



PLANNING STATEMENT

Change of Use from an (Use Class C3) to a Children's Residential Home (Use Class C2)

Site: Edgley, Grange Bottom, Royston, Hertfordshire SG

Applicant: Leigh Cares

Date: March 2026

Ref: 24085 / Rev: C

1. INTRODUCTION

1.1 **Leigh Cares** has commissioned this supporting statement for the change of use of the existing building at Edgley. The proposal seeks to provide a high-quality residential environment for up to **2 children** (up to the age of 18), supported by up to 2-3 non-resident carers on a rotational shift basis.

1.3 This statement, which should be read in conjunction with the supporting information submitted with the application, aims to give an appraisal of the planning issues and merits in context with planning and other policies, guidance, and material considerations.

1.4 This planning statement seeks to provide an overall summary of the existing site and surroundings, the relevant planning history of the site, and to provide justification for the proposed works in the context of the local surroundings. This is intended to support North Hertfordshire District Council in the determination of this proposal and demonstrate that the proposed changes comply with the policies of relevance within the Development Plan. The report is structured in the following format:

- Section 2: Site & Surroundings
- Section 3: Planning History
- Section 4: Use & Amount
- Section 5: Layout of the Property
- Section 6: The Need For The Proposed Use
- Section 7: The Occupiers & Daily Life in the Home
- Section 8: Planning Policy Framework
- Section 9: Planning Assessment and Principle of Development
- Section 10: Operational Management and Impact Mitigation
- Section 11: Impact on Neighbouring Amenity



- Section 12: Conclusion

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2. SITE & SURROUNDINGS

2.1 The existing site, known as Edgley, comprises a detached 4-bedroom bungalow. The property features a substantial hardstanding area to the front, providing sufficient off-street parking spaces, and a private residential garden/amenity space to the rear.

2.2 It is confirmed that the property is currently used as a single-family dwellinghouse falling within **Use Class C3**. The property is situated at **Grange Bottom in Royston, Hertfordshire**, within a well-established residential area. This location is characterised by a mix of detached and semi-detached dwellings of varying styles, set within a quiet and settled domestic environment.

2.3 The bungalow is well-maintained and its scale is consistent with the surrounding residential character, making it an ideal environment for a small-scale residential care home that seeks to replicate a traditional family setting.

2.4 The application site features a private garage and dedicated hardstanding, ensuring all parking requirements are met on-site without reliance on street parking. Situated on a road characterised by similar residential dwellings, the property is located within a predominantly residential context, while also benefiting from close proximity to various commercial services and local amenities.

2.5 According to the Government's flood risk mapping, the site is situated outside of any known flood risk zones (Flood Zone 1), indicating a low probability of fluvial or tidal flooding.

Furthermore, the property is located within a designated Conservation Area. Consequently, any proposed development has been designed with due regard to the character and appearance of the heritage asset, ensuring that the materials and scale remain sympathetic to the local vernacular.

As the site falls entirely within the established settlement boundary, the principle of development is considered consistent with local planning policy, provided it preserves or enhances the character of the Conservation Area

3. Relevant Planning History

3.1 Two-Storey Side & Single-Storey Rear Extension (March 2021)

- Reference: 21/00845/FPH



- Description: Demolition of the existing detached garage to make way for a two-storey side extension and a single-storey rear extension. This also included internal alterations.
- Outcome: Granted.

3.2. Single-Storey Side and Rear Extensions (September 2008)

- Reference: 08/02144/1HH
- Description: Extension of the ground floor footprint to enhance living space.
- Outcome: Granted.

3.3. Single-Storey Extension (June 1993)

- Reference: 93/00713/1
- Description: Early structural addition to the original dwelling.
- Outcome: Granted.

4. PROPOSED USE & AMOUNT (USE CLASS C2)

4.1 The proposal is to transition the property from C3 to C2 (Residential Institution).

4.2 **Occupancy:** Maximum of 2 children. This is a reduction in the total number of residents compared to the current 4-bedroom residential use.

4.3 **Staffing:** Up to 2-3 carers will be present at any one time. Shifts are designed to minimize traffic, with handovers occurring during standard daytime hours.

4.4 **Domestic Character:** The home will function as a single household. Children will eat together, attend local schools, and participate in community activities, mirroring a traditional family unit. The nature of the existing building and proposed change of use means that there are no material differences in relation to overbearing, overshadowing, overlooking or visual intrusion.

