

**Planning statement (including planning operational management plan
and London Plan policy D12 planning fire statement)**

Proposal.

Change of use from dwelling house (C3) to Children's Care Home (C2) for 2 children

At

76 Whitehall Rd
Uxbridge UB8 2DQ



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ISSUED FOR PLANNING

Introduction

The application site comprises a two-storey semidetached dwellinghouse situated on Whitehall Road, close to the junction with Burness Close. The property is set back from the highway and benefits from a hardstanding / driveway area to the front providing parking for one vehicle. To the side is an access way. To the rear there is a private garden.

The surrounding area is predominantly residential in character, comprising a varied mix of dwellinghouses of differing style and appearance. The Council's planning maps confirm that the site is not located within a Conservation Area. The nearest designated Conservation Area is the Greenway Conservation Area. The Environment Agency mapping confirms that the site lies within Flood Zone 1, indicating a low probability of flooding from rivers or the sea.



Street view of the site



Confirmation that it is outside of the conservation area



Environment Agency Flood Map

Basis of assessment and professional limitations

This Statement has been prepared on the basis of the operational details, household composition, staffing arrangements and other information supplied by the applicant. No independent verification has been undertaken of matters such as past or present activities, occupancy records, or third-party representations. If any of the information relied upon proves to be inaccurate, incomplete or materially different in practice, the planning conclusions reached in this Statement may require reconsideration.

This Statement is confined strictly to planning matters relevant to the proposed development. It addresses the planning merits of the proposal having regard to the Development Plan, other material considerations and the specific facts of the case. It does not constitute advice on or certification of operational care standards, Ofsted registration, safeguarding compliance, staffing regulation, building regulations, fire safety, health and safety, or any other separate statutory or regulatory regime.

Nothing in this Statement should be taken as confirming or certifying the lawful status of any existing use or operation at the property. The determination of the application, and the weight to be attached to the information submitted, remain matters for the Local Planning Authority.

The principle of the development - planning policy

The NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

Policy GG2 of the London Plan (2021) states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, particularly on sites within and on the edge of town centres, as well as utilising small sites wherever possible. Sites which are well connected by existing or planned public transport should be prioritised, and options to intensify the use of land in well-connected area to support additional homes should be explored, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling. This should align with Policy D3 of the London Plan (2021) by applying a design-led approach to determine the optimum development capacity of a site.

Policy GG4 (Delivering the homes Londoners need) sets out that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered and must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

Furthermore, Policy GG3 of the London Plan (Creating a healthy city) requires developments to address mental and physical health in an integrated and co-ordinated way, reducing health inequality where possible, which includes planning for appropriate health and care infrastructure to address the needs of London's changing and growing population.

Regard is also had to Policy H9 of the London Plan (ensuring the best use of stock) which requires boroughs to promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings.

Safeguarding existing homes

Policy DMH 1 of the Hillingdon Local Plan (2021) states that: A) The net loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace'. Further to this, Paragraph 4.3 states that in order to meet projected housing needs, the Council aims to resist the loss of residential accommodation within the Borough by means of Policy DMH 1: Safeguarding Existing Housing. For the purposes of this policy, residential accommodation includes Houses in Multiple Occupation (HMOs), student accommodation and other uses falling into Use Classes C3 and C4.'

London Plan Policy H8 also states that: Policy H8 of the London Plan (Loss of existing housing and estate redevelopment) sets out that any loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. This is to ensure that the redevelopment and intensification of London's housing stock continues to play an important role in the provision of new homes across London and to ensure that where housing is lost, it does not lead to a net reduction in places for people to live.

Proposed residential care home

Policy H12 Supported and specialised accommodation states - The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners (see Policy D7 Accessible housing) within a wider inclusive community setting. Boroughs should undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation within their borough. Supported and specialised accommodation could include: -

- 1) accommodation for people leaving hostels, refuges and other supported housing, as well as care leavers and people leaving prison to enable them to live independently
- 2) accommodation for young people with support needs
- 3) reablement accommodation (intensive short-term) for people who are ready to be discharged from hospital but who require additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation
- 4) accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible
- 5) accommodation (short-term or long-term) for people with mental health issues who require intensive support
- 6) accommodation for rough sleepers
- 7) accommodation for victims of domestic abuse
- 8) accommodation for victims of violence against women and girls

Policy DMH 8: Sheltered Housing and Care Homes states A) The development of residential care homes and other types of supported housing will be permitted provided that: -

- i) 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.
- ii) 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;
- iii) the accommodation is fully integrated into the residential surroundings; and
- iv) in the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport.

B) Proposals for residential care establishments which fall under Use Class C2 must demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).'

Response to principle of development

The proposal would introduce a specialist residential use within an existing building. In broad strategic terms, the introduction of supported accommodation can align with the objective of making efficient use of land and contributing to the range of residential and care provision within the borough. Those strategic aims, however, remain subject to compliance with the more detailed development plan policies, including those concerned with safeguarding existing homes and assessing whether the proposed care use is appropriate and justified in the circumstances of the case.

It is accepted that the proposal would result in the loss of an existing C3 dwelling. It is also accepted that no replacement C3 dwelling or equivalent C3 floorspace is proposed. However, this statement provides the planning justification for that loss by demonstrating that the proposal responds to an identified borough level need for children's residential care and should be assessed in the context of the relevant specialist accommodation policies. Further, this statement and the accompanying management material contained within explain how the proposed level of care would be delivered in practice. The sections below support the conclusion that the proposal would provide a genuine Class C2 use and an appropriate form of specialist accommodation consistent with London Plan Policy H12 and Policy DMH 8 of the Hillingdon Local Plan.

To further assess the acceptability of the principle of development, the need for this form of accommodation is a relevant consideration and is addressed below.

Hillingdon's Care Strategy November 2025-2030

Hillingdon's own Care Strategy sets the scene. It records the Council's commitment to delivering high quality care and support for cared for children and care experienced young people, recognising the distinct challenges they face and the need for an environment which promotes stability, empowerment and belonging. The Strategy explains that relationship-based practice is at the core of the Council's approach, with emphasis on strong, consistent and trusted relationships, comprehensive support tailored to individual strengths and needs, and the provision of safe places to live so as to minimise disruption and promote continuity.

The Strategy also identifies a clear local context in which residential provision remains necessary and under pressure. As of 31 March 2025, Hillingdon acted as corporate parent to 312 cared for children and 602 care experienced young people, with 10.3% of cared for children living in residential children's homes. The document goes on to state that the Council is expanding its in house provision, small residential homes, and supported accommodation, and that ensuring access to a safe, stable, and local home is central to its strategy. It further states that the Council will address gaps in residential provision and increase the availability of high-quality homes within Hillingdon, with the express aim of minimising disruption and promoting continuity for children and young people.

The Care Strategy is important in showing the nature of the support the Council considers necessary. Hillingdon states that children in its care should have access to skilled carers and professionals trained in trauma informed approaches, and records that foster carers and residential care workers are trained in PACE, while social workers have access to the Multi Agency Psychology Service to support decision making and children's emotional wellbeing. In substance, therefore, the Strategy is not merely about providing accommodation. It is about providing small scale, stable, relationship based and trauma informed homes capable of meeting emotional, behavioural and wellbeing needs within the borough.

Health and Social Care Select Committee, THURSDAY, 19 JUNE 2025

The Council's June 2025 Select Committee material provides further evidence of a local need for additional therapeutic residential provision for children in Hillingdon. The evidence shows that the Borough is responsible for a substantial cohort of looked after children and care experienced young people requiring stable, safe and well supported environments. It also shows that Hillingdon has a particularly significant proportion of unaccompanied asylum-seeking children, materially above that of its statistical neighbours, and that a large proportion of children entering care in the Borough arrive unaccompanied. The Council's own material recognises that these children and young people are often especially vulnerable and may present with significant emotional, psychological and trauma related needs.

