Planning, Design & Access Statement

Proposal: Change of Use from C3 (Dwelling House) to C2 (Children's Home)
Site Address: 35 Cumberland Drive, Bexleyheath, DA7 5LA
Applicant: Ade Bakare
Agent: G6 Studio Ltd
Date: October 2025

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1. Introduction

This statement supports a full planning application seeking permission to change the lawful use of 35 Cumberland Drive from Use Class C3 (dwelling house) to Use Class C2 (residential institution). The proposed C2 use will operate as a small-scale children's home providing 24-hour care and support for up to four young residents within a normal domestic setting. No external alterations are proposed.

This comprehensive statement addresses all material planning considerations including the principle of development, design, access, operational management, fire safety, waste management, highways impact, and compliance with national and local planning policy.

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2. Site and Surroundings

The property is a semi-detached two-storey dwelling with a converted loft, located within a well-established residential street in Bexleyheath. The surrounding area is predominantly residential (Use Class C3) with good access to local services, schools and public transport.

The site includes:

- Four on-site parking spaces at the front of the property
- Unrestricted on-street parking available
- Private rear garden measuring approximately 116 sq. metres
- Good pedestrian access to the main entrance

The property is well-connected to public transport, local amenities, schools, and community facilities, making it an appropriate location for a children's home where residents will be integrated into the local community.

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3. The Proposal

3.1 Proposed Use Details

Occupancy:

- Maximum of four children aged 11-17 years
- Two care staff members on site at all times (24/7)
- One Registered Manager present during office hours (Monday to Friday, 9:00 AM to 5:00 PM)
- **Maximum occupancy at any one time: 7 people (4 children + 3 staff)**

Staffing Pattern:

- Day shifts: 8:00 AM to 8:00 PM (two care staff members)
- Night shifts: 8:00 PM to 8:00 AM (two care staff members)
- Registered Manager: Monday to Friday, 9:00 AM to 5:00 PM (in addition to the two care staff)

Operation:

- Hours of operation: 24/7 residential use
- Visitors: Up to two visitors at any one time (family, social workers, or professionals)
- Care provided: Support and safeguarding tailored to individual needs under professional supervision
- Parking: Four on-site parking spaces plus unrestricted on-street parking available
- Refuse: Existing Council collection arrangements to remain
- Alterations: None proposed externally; internal layout adapted only to comply with fire safety and management requirements

3.2 Education and Daily Activities

The children would be in full-time mainstream education and would not be home-schooled. The children would be taken to school by appropriate vehicles. Daily routines would mirror those of a typical family household, with residents attending school, participating in recreational activities, and being supported by trained staff in their personal development.

3.3 Visitor Management

External visitors will include social workers (statutory visits every six weeks), therapists (weekly sessions), and family members. Visits will be pre-arranged and managed to ensure no more than two visitors are present at any given time, minimizing any impact on parking or neighbourhood activity.

4. Design and Layout

4.1 Internal Configuration

The existing layout of the dwelling provides adequate space for four residents and staff:

Ground Floor:

- Reception room
- Kitchen/dining area
- Staff office
- WC
- Shared living spaces

First Floor and Loft:

- Four bedrooms (three for children, one for staff use)
- Bathroom facilities
- All bedrooms exceed Nationally Described Space Standards

The residential character and appearance of the building will remain unchanged. No structural extensions are proposed.

4.2 Fire Safety Provisions

Comprehensive fire safety measures will be implemented to ensure the highest standards of safety for residents and staff, in full compliance with Building Regulations Part B. These measures include:

- Full zoned fire alarm system with smoke and heat detectors throughout
- Emergency lighting in common areas and escape routes
- FD90 fire doors to all bedrooms and living rooms
- Protected hallways and stair enclosures providing safe escape routes
- Secondary means of escape via windows on upper floors
- Designated evacuation assembly point on front forecourt

All fire safety installations will be professionally designed, installed, and maintained to ensure compliance with current Building Regulations.

