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PLANNING, DESIGN AND ACCESS STATEMENT

**PROPOSAL: CHANGE OF USE FROM A HOUSE IN MULTIPLE OCCUPATION (C4
USE) TO A CHILDRENS CARE HOME (C2 USE)**

SITE: 9 FERRERS AVENUE, WEST DRAYTON, UB7 7AA

DATE: JUNE 2025



1.0 Introduction

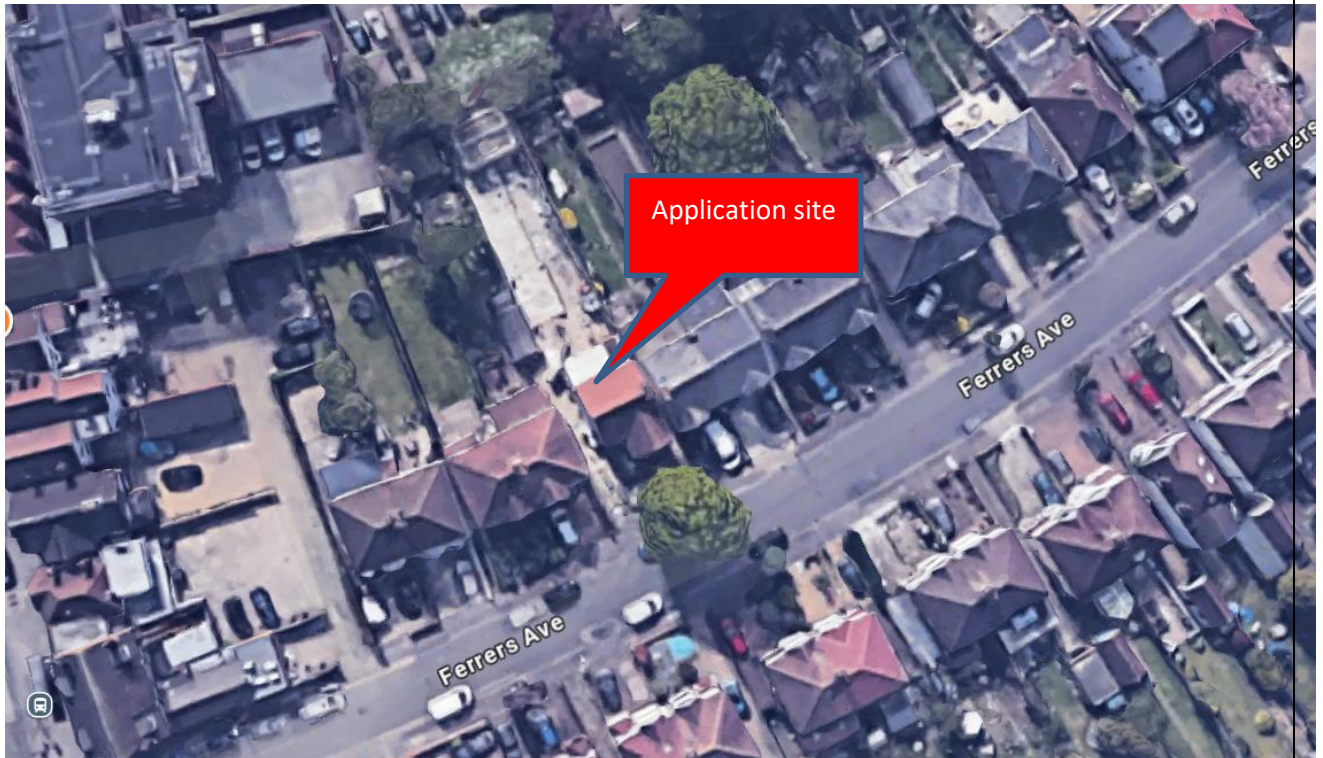
- 1.1 This Planning, Design and Access Statement has been prepared by LRJ Planning Ltd to accompany the full planning application for the change of use from a house in multiple occupation (C4 use) to a children's care home (C2 use) at 9 Ferrers Avenue, West Drayton, UB7 7AA.
- 1.2 This Statement provides a planning analysis to demonstrate that the submitted proposal is acceptable in planning terms and in accordance with the relevant policy and guidance.
- 1.3 The application is supported by a site layout plan and floor plans, which illustrates that the site is capable of the proposed change of use.
- 1.4 The remainder of this Statement is structured as follows:
- Section 2: Site location and description
 - Section 3: Development Proposal
 - Section 4: Planning Policy Context
 - Section 5: Opportunities and Constraints
 - Section 6: Design and Access
 - Section 7: Planning Analysis
 - Section 8: Summary

2.0 Site Description

- 2.1 The application site comprises a two-storey detached property arranged over three levels situated on the south eastern side of Ferrers Avenue. The property is set off the highway and benefits from a driveway accessed off Ferrers Avenue.