5. Property Layout

5.1 No material changes are proposed to be made to the house, as the existing layout requires no adaptation to facilitate the proposed use. No extensions are proposed to the building as part of this change of use application. The existing building is a detached bungalow and is currently in good decorative and structural order.

5.2 The existing property features 4 bedrooms. As the property is a bungalow, all accommodation is situated on the ground floor, including the 4 bedrooms, bathrooms, and general living spaces.

5.3 The property, therefore, continues to be used as a traditional “dwellinghouse,” with all living and sleeping accommodation remaining within the existing footprint of the bungalow.



5.4 Each resident will have their own bedroom and will share the communal kitchen and living areas. The carers will share and participate in the domestic and living activities alongside the residents to maintain a domestic environment.

5.5 Of the 4 available bedrooms, one will serve as a sleeping room for a staff member who is on-site 24 hours per day on a rota basis. This ensures that the property functions as a single household while providing the necessary support for residents.

6. THE NEED FOR THE PROPOSAL

6.1 Current Market Deficit and Placement Stability :There is a substantial and urgent need for high-quality Children's Homes across the UK. According to a landmark report published by Ofsted (January 2024), children with complex needs often wait months—or in the most severe cases, years—to be placed in a stable home. The inspectorate found that the vast majority of local authorities (**91%**) "frequently" struggle to find suitable homes for children with complex needs, often resulting in children being placed in unregistered settings or living in isolation far from their home communities.

National Audit Office (NAO) and CMA Findings This shortage is further evidenced by the National Audit Office (2024/25), which warned that local authorities are increasingly "forced to compete" for a limited number of places in an under-supplied market. This lack of sufficiency means that nearly half of all children in residential care are now placed more than 20 miles away from their local area, which can severely disrupt their education and support networks.

6.2 National policy encourages children to be placed in "small-scale" homes that provide a domestic, rather than institutional, atmosphere. This site is ideally situated near local amenities and transport links to facilitate the children's integration and development.

6.3 Statutory regulatory bodies and national policy frameworks have moved decisively away from institutionalised placements for children's residential care. Current best practice, championed by Ofsted and the Department for Education, prioritises community-integrated settings that replicate a domestic environment. Small, regulated residential homes—such as the one proposed at Edgley—allow children to be supported in discreet, residential settings proximal to local amenities, schools, and extracurricular activities. This integration is not merely an aesthetic preference; it is a safeguarding necessity. By embedding children within a stable community rather than an isolated institution, we significantly reduce the risk of children being targeted by criminal gangs or falling into cycles of exploitation. This community-focused approach is a core component of the Ofsted-mandated Location Risk Assessment, ensuring that the application site is a safe, protective environment for its residents.



6.4 The proposals for Edgley, as a four-bedroom children's home, offer a smaller-scale environment that is inherently more person-centred and reflective of a traditional family home. This domestic scale is essential for fostering a sense of belonging and normalcy, which is often lost in larger facilities. Children in care are a diverse cohort with vastly different emotional needs, personalities, and backgrounds; as such, there is no "one size fits all" solution for residential placements. Edgley provides a specific, high-quality alternative for children who would benefit from a quieter, more integrated family-style life, ensuring that the local "menu" of care options is sufficiently diverse to meet individual requirements.

6.5 The need for this provision is explicitly evidenced by Hertfordshire County Council's (HCC) 2023/24 Sufficiency Statement. The Council has identified a critical deficit in local accommodation options, stating a clear strategic objective to house all young people under their care within—or in close proximity to—the county borders. Currently, this goal remains unmet, with approximately 100 children from Hertfordshire forced into placements outside the county due to a lack of local provision.

Placing children out-of-county often severs vital links with their families, social workers, and peer groups. The Edgley proposal directly addresses this local authority sufficiency gap. By providing a new, high-quality facility within the county, we are supporting HCC's mission to keep vulnerable young people connected to their home communities, thereby contributing to a more sustainable, stable, and supportive care network across Hertfordshire.

7.0 The Occupiers and Daily Life in the Home

7.1 Nature of Provision and Resident Profile: Edgley is designed to provide high-quality residential accommodation and support for up to four young people aged 16 to 18 years. The home serves those who cannot remain with their families due to trauma, family breakdown, or neglect, and who are transitioning toward adulthood. By focusing on this specific age group (semi-independent preparation), the home bridges the gap between traditional foster care and full independence.

The facility is equipped to support young people with diverse needs, including mild physical disabilities and low-to-medium level mental health needs such as neurodiversity, anxiety, or depression. The environment is not intended for, nor will it accommodate, individuals requiring high-level forensic or acute clinical care.