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5. Waste Management Strategy

In accordance with the Council's waste management policies, the following measures will be implemented:

5.1 Indoor Waste Management

- Individual room bins emptied daily by staff
- Dedicated kitchen waste bin for food waste, packaging, and general refuse
- Daily transfer of waste to external bins

5.2 Outdoor Waste Management

- Official Council-provided wheelie bins positioned within property boundary near highway
- Bins placed to avoid obstruction of pedestrian access
- Safe distance maintained from windows and entrances
- Garden waste stored at rear and moved to front on collection days

5.3 Recycling Practices

- Council-provided recycling boxes used for segregated recyclable materials:
    - Box 1: Paper and cardboard
    - Box 2: Mixed recyclables (plastics, cans, glass)

5.4 Compliance

- All bins kept with lids securely closed to prevent pest access and contain odours
- Waste and recycling presented for collection by 6:00 AM on designated days
- No construction waste as no structural changes proposed

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6. Access and Parking

6.1 Vehicle Access and Parking Provision

Vehicle access remains via the existing driveway and public highway. The property benefits from four on-site parking spaces at the front of the property, ensuring adequate provision for staff and visitors.

Parking demand is anticipated to be low and comparable to a large family household:

- Staff typically use public transport or car-share arrangements
- Visitor numbers are limited and pre-arranged
- The property's location near public transport reduces reliance on private vehicles
- Four on-site spaces provide sufficient capacity for operational needs

There is also unrestricted on-street parking available, providing additional capacity should it be required. The level of parking provision exceeds typical residential parking

demand and will accommodate the use without affecting neighbouring properties or highway safety.

6.2 Pedestrian Access

Pedestrian access to the main entrance is level and unchanged from the existing arrangement. The property is well-connected to local amenities, schools, and public transport via existing pedestrian infrastructure.

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7. Impact on Neighbour and Residential Amenity

7.1 Residential Character

The use is entirely residential in nature and will operate quietly under professional supervision. Residents will live as a single household, supported by trained staff, and normal household routines will apply. The property will maintain its external residential appearance with no physical alterations visible from the street or neighbouring properties.

7.2 Noise and Disturbance

With 24-hour professional staffing, behaviour and comings/goings are well managed to avoid noise or disturbance. Continuous supervision by trained staff will ensure that any potential sources of noise or disruption are promptly addressed. The level of activity associated with the proposed use is not materially different to a large family household.

7.3 Privacy and Overlooking

No changes to windows or external openings are proposed. There will be no impact on the privacy or overlooking of neighbouring properties. The proposal maintains a high standard of residential amenity, with no loss of light or privacy for adjacent dwellings.

7.4 Staff Shift Patterns

The shift patterns of staff are comparable to C3 household occupants where family members work shifts. Shift work is a typical pattern of employment. A family home with two earners and children would likely have movements to and from the property throughout the day. There would be nothing inherently commercial in the nature of the movements to and from the site, and the pattern would not be jarring with the residential nature of the area.

7.5 Garden and Outdoor Space

The rear garden measuring 116 sq. metres provides ample private amenity space for the occupiers. The use of the garden will be no different from typical family use - for

recreation, relaxation, and outdoor activities - and will not generate noise or disturbance beyond what would be expected from a residential dwelling.

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8. Highways Impact and Transportation

8.1 Trip Generation and Vehicle Movements

For the vast majority of the time, there would be a maximum of six persons present on site (four children and two staff). During office hours Monday to Friday, there may be up to seven persons when the Registered Manager is also present. The main vehicle movements would be comparable to a normal family:

- School runs
- Doctor's appointments
- Shopping trips
- Social and recreational outings
- Staff changeovers (typically twice daily)

While there would be additional visits from professionals (social workers every six weeks, therapist once weekly), this would be comparable with social visits from friends and family associated with a large household.

8.2 Parking Demand Assessment

The parking demand will not be materially different from a large family household, given:

- Four children in residence
- Two care staff present at any time (three during office hours)
- Limited and pre-arranged professional visits
- Four on-site parking spaces available
- Good public transport accessibility
- Staff encouraged to use public transport or car-share

8.3 Highway Safety

The movements to and from the site are residential in nature and not jarring with the area's character. Not all movements will be by motor vehicle, and pedestrian movements will be innocuous. The proposal will have no adverse impact on highway safety or traffic flow.

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9. Community Benefit and Social Value

9.1 Meeting Local and National Need

The development provides an important community service by meeting documented demand for high-quality, small-scale children's residential care. It supports vulnerable young people in a family-style environment within the community.

