

**Town and Country Planning Act 1990  
(As Amended)**

**Planning Statement**

**Proposal:** Change of use of Dwellinghouse (Class C3a) to a Care Home for up to 4no. Children (Class C2)

**Site:** 206 Nestles Avenue, Hayes, UB3 4QG

**Applicant:** Barclay Care Group Limited

**Our Ref:** BAR39035/2/5

**Document date:** October 2025

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## APPENDIX A – DETAILS OF STAFF TRAINING PROGRAMMES

## **1. INTRODUCTION**

- 1.1 This Planning Statement supports a planning application proposing the change of use of a five-bedroomed semi-detached dwelling to provide a care home to care for up to 4no. young persons aged between 8-18 years of age ('the Proposal') at 206 Nestles Avenue, Hayes, UB3 4QG ('the Site').
- 1.2 Barclay Care Group Limited ('the Applicant') has substantial experience in the care industry. The applicant has identified a strong leader which intends to appoint as the Registered Individual of the home. The individual has worked at every level within the sector, including managing multiple homes, with a particular emphasis on children with Emotional and Behaviour Difficulties. Along with a decade of experience, the individual holds a Level 3 qualification in Residential Childcare and a Level 5 in Leadership and Management. He has contributed to the set-up of multiple successful care homes, providing essential care and guidance to children in residential settings. He will build upon his extensive track record as an effective strategic leader to enable brighter futures for children and young people.
- 1.3 This planning application is supported by the following documents:
  - Location Plan, Block Plan and Existing Plans & Elevations (drawings EP01 – EP06)
  - Location Plan, Block Plan and Existing Plans & Elevations (drawings PP01 – PP06)

- 1.4 This statement concludes that when all material planning considerations are weighed in the balance, the proposed development is in accordance with planning policy and that planning permission should be granted in accordance with Section.38 (6) of the 2004 Planning and Compulsory Purchase Act.

## **2. PROPOSED DEVELOPMENT AND NATURE OF OPERATIONS**

- 2.1 The Proposal would provide medium to long term accommodation (i.e. a minimum of 6 months) for up to four young persons aged between 8-18 years of age with emotional behavioural difficulties. This range is broad as it enables the applicant to look at the individual young person and make an assessment of their needs and whether they can help them in their home. The house would function similar to a family set up, where the carers would in essence act as corporate parents. The home will address the needs of the child in a sensitive, structured, and consistent way to encourage personal growth and a sense of responsibility and problem-solving skills that help them achieve their aspirations and life goals.
- 2.2 The aim is to provide a stable home environment for the occupant as their main and sole residence and that the length of stay is generally more than temporary or passing. It would not be a 'half way' house or provide overnight emergency lodgings for example.
- 2.3 The applicant will care for vulnerable young people with a professional staff team trained to work with young people with complex backgrounds who may have been victim of trauma and abuse. Details of the staff training programmes are summarised in **Appendix A**.

- 2.4 The young persons would have been admitted to the home due to family crisis/breakdown, foster placement disruption, serious behavioural/mental health needs and child exploitation. Residents are selected and assessed in order to promote the formation of a good relationship between each other. This longer-term arrangement provides stability to the residents and enables the young persons to integrate properly into the community and build strong relationships with their carers. The application will give children from the London Borough of Hillingdon priority to ensure that they are able to live close to their home and family where possible.
- 2.5 Where possible the applicant works to return young person's home, and they encourage family contact in the family setting (i.e. not at the property).
- 2.6 The applicant considers that such properties can offer a better environment than would be the case in larger institutions as they enable individual needs to be met and allow children to integrate into their community and live as equal citizens. Indeed, this is something that is endorsed by Ofsted (the regulator).

### **3. ASSESSMENT AGAINST PLANNING POLICY**

- 3.1 The Site is located within a predominantly residential area and is not subject to any other land use designations.
- 3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states;
 

*"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."*
- 3.3 Furthermore, paragraph 11 of the National Planning Policy Framework ('the Framework') emphasises the importance of decisions applying the presumption in favour of sustainable development and that development that accords with an up-to-date development plan should be approved without delay. Paragraphs 131 and 135 of the Framework also emphasise the importance of good design and protecting residential amenity. Paragraph 116 states that *"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".*
- 3.4 Paragraph 96 of the Framework also states that:
 

*"Planning ... decisions should aim to achieve healthy, inclusive and safe places which promote social interaction ... are safe and accessible ... [and] enable and support healthy lifestyles, especially where this would address identified local health and well-being needs"*
- 3.5 Most importantly, paragraph 61 of the Framework sets out that the Government's objecting is to significantly boost the supply of homes. However paragraph 63 goes on to states that:

3.6 “Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.” [Knights’ emphasis]

3.7 Footnote 26 sets out that “evidence of need for looked after children can be found in the relevant local authority’s Children’s Social Care Sufficiency Strategy”.

