

## Planning Statement

28 The Drive, Hillingdon, UB10 8AF



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## **1.0 Introduction**

### **1.1 Brief**

1.1.1 The intention of this document sets out a proposal for a change of use application at the detached property at '28 The Drive, Hillingdon, UB10 8AF'.

1.1.2 The proposal involves the Change of use from a dwelling house (class C3) to a Children's Residential Care Home (Class C2) for up to three children.

1.1.3 The proposal would be in keeping with the locality and designed to a high standard to meet current policies and building regulations. Careful consideration of the context ensures there would be no adverse impact on any neighbouring amenity or street scene.

1.1.4 The Planning Statement introduces the proposal and sets out in detail the existing context and approach in accordance with local planning policy and guidance.

1.1.5 The proposal is based on information provided by the applicant which includes up-to-date and accurate information on business operations, and a digitally measured survey ensuring all existing and proposed drawings have been accurately recorded, which includes the measurement of existing properties, boundaries, and windows.

### **1.2 Site Description**

1.2.1 The application site comprises a four-bedroom single-storey detached bungalow and is set back from the frontage with an area for hardstanding.

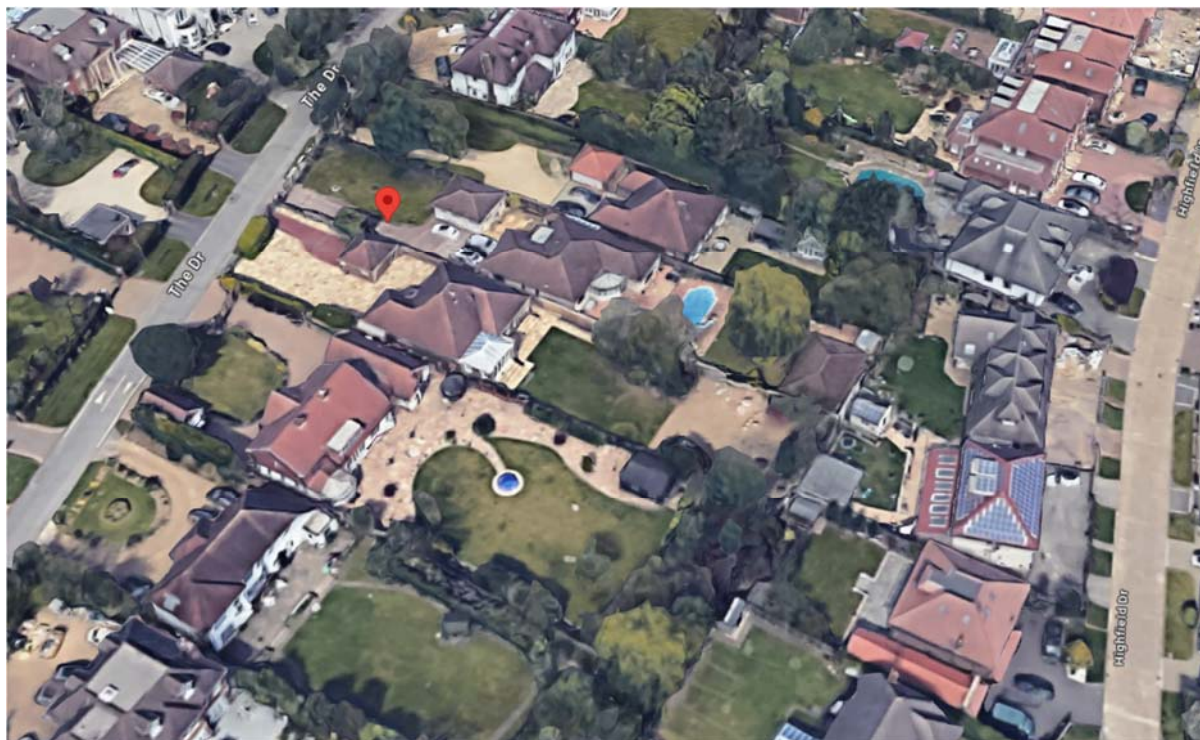
1.2.2 The forecourt fronting onto The Drive is covered by hardstanding that provides off-street parking. Toward the rear lies a generously proportioned landscaped garden. The property also benefits from an outbuilding located at the rear end of the garden and a single-storey rear extension.

1.2.3 The surrounding area consists of predominantly large detached dwelling houses and bungalows of varying styles and features.