National Context:

The shortage of children's homes and suitable accommodation represents a well-documented crisis:

- As of March 2024, 67% of children in children's homes were placed outside their local authority, with 49% placed more than 20 miles from home
- In 2024, 18,040 looked-after children (22% of all looked-after children) were placed more than 20 miles from home
- Research shows that children placed more than 20 miles from home have poorer wellbeing outcomes: 32.4% showed cause for concern on strengths and difficulties questionnaires, compared with 27.7% of other looked-after children
- The number of children placed more than 50 miles from home has risen from just over 6,000 in 2020 to well over 7,000 in 2024
- Between 2020 and 2024, the number of foster care households fell by 9% (excluding kinship care), reducing options for accommodating looked-after children

Sources:

- UK Parliament House of Commons Library, "Looked After Children (Distance Placements) Bill 2024-25" (May 2025)
- National Audit Office, "Government needs better oversight to tackle market failures in children's residential care" (2025)
- Community Care, "More children in care placed far from home, increasing risk of poorer wellbeing" (April 2023)
- Ofsted, "Children's social care in England 2025" (August 2025)

9.2 Statutory Duty

The London Borough of Bexley has a statutory duty under Section 22G of the Children Act 1989 to provide adequate care facilities for vulnerable children within its boundaries. Placements far from home disrupt education, life outcomes, and relationships, making children feel lonely, isolated, and stigmatised.

9.3 Local Employment

The proposal generates local employment for care staff and support professionals, providing quality employment opportunities within the local community.

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10. Management and Operations

10.1 Professional Management

- **Ofsted Regulation:** The use will be regulated by Ofsted, ensuring compliance with national standards for children's residential care
- **Experienced Provider:** The care provider has experience in the sector and will work with local authorities to supply care packages for children in need
- **Appropriate Care Packages:** The children and young people would receive the right care packages and staff supervision during the settling-in period and thereafter
- **Community Supervision:** Young people will be supervised in the community, unless they have been risk assessed to have independence
- **Professional Standards:** All staff will be appropriately trained, DBS checked, and work within Ofsted guidelines and regulations

10.2 Operational Protocols

The home will operate with:

- Clear policies and procedures covering all aspects of care
- Risk assessments for all residents
- Individual care plans tailored to each child's needs
- Regular staff training and supervision
- 24-hour staffing ensuring constant professional oversight
- Management of all external appointments and visits
- Liaison with schools, social services, and other professionals

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11. Planning Policy Context

11.1 National Planning Policy Framework (NPPF) 2024

The proposal accords with the aims of the NPPF, particularly:

Chapter 2 - Achieving Sustainable Development:
Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development.

Chapter 5 - Delivering a Sufficient Supply of Homes (Paragraphs 61-63):

- Paragraph 61: Emphasises the importance of a sufficient amount and variety of land for homes where needed, addressing the needs of groups with specific housing requirements

- Paragraph 62: Requires assessment of the size, type and tenure of housing needed for different community groups
- Paragraph 63: Specifies that planning policies should address the needs of those requiring care homes

Chapter 8 - Promoting Healthy and Safe Communities (Paragraphs 96-97):

- Paragraph 96c: Planning policies should enable and support healthy lifestyles, especially where this would address identified local health and well-being needs
- Paragraph 97a: Plan positively for community facilities and services to enhance sustainability of communities
- Paragraph 97b: Take into account and support local strategies to improve health, social and cultural well-being for all sections of the community

The proposal directly addresses an identified need for specialist children's accommodation, supporting vulnerable young people in a community setting, and aligns with the Government's objectives for inclusive and sustainable communities.

11.2 The London Plan (2021)

Policy GG1 - Building Strong and Inclusive Communities:
Requires development to strengthen communities and help deliver sustainable, inclusive places that support social infrastructure.

Policy H12 - Supported and Specialised Accommodation:
This policy directly supports housing which meets an identified need to satisfy the requirements of specific groups, including young people with support needs.

Policy D4 - Delivering Good Design:
The proposal maintains the existing residential character of the building with no external alterations.

Policy D5 - Inclusive Design:
The proposal provides inclusive accommodation meeting the specific needs of vulnerable young people.

Policy D6 - Housing Standards:
All proposed bedrooms exceed Nationally Described Space Standards.

Policy D11 & D12 - Safety, Security and Fire Safety:
Comprehensive fire safety measures are incorporated.

Policy H8 - Loss of Existing Housing:
While the use class changes from C3 to C2, this represents a change from one type of housing to another, meeting an identified specialist need. The loss of one family home is justified by the provision of essential care accommodation for which there is documented national need.