3.8 Policy DMH8 ‘Sheltered Housing and Care Homes’ of the Local Plan sets out the criteria that needs to be met for residential care homes and other supported housing can be supported. These are as set out below and responded to in turn:

- “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” – The applicant has undertaken a search of the Council’s planning portal and can confirm that there are no other children’s care homes in the immediate surrounding area (i.e. along Nestles Avenue, Gordon Crescent, Harold Avenue or North Hyde Road). In any event, small care homes like the one proposed are required to operate in a way as close as possible to a normal family home; as a result the impact of such care homes would not be detrimental to the character or amenity of the surrounding. Policy DMH4 is not relevant in this instance as it relates to the sub-division of houses to flats.
- “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” – It will be demonstrated later on that there is an identified need for children’s care homes within the Borough.
- “the accommodation is fully integrated into the residential surroundings” – The nature of this use would be that it is imperative that the property continues to appear and operate as close as possible to a standard family home. This is a requirement from Ofsted the regulator.
- “in the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport” – This proposal is not for sheltered housing, but nevertheless it is located in close proximity to services and facilities in order to meet the day-to-day needs of the children in care.

#### Identified Need – Principle of Development

3.9 In addition to Policy DMH8 of the Local Plan, Policy H12 of the London Plan ‘Supported and specialised accommodation’ supports specialised accommodation for young children with support needs.

3.10 The latest revision of the National Planning Policy Framework (published on 12 December 2024) includes the need to provide specialist housing specifically for 'looked after children' within the new paragraph 63 as one of the specialist groups in which housing should be provided where there is an established need. The LPA have accepted through recently granted planning applications for similar proposal that there is an established need for children's care home in the Borough. A recent example is a planning permission at 36 Moor Park Road, Northwood (LPA ref. 77170/APP/2024/1240) which was granted on 27 February 2025 where the committee report included a consultee response from the Children's Social Care Team which stated:

3.11 "*From the children's service perspective, we know there is a need for residential children's care homes nationally and locally and there are great benefits for Hillingdon children looked after to be living in the borough. Providing that the arrangements proposed are approved by Ofsted as the regulators, the Social Care team would support the application from the perspective of residential homes sufficiency.*" [Knights' emphasis]

3.12 Furthermore, Ofsted produced a Research and Analysis report entitled 'What types of needs do children's homes offer care for?' on 8 July 2022. This report states that "*children's homes were not evenly distributed across the regions of England, and there were no close relationships between the children's needs, where the homes were situated and what needs those homes met*". It states that in March 2020, 41% of all children in care lived outside of their home authority. Ofsted confirm that for most regions there is a shortage of care home places relative to number of children placed in that region, with London having the lowest percentage of care homes as it placed 11% of all children living in children's homes, but had only 5% of homes. This document confirms that on average children in care in London on average are located 54 miles from their home.

3.13 Therefore in light of the recent changes to National Planning Policy Framework the provision of specialised housing to cater for looked after children now holds substantial weight which should be taken into account in the overall planning balance when considering this planning application.

3.14 The committee report for 77170/APP/2024/1240 also confirmed (at paragraph 9.7) that the Planning Policy department were satisfied that the loss of a family house was acceptable in these exceptional circumstances due to the identified need for the children's care home.

3.15 It is therefore considered that the principle of development is acceptable.

#### Technical considerations

3.16 Paragraph 124 of the National Planning Policy Framework seeks to "*promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and securing safe and healthy living conditions*". As set out previously, the proposed development would operate in a very similar fashion to a family home and would involve infrequent shift patterns that would be focused outside peak traffic times and activities that would not adversely affect the amenities of neighbouring residents.

3.17 Policy DMHB 11 of the Local Plan seeks to protect local amenity and the LPA have consistently confirmed that the nature of small care homes for young persons would operate in a very similar way to a family home, and would therefore not result in an adverse impact on the amenity of local residents by way of the operations within the site and the associated comings and goings of staff (i.e. during shift change overs) and the children going about their normal day-to-day operations.

3.18 The proposed development would utilise the ground floor front room and three of the existing bedrooms on the first and second floors as the bedrooms for the children, with the two spare rooms on these floors used by the carers who would sleep over at the property. The remaining ground floor rooms would be used as communal rooms as shown on the proposed plans. A filing cabinet would be contained within the office on the ground floor containing a laptop (containing electronic files) and paperwork. The only internal alterations would be the installation of fire doors and fire extinguishers in order to adhere with fire regulations.