1.2.4 Neighbouring the property to the northern boundary is no.28a The drive; a single-family bungalow that shares similar characteristics to the application site in terms of features, scale, and proportions.

1.2.5 Neighbouring the property to the southern boundary is no. 26, another single-family dwelling.

1.2.6 The rear garden of the application site backs to neighbouring property no.44 Highfield Drive.



Satellite image of the application site with surrounding context

## 2.0 Site Photographs

### 2.1 Property Study



Rear elevation view of the application site



Rear end garden view of the application site



Front elevation view of property, detached garage, and driveway of the application site

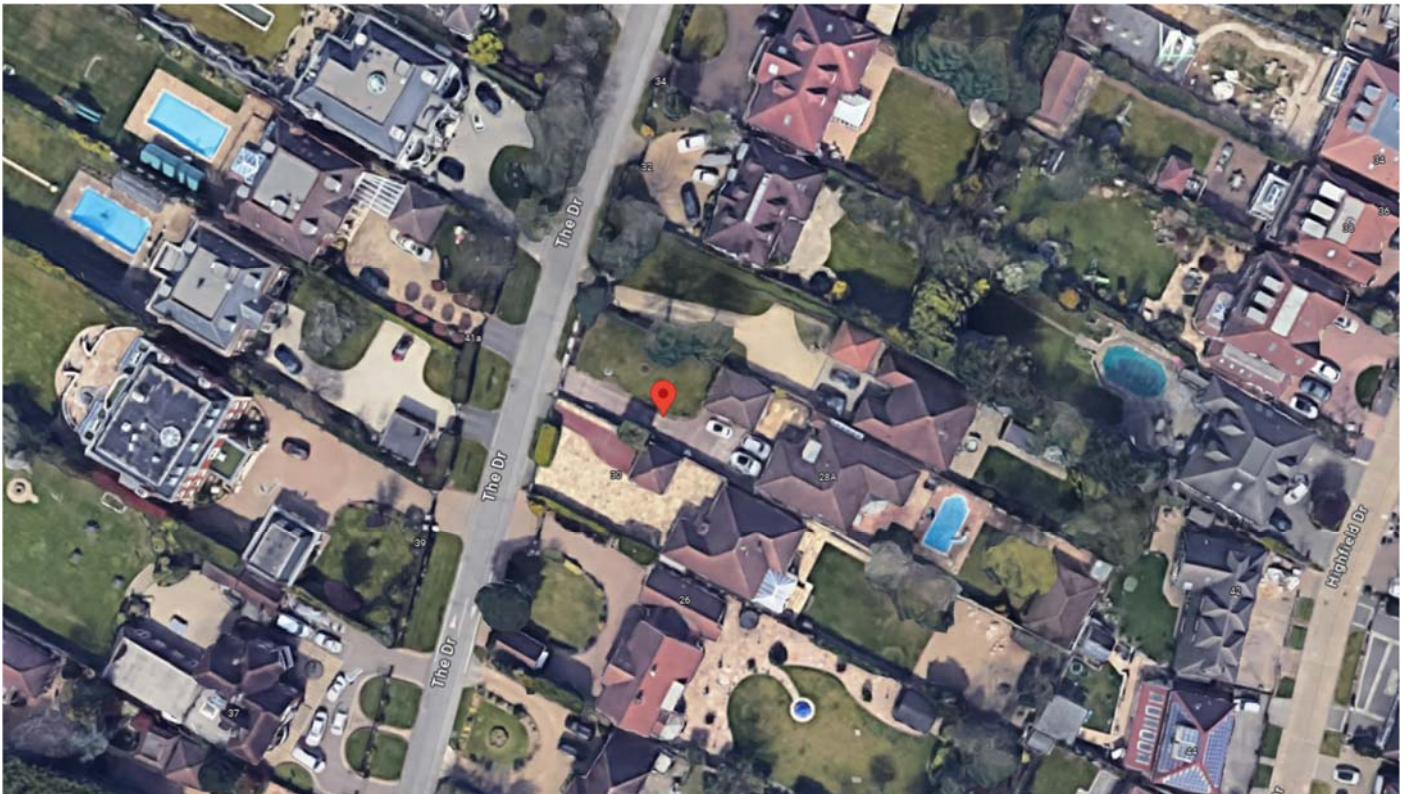
### 3.0 Context Analysis

#### 3.1 Site Designation

3.1.1 The site is not designated within a Conservation Area, the property is not statutory listed or considered a 'local heritage asset', nor subject to an Article 4 Direction.