The same evidence identifies pressure within the existing placement market. Officers reported that residential placements can be extremely expensive, with some placements reaching up to GBP 28,000 per week and acknowledged that high-cost placements are not necessarily associated with better outcomes. Importantly, the Council also recognised that where children are placed away from Hillingdon, the wraparound care element can be lost. That evidence supports the case for additional local provision capable of offering stability, continuity and therapeutic support within the Borough itself. The significance of that need is reinforced by the fact that six new residential units have recently been completed in Charville as part of the Borough's wider residential beds programme.

The Select Committee material shows that trauma informed care is central to Hillingdon's present strategy. Officers confirmed that trauma informed training for foster carers and residential workers is being enhanced to support children locally. The Council's wider corporate parenting material further records access to trauma informed parenting and PACE training and expressly recognises that care experienced children and young people may have hidden traumas that are not always readily visible. Read fairly and as a whole, the Council's evidence points toward a clear need for small scale, stable and therapeutically informed residential homes within Hillingdon for vulnerable children with complex emotional and behavioural needs.

In summary, the Council's material does not merely identify a general need for more accommodation. It identifies a need for local placements which, preserve continuity and wraparound support, and respond properly to trauma, vulnerability and emotional complexity. That evidence provides substantial support in principle for a carefully managed therapeutic children's home within the Borough.

Children, Families and Education Select Committee, WEDNESDAY, 18 JUNE 2025

The Council's Children, Families and Education Select Committee material dated 18 June 2025 provides further direct evidence of local need. It confirms that, at the end of March 2025, Hillingdon was corporate parent for 330 children under the age of 18 and a further 766 young people eligible for care leaving services, including 602 aged 18 to 25. This is a substantial local cohort requiring stable, safe and well supported home environments.

The same material also demonstrates that Hillingdon has a particularly significant proportion of unaccompanied asylum-seeking children. It records that 22% of the Borough's looked after children fall within that category, compared with only 9% amongst its statistical neighbours, and that a significant proportion of children entering care in Hillingdon arrive unaccompanied. The Council's evidence therefore points to a local profile of children and young people who are especially vulnerable and who may present with complex emotional, psychological and trauma related needs.

The Committee material is also important in showing the Council's present care priorities. It places emphasis on permanence, stability, continuity of care and supportive home environments, recognising that these matters are central to meeting children's physical, emotional and developmental needs. It further records that carers are supported through trauma informed parenting and PACE training and expressly recognises that care experienced children and young people may carry hidden traumas that are not always readily visible.

Read fairly and as a whole, this evidence does not point merely to a general need for accommodation. It points to a clear local need for small scale, stable and therapeutically informed homes within Hillingdon for vulnerable children with complex emotional and behavioural needs. It therefore provides further support in principle for carefully managed residential provision of this nature within the Borough.

CABINET Thursday, 22 May 2025 at 7pm

The Cabinet minutes dated 22 May 2025 provide further evidence of the Council's commitment to increasing children's residential care capacity within Hillingdon. On that date, Cabinet formally agreed to lease three further properties to be added to the Council's portfolio for the provision of residential care to support looked after children and care leavers. Cabinet also approved further capital funding for acquisition, set up and works to ensure that the homes are fit for service delivery under Ofsted regulations.

The reasons for decision are material. Cabinet expressly recorded that the purpose of the decision was to increase the capacity and quality of children's homes in the Borough in order to provide better care for looked after children and care leavers.

Read fairly, those minutes demonstrate more than a general aspiration. They show an active and recent strategic decision by the Council itself to expand in borough residential provision for vulnerable children and young people, and improve the quality of that provision. That is consistent with the wider evidence base pointing to a clear local need for additional small scale residential homes within Hillingdon capable of providing stable and appropriate care for looked after children.

The Hillingdon Safeguarding Partnership Annual Report 2023–2024

The Hillingdon Safeguarding Partnership Annual Report 2023 to 2024 provides further evidence of local need for additional residential provision for vulnerable children within the Borough. The report records that placement sufficiency is both a national and local issue and states that securing appropriate placements for young people, especially within the residential sector, became increasingly difficult during the year. It notes that the scarcity of suitable placements has significantly increased costs, with placement costs nearly doubling over the year, and confirms that the Council responded by embarking on an ambitious project to increase the availability of residential placements within Hillingdon. That evidence provides further support for additional small scale in borough provision. The report also identifies the nature and complexity of the cohort for whom provision is required. At the end of the financial year, Hillingdon remained corporate parent for 329 looked after children and was supporting 765 young people as care leavers into independence. It records that 49% of those care leavers had entered care as unaccompanied asylum-seeking children. The report further refers to a continuing increase in the complexity of needs, including increases in poor mental and emotional health, wider family pressures, and rising demand for intensive support and statutory intervention. Read fairly, that evidence points to a local cohort of children and young people who are especially vulnerable and who may present with complex emotional, psychological and trauma related needs.

The report is also important in showing the Council's present strategic response. It records that Hillingdon is commissioning service wide training to embed PACE methodology and trauma informed practice, and places emphasis on relationship-based practice, early support, resilience and child focused intervention. Taken together, the report demonstrates not merely a general need for more accommodation, but a clear need for stable, small scale and trauma informed residential provision within the Borough for children with complex emotional and behavioural needs.

In summary, the Annual Report reinforces the conclusion that Hillingdon faces both a shortage of appropriate residential placements and a cohort of children whose needs are increasingly complex. Additional local provision of the type proposed would directly assist in responding to those pressures by providing stable, carefully managed and therapeutically informed care within the Borough.

Applicants model

The proposed development is for the change of use of an existing family dwellinghouse from Use Class C3 to a children's home within Use Class C2. The proposal would provide a small-scale therapeutic home for up to 2 children within an established residential setting. The home would be operated under the relevant Ofsted regulatory regime, as proposed by the applicant. The existing dwelling would continue to operate in a domestic manner and would provide a stable and carefully managed environment for children requiring specialist support.

The applicant has confirmed that the home would accommodate no more than 2 children between the ages of 5 and 17. Care would be delivered on the basis of a therapeutic model for children with emotional and behavioural needs including children who may have experienced trauma, adverse childhood experiences, disrupted attachments, placement breakdown, family difficulties, emotional dysregulation or wider vulnerability. The model is therefore not a general residential arrangement, but a specialist form of support directed toward children who require a safe, consistent and nurturing environment.

The applicant has further confirmed that staffing would be based on a 1:1 model. There would be 2 members of care staff present on site during the day, together with 2 waking night staff on a shift basis, and a registered manager who would attend during normal weekday business hours in a management and supervisory capacity. The registered manager would not reside at the property and would not form part of the day-to-day residential occupancy. This operational structure reflects a carefully managed home of limited scale, with a high degree of support, consistency and supervision.

The therapeutic approach described by the applicant is relationship based and trauma informed. It is centred on the provision of consistent care, emotional support, trust, structure and routine, with care tailored to the needs of each child. The home would provide a warm and domestic environment in which children are supported to develop stability, resilience and confidence, while receiving care that responds directly to their emotional and behavioural presentation. The emphasis is on personalised support rather than institutional provision. Importantly, the proposed model is fully consistent with the wider local evidence base already referred to in this statement. Hillingdon's strategy and committee material identify the need for stable, local and therapeutically informed homes for vulnerable children with complex emotional and behavioural needs. The applicant's proposed model is closely aligned with that identified need. It is small scale, specifically directed toward emotional and behavioural support, and designed to provide a safe and structured home environment capable of meeting the needs of highly vulnerable children within the Borough.