7.2 The property functions as a single, cohesive household. Care is provided by a dedicated team working on a shift basis to mirror a traditional family structure.

- **Daytime:** Generally, 2–3 staff members will be on-site, depending on the complexity of the residents' needs. They support community access,



educational pursuits, training, and life-skills development (e.g., grocery shopping, attending appointments).

- **Nighttime:** 2- 3 staff members will remain on-site in a "sleep-in" capacity or waking night capacity to ensure 24-hour safety and support, although this is not their primary residence.
- **Shift Patterns:** To minimise disruption, staff operate on 12-hour shifts. Handovers typically occur at 08:00 and 20:00, lasting approximately 15–30 minutes to ensure a seamless transfer of care notes.

7.3 The objective is to mirror a traditional family home in a "normal" neighbourhood. Residents share communal spaces, eat meals together, and participate in collective household activities. Young people are actively encouraged to participate in meal preparation and household tasks, ensuring the home maintains a residential rather than institutional character. This environment is essential for helping 16–18-year-olds develop the social skills and independence necessary for a fulfilling adult life.

Visits from external professionals (Social Workers or NHS clinicians) are infrequent and, where possible, are conducted at community-based locations such as doctor's surgeries or day-opportunity centres to maintain the privacy and "domestic" feel of the home.

7.4 No physical alterations—internal or external—are required to the property. From the street, Edgley will remain entirely indistinguishable from any other family home in the community. This lack of "institutional" signage or modification is a deliberate strategy to ensure the residents feel integrated and to protect the character of the neighbourhood.

7.5 A secure, fenced garden and dedicated garden room provide safe outdoor amenity space. These facilities are central to the home's operation, encouraging physical activity and outdoor recreation within a protected environment.

7.6 Impact on Local Amenity and Highways: The proposed use is consistent with the character of a large family home.

- **Vehicle Movements:** Movements to and from the site will be comparable to, or less than, a typical family with adult children. Residents (aged 16-18) are unlikely to own cars, meaning vehicle movements are largely limited to staff shift changes twice daily.
- **Comparison:** A standard family could easily accommodate multiple adults, each with their own vehicle, travelling independently for work and leisure. By contrast, Edgley's movements are regulated and predictable, resulting in no material increase in traffic or noise that would impact neighbouring amenity.

8. Planning Process Framework



8.1 The relevant policy considerations for the proposed development at Edgley are:

- North Hertfordshire District Local Plan 2011–2031
- North Hertfordshire Proposals Map
- Supplementary Planning Documents (SPD), specifically the North Herts Parking SPD
- National Planning Policy Framework (NPPF)

NORTH HERTFORDSHIRE DISTRICT LOCAL PLAN

8.2 **Key Local Policies:** The following policies are central to the determination of this application:

3.1 Strategic Policies (SP1 & SP8)

- **Policy SP1 (Sustainable Development):** The proposal supports the social pillar of sustainability by providing essential care infrastructure within an existing settlement, reducing the need for "out-of-county" placements.
- **Policy SP8 (Housing):** This policy recognises the need for a range of housing types. Converting a single dwelling to a C2 use for vulnerable youths contributes to the diversity of the district's housing stock.

3.2 Specialist Housing (HS3 & HS4)

- **Policy HS3 (Housing Mix):** By providing specialised accommodation for young people, the proposal ensures the local housing mix addresses the needs of all community sectors, including those requiring supported living.
- **Policy HS4 (Supported, Sheltered and Older Persons Housing):** This policy explicitly supports the provision of specialist accommodation. The proposal meets the criteria by being located in a sustainable area with access to local services, shops, and transport links in Royston.

3.3 Design and Amenity (D1 & D3)

- **Policy D1 (Sustainable Design):** As no physical changes are proposed, the development respects the existing character and context of Grange Bottom. The "high-quality design" is reflected in the internal management plan which ensures a domestic, familial atmosphere.
- **Policy D3 (Protecting Living Conditions):** The small scale of the home (max. 2 children) ensures that the intensity of use is comparable to a standard C3 family home. Noise and activity levels will be strictly managed via the Social Management Plan to ensure no adverse impact on neighbouring occupiers.



3.4 Transport and Parking (T2)

Policy T2 (Parking): The property benefits from a large driveway. With only 1-2 children (who do not drive) and a maximum of three staff members on-site at any time, the existing parking provision exceeds the requirements for a C2 use of this scale, preventing any overspill onto Grange Bottom.

