



LOCAL NEEDS ASSESSMENT REPORT

**Proposed Change of Use from C3 Dwellinghouse to C2 Children's Residential
Care Home (Up to 4 Children)**

5 Barnhill Lane, Hayes, UB4 9HD

Prepared by	V-Design CAD Services Limited
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Document Control

Item	Details
Document	Local Needs Assessment Report
Proposal	Proposed Change of Use from C3 Dwellinghouse to C2 Children's Residential Care Home (Up to 4 Children)
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1. Executive Summary

This Local Needs Assessment accompanies a planning application for the change of use of 5 Barnhill Lane, Hayes from a C3 dwellinghouse to a small C2 children’s residential care home for up to four children. The submitted drawings show four resident bedrooms, 24-hour staff facilities, communal accommodation, private garden, two car spaces, four cycle spaces, bin storage and an electric-vehicle charging point. No external elevation changes are proposed.

OVERALL CONCLUSION

There is verified evidence of continuing placement-sufficiency pressure in Hillingdon and policy support for supported and specialised accommodation that meets identified need. Subject to Ofsted registration, a tightly defined Statement of Purpose, robust operational controls and the plan clarifications identified in this report, the proposal can deliver substantial social benefit in a domestic setting without unacceptable planning harm.

Key findings

- Hillingdon’s published performance and risk reporting identifies constrained choice, high costs and increasing use of external residential placements for looked-after children.
- The London Plan expressly supports supported and specialised accommodation meeting identified need, including accommodation for young people with support needs.
- The four-place model is small in scale and capable of operating with the character of a supervised household, provided staffing, admissions, transport, visitors and safeguarding are controlled through an approved Operational Management Plan.
- The plans provide four child bedrooms: Rooms 1–3 at first floor and Room 4 in the loft. Ground-floor staff office/rest accommodation is separate from the resident bedrooms.
- Two on-site car spaces, four cycle spaces and EV charging are shown. Exact trip generation must remain tied to the final staffing rota and admissions model.

2. Purpose, Scope and Method

The report addresses the local need for children’s residential placements, the relevant planning and regulatory framework, the suitability of this particular property, likely amenity and transport effects, safeguarding considerations and the overall planning balance.

3. Site and Surroundings

The site is a two-storey dwelling with loft accommodation on the south-west side of Barnhill Lane, within an established residential area of Hayes. The submitted location and block plans show a conventional domestic plot between neighboring dwellings, with front hard standing and a private rear garden.

Planning judgement

A domestic property in an ordinary residential street can be suitable in principle for a small children’s home because it offers a homely setting and community integration. Suitability depends less on the label C2 than on intensity: admissions profile, staff numbers, shift changes, professional visits, vehicle movements, supervision and management.

4. Proposed Development and Drawing Review

The proposal is a material change of use from C3 to C2 for a maximum of four children. The submitted plans show internal alterations and fire-safety measures but state that the existing and proposed elevations are unchanged.

Element	Drawing evidence	Assessment / action
Resident accommodation	Rooms 1–3 on first floor: 15.46 m², 9.42 m² and 8.97 m²; Room 4 in loft: 20 m². Each is shown with an en-suite.	Four child bedrooms are identifiable. Confirm net usable areas and that sloping loft headroom is excluded where appropriate.
Communal space	Ground-floor kitchen/dining plus living room (10.86 m²).	Combined provision appears capable of supporting domestic routines, but furniture layouts and usable area should be

		confirmed. Avoid treating bedrooms as substitutes for communal space.
Staff facilities	Ground-floor office (8.00 m ²), staff rest area (10.00 m ²), shower/WC.	Supports 24-hour management. Clarify whether the rest room is a sleep-in room, waking-night base or both, and the maximum staff present overnight.
External amenity	Private rear garden retained.	Positive for recreation and wellbeing. Provide boundary, supervision and maintenance controls in the OMP.
Parking / cycles	Two car spaces, four cycle spaces, EV charging and bin storage.	A reasonable physical provision for a small home, subject to a staffing/visitor schedule and safe manoeuvring.
External appearance	No changes to elevations.	Limits design and streetscape effects; any signage, lighting, CCTV or security apparatus should remain domestic and discreet.
Fire / escape	FD30 doors, alarms, emergency lighting and protected escape route are annotated.	Positive indication only. Building Regulations, fire-risk assessment and Ofsted registration remain separate statutory processes.

5. Statutory and Regulatory Context

Children Act and sufficiency duty

Section 22G of the Children Act 1989 requires a local authority to take steps, so far as reasonably practicable, to secure sufficient accommodation within its area for looked-after children whose circumstances make local placement consistent with their welfare. The duty does not create an automatic planning entitlement, but it is relevant evidence of the public interest in a diverse, good-quality local placement market.

Children's Homes (England) Regulations 2015

A children's home must be registered with Ofsted before operating. The Regulations and statutory Guide establish Quality Standards covering the purpose and quality of care, children's views, education, enjoyment and achievement, health and wellbeing, positive relationships, protection, leadership and management, and care planning.