In planning terms, the significance of the applicant's model is that it demonstrates a genuine and carefully defined Class C2 use. It is not an intensive or institutional form of development. Rather, it is a tightly controlled therapeutic home for 2 children only, delivered in a manner intended to combine specialist care with a domestic living environment. Whilst the proposal would result in a change of use from Class C3 to Class C2, the building would remain domestic in scale and character, no subdivision is proposed, and no separate units would be created. The proposal would therefore repurpose an existing dwelling to meet a specialist residential care need within the Borough. That does not displace the relevance of Policy DMH 1, but it does materially inform the planning balance and the weight to be given to the acknowledged loss of the existing dwelling.

At national level, ministerial statements have also recognised that the planning system should not operate as an unnecessary barrier to the provision of homes for some of the most vulnerable children in society, and that local planning authorities should be supportive of applications for children's homes where appropriate. Whilst that does not displace the need to assess the proposal against the development plan and the specific facts of the case, it provides further support for the proposition that appropriately planned children's residential provision should not be approached with any presumption against it.

Policy DMH 8 requires consideration of whether the proposal would lead to an over concentration of similar uses detrimental to residential character or amenity. On the material presently available, there is no proper basis for any such conclusion in this case. A review of recent approved or operating children's homes within the Borough indicates that such provision is generally dispersed rather than concentrated around the application site. By way of example, children's homes or approved C2 homes have been identified at 53 Paddington Close, Hayes, approximately 5.3 miles away, 3 Deane Avenue, Ruislip, approximately 5.7 miles away, 36 Moor Park Road, Northwood, approximately 7 miles away, 6 Langley Crescent, Hayes, approximately 6 miles away, 2 Wimborne Avenue, Hayes, approximately 4 miles away, 391 Lansbury Drive, Hayes, approximately 3.1 miles away, 24 Douglas Crescent, Hayes, approximately 4 miles away, and the Charville Lane children's home in Hayes, approximately 2.3 miles away. On that snapshot, the only identified comparable home in very close proximity is 49A Chiltern View Road, Uxbridge. That nearby example should be acknowledged openly. However, the existence of one other nearby children's home does not, without more, demonstrate harmful over concentration.

The relevant question is whether the proposal would result in such a clustering of similar uses as to harm the character or amenity of the area. On the present evidence, that threshold is not reached. The broader pattern remains one of generally dispersed provision across the Borough, rather than a dense concentration in the immediate Whitehall Road locality. That conclusion is reinforced by the wider character of the area, which already includes a range of care related and supported accommodation uses, including older persons residential and assisted living provision in and around Hillingdon. Whilst those uses are not directly equivalent to a children's home, they do demonstrate that the wider locality is not devoid of care related residential provision and that such uses can coexist with the area's residential character. In those circumstances, the proposal would not create or materially contribute to a harmful over concentration of similar uses. Rather, it would represent a single additional home responding to an identified need, without altering the essential residential character of the locality.

The proposal would introduce a specialist residential use within an existing building. In broad strategic terms, the introduction of supported accommodation can align with the objective of making efficient use of land and contributing to the range of residential and care provision within the borough. Those strategic aims remain subject to compliance with the more detailed development plan policies, including those concerned with safeguarding existing homes and assessing whether the proposed care use is appropriate and justified in the circumstances of the case.

It is accepted that the proposal would result in the loss of an existing C3 dwelling. It is also accepted that no replacement C3 dwelling or equivalent C3 floorspace is proposed. However, this statement provides the planning justification for that loss by demonstrating that the proposal responds to an identified borough level need for children's residential care and should be assessed in the context of the relevant specialist accommodation policies. Further, this statement and the accompanying management material contained within explain how the proposed level of care would be delivered in practice. The sections below support the conclusion that the proposal would provide a genuine Class C2 use and an appropriate form of specialist accommodation consistent with London Plan Policy H12 and Policy DMH 8 of the Hillingdon Local Plan.

Drawing those matters together, the proposal satisfies the principal policy tests engaged by Policies DMH 1 and DMH 8 and aligns with London Plan Policy H12. The principle of the development is therefore acceptable.

Non-borough residents

In terms of placement arrangements, the provider intends to apply to join Hillingdon Council's commissioning framework for children's residential services. That is the established mechanism through which the Council commissions and monitors provision for looked after children and enables placements to be made through standard commissioning and invoicing processes. The provider's clear intention is to work in close partnership with Hillingdon so that the home supports the borough's identified needs and operates within the Council's wider placement and safeguarding framework.

The Council's own evidence demonstrates that Hillingdon faces significant and increasing placement pressures. As at the end of March 2025, the borough was corporate parent to 330 children, with a further 766 care leavers, and with nearly half of children entering care doing so as unaccompanied asylum-seeking children. The Council's published material also identifies growing pressure on placement sufficiency, increasing complexity of need, and sharply rising placement costs. The evidence further shows a clear corporate objective to expand in borough provision and reduce reliance on external placements.

A particular concern identified by the Council is the continued use of out of borough placements, which can remove children from familiar surroundings, weaken family and community ties, and reduce the effectiveness of the wraparound care that is often critical to stability and recovery. The Council's Cabinet and committee material makes clear that increasing local capacity is intended precisely to address that issue by enabling more children to remain within or close to their home borough where appropriate.

Against that policy and evidential background, the proposal is directed first and foremost to meeting Hillingdon's own needs. The provider's intention is that the home should be available to support Hillingdon children and to assist the Council in reducing dependence on distant or more costly placements. That is the primary purpose of the proposal and the basis upon which need has been advanced in this statement. For completeness, it is recognised that participation in a commissioning framework does not of itself amount to an absolute legal prohibition on any placement from outside the borough. However, that does not undermine the planning merits of the proposal. The material point is that the home is being brought forward in response to Hillingdon's identified sufficiency needs, with a clear operational commitment that local demand will be prioritised. Any non-borough placement would be incidental rather than defining and would not alter the essential planning character or public benefit of the scheme as a small-scale therapeutic children's home helping to expand local residential care capacity.

Accordingly, the proposal should not be characterised as development that would displace local need or dilute local welfare provision. On the contrary, it is intended to strengthen borough capacity, support Hillingdon's sufficiency duty, reduce reliance on external placements, and help keep children closer to their communities, education and support networks where appropriate. Properly understood, that is a material benefit weighing in favour of the development.

Operation management

The proposed home would operate on a fixed and clearly defined staffing basis appropriate to a small-scale therapeutic children's home for up to two children. The staffing structure would comprise two staff on the day shift from 8.15am to 8.15pm and two staff on the night shift from 8.15pm to 8.15am. No sleep in accommodation is proposed, as the evening and night staff would be waking night staff in order to meet the children's needs. A registered manager would attend during business hours from 9.30am to 5.00pm in a management and supervisory capacity. In addition, a Responsible Individual would undertake periodic oversight visits, typically once every two weeks and as the home becomes more established once a month. This staffing structure is important because it ensures that there are always at least two members of staff on duty and that the home is staffed and supervised at all times. The proposal is therefore not one in which staffing levels are uncertain or dependent on ad hoc arrangements. Rather, the operational model is defined in advance and structured to meet the needs of up to two children within a tightly managed domestic setting.

No sleep in accommodation is provided for staff. This is a waking night model. That is material because it means children would continue to be supervised throughout the night without reliance on sleep in arrangements, ensuring immediate staff presence and continuity of care if required. Shift handover periods would take place between 8.00am and 8.15am and between 8.00pm and 8.15pm. These are short and contained transition periods between outgoing and incoming staff. They would not occur during school hours and therefore would not affect the staff's ability to take children to school or otherwise manage the day-to-day operation of the home. During handover, staff would be focused on exchanging relevant information to ensure continuity of care.