- 2.2 The aerial photograph exhibited in figure 1 below illustrates the location of the site and nature of the surrounding development.

Figure 1 – Aerial View of Site



- 2.3 The site is not located within a Conservation Area or adjacent to any designated heritage assets.

3.0 Proposal

- 3.1 Full planning permission is sought for the change of use from a house in multiple occupation (C4 use) to a children's care home (C2 use).
- 3.2 The current application seeks planning permission for the change of use to a children's care home (C2 use). Internally, the property will be configured as follows:
- Ground floor – En-suite bedroom, kitchen, lounge, office



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- First floor – Three en-suite bedrooms and kitchen
- Second floor – En-suite bedroom

- 3.3 The care home will accommodate up to 4 children both genders within an age range between 11 to 17. The care home will be regulated by Ofsted and the children will be placed in the care home by Local Authorities. The care home will be staffed by a minimum of 3 full time employees working on a shift system. It will be staffed 24 hours a day.
- 3.4 The proposed children's home will operate as a family-style residence, offering support that focuses on daily living skills, personal development, and integration into the wider community. While the model incorporates elements of domiciliary care, such as assistance with personal care and household tasks, its core structure is that of supported accommodation, designed to provide a warm, stable, and nurturing environment.
- 3.5 The home will function in the same manner as a typical family household, with shared meals, communal living spaces, and joint participation in daily activities. The garden will be used as a family garden, offering a domestic and non-institutional atmosphere.
- 3.6 Children will always be supported by adults present in the home, with care staff working on a structured rota system to ensure consistency and continuity of care. Staff will also assist children in accessing education either by supporting them to travel independently to school, gradually building their confidence with public transport, or by escorting them directly in a staff vehicle if necessary.
- 3.7 Professional appointments, such as those related to health or social care, will typically take place off-site in designated service settings. This approach helps to preserve the home as a comforting and familiar space, rather than a clinical or institutional environment.



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3.8 Visitors to the home will primarily include professionals. Wherever possible, children will be encouraged to engage with services, activities, and community resources outside the home, mirroring the experiences and expectations of a typical family setting and promoting full inclusion within the community.

3.9 As is the existing situation an area will also be retained at the front of the site for parking.

4.0 Planning Policy Context

4.1 In December 2024, the Government published the latest version of National Planning Policy Framework (NPPF). The NPPF took immediate effect. It sets out the Government's planning policies for England and sets out how they are expected to be applied. In addition, the NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions, as are previous planning decisions and appeals.

4.2 Paragraphs 2 and 47 of the NPPF states that *"Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise"*. This plan-led approach to development is enshrined by Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990.

4.3 Paragraphs 7 and 8 confirm that the purpose of the planning system is to contribute to the achievement of sustainable development, which comprises economic, social and environmental dimensions.

4.4 Paragraphs 10 and 11 identify the presumption in favour of sustainable development, with Paragraph 11 reaffirming that *"applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise"*, and that development proposals which accord with the development plan should be approved without delay.



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- 4.5 Paragraph 39 of the NPPF relates to decision making and confirms that “*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.*”
- 4.6 Paragraph 61 indicates that due regard should be given to size, type and tenure to address the needs of different groups in the community.
- 4.7 Paragraph 124 highlights that policies and decisions should promote an effective use of land in meeting the need for homes and other uses, maximising the use of brownfield land. Similarly, Paragraph 125d encourages decisions to promote and support the development of under-utilised land and buildings.
- 4.8 Paragraph 131 notes that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. It elaborates that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.9 Paragraph 135 seeks to ensure that developments will function well and add to the overall quality of the area, be visually attractive as a result of good architecture, and be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

The Development Plan

- 4.10 The Development Plan for the London Borough of Hillingdon consists of the Local Plan: Part 1 - Strategic Policies (2012), The Local Plan: Part 2 - Development



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Management Policies (2020), The Local Plan: Part 2 - Site Allocations and Designations (2020), West London Waste Plan (2015) and The London Plan (2021). The following is a summary of the relevant planning policies.