NATIONAL PLANNING POLICY

8.3 Presumption in Favour of Sustainable Development The National Planning Policy Framework (NPPF), updated in December 2023, is a material consideration in planning decisions. Paragraph 11 confirms that a presumption in favour of sustainable development is at the heart of the Framework. For decision-taking, this means approving proposals that accord with an up-to-date development plan without delay.

8.4 Three Overarching Objectives As outlined in Paragraph 8, achieving sustainable development requires the pursuit of three mutually supportive objectives:

- **Economic:** Ensuring land is available in the right places to support growth.
- **Social:** Supporting strong, vibrant, and healthy communities by providing a sufficient range of homes to meet the needs of present and future generations and fostering a safe, well-designed built environment.
- **Environmental:** Protecting and enhancing our natural and built environment while making effective use of land.

8.5 Delivering a Sufficient Supply of Homes In line with the social objective, the NPPF places significant emphasis on meeting diverse housing needs:

- Paragraph 60: Highlights the government's objective to significantly boost the supply of housing, ensuring land comes forward where it is needed.
- Paragraph 63: Explicitly states that the size, type, and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including those with disabilities and people requiring specialist support.

8.6 Effective Use of Land and Community Facilities

- Paragraph 96: Strategic policies should make sufficient provision for community facilities and other local services.
- Paragraph 123: Promotes 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.



- Paragraph 127: Encourages a positive approach to applications for alternative uses of developed land (not allocated for a specific purpose) where this would help meet identified development needs.

8.7 Decision-Making and Proactive Engagement

- Paragraph 38: Requires local planning authorities to approach decisions in a positive and creative way, working proactively with applicants to secure developments that improve economic, social, and environmental conditions.
- Paragraph 47: Reaffirms that applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
- Paragraph 55: Advises that planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions.

9.0 Planning Assessment and Principle of Development

9.1 Overview

This section assesses the proposal's compliance with the Development Plan and the National Planning Policy Framework (NPPF). It analyses the principle of the change of use and provides a detailed, policy-oriented evaluation of the operational management of the site.

9.2 Principle of Development

The NPPF (Paragraph 7) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. Under Paragraph 11, there is a clear "presumption in favour of sustainable development," requiring Local Planning Authorities to approve applications that accord with the Development Plan without delay.

The proposed change of use contributes to these objectives in three keyways:

- **Socially:** The proposal supports a "strong, vibrant, and healthy community" by expanding the range of available housing. It provides a high-quality, safe, and well-designed environment for vulnerable young people, ensuring they have access to local services and open spaces.
- **Economically:** The development makes a positive contribution to the local housing supply through specialist provision, generating employment and long-term social value.
- **Environmentally:** The proposal represents an effective and efficient use of land. By maintaining a domestic profile, the use enhances the character and



appearance of the area, remaining entirely in keeping with the surrounding residential context.

Consequently, the proposal achieves "net gains" across all sustainable development objectives. As there are no adverse impacts that "significantly and demonstrably outweigh the benefits" (NPPF Paragraph 11), the presumption in favour of development applies.

9.3 Housing Mix and Specialist Provision

NPPF Paragraphs 60-63 mandate that local authorities plan for a diverse mix of housing that reflects the needs of different groups within the community, including those requiring specialist care. The proposal aligns with Local Plan Policies HS3 and HS4 by providing specialized residential units within close proximity to existing settlements, transport links, and essential facilities.

10.0 Operational Management and Impact Mitigation

A comprehensive Site Management Plan (SMP) has been developed for "Edgley" to ensure the home operates with minimal impact on the local community.

10.1 Traffic and Parking Management

The home utilises a "minimal traffic" policy. While the worst-case theoretical parking demand during a 30-minute shift overlap is 7 vehicles, the site provides 8 dedicated parking spaces (5 off-street driveway, 3 supplementary).

- Shift Control: Changeovers are strictly limited to two daily windows (07:30–08:00 and 19:30–20:00).
- Transport Mandate: Regular shift staff are mandated to use public transport or carpool, ensuring that actual daily vehicle movements remain significantly below those of a standard large family dwelling.

10.2 Integration and the "Family Home" Ethos

The home is operated under a "Family Home" ethos to ensure it is indistinguishable from a private dwelling:

1. Domestic Profile: No institutional signage or external indicators of the home's use will be present. The property will be maintained to the highest domestic standards.
2. Professional Conduct: Staff do not wear uniforms and are trained to maintain a low-profile, residential presence.



