the Safeguarding Partnership evidence. London Plan H12 and Hillingdon DMH 8 contemplate appropriately located and managed specialist housing and care. August 2026 NPPF HO7 directs substantial weight to accommodation meeting evidenced need, while HO9 supports appropriate management and access to services. Under S3 and S4, development within an urban settlement is supported unless its benefits would be substantially outweighed by adverse effects under the national decision making policies. Although DMH 1 safeguards C4 accommodation and its loss carries genuine weight, the proposal retains the residential building and would deliver two specialist child care places rather than convert the premises to a commercial or non-residential business use. The applicant submits that the particular one property loss and controlled land use effects are not substantial enough to outweigh the identified care benefits. This is an express planning balance, not an exemption from housing policy or a guarantee of consent. Recent 2026 Hillingdon approvals at Beechwood Avenue, Charville Lane and Whitehall Road further reinforce this conclusion, recording direct Children's Services confirmation of borough need for children's residential provision. The combination of the Council's published evidence and direct 2026 Children's Services confirmations provides a current and specific evidential basis for the DMH 8(ii) need test.

The scale and physical quality of the proposal are material. This is not a four child home superimposed on an unsuitable HMO layout. The proposed drawings show two individually sized children's bedrooms, a separate first floor quiet room, substantial shared living, kitchen and dining accommodation, and specific dedicated sleep in and staff office facilities. The garden remains. The building would not expand externally and would continue to present an ordinary domestic appearance. On the basis of the applicant-confirmed first-floor layout and proposed partition changes, the accommodation provides a substantially coherent living environment for the precise two child care model.

The potential for residential amenity effects is treated seriously. There would be professional carers, two daily shift changes, Manager attendance and regulated visits. Those effects are identified with approximate timings and frequencies, with management arrangements designed around indoor handovers, quiet evening arrivals, off site appointments and neighbour response. These facts distinguish this proposal from under specified schemes. No finding of absolute equivalence to C3 family occupation or a zero vehicle movement baseline is sought, but the evidence supports a conclusion that a carefully managed two child care home can sit acceptably in an existing residential street.

Parking is the principal site-specific transport consideration and is addressed through a defined two-space strategy. The site has two physical frontage spaces; one would be occupied by the dedicated home vehicle, leaving one for a staff or Manager vehicle. The applicant does not rely on three or four frontage spaces or routine unrestricted kerbside parking. PTAL 4, nearby bus and rail services, the HY1 controlled parking regime and the operator's coordinated staffing, handover and visitor arrangements provide a credible site-specific basis for the proposed parking strategy.

The recent Hillingdon outcomes provide useful site-specific context. The approvals at Chestwood Grove and Woodrow Avenue demonstrate that children's residential care can be accommodated where the facts and management arrangements support it. Lavender Rise and Gledwood Crescent identify the evidence Hillingdon expects on baseline, care, need, accommodation, staffing and transport. Fairdale has been prepared specifically to address those matters through a tightly defined two-child model, documented C4 baseline, strong accommodation, embedded Planning Management Plan and site-specific transport case.

Management evidence addresses appropriate planning effects under NPPF HO9. Under DM7, however, the Council's role does not extend to certifying Ofsted readiness, child specific safeguarding, staffing adequacy, internal technical fire safety or structural compliance. Those are separate responsibilities. The planning balance should give proper weight to the tangible land use and accommodation evidence, while avoiding unsupported concerns about children in care or conflation of separate regulatory regimes.

Taken together, the evidenced need and specialist accommodation benefits, small two child scale, prospective living environment, unchanged outward domestic appearance, accessible urban location and defined Planning Management Plan form a strong case for approval when the development plan is read as a whole. The housing safeguarding impact has been acknowledged and the S4 balance explicitly applied. The applicant has confirmed the proposed layouts and intended operational arrangements, including the two-space parking strategy expressly accepted by the operator. The existing C4 baseline remains supported by the applicant's documentary evidence and written confirmations, without independent certification of planning lawfulness. The Fairdale Gardens register audit also identifies no comparable Class C2 children's residential care use on the street, supporting the conclusion that the proposal does not create harmful overconcentration under DMH 8(i).

On that basis the applicant considers the proposal to accord with the relevant specialist care policies and to deliver benefits which outweigh the identified adverse planning effects.

Prepared by

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For and on behalf of RAHUL TAHEEM LTD



Appendices

Appendix 1 - Hillingdon's Care Strategy November 2025-2030

Appendix 2 - Children, Families and Education Select Committee 15 April 2025

Appendix 3 - Children, Families and Education Select Committee, WEDNESDAY, 18 JUNE 2025

Appendix 4 - CABINET Thursday, 22 May 2025 at 7pm

Appendix 5 - The Hillingdon Safeguarding Partnership Annual Report 2023–2024

Appendix 6 – Existing Class C4 HMO Evidence and Article 4 Chronology