

PLANNING AND OPERATIONAL MANAGEMENT STATEMENT

74 Longmead Road, Hayes, UB3 2HG

Application for a Certificate of Lawfulness for a Proposed Use or Development (Section 192 of the Town and Country Planning Act 1990)

Proposal: Certificate of Lawfulness for a Proposed Use – Change of Use from a Single Dwellinghouse (Use Class C3) to a Residential Care Home for up to 4 Adults with 1 Care Assistant Living Together as a Single Household (Use Class C3(b)).

1. Introduction & Background

This statement is submitted in support of an application for a Certificate of Lawfulness for a Proposed Use or Development (CLOPUD) at 74 Longmead Road. A previous full planning application (Ref: 61428/APP/2026/867) seeking a change of use to Class C2 (Children's Care Home) was refused by the London Borough of Hillingdon on 16th June 2026.

The previous C2 application was refused due to concerns regarding the loss of a C3 family dwelling, lack of local authority needs evidence, intense shift/visitor management patterns, substandard outdoor amenity space, and potential parking displacement on Longmead Road.

This revised proposal fundamentally alters the legal and operational framework of the site. Rather than introducing an institutional Class C2 care facility, the applicant intends to operate the property strictly within **Use Class C3(b)** (dwellinghouses used by not more than six residents living together as a single household where care is provided for residents). Because the property will maintain its character as a single, shared domestic household, the change from Class C3(a) to Class C3(b) does not constitute a "material change of use" under Section 55 of the Town and Country Planning Act 1990. Therefore, the proposed use is lawful as permitted

development and does not require full planning permission.

2. Physical Property Description & Layout Standards

The application site comprises an established mid-terrace residential dwelling which has been previously extended via a single-storey rear extension and a rear dormer loft conversion. The internal configuration has been optimized to fully support 4 residents and 1 carer while maintaining a standard domestic environment:

- **Ground Floor Communal Space:** The ground floor provides an expansive, open-plan kitchen, living, and dining area measuring a combined 37.6 sqm. This significantly exceeds the minimum standard set by the Technical Housing Standards – Nationally Described Space Standard, which prescribes an area of 29sqm for a 5-person household. This generous communal layout prevents institutional crowding and ensures high-quality indoor living. The ground floor also includes a large, independent shower room for ease of accessible use.
- **First Floor Accommodation:** The first floor accommodates three bedrooms (designated for residents) and a shared central family bathroom. The layout ensures each bedroom meets or exceeds all relevant spatial parameters for single occupancy.
- **Loft Level Accommodation:** The loft floor provides a large bedroom of 24.8sqm featuring dedicated en-suite facilities. This represents the largest single room in the house.
- **Carer Bedroom Facility:** The front ground floor room, measuring 8.7 sqm, will serve as the dedicated bedroom for the live-in carer. This room remains integrated within the main envelope of the dwellinghouse, ensuring immediate proximity and domestic overnight support.

3. Repurposing of the Outbuilding & Amenity Space

A major objection in the refused Class C2 officer report concerned the inadequate standard and small size (approx. 40–44 sqm) of the private rear garden, which was further compromised by the previous proposal to locate the carer's living quarters inside the detached outbuilding.

Under this C3(b) proposal, the detached rear outbuilding will not be used for

primary residential accommodation. It has been entirely decoupled from sleeping or live-in arrangements. Instead, it will function as an ancillary store, administrative office, and physical gymnasium for the exclusive use of the residents. It features an integrated en-suite facility for convenience.

Crucially, the outbuilding is directly accessible via an existing side alleyway. This side access allows visiting managers or specialist therapists to enter the office/ancillary space directly without tracking through the main house, its kitchen, or the private dining spaces. This layout protects the domestic privacy and calm environment of the residents inside.

By moving the carer inside the main dwelling envelope and retaining the outbuilding strictly for quiet, ancillary recreation and storage, the garden is restored to a functional, low-intensity domestic courtyard, resolving the previous reasons for refusal under Policy DMHB 18.

4. Operational Model: The Single Household Test

To qualify under Use Class C3(b), the residents must live together as a single household. The operational model for 74 Longmead Road is structured explicitly around this definition:

- **Resident Profile:** The property will home 4 adults who require a stable, domestic environment due to specific care needs.
- **Live-in Care:** One dedicated carer will reside full-time within the property, occupying the 8.7sqm ground-floor room. The care model mirrors a traditional family dynamic where cooking, laundry, dining, and cleaning are undertaken collectively.
- **Absence of Institutional Character:** There will be no commercial signage, internal fire-door separation mechanisms that break domestic flow, or defensive office counters inside the main house. The property will operate indistinguishably from any surrounding family home on Longmead Road.

5. Highways, Parking, and Sustainability

The refused C2 application cited a lack of transport data and concerns over visitor/staff parking displacement. This C3(b) application confirms the following infrastructure:

- **On-Site Vehicle Parking:** The hard-paved front garden accommodates two off-street car parking spaces. Because the 4 adult residents do not own private motor vehicles due to their care requirements, these two spaces are entirely sufficient to accommodate the live-in carer's vehicle and any scheduled, infrequent visits from a manager or healthcare professional.
- **Cycle Parking:** Secure and sheltered cycle storage is provided on-site, fully complying with Hillingdon Local Plan Policy DMT 6.
- **Low Traffic Intensity:** Because the staff pattern relies on a single live-in carer rather than large shift handovers of multiple commercial workers, the traffic profile is lower than or equal to a typical C3(a) family home, resulting in a completely neutral impact on local parking stress.

6. Legal Framework & Conclusion

The Town and Country Planning (Use Classes) Order 1987 (as amended) explicitly establishes Use Class C3(b) to enable individuals needing care to live within conventional residential areas without facing the planning hurdles associated with commercial institutions (Class C2).

Case law (such as *North Devon DC v First Secretary of State [2003]*) confirms that where residents live together as a single household and receive care, the use falls squarely within Class C3. Since the transition from Class C3(a) to Class C3(b) is explicitly permitted within the same overarching Use Class, it does not constitute a material change of use.

The proposal effectively overcomes the previous C2 refusal by:

1. Re-integrating the carer into the main dwellinghouse envelope.
2. Eliminating residential use from the rear outbuilding.



104 Oaks Lane, Ilford, Essex, IG2 7PX
079 0386 5705 info@livarch.co.uk
www.livarch.co.uk

3. Establishing an ancillary office/gym with side-alley access to eliminate internal tracking disturbance.
4. Providing dedicated parking for two vehicles to satisfy local highway conditions.

Therefore, the Local Planning Authority is respectfully requested to issue a Certificate of Lawfulness for the proposed use.