External professional involvement would be limited and managed. Ofsted inspection visits would typically occur during normal weekday office hours and would be expected to take place no more than twice per year. Regulation 44 visits would also usually take place once per month during weekday office hours. Social worker attendance would depend on the individual child's care plan, but where visits occur they would generally be during weekday office hours and managed as part of the normal operation of the home. Any specialist support required in connection with a child's care arrangements would also be organised on a planned basis. Such input may include review-based attendance by relevant professionals where appropriate to the child's needs. Some sessions may take place at the property and others off site. Any sessions at the property would be limited in nature and would ordinarily occur no more than once a week. The important planning point is that such attendance would remain ancillary to the ordinary operation of a small residential children's home and would not alter the essential planning character of the use.

Family contact would depend on the individual child's care arrangements and may take place either at the home or off site as appropriate. Any such visits would be supervised and managed by staff. The applicant envisages that such family visits would ordinarily occur no more than once a month. The home would not operate as a premises of unrestricted visiting.

In transport terms, the site is in a location with moderate public transport accessibility, with a PTAL of approximately 3. Bus stops are located around 340 metres from the property, and the nearest underground station is approximately 0.7 miles away. Staff and visitors would therefore be able to access the site by sustainable means. The children themselves would not be of driving age, and, in any event, children placed in the home would not own or drive private cars. The proposed residents are children requiring residential care and support, not young people living independently. If any young person were to progress to a stage where independent living and car ownership became relevant, that would be a matter for transition to a different and more independent form of accommodation, not continued residence at this home.

The operation of the home would be managed so that visits do not overlap unnecessarily with staff handover periods. Visits would generally be arranged by booking and managed in an orderly way so as to avoid undue activity at sensitive times. Most visits would be expected to take place during weekday working hours. Staff and visitors would be provided with information about local public transport options to support travel by non car modes wherever practicable. Overall, the proposed operation is modest in scale, clearly defined and professionally supervised. The fixed staffing model, waking night provision, limited and managed visiting arrangements, dedicated transport arrangements, and accessible location together demonstrate a small scale C2 use capable of operating in an orderly and proportionate way within the existing residential setting.

Risk and management plan

The proposed home would operate within a clear, structured and professionally managed framework appropriate to a small-scale Ofsted registered therapeutic children's home. The property would accommodate no more than two children. The client's confirmed model is for children approximately aged 5 to 17, supported on a 1:1 staffing basis, with two care staff present during the day, two waking night staff on a shift basis, and a registered manager attending during weekday business hours in a management and supervisory capacity. The proposal is therefore not an undefined or open-ended institution, but a tightly controlled and supervised residential care setting of very limited scale.

The home would be operated by an Ofsted registered provider with the purpose of creating a safe, stable and supportive domestic environment for children with emotional and behavioural needs. The operational aim is to provide a motivating and therapeutic home in which children can achieve, build positive relationships, engage in education and meaningful activity, and develop healthy routines and greater self-confidence. In planning terms, that is material because it confirms that the proposal is genuinely a care led Class C2 use with a therapeutic focus, rather than a generic shared living arrangement.

The internal operation of the property would follow the model already identified in the application material. The first floor would contain two bedrooms for the resident children together with a room used as a staff office for administrative tasks and record keeping. At ground floor level, the front reception room would be retained as a separate quiet or calming space for children when required, the rear part of the house would provide shared living, kitchen and dining accommodation, and the ground floor WC would be available for staff use. The existing outbuilding would remain for storage only and would not be used as habitable accommodation. These arrangements are relevant because they show that the home is intended to function as a managed domestic environment with identifiable staff facilities, shared living space and separate quiet space.

The property would be subject to a formal location risk assessment before first occupation as a children's home and that assessment would be reviewed regularly thereafter, including at least every six months and sooner if circumstances require. The purpose of that exercise would be to identify and minimise any risks associated with the specific location, assess the suitability of the neighbourhood for the intended residents, and ensure that children can live safely at the property while benefiting from local services and facilities. This is important in planning terms because it demonstrates that the suitability of the site would not be assumed once and then left unmonitored but would be kept under active review.

That assessment would consider matters such as whether the location presents any risk of children being drawn into anti-social behaviour, gang related activity, criminal exploitation or sexual exploitation, whether the area presents any particular concern for already vulnerable children, whether there are environmental hazards nearby such as busy roads, and whether local schools, services, leisure opportunities and support networks are available in a manner beneficial to the children living at the home. The assessment would also draw on publicly available local information and, where appropriate, liaison with relevant safeguarding bodies and partner agencies. Where any concern is identified, corresponding management measures would be put in place.

Those management measures would include direct staff supervision, educating children about local risks, ensuring access to support services and confidential advice, recording and monitoring any identified vulnerability issues, improving security arrangements where necessary, and using multi agency working where appropriate to manage and minimise risk. The proposal is therefore based on a structured model of prevention, review and intervention, rather than passive occupation.

The day to day running of the home would also be managed so as to remain compatible with its residential surroundings. Professional visits, including Ofsted inspections, Regulation 44 visits, therapeutic support sessions, social worker attendance and other professional involvement, would generally be arranged in advance where possible, would usually occur during daytime hours, and would be managed by staff so that they take place in an orderly manner and do not overlap unnecessarily with staff shift changes. Family contact would likewise be supervised and managed appropriately. This is a material point because the likely pattern of attendance is controlled and limited rather than open ended or unpredictable.

Noise and neighbour impact would be managed proactively. The provider's management approach includes maintaining respectful conduct by staff and residents, controlling visitor activity, encouraging quiet operation particularly during evening and nighttime hours, and responding promptly to any issue that may arise. Quiet hours would be observed during nighttime periods and activities likely to generate noise would be expected to occur within normal daytime hours. Staff training would include respectful neighbourhood conduct, noise awareness and emergency response. The home would be run as a place of care and residence, not as a high turnover facility or a premises of unrestricted visiting.

There would also be clear procedures for visitor control, access and complaints handling. Visitors would be expected to attend by prior arrangement, would be supervised where appropriate, and would comply with the provider's procedures. Visitors would sign in and out where required and a secure entry system would be maintained to prevent unauthorised access. The operator would also maintain a clear complaints procedure so that any concern raised by neighbours or other parties can be logged, reviewed and responded to by management, with steps taken where necessary to prevent recurrence. This is reinforced by a commitment to maintain communication with the local community where needed so that issues can be identified early and addressed through management.

The home would be properly maintained and monitored. Regular maintenance checks would be undertaken to keep the premises in good order, outdoor areas would be kept tidy, and emergency procedures would be in place covering matters such as fire safety and medical incidents. Staff would be trained not only in care provision but also in respectful neighbourhood behaviour, emergency response and the practical operation of the home within a residential setting. These are modest but material controls which support the conclusion that the use would be properly managed in practice.

Transport and staff movement would also be controlled by management. The property has one off street parking space, which the client has indicated would typically be used by the registered manager during weekday daytime hours. Staff would primarily be expected to travel by public transport, given the site's accessibility. Visitor attendance would be limited, short in duration and managed in advance where possible. The surrounding controlled parking arrangements and short stay visitor parking provide a further mechanism through which occasional visits can be accommodated in an orderly manner. These arrangements are relevant because they show that transport effects are not left undefined but form part of the intended operation of the home.

Overall, the proposal includes an adequate and proportionate management framework tailored to this specific operator model and this specific site. Read as a whole, the limited two child occupancy, 1:1 care structure, day and waking night staffing, weekday manager oversight, quiet room, staff office, visitor management, location risk assessment process, complaints procedure, neighbour awareness, access control, maintenance and ongoing review mechanisms demonstrate that the home would operate in a structured, supervised and policy compliant manner. The Council is therefore able to assess the proposal on the basis of a defined and credible operational model, rather than assumption or speculation.