3.19 The application site would typically operate with two carers working on a 48-hour shift pattern which would be staggered with carers starting and finishing their shifts on alternate days. These two carers would sleep at the property. The number of overall staff would be small (i.e. up to 8no. in total) in order to provide continuity with the children and to create a family environment. Dependent upon the needs of the particular child there may be a requirement for an additional (third) carer during the day and a 'waking night' carer at night however this would be a short-term occurrence during rare occasions when a child requires it as part of their care plan (and will be expanded on later on in this report).

3.20 This shift pattern mirror those of many working families. It should be noted that there is some flexibility in shift handovers (particularly as some staff may finish their shift once the children are dropped off at school and may only need to start their shift at school pick-up time). This ensuring that shift change overs occur outside peak traffic hours. The small group of carers will quickly adapt to the familiar handovers and ensure efficiencies.

3.21 On rare occasions (depending upon the needs of the children at the time) it may be necessary for a third carer to attend during the day shift (who would leave once the children are settled to sleep). In other occasions, there may need to be an additional 'waking night' carer who would arrive once the child is asleep and would leave in the morning. These requirements for additional staff typically occur for short periods of time when a child is settled into the property and is required less frequently when that particular child settles in. On this basis, it is requested that the planning permission is not restricted to allow only 2 carers at any time in order to provide for this contingency. This additional staff member would not materially affect residential amenity.

3.22 The proposal would not generate significant levels of traffic. The proposal will not result in increased vehicle movements to and from the site, given that the property would technically still function as a single residential dwelling, which if occupied by a family would generate a similar amount of (if not more) vehicle movements, and at similar times to the proposed shift patterns.

3.23 Policy DMT 6 'Vehicle Parking' of the Local Plan sets out car parking standards for new development, however it is important to note that the justification text to this policy expresses these standards as maximum standards (with no minimum standards set). This aligns with paragraph 113 which states that "*maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport*". Appendix C sets out that for 'residential institutions (including care homes)' that there should be a minimum of 2no. car parking spaces and that typically this 1 space should be provided for every three members of staff. However, these standards appear to be based on larger scale residential institutions, and it is therefore considered that a more site specific assessment is required for smaller care homes such as this one.

3.24 The site provides 2no. off-street parking spaces on the driveway, and an EV charging point to be installed. Parking on the highway is reserved for permit holders, and restricts the ability for additional staff to park on the road in front of the site in any event. In the case of this proposal, staff would be recruited locally and would use a combination of train, bus, cycle, and walking to travel to/from the application site (for instance there are bus stops a 3 minute walk away on the junction of North Hyde Road and Roseville Road and is a 12 minute walk to Hayes & Harlington station on the Elizabeth Line). The site will provide 2 cycle sheds with 2 spaces each (4 in total). Staff will be incentivised to use public transport and cycling to get to work as part of their employment. Where staff choose to use a car this would be pre-agreed between the staff (managed by the site manager) to ensure that this is not over subscribed. In any event, shift changeover would take place outside of peak hours and would enable staff finishing their shift to drive away once the children are at school and for the incoming staff to arrive later (with incoming staff typically doing other tasks off-site (such as shopping) before coming to site).

3.25 The application site is located in an area with a PTAL ranking of 2 indicating that access to public transport is 'moderate'. However, this will be updated soon as a new bus route is planned which will run the length of Nestles Avenue, which will improve the scoring further.

3.26 At weekends (when the children are at home) the shift patterns would be subtly different and would be timed around the children's weekend activities (i.e. day trips, hobbies or visiting friends and family) to avoid instances where excessive car parking would occur on the street. Visits with family members would be prearranged and would take place in neutral locations away from the care home.

3.27 Each home has a registered manager who oversees the running of the home to meet the relevant regulatory standards. Their role is to provide more senior input and on many occasions, some of their tasks can be undertaken remotely so they can often work from home or head office. They would typically attend the property 3-5 times a week, as and when required (generally between the hours of 10am and 4pm when the children are at school). The role of a 'Registered Manager' is also one that is required by Ofsted and is not involved in direct caregiving. They are a senior member of staff who are more qualified (i.e. hold a level 5 children's residential care qualification - whereas the other staff would hold a level 3 qualification). The site manager would typically visit the site via public transport as their work

hours (i.e. normal working week hours) are conducive to use the available bus and train services nearby.

