



TRANSPORT STATEMENT

Application for the change of use of a dwelling(Use Class C3a) to a children's home for up to three children, with a manager and three carers, two of whom would stay overnight, working on a rota basis (C2).

**61, BOTWELL LANE,
HAYES,
HILLINGDON,
UB3 2AD**

18/04/2026



1. Background

1.1. I am writing on behalf of my client, Lifepaths Care Ltd, which is seeking planning permission to use, 61 Botwell Lane, a dwelling (Use Class C3a), as a small specialist care home for up to three children, who will either have been diagnosed with learning disabilities (LD) and/or emotional and/or behavioural difficulties, (EBD) looked after by up to three carers and a manager, which falls within Use Class C2 of the Use Classes Order.

1.2. The property is a four-bedroom semi-detached house, with two off-street parking spaces to the rear. The road to the rear has double yellow lines, while on street parking to the front is unrestricted. It benefits from:

- rear parking provision
- bicycle storage
- refuse/bin storage
- vehicle access
- sustainable transport measures.

1.3. The proposed plans clearly demonstrate:

- two rear off-street parking spaces
- electric vehicle charging provision
- dedicated bicycle storage
- designated refuse/bin storage
- adequate rear outdoor amenity/play space.

1.4. It is the company policy to require staff to use public transport (with free bus passes or subsidised taxi fares) or bicycle (with the



provision of a secure cycle rack) and not to allow on-street parking. Please note the map of all the bus routes close to the property.

- 1.5. Three children (aged 7-17) would live at the house, supported in the day by a manager (9 am until 5 pm or until required), daily carer (8.30 am to 8.30pm) plus two of the carers working on a rota basis, staying overnight.
- 1.6. The two overnight carers would work for 48 hours, sleeping overnight, with a manager attending each weekday (8:30 am until 6:30 pm, or until required) and a daily carer. The overnight carers would operate on a 48-hour shift pattern, followed by 72 hours off. Except at changeover times, which last around fifteen to thirty minutes, there will be no more than four staff (a manager and three carers) on the premises at any one time. The changeover of one of the overnight care staff members occurs every 48 hours, usually around 8.30 am.
- 1.7. If a child with a higher level of need is allocated to the home, it is sometimes necessary for an overnight carer to stay awake. In these circumstances, one of the two overnight carers would arrive around 8:30 pm and work until 8:30 am, when a daytime carer would replace them. The maximum number of staff in the home would remain at two overnight and three in the daytime.
- 1.8. These comings and goings are set out in the table below.
- 1.9. During the day it is expected that the child would engage in various activities, plus attend a mainstream or special school. In some cases,



the child may receive some home schooling or via virtual school but only while he/she settles in. Clearly, this is no different from a family choosing to have home tutoring.

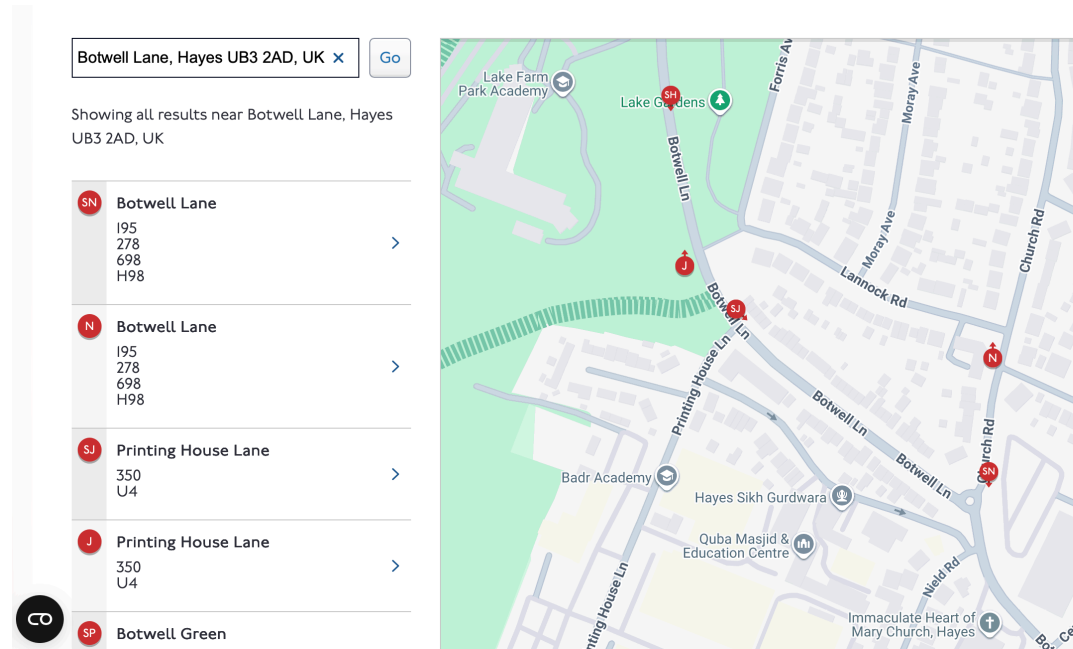
2. Transport Assessment

2.1. Paragraph 116 is specifically relevant, *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios'*.

2.2. The local planning policy states that the provision of appropriate housing to meet the specialist needs of local people will be supported where it can be robustly demonstrated that:

i. The site has access to essential services and shops by walking and cycling.