Location assessment and safeguarding

Regulation 46 requires the registered person to review the appropriateness and suitability of the home's location at least annually, taking account of safeguarding risks and access to services. The planning assessment and the Ofsted location assessment are complementary but distinct. Planning permission does not predetermine Ofsted registration.

Inspection

Ofsted's current Social Care Common Inspection Framework focuses on children's experiences and progress, help and protection, and the effectiveness of leaders and managers. Registration, recruitment checks, staff competence, policies, records and safeguarding practice are operational requirements and should not be presented as secured merely by land-use permission.

6. Verified Evidence of Local Need

Council evidence

Hillingdon's Annual Performance Report 2024/25 states that external residential placements and high-cost placements increased through the financial year and represent a significant proportion of the Children's Social Care budget. It explains that monitoring is intended to support more local and sustainable options.

The Council's 2025 corporate risk reporting records an Education and Care Placement Sufficiency risk. It identifies inflated costs and lack of choice in residential and independent-fostering provision, with potential effects on financial stability and regulatory outcomes. The identified actions include the Charville residential project and wider placement-market work.

Hillingdon's SEND and Alternative Provision Sufficiency Strategy 2025–30 records more than 3,500 children and young people with an Education, Health and Care Plan and forecasts growth. SEND educational sufficiency is not

the same as residential-care demand, but it is relevant context because some looked-after children require coordinated education, health and care support.

Reasonable conclusion

Taken together, these primary sources verify a strategic placement-sufficiency pressure and a policy objective of creating more appropriate local options. They do not verify that every new private home will meet commissioning requirements. The final provider must demonstrate a credible Statement of Purpose, referral criteria, workforce model and engagement with placing authorities.

7. Existing Provision and Market Context

Public Ofsted inspection records confirm that children's homes operate within the Hillingdon local-authority area, including small homes whose names and addresses are withheld. Hillingdon also operates residential services, including disability respite/short-to-medium-term provision and services for local young people and unaccompanied asylum-seeking children.

The existence of other homes does not negate need. Placement matching is highly specific: age, sex, safeguarding compatibility, education, disability, therapeutic needs, peer mix, location, legal status and staffing all affect whether a place is usable. Conversely, planning permission should not be justified by unverified statements that existing homes are at capacity.

Planning judgement

A four-place home can add useful flexibility to a constrained market, particularly where its Statement of Purpose addresses an identified cohort and it maintains stable staffing. Weight is appropriately given to the type and quality of provision, not merely the gross number of beds.

8. National, London and Hillingdon Planning Policy

Policy / material	Relevance	Assessment
NPPF (Dec. 2024)	Presumption in favour of sustainable development; meeting needs; healthy, inclusive and safe places; high-quality design; transport, amenity, noise and flood risk.	The social benefit attracts weight, but does not displace normal site-impact tests.
London Plan GG1, GG3, GG4	Strong and inclusive communities; health; homes Londoners need.	Supports inclusive provision and local access to services.
London Plan H12	Delivery, retention and refurbishment of supported and specialised accommodation meeting identified need should be supported; expressly includes young people with support needs.	Strong policy support where need and suitability are demonstrated.
London Plan D3, D5, D11, D14	Design-led approach, inclusive design, safety/security, noise.	No external change; operational and security measures must remain proportionate and domestic.
London Plan T5, T6, T6.1	Cycling and parking standards / management.	Four cycle and two car spaces are shown; assess against final operation.
Hillingdon Part 1 BE1	High-quality built environment and amenity.	Compatible subject to design and management controls.
Hillingdon DMH8	Sheltered housing and care homes: need, appropriate location, accessibility and impact.	Evidence supports need; site and operational suitability must be secured.
Hillingdon DMHB11	Design of new development and local context.	External form is unchanged; domestic character should be retained.
Hillingdon DMHB16	Housing standards / internal and external amenity.	Useful benchmark for living quality, although C2 is not ordinary C3 housing.
Hillingdon DMHB18	Private outdoor amenity space.	Rear garden is retained.
Hillingdon DMHB12 /	Neighbour amenity, transport and highway	Impacts depend on staff/visitor/travel management.

DMT1 / DMT2	safety.	
Hillingdon DME114	Air quality.	EV charging and active travel help; avoid unnecessary vehicle trips.

9. Site Suitability and Quality of Accommodation

Domestic character

The unchanged elevations, modest capacity and retained garden support a homely rather than institutional character. Any future external cameras, lighting, alarms, fencing or signage should be sensitively located and no more extensive than necessary for safeguarding.

Internal layout

Four individually identified en-suite bedrooms and separate communal/staff functions are shown. Room 3 is annotated 8.97 m² and Room 2 9.42 m²; these are relatively compact. There is no specific national planning space standard for C2 children's bedrooms, but the applicant should demonstrate that each room accommodates a full-size bed, storage, desk/study provision, circulation and personalisation without crowding.