- 3.28 The children attending this care home would typically attend a local mainstream school. Children in care typically have access to taxis to be taking to and from school (when beyond normal walking distances) which again minimises the need for staff carers to move to and from site during these times. The children would not be home-schooled nor would they have any educational requirements which would require additional extra-curricular education.
- 3.29 Ad hoc visits would occur from professional care workers i.e. there may be occasions where visiting professionals who oversee the care needs of the young person make appointments to visit the property (i.e. social care workers). They tend to request that the registered manager is present at these meetings. These typically last only a few hours at a time and are not usually a regular occurrence (i.e. typically once every four to six weeks). These visits would be arranged outside peak traffic hours and shift change overs (and they would be directed towards using the nearby public car parks or public transport modes in advance of the meetings).
- 3.30 As mentioned previously, the running of this care home would be undertaken as close as possible to that of a normal dwellinghouse. Any staff training or meetings would take place off-site and the child would also visit healthcare professionals off-site as per a normal family operation (i.e. doctors, dentists, etc.). As well as the children being placed in the local school in the catchment area, they would also utilise services and facilities in the surrounding area. At all times when outside of the property, the children would be accompanied by at least one carer. As stated previously, the children would not require any additional education requirements over and above a typical child.
- 3.31 As set out previously, given the nature of the children in care (who have been removed from care of their parents), contact with parents and other family members or friends is strictly controlled. Any contact with parents and other parties would be managed in a very carefully controlled way, carried out in coordination with local authority social care teams, under supervision and in a neutral location (i.e. not on site). For the children in care at this premises, there would be no on-site family visits. In light of the above, it is considered that the proposal would not result in an adverse impact on highway safety and would satisfy the transport policies contained within the Local Plan and the London Plan, as well paragraphs 113 and 116 of the National Planning Policy Framework. It is important to note that the LPA have accepted previously (including in planning permission 76090/APP/2024/552 which approved a care home for four children with four staff present at 24 Douglas Crescent, Hayes granted on 2 July 2024) that accepted that 2 off-street parking spaces to serve 2 carers would be acceptable.

#### **4. SUMMARY AND CONCLUSION**

- 4.1 In conclusion, the operations associated with this proposed development would be barely discernible from the extant use of the building as a five-bedroom dwellinghouse. Indeed, no external alterations are proposed to the property and the operations of care home. The proposal is considered to be acceptable in respect of both residential amenity and highway safety.

4.2 This planning application should also be viewed in light of the increased local demand for small children's care homes within the London (and across the country as a whole), the demand has already been accepted by the Council's Children's Social Care Team in recent care home planning applications. This policy compliant proposal would help to meet this shortfall and would provide a care home that would integrate positively into the local community. This need carries substantial weight in the planning balance. There are also economic benefits including the creation of in the region of 8 jobs through the employment of carers at this home; paragraph 85 of the National Planning Policy Framework states that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development".

4.3 It has been demonstrated that the proposal would operate as close as possible to a family home. Therefore, even if the LPA considered that there is some harm associated with residential amenity or highway safety, it is considered that this harm is 'limited' at most and should accordingly be attributed minimal weight in the overall planning balance; therefore having minimal impact on. When considering the proposal in the overall planning balance, it is considered that such limited harm would not outweigh that the benefits that this proposal would bring forward (as has been accepted in the aforementioned planning applications).

4.4 In light of the above, it is considered that the proposal would accord with the policies contained within the Local Plan, the London Plan and the National Planning Policy Framework, and would comprise sustainable development, and as such, in accordance with Section 38(6) of the 2004 Planning and Compulsory Purchase Act, planning permission ought to be granted.

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**Knights**

**OCTOBER 2025**

## APPENDIX A – DETAILS OF STAFF TRAINING PROGRAMMES

### **Trauma-Informed Practice**

- Staff are trained to understand how trauma affects children's behaviour, emotions, and development.
- Every interaction is grounded in empathy and sensitivity, with a focus on helping children feel safe and understood.
- Regular reflective sessions encourage staff to adapt care approaches to each child's emotional history.

### **Relationship & Trust Building**

- Staff use therapeutic approaches such as **PACE (Playfulness, Acceptance, Curiosity, Empathy)** to build trusting, meaningful connections.
- Consistent routines and reliable adult presence create a secure base from which children can emotionally grow.
- Life story work helps children make sense of their experiences and develop self-worth.

### **Mental Health Support**

- Emotional health is prioritised through access to on-site or external counselling and therapy services.
- Staff are trained to spot early signs of anxiety, depression, or behavioural disorders, and work closely with mental health professionals.
- Well-being check-ins and resilience-building activities are a regular part of daily care.

### **Therapeutic & Expressive Programmes**

- Art therapy, music sessions, and creative writing workshops allow children to process emotions and express themselves safely.
- Physical activities like yoga and mindfulness help regulate mood and reduce stress.
- Group work fosters peer support and social skills development.

### **Behavioural Support with Empathy**

- Positive Behaviour Support programmes help staff understand challenging behaviour as a form of communication.
- De-escalation techniques are rooted in compassion, never punishment.
- Staff celebrate achievements and progress, reinforcing self-esteem and emotional growth.

### **Inclusive & Individualised Care**

- Each child has a personalised care plan that reflects their emotional needs, cultural background, and personal preferences.
- Staff use observation and feedback to continually tailor care approaches.
- Diversity and identity are respected and embraced, creating an environment where all children feel seen and valued.