Fire safety

In accordance with Policy D12 of the London Plan, fire safety has been considered as part of the proposed development. The application relates to the change of use of an existing dwellinghouse to a small-scale children's home within Use Class C2. The proposal does not involve any substantial external enlargement or intensification of built form. Nonetheless, the applicant recognises the importance of ensuring that the building is capable of being operated with appropriate fire precautions having regard to the nature of the intended use and the needs of future occupants.

The existing property is a two storey dwellinghouse and retains a domestic form and layout. The intention is that an appropriate fire detection and alarm system would be installed and maintained for the use, designed and certified by a suitably qualified specialist through the relevant technical and regulatory processes. At this stage, the applicant's intention is for a system providing comprehensive coverage appropriate to the building and the proposed operation of the home, including protection to circulation areas, principal living spaces, bedrooms and other relevant rooms. Final specification and certification would be addressed through the appropriate detailed design and regulatory processes.

The home would also be provided with suitable fire safety equipment and measures where appropriate including, emergency lighting where required, and firefighting equipment such as fire blankets and extinguishers in suitable locations. Internal doors would be fitted, upgraded or managed as necessary as part of the detailed fire strategy for the premises, and appropriate smoke sealing and self-closing measures would be incorporated where required by the final design approach. These matters would be implemented by competent persons and maintained thereafter as part of the ongoing operation of the home.

The building benefits from an existing domestic layout with direct access and escape routes capable of serving the proposed use. All habitable rooms would have access to protected escape routes or suitable escape windows as appropriate to the detailed fire strategy. The aim is to ensure that occupants are able to evacuate the building safely in the event of fire, with measures proportionate to the scale of the building and the nature of the proposed use. Given the intended use of the property to provide care for children, the applicant also recognises that fire safety is not only a design matter but an operational one. Appropriate fire procedures, staff awareness, maintenance arrangements and regular testing of equipment would form part of the overall management of the home. The property would therefore operate with a combination of physical fire precautions and day to day management measures designed to promote the safety of residents and staff.

The detailed design, installation, commissioning and certification of the relevant fire safety measures would be undertaken through the appropriate statutory and technical regimes by suitably qualified persons. For present planning purposes, it is sufficient to note that fire safety has been actively considered from the outset and that the building is capable of accommodating suitable fire precautions for the proposed use. The proposal therefore addresses the objectives of London Plan Policy D12.

Care and regulatory framework

The proposed home would operate within the statutory framework applicable to registered children's homes in England. The provider's model is therefore not an informal or loosely defined residential arrangement, but one subject to registration, inspection and continuing regulatory oversight in relation to management, staffing, safeguarding, care planning and the quality of the living environment. The provider confirms that the home would be managed and delivered in accordance with the relevant legislative and regulatory requirements governing children's residential care, including the Children's Homes Regulations and the associated Quality Standards. In planning terms, that is material because it confirms that the proposal is advanced as a genuine, regulated and professionally managed Class C2 use, rather than an informal or loosely defined residential arrangement.

The operator understands that a registered children's home is expected to function through a defined Statement of Purpose, clear leadership and management arrangements, appropriately trained staff, safeguarding systems, and care delivered by reference to each child's assessed needs and relevant plans. The statutory framework also requires the home environment to be suitable for children's day to day living, privacy, wellbeing and participation in the life of the home, within a setting that is domestic in character and properly supervised.

The proposed model has been framed with that context in mind. It is for a small-scale therapeutic home for up to two children only, with defined staffing, waking night cover, managerial oversight, structured safeguarding arrangements, and accommodation arranged to provide shared domestic living space, personal bedroom space, staff facilities and separate quiet space. The proposal is therefore advanced as a genuine care led Class C2 use, with a clear understanding that residential children's care must be professionally managed, plan led and subject to ongoing review.

The provider's management structure would include a Responsible Individual, a registered manager and care staff, each performing a distinct and important role within the operation of the home. The Responsible Individual would have overarching responsibility for supervising the management and delivery of the service and for ensuring that the home is operated in accordance with the applicable regulatory requirements. That role requires sufficient experience, capacity and competence to oversee leadership, management and service quality, and to ensure that the home has the capability to meet the standards expected of registered children's homes. In practical terms, this provides strategic oversight above the day to day running of the home and an additional level of accountability in relation to safeguarding, quality of care and service delivery.

The registered manager would be responsible for the day-to-day leadership and management of the home. That would include responsibility for safeguarding and promoting the welfare of the children, supervising staff practice, maintaining a suitable living environment, ensuring that care is delivered consistently and appropriately, and overseeing the operation of the home in a structured and professionally managed way. This is material to the present application because it demonstrates that the home would not function casually or without clear operational leadership, but under defined management arrangements appropriate to a regulated care setting.

Care staff would provide the day-to-day support within the home and would work directly with the children across their daily routines, welfare, behaviour, emotional support, education related routines, activities and general development. Their role would not be confined to observation or basic supervision. Rather, it would involve delivering consistent, child centred support within a safe domestic environment, with the aim of promoting stability, resilience, emotional wellbeing and positive outcomes for each resident child.

The provider also confirms that the home would be operated by reference to the principal Quality Standards applicable to children's homes, including in particular standards relating to the quality and purpose of care, children's views, wishes and feelings, education, enjoyment and achievement, health and wellbeing, positive relationships, protection of children, leadership and management, and care planning. Those standards are not repeated here in full because the planning system is not the forum for determining detailed regulatory compliance. They are, however, relevant in demonstrating that the proposed use is intended to operate within a recognised and rigorous framework governing the quality, purpose and management of children's residential care.

For planning purposes, the significance of the above is not that the local planning authority is being asked to duplicate the role of the care regulator. Rather, it is that the proposal has been formulated with a clear understanding of the statutory framework applicable to children's residential care and is intended to operate within that framework. That assists in demonstrating that the proposal is a bona fide, regulated and properly managed Class C2 children's home, with a clear management hierarchy, defined care model, child centred purpose and external regulatory oversight.

Quality of Accommodation

Policy D6 of the London Plan requires housing development to provide high quality internal environments with layouts that are fit for purpose. Policy DMHB 16 of the Hillingdon Local Plan similarly requires an adequate provision of internal space to secure an appropriate living environment. Whilst the proposal is for a Class C2 children's home rather than conventional self-contained housing, the same broad principles of functional layout, adequate space, privacy, shared living and overall suitability remain relevant.

The application relates to the change of use of an existing dwellinghouse to a small-scale therapeutic children's home for up to two children only. The planning question is therefore whether the building would provide a safe, functional and appropriate living environment for that intended use. On the facts of this case, it is submitted that it would. The property is an existing family dwellinghouse with a conventional domestic arrangement over two floors. It has a GIA of 79m². At ground floor level it contains shared living accommodation comprising a living room, kitchen and dining space together with a WC. At first floor level it provides three bedrooms, a WC and a family bathroom. A rear garden would remain available as private outdoor amenity space. The building therefore already possesses the core features of a domestic home, namely communal living space, private bedroom accommodation, bathroom facilities and outdoor space.

The proposed internal arrangement is simple and coherent. Two of the first-floor bedrooms would be used as bedrooms for the resident children. The bedrooms would comply with the Technical Housing Standards in terms of floor area and width, and each child would therefore have their own bedroom and own personal space. That is consistent with the statutory Guide to the Children's Homes Regulations and Quality Standards, which states at paragraphs 3.17 to 3.20 that it is important that children can spend time away from other group members and that each child should have their own personal space, which will usually be their bedroom. The Guide further states that children should have separate bedrooms and should not share a bedroom with an adult. The proposal accords with that expectation.

The third bedroom would be used as a staff office for administration, record keeping and confidential discussions. That is an important point. It means the layout does not leave staff functions undefined or dependent on ad hoc use of children's living space. It also provides a clear and identifiable room for the administrative and supervisory aspects of the operation of the home.