Local Plan: Part 1 - Strategic Policies (2012)

PT1.BE1 - (2012) Built Environment	PT1.H1 (2012) Housing Growth
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The Local Plan: Part 2 - Development Management Policies (2020)

DMH 1 Safeguarding existing housing	DMHB 14 Trees and landscaping
DMH4 - Residential Conversions and Redevelopment	DMH 18 Housing Standards
DMH 8 - Sheltered Housing and Care Homes	DM2 Highway Impacts
DMH 11 Design of New Development	DM6 Vehicle Parking
DMH 12 Streets and Public Realm	

London Plan (2021)

D3 (Optimising site capacity through the design-led approach)	D6 (Housing quality and standards)
D12 (Fire safety)	H12 (Supported and specialised accommodation)
D13 (Agent of Change)	T5 (Cycling)
D14 (Noise)	T6.1 (Residential parking)



5.0 CONSTRAINTS AND OPPORTUNITIES

- 5.1 The site represents an opportunity to create a care home (C2 use) within the physical limits of a settlement that is, due to its accessibility and sustainability, a location where development is directed and encouraged to locate. Consequently, the proposal accords with the provisions of the development plan.
- 5.2 An opportunity exists to layout the building in a fashion that will retain and reflect the character of the street and the grain of the surrounding urban area. For these reasons it is deemed that the proposal is acceptable in design terms.
- 5.3 Taking account of national and local planning policy, including the 'weight' that should be afforded to such, we would submit that the balance of material considerations indicate that the proposal is acceptable, in principle.
- 5.4 There is no proposal to alter the levels upon the site. As such, topography does not therefore pose a constraint to development.
- 5.5 The site is in a sustainable location and is accessible by alternative modes of transport. It is also within close proximity to employment opportunities, as well as local facilities, including shops, schools, churches, restaurants and other local community facilities.
- 5.6 A safe and satisfactory access can be achieved to the development.

6.0 DESIGN AND ACCESS

- 6.1 The design related policies in the development plan identify that context and character are key considerations and that development in existing areas must respond to and



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respect inherent layout, density, scale, appearance, materials and access.

i) Layout

- 6.2 The layout of the building has been arranged to ensure an enhancement to the overall level of accommodation and ensure an efficient use of the space.
- 6.3 The rooms and communal areas have been carefully designed within the building perimeters to ensure satisfactory living conditions for the care home residents, whilst also maintaining the amenity enjoyed by surrounding buildings. The care home that will accommodate up to 4 children will further ensure this.

ii) Density

- 6.4 The change of use will result in a scheme that is commensurate to the size of the property.
- 6.5 The change of use seeks to utilise the site with regard to the footprint, scale and mass, in particular levels and heights.

iii) Scale

- 6.6 There will be no unacceptable impact on surrounding residential properties as a result of the change of use to a children's care home. The scale of the development is consistent and respects the form of the surrounding development.

iv) Appearance

- 6.7 No external alterations are proposed.

vi) Access

- 6.8 No alterations to the existing access arrangements are proposed.
- 6.9 Having regard to the location of the site, which is within walking distance of local amenities and bus stops, it is considered that the site represents a sustainable location.

7.0 PLANNING APPRAISAL

- 7.1 This section seeks to highlight the main issues relevant to the determination of the application and assess the scheme against the local and national planning policies referenced in section 5.0 above.
- 7.2 The main issues that are considered to be relevant in this case include the following:
- The principle of the conversion of the property to a children's care home;
 - The effect the development will have on the amenity of neighbouring properties; and
 - Transport matters.

i) Principle of Development

- 7.3 Paragraph 11 of the Framework sets out the presumption in favour of sustainable development. For decision-taking this means where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies of the NPPF that protect areas or assets of particular importance provides a clear reason for refusing



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the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