#### 3.2 Orientation

3.2.1 The property is on a West-East axis. The front (West) elevation faces onto The Drive.



### 3.4 Planning History

3.4.1 The following planning applications below are logged on Hillingdon Planning Directory.

3.4.2 It is noted that the application site had two planning applications for a similar Change of use scheme.

3.4.3 The first application submitted was a Full Planning Application which was withdrawn. The second (latest) application submitted was a Certificate of Lawful Development for Proposed Use, which was refused.

3.4.4 The two other planning applications relating to a single and two-storey development were approved.

- *74154/APP/2023/3200, 28 THE DRIVE ICKENHAM UB10 8AF, Change of use from a residential dwelling (Class C3) to a residential building for the provisions of care (Class C3b) (Application for a Certificate of Lawful Development for a Proposed Development)*
- *74154/APP/2023/993, 28 THE DRIVE ICKENHAM UB10 8AF, Change of use from a residential dwelling (Class C3) to a children's residential care home (Class C2).*
- *74154/APP/2018/3338, 28 THE DRIVE ICKENHAM UB10 8AF, Single storey rear extension*
- *33840/APP/2016/2362, 28 THE DRIVE NORTHWOOD, Two storey side/rear extension, two storey rear extension and single storey front extension*

## 4.0 Planning Consideration

### 4.1 Planning Policy Context

4.1.1 According to planning law, applications for planning permission must be assessed in line with the development plan, unless there are significant material considerations indicating otherwise. The following Local Planning Policies are considered relevant to the application:

*Part 1 Policies:*

*PT1.BE1 (2012) Built Environment*

*Part 2 Policies:*

*DMEI 10 Water Management, Efficiency and Quality*

*DMH 1 Safeguarding Existing Housing*

*DMH 4 Residential Conversions and Redevelopment*

*DMH 8 Sheltered Housing and Care Homes*

*DMHB 11 Design of New Development*

*DMHB 15 Planning for Safer Places*

*DMHB 16 Housing Standards*

*DMHB 18 Private Outdoor Amenity Space*

*DMT 1 Managing Transport Impacts*

*DMT 2 Highways Impacts*

*DMT 6 Vehicle Parking*

*LPP D5 (2021) Inclusive design*

*LPP D6 (2021) Housing quality and standards*

*LPP D11 (2021) Safety, security and resilience to emergency*

*LPP D12 (2021) Fire safety*

*LPP D13 (2021) Agent of change*

*LPP H12 (2021) Supported and specialised accommodation*

*LPP T4 (2021) Assessing and mitigating transport impacts*

*LPP T5 (2021) Cycling*

*LPP T6 (2021) Car parking*

*LPP T6.1 (2021) Residential parking*

4.1.2 Additionally, planning law requires that applications for planning permission adhere to the development plan unless significant material considerations suggest otherwise. The Development Plan for the London Borough of Hillingdon currently comprises the following documents:

*The Local Plan: Part 1 - Strategic Policies (2012)*

*The Local Plan: Part 2 - Development Management Policies (2020)*

*The Local Plan: Part 2 - Site Allocations and Designations (2020)*

*The West London Waste Plan (2015)*

*The London Plan (2021)*

4.1.3 The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

## **4.2 Definition of use Class**

4.2.1 Class C2 is defined by the Use Classes Order as "Residential institutions." This classification encompasses the provision of residential accommodation and care for individuals in need of care, excluding those covered under Class C3 (dwelling houses).

4.2.2 A change of use is proposed from a four-bedroom bungalow (C3 Class) to a Children's care home (C2 Class).

## **4.3 The need for housing and support**

4.3.1 The utilization of previously developed land is endorsed by the Local Plan, London Plan, and NPPF. London Plan Policy H12 emphasizes the importance of facilitating the delivery, retention, and refurbishment of supported and specialized housing tailored to meet identified needs. This housing should be designed to cater to the specific requirements of its intended use or group, while also offering accommodation options that reflect the diversity of London's population, including disabled individuals (as outlined in Policy D7 on Accessible Housing), within an inclusive community environment. Boroughs are encouraged to conduct assessments to determine the demand for short-term, medium-term, and permanent supported and specialized accommodation within their respective areas. Such accommodation may include: Homes with support for young people, Housing for people with disabilities or those who need extra support.