At ground floor level, the front reception room would serve as a separate quiet or calming room when required, whilst the kitchen, dining and main living areas would continue to function as shared domestic space. The Council's concern in other cases that children should be able to withdraw from others is, in this instance, addressed in two ways. First, each child would have their own bedroom as their principal personal space, which is exactly how the statutory Guide frames the issue. Secondly, the layout also provides an additional separate room capable of being used as a quiet or calming space when needed. The proposal therefore cannot fairly be characterised as lacking any means by which a child may spend time away from others. The existence of this separate front room is a material distinction. The home would not operate from a single undifferentiated open plan space. Rather, it would provide both shared domestic accommodation and a degree of internal separation capable of supporting a small-scale therapeutic model for two children. That is sufficient for planning purposes.

The Council should also avoid imposing planning requirements that are not in fact mandated by the statutory children's homes regime. In particular, neither Regulation 6 nor paragraphs 3.17 to 3.26 of the statutory Guide impose any blanket requirement that each child must have an en suite bathroom. The relevant test is whether the premises are designed and furnished so as to meet the needs of each child and enable them to participate in the daily life of the home pursuant to Regulation 6(2)(c). In this case, the dwelling provides ordinary domestic bathroom facilities of a type commonly found within family housing. For a home limited to two children only, that arrangement is plainly capable of functioning appropriately. The absence of en suite bathrooms does not, without more, demonstrate that the accommodation is unsuitable.

Similarly, the Guide at paragraph 3.26 refers to providing appropriate accommodation and facilities for staff who sleep in the home overnight. That is not this proposal. The client's model is for waking night staff rather than sleep in accommodation. It follows that the premises do not need to be assessed on the basis that overnight staff bedrooms must be provided. Instead, the relevant planning question is whether the layout provides suitable staff facilities for the intended model. In this case, it does: there is a staff office and a ground floor WC for staff use, alongside the wider domestic accommodation of the house.

The layout is also appropriate having regard to the limited scale of the proposal. This is not a home for four children or a larger and more intensive institutional operation. It is a home for up to two children only. That reduced scale is material because it lessens pressure on shared facilities, reduces internal intensity and makes the existing domestic arrangement far more readily capable of accommodating the intended use.

Turning to the level of outlook, daylight and privacy afforded to the dwelling, an acceptable number of windows would be provided in locations conducive to providing outlook and maintaining internal privacy. All windows are noted to be existing.

The rear garden would remain available as private outdoor amenity space. Although the space standards applied to conventional dwellinghouses are not directly determinative in a C2 case, the retained garden materially supports the quality of the living environment by providing outdoor space for recreation, informal play and general wellbeing within the curtilage of the property.

Taken as a whole, the building would provide separate bedrooms for each child, shared domestic living space, an additional quiet or calming room, bathroom facilities, a staff office, staff WC and a usable rear garden. The layout is therefore functional, domestic in character and capable of supporting the proposed small scale therapeutic use. It would provide an acceptable standard of accommodation for future occupiers and would not justify refusal on internal quality grounds. For those reasons, the proposal is consistent with Policy D6 of the London Plan and Policy DMHB 16 of the Hillingdon Local Plan, read in a manner appropriate to the proposed Class C2 use.

Design and Quality of Materials

Hillingdon Local Plan Part 1: Strategic Policies (2012) Policy BE1 states 'The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long term needs of all residents. All new developments should achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place.' Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) 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: i) 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.

The proposed change of use would not alter the character of the dwelling with the overall appearance remaining as existing. The host building remains well integrated with its surroundings. Overall, the development will not harmfully impact the character or appearance of the street scene and is in accordance with the relevant local plan policies.

Impacts to Neighbouring Amenity

Policy D3 of the London Plan requires development to deliver an appropriate standard of privacy, outlook and amenity. Policy D13 requires noise and other nuisance generating development to incorporate suitable measures to avoid or manage adverse effects. Policy DMHB 11 of the Hillingdon Local Plan seeks to ensure that development does not adversely affect the amenity of neighbouring occupiers or the character of the area.

The application seeks permission for the change of use of an existing dwellinghouse to a small-scale children's home within Use Class C2. It is accepted that a C2 children's home is a different planning use from a Class C3 dwellinghouse. The case advanced is not that the proposal is legally or functionally identical to an ordinary family dwelling. Rather, the relevant planning question is whether, having regard to the actual scale and operational characteristics of the proposal, it would give rise to material harm to neighbouring amenity by reason of noise, disturbance, comings and goings or over intensification of the site. On the facts of this case, it is submitted that it would not.

The proposal is for a home for no more than two children only. That limited scale is of central importance. It materially reduces the likely level of activity within and around the property when compared with larger children's home models and means that the use would operate within a modest and readily understandable domestic framework. The home would not function as a larger institution, nor as a high turnover facility with multiple resident groups, extensive staffing or unrestricted visiting.

The operational model is also clearly defined. The children would be approximately 5 to 17 years old and would receive therapeutic support for emotional and behavioural needs. Care would be provided on a 1:1 basis. The staffing model provides two staff on the day shift and two staff on the waking night shift, with the registered manager attending during weekday business hours in a management and supervisory capacity. A Responsible Individual would undertake periodic oversight visits. The significance of this is that the home would be staffed and supervised at all times. Activity at the property would not be left to informal or unstructured occupation.

That distinction matters in amenity terms. The likely pattern of use is one of routine, supervision and management rather than unpredictability or uncontrolled activity. School age children would ordinarily be away from the property during the school day. Daytime staffing would be present for care, supervision and domestic management. The home would therefore tend to operate with a stable and controlled daily rhythm. Evening activity would remain domestic in nature, comprising meals, quiet recreation, homework, ordinary household routines and bedtime. Waking night staff would provide supervision overnight, but that does not of itself generate external noise or activity harmful to neighbours.

The proposal would not give rise to any harmful physical intensification of the site. No extension, subdivision, external alteration or additional built form is proposed. The property would remain a dwellinghouse in appearance and would continue to sit comfortably within its residential context. There would be no external plant, no institutional signage, no service yard activity and no visual features suggestive of an intrusive non residential use. In character terms, the building would continue to read as a house within a suburban street.

The likely pattern of visits is also limited and managed. Ofsted inspections would be infrequent and are expected to occur approximately twice per year. Regulation 44 visits would ordinarily occur once per month. Social worker attendance and any specialist support would be arranged in accordance with the relevant care plan and managed as part of the normal operation of the home. On the applicant's case, such visits are not expected to exceed approximately once per week. Family contact may occur on an approximately monthly basis and, where appropriate, may take place off site. These are not unrestricted public visits. They would generally be pre-arranged, limited in number, and capable of being supervised and coordinated by staff.

The management approach is important. The home would operate with controlled visitor arrangements, staff oversight, complaints procedures, neighbour awareness, location risk assessment and continuing review. Visits would generally be arranged in advance where possible and managed so that they do not overlap unnecessarily with shift handovers or create avoidable disturbance. The home would not operate as a premises of open ended visiting or uncontrolled comings and goings.

There is also no sound basis for assuming that the use would generate a materially greater level of noise and disturbance than a range of lawful domestic living patterns. An ordinary family dwelling may lawfully generate overlapping adult and child routines, visitors, carers, social worker attendance, deliveries, school related movements, home working, domestic noise and general day to day comings and goings. That does not mean a C2 use should be treated as equivalent to a C3 use for all purposes. It does, however, mean that alleged amenity harm must be demonstrated by reference to the actual scale and likely operation of the proposal, not by unsupported speculation.