Policy T6 - Car Parking:
Four on-site parking spaces exceed typical residential provision and adequately serve the operational needs of the children's home.

11.3 Bexley Local Plan (2023)

Policy SP1 - Achieving Sustainable Development:
The proposal represents sustainable development by reusing an existing building to meet an identified social need without physical expansion or environmental impact.

Policy SP2 - Meeting Bexley's Housing Requirements:
Bexley's local level assessment of specialist housing has identified a need of 81 (gross) units per annum. This proposal contributes directly to meeting this identified need.

Policy SP7 - Social and Community Services and Facilities:
This policy identifies children and family services such as the residential institution proposed as a type of social and community infrastructure within a neighbourhood.

Policy DP6 - Loss of Existing Housing:
The loss of one family home is suitably justified by the provision of a care home for which there is an identified need. The proposal creates balanced communities that meet local needs whilst delivering essential specialist accommodation.

Policy DP11 - Achieving High Quality Design:
No external alterations are proposed. The building will retain its residential appearance and character.

Policy DP22 - Sustainable Transport:
The site is well-connected to public transport, reducing reliance on private vehicles.

Policy DP23 - Parking Management:
Four on-site parking spaces provide adequate provision for the use.

Policy DP24 - Impact on Transport Network:
The proposal will not harm highway safety or the free flow of traffic.

Policy DP26 - Waste Management:
Comprehensive waste management provisions are detailed in Section 5.

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12. Principle of Development: Relationship to C3(b)

12.1 Use Class Analysis

The application seeks permission for the change of use from Use Class C3(a) Dwellinghouse to Use Class C2 (Residential Institution). It is important to note that a

similar use under C3(b) could potentially be carried out under Permitted Development rights.

The Town and Country Planning (Use Classes) Order 1987 (as amended) defines Class C3: Dwelling houses as formed of 3 parts:

- **Class C3(a):** Those living together as a single household
- **Class C3(b):** Not more than six residents living together as a single household where care is provided for residents
- **Class C3(c):** Not more than six residents living together as a single household where no care is provided

12.2 Household Characteristics

The proposed use involves:

- Maximum of four children (ages 11-17 years)
- Two care staff members present at all times
- One Registered Manager during office hours (Monday-Friday)
- Maximum occupancy: 7 people at any one time

The residents would share facilities such as bathroom, kitchen, living areas and garden, and would live in a similar manner to a family household. The level of activity will not exceed that of a large family home.

12.3 Relevance of C3(b) Precedent

This reference to C3(b) is included to demonstrate that:

1. **The impact of the proposed C2 use is comparable to a C3(b) use**, which accommodates up to six residents with care provision
2. **The scale and character of the operation** falls within parameters that could potentially operate under Permitted Development
3. **The intensity of use** is not materially greater than what could lawfully occur without planning permission

Case Law Support:

In R(Hossack) v Kettering BC [2002], the court held that the important consideration was that six or fewer people should be resident. Staff in a small care home do not actually have to reside full time for the unit to be viewed as a household.

A recent appeal (Debbie Moore vs Sefton Borough Council, December 2022) involved the conversion of a house (C3) into a children's home (C2) for two children. The Planning Inspector concluded that use of a dwelling as a children's home by two children and two staff members does not amount to a material change, therefore conversion falls under Permitted Development rights.

12.4 Application Rationale

While the operational characteristics overlap with C3(b), this application seeks C2 permission to:

1. Ensure full regulatory compliance with Ofsted requirements for children's home registration
2. Provide certainty for all parties including the Council, neighbours, and the operator
3. Enable proper assessment of all material planning considerations

This approach ensures transparency and allows the Council to fully consider the proposal against relevant planning policies, while recognising that the scale and impact of the use is comparable to what could occur under Permitted Development.

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13. Assessment Against Material Considerations

13.1 Loss of Family Dwelling

While the application property is a semi-detached house with substantial accommodation, the following considerations are relevant:

- **No Net Loss:** There is potentially no net loss of residential accommodation, as it represents a change from one type of housing to another
- **Modest Impact:** Relative to housing provision across the whole borough, the loss of one dwelling has only a very modest impact on supply
- **Meeting Identified Need:** The loss is justified by addressing the documented shortage of specialist children's accommodation both locally and nationally
- **Policy Support:** Policy SP2 identifies a need for 81 specialist housing units per annum in Bexley

As established in Appeal Ref: APP/P4605/W/22/3313619, the loss of one family home can be suitably justified by the provision of a care home for which there is an identified need.

