

**Planning Statement**  
**21a Cleveland Road**  
**Uxbridge**  
**On behalf of Hopewell**  
**Housing**

## **Introduction**

This statement has been compiled to support an application for the change of use of an existing property which has been operating under C3b use to C2.

## **Description**

The description of development is as follows:

Change of use from C3b to C2.

## **History**

The only site history of any relevance is the rear extension which was constructed in 2019.

The property has been used for C3b purposes for a number of years.

## **Principle of Development**

The proposal is for the conversion of the existing property which has been used under as care accommodation for a number of years under class C3b of the GPDO. The requirement for consent comes after an increase in uptake to meet the underlying need for C2 accommodation across London which will require the extension to be utilised as part of the care accommodation therefore creating 7 bedrooms rather than the 6 permitted under class C3b. Based on the existing use of the property as C3b the assessment of the application should be limited to the harm derived from the occupation of 1 additional bedroom.

Both the London Plan 2021 and the Hillingdon Local Plan address care accommodation (such as residential institutions, care homes, and supported living) in different ways, focusing on the provision of appropriate housing for those with care needs, as well as ensuring that developments meet broader policy objectives related to housing, accessibility, and sustainability.

London Plan 2021:

The London Plan 2021 addresses care accommodation primarily under policies related to housing, accessibility, and the provision of specialist accommodation. Key points related to care accommodation include:

### **1. Policy H12: Specialist Older Persons Accommodation**

- London Plan Policy H12 specifically focuses on the need to provide specialist accommodation for older persons, including care homes, sheltered housing, and extra care housing. It highlights the increasing demand for such accommodation due to an ageing population and the need for a wide range of housing types to meet this need.

- The policy encourages the provision of high-quality, well-designed, and accessible specialist accommodation, including options that allow for the integration of care services.
- It recommends planning authorities to plan for the future housing needs of older people, ensuring that schemes are integrated into the local community, with appropriate facilities and support.

## 2. Policy H10: Housing for People with Specialist Care Needs

- This policy supports the provision of specialist housing for people with care needs, which includes the full range of housing options for people with disabilities, mental health needs, or other support requirements.
- The policy emphasizes the importance of designing homes to be adaptable and accessible for people with a range of needs, ensuring they are equipped to accommodate different levels of care.
- The provision of housing for people with care needs is seen as essential to meeting London's housing and social care needs, and the plan encourages partnerships between housing providers and care providers to meet these needs.

## 3. Policy D7: Accessible Housing

- This policy requires that housing developments (including care accommodation) be accessible and inclusive. New developments should meet the 'Building Regulation M4(2) Accessible and Adaptable Dwellings' standard, ensuring that units can be adapted as needed for individuals with different mobility and health requirements. This is particularly relevant to care accommodation for people with disabilities or those with other mobility or accessibility needs.

## 4. Policy E6: Provision of Health and Social Care Facilities

- The London Plan encourages the provision of health and social care facilities, including residential care homes, and recognises the importance of co-locating these facilities with other services (e.g., community and healthcare services) to ensure ease of access and integration into the wider community.

The definition of care accommodation in planning policy terms states that following:

- The application proposal includes the provision of 12 assisted living apartments as part of the existing care home. These proposed units meet the definition of care home accommodation within Paragraph 4.13.4 of the London Plan (2021) and, therefore, are exempt from the requirements of Policy H13 and do not

generate an affordable housing requirement. Paragraph 4.13.4 defines care home accommodation as follows:

- Personal care and accommodation are provided together as a package with no clear separation between the two.
- Personal care packages and accommodation are provided by the applicant who is CQC registered. The level of care provision can therefore be adjusted as residents needs alter over the course of their stay.
- The person using the service cannot choose to receive personal care from another provider
- Personal care provision is delivered through Comfort Care only are a registered care provider and CQC registered. People using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold.
- The units will not be occupied under any of these agreements.
- Likely CQC-regulated activity<sup>72</sup> will be ‘accommodation for persons who require nursing or personal care’ (Housing with care: Guidance on regulated activities for providers of supported living and extra care housing, Care Quality Commission, 2015)
- The residents of the proposed units are for those people who are unable to live independently without assistance.

It is also clear that there is a substantial and urgent need to provide assisted living flats for residents whose care requirements change overtime but are not yet at the level to require relocation to a care home with full care provision. The ability for residents to be able to live within this type of C2 accommodation for a greater period of time is far more beneficial for resident well-being and allows for a smoother transition to full care provision, should that be required at a later stage.

In response to this ongoing urgent need, the applicants have made the decision to expand into the extension and create 1 additional bedroom (a seventh).

This proactive response to an identified need will have the additional benefit of ensuring the ongoing viability of the existing established use of the property in perpetuity.

It is key to note that the existing property has been running as a care home lawfully for a number of years and has received no complaints. The addition of 1 care bed would not amount to any form of harm to local residents and any harm identified by officers would be limited.

## **Highways**

The existing property is used as care accommodation therefore its occupants at present do not have access to a car and future occupants who have care needs are unlikely to have access to a car either. There are a maximum of 2 staff present at any one time and

this includes a shift change over therefore the maximum parking requirements should be for 2 vehicles and potentially 1 visitor space. The frontage of the property can feature hardstanding and comfortably fit 3 – 4 vehicles. This arrangement will not change and is not affected by the development.