The 10.86 m² living room is supplemented by a substantially larger kitchen/dining area. The provider should confirm maximum occupancy of communal rooms, quiet/homework space and how children can spend time together or separately. The loft room requires confirmation of usable headroom, safe escape and thermal comfort.

10. Residential Amenity, Noise and Neighbour Relations

The relevant planning issue is the effect of the land use, not assumptions about children in care. There is no evidential basis to presume antisocial behaviour because of residents' protected or personal circumstances. Potential effects arise from the operational intensity: staff arrivals, shift overlap, visitors, deliveries, vehicle doors, garden use, alarms and waste collection.

Controls recommended

- Maximum of four resident children and a defined maximum number of staff present by day and night.
- Staggered shift changeovers outside sensitive early-morning/late-evening periods where practicable.
- Pre-arranged professional and family visits, with a visitor log and no routine congregating outside.
- No amplified music outdoors; supervised garden use consistent with ordinary residential expectations.
- Complaint contact displayed privately to immediate neighbours and a written escalation/response log.
- Domestic-scale waste storage/collection and no commercial servicing at anti-social hours.
- A condition requiring operation in accordance with the approved OMP, with material changes requiring written approval.

With these controls, the small scale and domestic form make unacceptable noise or disturbance unlikely. This is a planning judgement contingent on the final OMP.

11. Transport, Parking and Accessibility

The plan provides two on-site car spaces, four cycle spaces and active/passive EV charging. Children may travel to education, family contact, health appointments and activities by a mixture of staff vehicle, taxi, walking and public transport. Staff and professional visits will add movements compared with a family dwelling.

Information required in the transport/OMP package

- A day/night staffing schedule, shift times and maximum overlap.
- Expected manager, social-worker, therapist, inspector, maintenance and family-visitor frequency.
- Resident school-transport assumptions and arrangements for emergency/unplanned journeys.
- Parking allocation, visitor protocol, cycle-store design and refuse access.
- Confirmation that vehicles can enter/leave safely and that the parking layout is dimensioned.
- A commitment to prevent displacement parking, monitor travel complaints and promote walking, cycling and public transport.

On the available plans, the physical parking/cycle offer is proportionate. A definitive no-harm conclusion should be tied to the numerical operational schedule rather than generic comparisons with C3 occupancy.

12. Safeguarding, Community Safety and Equality

Safeguarding is primarily governed through children's social-care law, Ofsted registration and the home's policies. Planning can support safe design and secure appropriate operating parameters but should avoid publishing information that would identify vulnerable children or confidential security arrangements.

Location and operating safeguards

- Complete an Ofsted-compliant location assessment before registration and review it at least annually.
- Consult the police, Hillingdon safeguarding partners and relevant commissioning teams on contextual risks, missing-from-care protocols and local services.
- Use proportionate access control, lighting and CCTV; do not aim cameras into neighbouring private areas.
- Maintain safer recruitment, DBS checks, training, supervision, incident reporting and 24-hour management escalation.
- Adopt individual placement plans, compatibility/risk assessments and clear admissions/exclusion criteria.
- Keep resident and home information confidential in public planning material.

Public Sector Equality Duty

Children in care may have protected characteristics, disabilities or trauma-related needs. Decision-making should be based on objective land-use impacts and avoid stigma. Providing accommodation within an inclusive community can advance equality of opportunity, while any design limitations must be candidly addressed.

13. Planning Balance

Consideration	Weight / conclusion
Local need and social infrastructure	Substantial positive weight: verified strategic sufficiency pressure and policy support.
Four local placements	Positive weight, subject to provider quality, commissioning fit and Ofsted registration.
Design / character	Neutral to positive: no elevation changes and domestic scale.
Living conditions	Potentially acceptable; requires furniture/headroom/communal-space confirmation and Building Regulations/Ofsted approval.
Neighbour amenity	Acceptable in principle with occupancy, staffing, visitor, garden and complaint controls.
Highways / parking	Acceptable in principle based on two spaces/four cycles, subject to quantified operational schedule.
Safeguarding	Capable of being addressed through location assessment, Ofsted registration and OMP; confidential detail should not be public.

14. Recommended Planning Conditions and Submission Actions

Suggested condition heads

- Use restricted to a children's residential care home within Class C2 for no more than four resident children; no other C2 use without permission.
- Operation in accordance with the approved Operational Management Plan, including staffing maxima, shift pattern, visitors, transport, garden, waste, complaints and incident liaison.
- Cycle parking, car parking, EV charging and refuse storage installed before occupation and retained.

- No occupation until the provider has obtained all registrations legally required for the proposed operation.

15. Sources and References

Primary and authoritative sources accessed 29 July 2026. URLs are provided for verification.

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13. Ofsted, Children's social care registration guidance. <https://www.gov.uk/government/collections/childrens-social-care-registration>
14. V-Design CAD Services Ltd, drawings PL-01–PL-06, Job Ref. 26101V, July 2026. Applicant-supplied drawing package.