13.2 Standard of Accommodation

All proposed bedrooms exceed Nationally Described Space Standards:

- Each bedroom provides adequate floor space for furniture and circulation
- All habitable rooms have appropriate access to natural light, outlook, and ventilation
- Shared facilities (kitchen, living areas, bathrooms) are appropriately sized
- The rear garden (116 sq. metres) provides ample private amenity space

13.3 Character and Appearance

No external alterations are proposed. The building will retain its residential appearance and character, maintaining the visual amenity of the street scene. The use will be indistinguishable from a large family home from an external perspective.

13.4 Residential Amenity

The proposal maintains high standards for both occupiers and neighbouring properties:

- Professional 24-hour supervision ensures controlled behaviour
- Activity levels comparable to a large family household
- No loss of privacy or light to neighbouring properties
- Appropriate management of noise and comings/goings
- Normal domestic use of outdoor space

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14. Sustainability and Environmental Considerations

14.1 Sustainable Use of Existing Building

The proposal re-uses an existing dwelling with minimal physical change, representing sustainable use of the built environment. This approach:

- Avoids demolition and reconstruction
- Retains embodied carbon in existing structure
- Minimizes construction waste
- Makes efficient use of existing infrastructure

14.2 Environmental Impact

There are no alterations to:

- External building fabric
- Drainage or water systems
- Landscaping or external areas
- Site boundaries or access arrangements

The environmental impact of the proposal is minimal.

14.3 Biodiversity Net Gain (BNG)

Not applicable - No external development or habitat impact is proposed. The existing garden will be retained and maintained.

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15. Conclusion

The proposal represents an appropriate change of use from a private dwelling (C3) to a small children's home (C2) that:

15.1 Meets Planning Policy Objectives

- **Accords with NPPF:** Addresses identified housing needs for children in care and supports healthy, inclusive communities
- **Complies with London Plan Policy H12:** Provides supported accommodation meeting documented need
- **Aligns with Bexley Local Plan Policies SP2 and SP7:** Contributes to specialist housing targets and provides essential social infrastructure

15.2 Addresses Critical Need

- **National Crisis:** 67% of children in children's homes placed outside their local authority; 22% placed more than 20 miles from home
- **Poor Outcomes:** Children placed far from home show significantly worse wellbeing outcomes
- **Fulfils Statutory Duty:** Supports the Council's obligations under Section 22G of the Children Act 1989

15.3 Protects Amenity and Character

- **No External Alterations:** Retains residential appearance
- **Minimal Impact:** Activity levels comparable to large family household
- **Professional Management:** 24-hour staffing ensures appropriate supervision
- **No Highway Issues:** Four on-site parking spaces exceed typical provision

15.4 Provides Quality Accommodation

- **High Standards:** All bedrooms exceed space standards
- **Comprehensive Fire Safety:** Full compliance with Building Regulations Part B
- **Effective Waste Management:** Thorough environmental protocols
- **Appropriate Outdoor Space:** 116 sq. metres garden provides ample amenity space

15.5 Sustainable Development

- **Reuses Existing Building:** Minimal environmental impact
- **Community Integration:** Supports vulnerable young people within local community
- **Local Employment:** Provides quality jobs for care professionals
- **Efficient Land Use:** Makes optimal use of existing residential property

15.6 Comparable to Permitted Development Scale

The proposal is similar in scale and impact to a C3(b) use (up to six people living as a household with care). This demonstrates that the intensity of use is not materially different from what could potentially occur under Permitted Development rights, though C2 permission is sought to ensure full regulatory compliance with Ofsted requirements.

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16. Final Summary

No physical alterations are proposed, and the property will retain its residential appearance and character. The use will provide vital community benefit without causing harm to:

- Neighbouring amenity
- Parking provision or highway safety
- Local infrastructure
- Visual character of the area

The proposal makes efficient use of the land, provides alternative housing choices for a specific demographic which improves inclusivity, and meets a critical documented national need. The use and associated activity would be unlikely to cause significant disturbance or amenity harm.

The proposed change of use is acceptable in principle, the standard of accommodation is high quality, and the proposal would not result in harm to the area's visual amenity, residential amenity, or the functioning of the local highways network.

Accordingly, planning permission should be granted.