1. Housing for people moving from shelters, refuges, and care facilities to live independently.
2. Short-term support for those leaving hospitals, helping them transition to independent living.
3. Homes with intensive support for people with mental health issues.
4. Accommodation for people experiencing homelessness.
5. Safe housing for victims of domestic abuse.
6. Housing for victims of violence against women and girls.

4.3.2 Policy DMH 1 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) stipulates that any reduction in existing self-contained housing, including affordable housing, will be resisted unless it is replaced with an equivalent amount of residential floor space. Additionally, under section B, the policy specifies that planning permission for dwelling subdivision will only be granted if certain criteria are met:

- i) Car parking standards must be met within the site's boundaries without negatively impacting the street scene.
- ii) All units must be self-contained, with exclusive access to sanitary and kitchen facilities, and each unit should have individual entrances and internal staircases for those above ground floor level.
- iii) Sufficient amenity space must be provided for the residents' benefit.
- iv) The living space must meet adequate standards.

4.3.3 Policy DMH 8 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) outlines the conditions under which the development of residential care homes and other supported housing types will be permitted:

- i) It should not result in an excessive concentration of similar uses that could negatively impact the residential character or amenity of the area and must adhere to Policy DMH 4: Residential Conversions.
- ii) The development should address needs identified in the Council's Housing Market Assessment, recognized public body assessments, or appropriate needs assessments, responding to identified needs by the Council or other recognized public bodies such as the Mental Health Trust.
- iii) The accommodation should be seamlessly integrated into the residential surroundings.
- iv) For sheltered housing, it should be situated near shops and community facilities and easily accessible by public transport.

4.3.4 Proposals for residential care establishments falling under Use Class C2 must demonstrate compliance with the care levels defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).

4.3.5 Policy DMH 4 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020), as mentioned in Policy DMH 8, dictates the conditions for residential conversions and the redevelopment of dwellings into new blocks of flats. This policy permits such developments only if:

- i) The proposal is located on a residential street where the conversion to flats would not exceed 10% of properties.
- ii) For residential streets longer than 1km, the proposed redevelopment site should be considered the midpoint of a 1km length of road for assessment purposes.
- iii) The internal floor area of the original building to be converted is at least 120 sqm.
- iv) Residential conversions are limited to one unit per floor.

4.3.6 The application is aimed at children of who have supported needs in line with London Plan Policy H12 and Local Policy DMH8. A search of the area reveals that there are very few other care homes of this type in the local area specifically orientated around children. This further verifies compliance with policy DMH8.

- Atock Homes: 51 Hillingdon Hill, Uxbridge UB10 0JG – 2.2 miles from application site
- Charville Lane Children's Home: 113 Charville Ln, Hayes UB4 8PD – 4.1 miles from application site

4.3.7 Considering the outlined factors, it is observed that the proposed use aligns with Use Class C2 and would provide the expected levels of care as per DMH8 requirements. Furthermore, the development is not anticipated to contribute to an over-concentration of care homes or similar C2 uses in the vicinity. A planning history review of the immediate area indicates the absence of comparable uses nearby, including flat conversions, thus satisfying DMH4. Additionally, the existing dwelling boasts a floor area of 173m<sup>2</sup>.

## 5.0 Proposed Development

### 5.1 Proposed Use

5.1.1 The proposal involves changing the property's use from class C3 to class C2, accommodating a maximum of two carers at any given time and a site manager who will be periodically present. Carers will follow a shift pattern. The facility will cater to up to three children aged 7 to 17 years old, resulting in a total of five occupants at any one time, akin to the occupancy as existing and a typical house of similar size.

5.1.2 These children come from diverse backgrounds with varying life experiences and specific sets of needs. Despite their differences, they share vulnerability and require care. The care provided will address:

- Previous experiences of abuse and neglect.
- Complex emotional and mental health needs, including learning disabilities.
- Increased vulnerability and lack of stable relationships.

5.1.3 The objective of the care is to facilitate the following for the individuals involved:

- Enhancing emotional wellbeing.
- Providing support for emotional needs.
- Addressing mental health needs.
- Empowering children to express themselves and have a voice.
- Empowering children to influence their lives.
- Improving understanding of identifying harmful situations.
- Enhancing decision-making skills.