In terms of the sustainability of the location, the nearest shops/services would be approximately 10 minutes' walk from the property which is not considered to be unacceptable.



ii. *The site is well served by public transport*

The site benefits from excellent public transport accessibility and is located within a sustainable urban location in close proximity to a range of public transport services. The nearest bus stops are located on Botwell Lane and Coldharbour Lane, approximately 2–5 minutes' walking distance from the property. These stops are served by a number of frequent bus routes including routes 90, 140, 195, 278, 350, E6, H98, U4, SL9 and N140, providing connections to Hayes Town Centre, Heathrow Airport, Uxbridge, Southall, Hounslow, Harrow, Northolt and surrounding areas. Hayes & Harlington Station is located approximately 10 minutes' walk from the property and is served by the Elizabeth Line and Great Western Railway services, providing direct access to Central London, Reading and Heathrow Airport.

The site is therefore considered to be highly sustainable in transport terms, with future staff and visitors having access to a



wide range of public transport options, reducing reliance on private vehicle use.

- iii. *The proposal meets the parking requirements set out in Policy 24 and it will not have an unacceptable impact on parking conditions and traffic congestion in the area.*

Only the manager is likely to bring a car to the site, with care staff given the incentive to use public transport, taxis or bicycles to get to work. Due to the nature of the young people, all visitors, both professional and family and friends, are carefully managed in advance, to avoid being present at the same time. The car parking in the area is certainly not near the threshold in NPPF Paragraph 116.

- iv. *Adequate provision for visitor and carer parking facilities is provided and where appropriate, provision is made for the safe and convenient storage of wheelchairs and mobility scooters.*

Adequate parking facilities are available in the area to meet the anticipated need. Children with physical disabilities would not be allocated to this home.

- 2.3. Comings and goings, and visits by friends, family and tradespersons are commonplace in residential settings. There is no control over how often or when these activities take place in a typical residential dwelling. However, the potential intensification of such activities on a regular and daily basis, to a point that it would be out of character with the residential area, requires consideration.



- 2.4. The comings and goings would also not have an adverse impact on the amenity of neighbours.
- 2.5. Day-to-day activities in the home will mirror those of a typical large family. Staff shift changes, school runs, and visitors will all follow a schedule similar to that of a family with young children. Additionally, evidence from other similar care homes suggests that the level of comings and goings will not differ materially from that of a typical household.
- 2.6. As stated in 1.7 above, if a child with a higher level of need is allocated to the home, it is sometimes necessary for an overnight carer to stay awake. In these circumstances, one of the two overnight carers would arrive around 8:30 pm and work until 8:30 am, when a daytime carer would replace them. The maximum number of staff in the home would remain at two overnight and three in the daytime.
- 2.7. A typical week at the home will include regular school runs, staff changes, and occasional social worker visits. These activities will follow a predictable schedule, and all efforts will be made to minimize traffic and disruption to the surrounding area.
- 2.8. The comings and goings, whether by car or other means, are similar to a typical family dwelling. The home manager would arrive each weekday in the morning and leave each evening (9am and 5pm). In terms of the other staff on the premises, the care staff



would work on 48-hour shifts with only one of the two staff changing each day around 8.30 am.

2.9. An elderly person or someone with special needs living in a dwelling with four carers arriving throughout the day does not have a material impact on the amenity of neighbours, hence nor would the proposed movements.

2.10. The nature of the area is also relevant, with comings and goings in a busy area having less impact than in a quiet residential area.

2.11. In addition to Ofsted's one visit per year, there will be visits by local social services circa every four to six weeks and one Regulation 44 each month. Usually, each child's social worker would visit them individually but if they are from the same local authority one of the social workers may visit both children. This means these visits are quite rare and with one or two inspectors visiting the property each month, this is not going to have a material impact on the character of the property.

2.12. Depending on the needs of the individual children, there may be occasional visits by other professionals. In addition, there may be visits by family members and friends, although these are carefully managed in advance or the home will facilitate family contact outside the home, subject to child's individual care plan. These visits are no more frequent than those to a typical family by friends or relatives. They are quantified in schedule 2 below.



2.13. An estimate of the average number of comings and goings in a week of the existing and proposed use are set out below.

2.14. All household chores such as cleaning, cooking and gardening involve the children and no additional staff are employed at the premises.

Schedule 1 (estimated comings and goings from the current use)

Activity	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Journeys to work		4	4	4	4	4	
School run		4	4	4	4	4	
Shopping/ Social/recreational outings	2				2		2
Other visitors	4			2		2	4
Total Movements (in and out)	6	8	8	10	10	10	6

Schedule of Proposed Use (based upon experience of other similar homes)

Activity	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Home Manager / daily carer	2	4	4	4	4	4	2
Care workers starting and finishing shift	2	2	2	2	2	2	2
School run		4	4	4	4	4	
Shopping/ Social/recreational outings	2						4
Visitors (inspections/ social workers/ family and friends)	2			2			2
Total Movements (in and out)	8	10	10	12	10	10	10



2.15. The above schedule shows that the comings and goings would be similar to the current use.

Parking considerations

2.16. Policy T2 of the London Plan (2021) states that development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.

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2.17. The Council's parking standards for residential institutions require one space per three employees. With a maximum of four staff on site at any one time, the two spaces satisfy the requirement.

2.18. A secure bicycle rack will also be provided for staff.

3. Conclusion

3.1. It is maintained that the proposal would not go above the threshold required by Paragraph 116 of the NPPF. *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network.'*

3.2. Furthermore, it is maintained that there would be no material difference in planning terms from the current use as a dwelling. The carers, working on a rota basis, would effectively live at the dwelling



house to provide 24-hour care, as a single household. The comings and goings associated with the use would not be materially different from a typical residential household.

- 3.3. The local authority is therefore respectfully requested to support the application to establish this much-needed facility.