- 7.4 Paragraph 61 of the NPPF adds that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 7.5 This application seeks planning permission for the change of use of the property from a HMO (C4 use) to a C2 residential institution, specifically a children's care home for up to four children.
- 7.6 The proposed development for a children's residential care home has been carefully assessed against the criteria set out in Policy DMH8. The application demonstrates clear compliance with the policy and is considered acceptable in principle.
- 7.7 The scheme provides a small-scale, specialist care facility for children in need of stable residential placements. This responds to an identified and growing need for supported accommodation for vulnerable young people within the borough, as evidenced in strategic housing assessments and wider social care strategies. The home is intended to cater primarily for local children, supporting their ability to remain within familiar networks and services.
- 7.8 In line with Policy DMH8(i), the proposal would not result in an over-concentration of similar uses within the area. The scale of the development is modest, with a low occupancy and staffing model that ensures a domestic character is maintained. There is no evidence to suggest that the introduction of this care home would erode the residential character or amenity of the area. The existing building will retain its



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appearance, with no external alterations proposed that would suggest a non-residential use.

- 7.9 The property is well-integrated into the surrounding neighbourhood, in accordance with DMH8(iii). It is located within a well-established residential area and is visually and functionally indistinguishable from other properties in the vicinity. The home will be operated in a way that reflects typical family life, and the design and layout of the accommodation are consistent with that of a traditional dwelling, ensuring a comfortable and supportive environment for its occupants.
- 7.10 The site benefits from excellent access to public transport links and is in proximity to shops, schools, and community facilities. This sustainable location supports accessibility for both staff and residents, consistent with the locational criteria of the policy.
- 7.11 As required by DMH8(B), the proposal falls within Use Class C2 and will provide regulated levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). The operation of the home will be subject to statutory oversight by Ofsted and will adhere to national care regulations including the Care Standards Act 2000 and the Children's Homes (England) Regulations 2015. This ensures that care delivery will meet required standards and provide safeguarding for vulnerable children.
- 7.12 In summary, the proposal is compliant with all relevant aspects of Policy DMH8. It represents an appropriate, sustainable, and much-needed form of development that will deliver tangible social benefits without compromising the character or amenity of the surrounding area. The principle of development is therefore supported.

ii) Living Conditions of Neighbouring Properties



- 7.13 In relation to the change of use, the use of the property as a children's care home would continue to be residential in nature and would not be dissimilar to its use as a HMO (C4 use), which is a logical fallback position. The level of intensity will be more closely aligned to the residential use of the surrounding properties.
- 7.14 A maximum number of 4 children would be cared for at the application site. It is recognised that the proposed use of the site would be likely to result in a different pattern of occupation, activity and of comings and goings, compared to a HMO. Given the number of bedrooms and maximum occupancy level, which can be secured through condition, it is considered that there would not be so significant a degree of intensification as to be materially harmful in terms of noise and activity in the context of this site.
- 7.15 Overall, the proposal is found to be acceptable and policy compliant in respect of its impact on neighbouring occupier amenity and crime and anti-social behaviour.

iii) Transport

- 7.16 The main access to the site, both for pedestrians and vehicles, is currently direct from the highway and this will be retained. Entrance via the main entrance will be provided for all future occupants. Currently there is off street parking for 2 cars at the front drive. Given the nature of the staffing arrangements and the client group of residents (children aged 11-17) it is considered that while the pattern of usage may be different the overall parking demands from the development are likely to be neutral when compared to the existing situation at the site. The proposal will not have an adverse impact on transport and highway, given the access to sustainable forms of transport. As such the scheme is policy compliant.



8.0 Conclusion

- 8.1 Having taken all material planning considerations into account, it is found that subject to compliance with the attached conditions, the proposed development would be acceptable and compliant with the objectives of the relevant development plan policies and guidance. The proposal would have an acceptable impact on the amenities of neighbouring occupiers and the character and appearance of the application site, street scene and the locality more widely. There would be no materially adverse traffic, parking or highways impacts caused by the proposed development. The scheme would meet an identified need for such accommodation in the Borough and provide a reasonable standard of accommodation for future occupiers.
- 8.2 This statement has identified that the proposed development complies with national and local planning policy. The Council's decision on the planning application must be taken in accordance with the development plan unless material considerations indicate otherwise. In light of the scheme's accordance with the development plan, it is respectfully requested that planning permission is granted