5.1.5 The care home, operated by a registered provider, aims to:

- Create a supportive environment where children can thrive, form positive relationships, and feel at home.
- Advocate for equality among occupants, ensuring they are respected and valued as individuals.
- Prioritize the safety and wellbeing of those under their care.
- Foster confidence and self-esteem in children.
- Cultivate a culture of transparency and trust.
- Provide support for education and meaningful activities.
- Promote long-term healthy lifestyles.

5.1.6 The provider's primary goal is to establish a nurturing environment where children can live, learn, and flourish with the care and support of highly trained staff. The property will be managed by a team of experienced and dedicated support workers, combining professional expertise with a family-oriented approach to enhance outcomes for the children. With over 8 staff members available, only two will be on-site at any given time, including a manager who will periodically visit. An application has been submitted to OFSTED for review.

5.1.7 The provider assures that the proposed living environment is designed to safely accommodate the children's needs, with 24-hour care provided by qualified staff. The care home will undergo regular monitoring and risk assessment to ensure the highest level of safety.

5.1.8 The existing four-bedroom home could potentially house a large family, yet at the proposed scale, the development is not expected to cause excessive noise or disturbance. Managed by staff, the facility aims to minimize any adverse impacts on neighboring dwellings. The proposal entails minimal external alterations and provides sufficient parking, self-contained units, and good living conditions in accordance with policy DMH1. Therefore, it is deemed suitable for integration into the residential surroundings and acceptable in principle.

## **5.2 Existing Layout**

5.2.1 The existing dwelling has four bedrooms: One double-bedroom en-suite, a double bedroom and two single bedrooms and can provide accommodation for up to six people.

5.2.2 The property benefits from a large entrance hall that branches off to several rooms and an inner hallway for the bedrooms.

5.2.3 The kitchen is accessed from the entrance hall and is located towards the front. The dining is connected to both the kitchen and entrance hall. The dining room is also connected to the reception room and is arranged as an open-plan layout, benefitting from views of the rear garden.

## **5.3 Proposed Layout**

5.3.1 The existing layout will remain largely unchanged

5.3.2 The existing en-suite bedroom will be primarily used as an office space but will also accommodate a bedroom for staff.

## **6.0 Access & Parking**

### **6.1 Car Parking**

6.1.1 The site has a PTAL rating of 1b, but is within proximity to local bus routes and several train stations serves the area well including Ikenham, West Ruislip and Uxbridge - which in particular, has a PTAL rating 6a.

6.1.2 The majority of the residential properties along The Drive benefit from off-street parking.

6.1.3 The application site currently benefits from off-street parking for potentially over ten vehicles. The detached garage, located in front of the entrance door provides sheltered and secured parking for one vehicle.

6.1.4 While the garage provides one vehicle parking space, it is planned to allocate the cycle storage within this space. Therefore, the existing arrangement of off-street vehicle parking is considered an acceptable level to concur with London Borough of Hillingdon Local Plan Part 2 - Appendix C Table (b) Parking Requirements.

### **6.2 Cycle Parking**

6.2.1 The development proposes four cycle parking spaces to be securely stored within the existing garage at the front. The cycle parking will be closer to the front door of the dwelling and easily accessible for users.

6.2.2 The cycle space will meet the London Cycling Design Standards (LCDS) 8.5.3 Residential Cycle Parking and comply with the Mayor's Transport Strategy or NPPF 9 Promoting Sustainable Transport.

### **6.3 Access**

6.3.1 The proposal includes an access ramp for equality and with all rooms and amenities located on the ground floor only, providing reasonable access for those with physical disabilities. However, the proposal isn't specifically designed for individuals with physical disabilities. The property concurs with The Equality Act 2010.

## **6.4 Fire Safety**

### **6.4.1 The proposal ensures:**

1. The property is periodically inspected.
2. Clear outside space for fire appliances and evacuation.
3. Incorporation of fire safety features like alarm systems, heat detectors and emergency lighting.
4. Construction methods to minimize fire spread.
5. Suitable means of escape for all occupants.
6. A robust evacuation strategy, periodically updated.
7. Adequate firefighting equipment appropriate for the development's size and use.
8. Fully trained and qualified staff including periodic evacuation drills.