In the present case, the use proposed is for two children only, with clear staffing arrangements and active supervision. The proposal is therefore materially different from larger or more intensive children's home models where a local planning authority may legitimately have greater concern about intensity of use. The Council is not being asked to assess an undefined care operation with uncertain staffing, uncertain visitor levels or uncertain management arrangements. The application sets out a defined and limited model, and it is that model which falls to be considered.

The possibility that children at the upper end of the age range may sometimes leave or return to the property does not alter the planning conclusion. The home would remain a supervised residential care setting. The fact that an older child may in some circumstances attend education, activities or appointments does not convert the property into a harmful source of external disturbance. The planning system must assess likely land use effects on a realistic basis. Here, with only two children, structured care, supervised routines and professional management, there is no evidential basis for concluding that the proposal would cause material neighbour harm.

The internal arrangement of the property also assists in this regard. The building provides ordinary shared domestic space together with separate bedrooms for each child and an additional front room capable of operating as a quiet or calming space. That layout supports the proposition that activity within the home can be managed in a calm and structured way, reducing the prospect of conflict or disturbance spilling into the surrounding area.

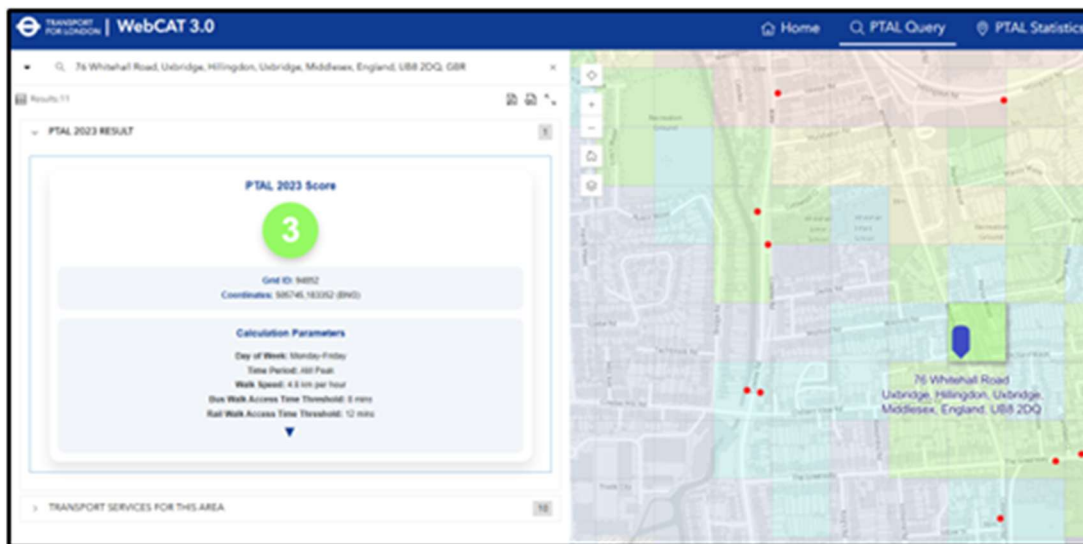
Overall, the proposal would introduce a small scale, managed and supervised residential care use within an existing house, with no external alteration and no persuasive evidence of material amenity harm. The likely level of activity would be structured, modest and residential in character. The use would not result in harmful noise, disturbance, over intensification or loss of residential amenity for neighbouring occupiers. Accordingly, the proposal complies with Policy DMHB 11 of the Hillingdon Local Plan and Policies D3 and D13 of the London Plan.

Location and highways including travel plan

Policy T2 of the London Plan seeks development that supports sustainable travel by walking, cycling and public transport and requires the impacts of development on the transport network and highway safety to be properly taken into account. Policy T5 requires appropriate cycle parking provision. Policy T6 establishes a car free and car lite approach in appropriate locations, with parking provision considered in light of public transport accessibility, connectivity and the particular characteristics of the development. At local level, Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan Part Two require the Council to consider whether traffic generated by development is acceptable in terms of local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety, and whether suitable parking and servicing arrangements are provided.

The application seeks permission for the change of use of an existing dwellinghouse to a children's home within Use Class C2 for up to two children only. The proposal must therefore be assessed by reference to its actual scale and likely transport effects, rather than by reference to a larger institutional model. On the facts of this case, the transport implications are modest and capable of being accommodated without unacceptable harm to highway safety or local parking conditions.

The site has a Public Transport Accessibility Level of approximately 3, which indicates moderate accessibility by public transport. The nearest bus stop lies approximately 340 metres from the property, and the train station is approximately 0.7 miles away on foot. In those circumstances, the site is reasonably accessible by non-car modes and is not a location wholly dependent on private vehicle use.



The existing use is a three-bedroom dwellinghouse with one formal off-street parking space on the driveway. The proposed layout would reduce the property to two bedrooms, and, in those circumstances, a parking provision of 0.75 spaces would ordinarily arise in C3 terms. The site already provides one off street parking space and therefore continues to meet that level of provision. It is accepted that there is no fixed London Plan parking standard for this form of C2 use. Parking therefore falls to be assessed on a case-by-case basis having regard to Policy T6, PTAL, connectivity and the actual characteristics of the proposal. The Council's own local standards nevertheless provide useful context. Under Hillingdon Local Plan Part Two, care home parking is approached by reference to a maximum standard. Hillingdon Local Plan: Part 2 requires either a transport assessment/travel plan or 1 space per 4 dwelling units (min. 2 spaces), plus 1 for a warden.

Notwithstanding this in a recent delegated assessment (23664/APP/2025/2264) of a children's home in a PTAL 3 location, the Council accepted a practical outcome of two parking spaces for four staff on the basis of the site's bus connectivity and a staff travel model based on public transport. Applying that same broad logic here, a two staff model with manager would equate to 1.5 spaces. The site provides one on site space, and the remaining demand is addressed through the applicant's operational travel plan.

That travel plan is straightforward and realistic. The single onsite parking space would ordinarily be used by the registered manager during weekday daytime hours. Other staff would be expected to travel to and from the site by public transport, and the applicant proposes to support that through paid travel arrangements. The proposal is therefore not based on multiple staff routinely arriving by private car or competing for parking on surrounding streets. The operational model is also material in another respect. The children themselves would not own or drive cars. The provider confirms that placements would not be accepted for children living with such a degree of independence that regular driving or car ownership would arise.

If a young person were to progress to a stage where that became relevant, that would be a matter for transition to a more independent form of accommodation rather than continued residence at this home. That significantly limits the scope for resident generated parking demand.

Visitor activity would likewise be limited and managed. Visits would generally be pre-arranged, short in duration and modest in number. Professional attendance such as Ofsted, Regulation 44 and social worker visits would typically occur during weekday office hours as part of the normal operation of the home. Family contact would also be managed and, where appropriate, may take place off site. Where occasional visitors do arrive by car, they would be expected to rely on the surrounding controlled parking and pay and display arrangements rather than on any assumption of unrestricted overspill. The property lies within a Controlled Parking Zone. The surrounding on street regime includes regulated parking controls and short stay visitor parking arrangements. That provides an existing framework within which occasional visitor parking can be managed where necessary. However, the planning case advanced is not dependent on unrestricted on street parking or general permit reliance. Rather, it rests on the limited scale of the use, the availability of one on site space for the registered manager, the expectation that other staff would travel by public transport, the managed and infrequent nature of visits, and the fact that resident car ownership would not arise.

For completeness, the applicant notes that residential parking permits may be available under the Council's separate parking regime if ever required. That point is noted as background only and not as the primary basis of the assessment. Should the Council consider that a permit-based arrangement ought also to form part of the parking management approach, the applicant would be willing to discuss that through the application process.

Emergency and servicing access would remain as existing. The site already functions as a dwellinghouse with established access from the public highway, and no physical alteration is proposed that would prejudice access arrangements. There is no reason to conclude that emergency or routine servicing vehicles could not continue to access the property in the ordinary way.