## **7.0 Main Planning Considerations**

### **7.1 Impact on the amenities of the occupiers of neighbouring residential properties**

7.1.1 Local Plan Policy DMHB 11 outlines design guidelines for new developments in the borough, emphasizing the importance of not negatively impacting the amenity, daylight, and privacy of adjacent properties and open spaces. The guidance aims to ensure sufficient privacy for residents and resist proposals that create unreasonable overlooking or encroachment onto private spaces. Furthermore, Paragraph 130(f) of the NPPF (2021) stresses the creation of safe, inclusive, and accessible places that promote health and well-being. Considering that the existing building remains unchanged in bulk, scale, or height, the proposed development would not overly affect neighboring dwellings. There would be no additional loss of outlook or light for adjacent properties. The existing front and rear elevation windows offer views towards the street and the property's rear garden, respectively. Since the proposed development does not introduce additional windows, it maintains the same views as the existing dwelling.

7.1.2 At least two staff would be present at the site at any one time. The care home would be staffed 24 hours a day, seven days a week with shifts understood to commence at 8:00am and 7:30pm. In light of the small scale of the proposed use, it is considered that the number of people present would not be dissimilar to a residential dwelling and the comings and goings to the property would not be out of keeping with a residential area.

7.1.3 Moreover, transitioning from a four-bedroom dwelling to a four-bedroom children's care home is unlikely to significantly increase the number of occupants at the site, ensuring that privacy levels remain consistent with the residential setting.

7.1.4 The scale of the proposal is such that noise levels and disturbances from activities on the premises would be similar to those of a typical family dwelling, making it compatible with the residential location. Overall, the proposal is deemed to have minimal impact on neighboring properties and is suitable for the area.

## **7.2 Impact on the character & appearance of the area**

7.2.1 Paragraph 126 of the NPPF (2021) seeks the creation of high-quality, beautiful and sustainable buildings. Parts b) and c) of paragraph 130 of the NPPF (2021) states that planning policies and decisions should ensure that developments are visually attractive as a result of good architecture 9 of 13 OREPDEL (ODB 2022) and are sympathetic to local character and history, including the surrounding built environment.

7.2.2 Policies D3 and D4 of the London Plan (2021) require development proposals to be of high-quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness.

7.2.3 Policy DMHB 11 states 'All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: harmonising with the local context by taking into account the surrounding scale of development, height, mass and bulk of adjacent structures; building plot sizes and widths, plot coverage and established street patterns; building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment'.

7.2.4 Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) re-emphasizes the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

7.2.5 No external changes are proposed to the building. However, the proposal will include a new access ramp to promote equality amongst users. This would be located behind the detached garage and will not be visible from the street. The proposal will also include two charging ports for two electrical vehicles to help promote sustainable living and development.

7.2.6 It is considered that the proposal would not cause harm to the character and appearance of the host dwelling and the surrounding area. The proposal therefore accords with the objectives of Policy BE1 of the Hillingdon Local Plan: Part One Strategic (2012) and Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

## **7.3 Urban Design, and Security Considerations**

7.3.1 Paragraph 130(f) of the NPPF (2021) prioritizes health, well-being, and high amenity standards for development users. London Plan (2021) Policy D6 and Hillingdon Local Plan Part 2 - Development Management Policies (2020) Policy DMHB 16 upholds housing quality. The proposed care home features three well-lit bedrooms, shared facilities, and office space, exceeding minimum floor space standards. Policy DMHB 18 requires sufficient private outdoor amenity space, provided by a large garden. This ensures adequate amenities for residents, with supervision from OFSTEAD for quality assurance.

7.3.2 Policy D6 of the London Plan (2021) states that housing development should be of high-quality design and provide adequately sized rooms.

7.3.3 It is considered, that all the proposed habitable rooms, would be of an adequate size, and maintain an adequate outlook and source of natural light, therefore complying with Policy DMHB 16 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and Policy D6 of the London Plan (2021). Sufficient external amenity space to the rear would be retained

## **8.0 Conclusion**

### **8.1 Conclusion**

8.1.1 It is believed that the proposal is considered to comply with the development plan, and having regard to the material considerations and all matters raised, the application should be recommended for approval.

8.1.2 Regarding the loss of residential dwelling, DMH 1 of the Local Plan seeks to resist the net loss of existing self-contained housing unless the housing is replaced with at least equivalent residential floorspace. The proposal involves the loss of one family sized dwelling though the change of use remains within the residential use class and there are no modifications to the dwelling that would prevent its use as a C3 residential dwelling in future.