The proposal also incorporates sustainable transport measures. One active 7kW electric vehicle charging point would be provided. Two secure and covered cycle parking spaces would also be provided. Those measures reinforce the sustainable transport credentials of the proposal and further reduce reliance on private car travel. Waste storage would remain as existing.

Drawing these matters together, the proposal is not expected to generate unacceptable parking demand, prejudice highway safety or give rise to severe transport impacts. The use is limited to two children only, resident car ownership would not arise, one on site parking space is available for the registered manager, other staff would be expected to travel primarily by public transport with paid travel support, and visitor activity would be infrequent and managed within a controlled parking context. The transport implications are therefore modest, structured and acceptable, and the proposal complies with the objectives of Policies T2, T5 and T6 of the London Plan and Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan Part Two.

Other Matters Raised (Anti-social, security, crime and other social issues)

Concerns are sometimes raised in cases of this nature regarding anti-social behaviour, crime, security or wider social effects. Those matters must, however, be approached on an evidential basis and not by stereotype or generalised assumption. The planning system is concerned with whether there is a proper evidential basis for concluding that the proposed use would be likely to give rise to material harm of that kind.

In the present case, no such evidential basis is identified. The proposal is for a small-scale therapeutic children's home for up to two children only, operating within a structured and professionally managed framework. The home would be continuously supervised by staff in accordance with the defined operational model, including day staff, waking night staff and management oversight. The children would therefore not be occupying the property in an unsupervised or unmanaged manner. The proposal is not for a larger institution or a use involving uncontrolled movements or unrestricted activity.

The staffing model is itself material. Care would be provided on a 1:1 basis, with staffing responsive to the needs of the children placed. Staff would be trained and responsible for supporting children appropriately both within the home and, where relevant, when engaging with the local area. The home would operate within the statutory and regulatory framework applicable to registered children's homes, with safeguarding procedures, management oversight and external review. That context materially distinguishes the proposal from any suggestion of an unregulated or disorderly use.

There is no proper planning basis to assume that children living in residential care are inherently more likely to generate crime, anti social behaviour or disorder. Such an approach would be speculative and would fail to recognise the actual characteristics of the proposal, namely a small and supervised therapeutic setting designed to provide stability, care and support. If any criminal or anti social conduct were ever to arise, those matters would fall to be addressed through the relevant regulatory, safeguarding and general legal regimes, rather than by refusing an otherwise acceptable planning application on the basis of unsupported fear.

The proposal should therefore be assessed by reference to its actual land use characteristics. On that basis, there is nothing to indicate that it would result in material crime, anti social behaviour, security problems or wider social harm so as to justify refusal.

Other Issues

No external operational development is proposed. The application relates to a change of use only and would not involve extension, enlargement or alteration to the building. The footprint, bulk and external appearance of the property would therefore remain unchanged. No trees or hedges would be affected by the proposal. No issue of ecological harm is identified. The site lies within Flood Zone 1 and is therefore in an area of low probability of flooding. As no external building works are proposed, no separate issue is identified in relation to flood risk, drainage or construction related environmental effects.

For the same reason, the proposal would not materially affect air quality through demolition or construction activity. The use would continue to operate from an existing residential building, and no evidence has been identified to suggest that the proposed small scale C2 use would give rise to any unacceptable environmental effects in this regard. The proposal does not involve built development of a kind that would normally trigger planning obligations and no basis has been identified on which any such obligation would be required. Subject to the Council's usual validation and assessment processes, the proposal is therefore not considered to give rise to any separate issue in relation to planning obligations or related charges.

Planning balance

This application seeks planning permission for the change of use of 76 Whitehall Road from a dwellinghouse within Use Class C3 to a small-scale therapeutic children's home within Use Class C2 for up to two children. The proposal has been assessed against the Development Plan and all other material considerations. It is accepted that the development would result in the loss of an existing C3 dwelling and that this engages Policy DMH 1. However, that is not the end of the matter. The proposal must be assessed in the round, including by reference to the specialist accommodation policies, the identified borough level need for this form of provision, and the actual scale and characteristics of the proposed use. In that regard, the application is supported by clear and recent evidence from Hillingdon's own published strategy and committee material demonstrating a genuine need for additional local residential provision for vulnerable children, including homes capable of providing stable, small scale and therapeutically informed care. The Council's own material identifies increasing placement pressures, growing complexity of need, and a clear strategic objective to expand in borough residential capacity. The proposal responds directly to that identified need.

The applicant's operational model has also been clearly defined. The proposal is for no more than two children only, within a structured therapeutic setting, with 1:1 staffing, day staff, waking night staff, registered manager oversight and wider management supervision. The material submitted demonstrates that this is a genuine care led proposal falling within Use Class C2 and not an informal or loosely defined residential arrangement. It has also been shown that the home would operate within a recognised regulatory and management framework, albeit that detailed compliance with those separate regimes is not a matter for the planning system to determine.

The proposal would not give rise to a harmful over concentration of similar uses. The evidence before the Council indicates that children's homes within the Borough are generally dispersed. Whilst one nearby example has been acknowledged, that does not amount to a harmful clustering of similar uses such as to undermine residential character or amenity.

The remaining detailed planning considerations also weigh in favour of the scheme. The proposal would continue to operate from an existing house with no external alteration, such that there would be no harm to the character or appearance of the street scene. The internal accommodation would be suitable for the intended use, providing separate bedrooms for each child, shared domestic living accommodation, a separate quiet or calming room, staff facilities and private rear garden space. The home would therefore provide an acceptable standard of accommodation for future occupiers.

In amenity terms, the likely level of activity would be modest, managed and residential in character. The proposal is for two children only, not a larger institutional model. The submitted material demonstrates structured staffing, supervised routines, limited and managed visits, complaints procedures, neighbour awareness and continuing review mechanisms. On that basis, there is no persuasive evidence that the use would give rise to material harm to neighbouring amenity by reason of noise, disturbance, comings and goings or over intensification.

In highways terms, the proposal has likewise been shown to be acceptable through a considered travel plan. The site benefits from moderate public transport accessibility, one off street parking space, controlled parking arrangements in the wider area, and a staffing and visitor profile which is limited and managed. Resident car ownership would not arise. Read fairly and as a whole, the transport effects of the proposal would be modest and would not justify refusal on highway safety or parking grounds.

Other matters raised, including crime, anti social behaviour and related social concerns, do not provide a proper basis for refusal. Such matters cannot be judged by assumption or stereotype. The proposal is for a small, supervised and professionally managed therapeutic home, and no sound evidential basis has been identified for concluding that it would give rise to material harm of that kind.

Drawing these matters together, the application presents a clear and compelling planning balance in favour of permission. Against the acknowledged loss of a single C3 dwelling must be weighed the substantial public benefit of providing genuinely needed therapeutic residential care for vulnerable children within Hillingdon, in a form which is small scale, appropriately managed, integrated into a residential setting, and acceptable in terms of design, amenity, accommodation and transport. On the evidence before the Council, that balance falls clearly in favour of the proposal.

For all of those reasons, the proposed change of use to a children's home within Use Class C2 accords with the Development Plan when read as a whole, and planning permission should be granted.

Appendices

Appendix 1 - Hillingdon's Care Strategy November 2025-2030

Appendix 2 - Health and Social Care Select Committee, THURSDAY, 19 JUNE 2025

Appendix 3 - Children, Families and Education Select Committee, WEDNESDAY, 18 JUNE 2025

Appendix 4 - CABINET Thursday, 22 May 2025 at 7pm

Appendix 5 - The Hillingdon Safeguarding Partnership Annual Report 2023–2024

Appendix 6 - Guide to the Children's Homes Regulations including the quality standards April 2015

Appendix 7 – Delegated report 23664/APP/2025/2264