3. **Community Integration:** Resident routines are designed to mirror a typical household, with a focus on attending local education, employment, and leisure facilities.

10.3 Staffing and Safety Protocols

Staffing and Safety Protocols: The property operates with a robust 1:3 staffing ratio (3 staff to 1-2 young persons) as mandated by the Care and Support Plan.

- **Non-Resident Staffing:** While the home primarily operates via rotational shifts, management retains the strategy to utilize "live-in" arrangements only in exceptional circumstances where enhanced stability or a further reduction in vehicle movements is required. This is not a regular occurrence.
- **Positive Behaviour Support (PBS):** Management is rooted in therapeutic, de-escalation-first principles. This proactive approach ensures that any challenges are handled internally by highly trained professionals, preventing any negative impact on the peace and amenity of the neighbourhood.

11.0 Impact on Neighbouring Amenity

11.1 Compatibility and Character

The proposal involves no external physical alterations to the existing building. The residential nature of the care provided ensures that the character of the use remains broadly similar to the existing domestic use. Consequently, the proposal is entirely compatible with the residential grain of the area and will not result in "dis-amenity" to neighbouring properties. There will be no adverse impact regarding visual intrusion, overshadowing, or loss of privacy.

11.2 Comparative Analysis of Activity Levels

A critical component of this assessment is the comparison between the proposed use and the established lawful fallback positions of the Edgley site. The activity levels—specifically the frequency of vehicular and pedestrian "comings and goings"—are projected to be lower than, or at least comparable to, the following baseline scenarios:

- **Four-Bedroom Family Dwelling:** As a four-bedroom home, Edgley is naturally suited to accommodate a large family unit, such as two parents and several adult children. In this typical domestic scenario, it is common to have four or more vehicles associated with the household. Each resident would likely move independently for employment, education, hobbies, and social visits, resulting in high-frequency, unscheduled movements throughout the day and evening.
- **House in Multiple Occupation (HMO):** Under current Permitted Development rights, the site could be converted into a small HMO. This use class inherently generates a high intensity of independent activity, as each occupant leads a



separate life with their own visitors, deliveries, and parking requirements, often exceeding the impact of a single-family unit.

In contrast, the proposed specialist care use is a highly managed environment. Staff movements are coordinated and largely restricted to specific changeover windows, creating a "controlled and predictable" pattern of activity. Unlike a traditional family home or an HMO where movements are random and cumulative, the proposed use allows for oversight of site arrivals and departures, ensuring that the residential character of the area is maintained without any material intensification of use.

11.13 Class C3(b) Fallback and Materiality

It is a significant material consideration that the property could be used for up to six residents living together as a single household receiving care under Use Class C3(b) without requiring planning permission.

Under Class C3(b), there is no statutory limit on the intensity of care provided, nor a "normal" level of staffing to be measured against. In a C3(b) scenario, the presence of multiple full-time carers and associated parking is both common and lawful. Therefore, the contention that the current proposal constitutes a "material intensification" of use is unsupported when weighed against the lawful C3(b) baseline.

11.14 Intensity of Care and Service Delivery

The planning system does not provide a basis for limiting the level of care provided within a residential setting. Because the proposal maintains the "Family Home" ethos—with shared communal spaces and a single household identity—the intensity of the support staff does not fundamentally alter the domestic character of the site.

11.15 Conclusion on Amenity

The proposal will have no material impact on the amenity of neighbouring occupiers when compared to the current situation and the maximum allowable lawful use of the site. The activity levels are contained, the parking is provided for on-site, and the management protocols ensure that the residential peace of Ryston is preserved.

As such, the application is considered to comply with all relevant local and national policies concerning the protection of residential amenity.

12.0 PRECEDENT AND CONCLUSION

12.1 Case Precedence: In determining this application, significant weight should be given to the Council's established decision-making consistency regarding similar specialist residential provisions. North Hertfordshire District Council has recently approved multiple C3 to C2 conversions, including:

- 186 Whitehill Road (Ref: 25/02409/FP)



- 25 Milestone Road (Ref: 25/00012/FP)
- Hayes Cottage, Putteridge Park (Ref: 25/01765/FP)

These cases demonstrate the Council's clear position that small-scale C2 residential institutions are entirely appropriate within established residential areas. In these instances, it was concluded—as it should be here—that such uses generate no unacceptable highways or amenity impacts and align directly with Local Plan policies HS3, HS4, and D3, as well as the NPPF's objectives for meeting diverse community needs.

12.2 This Planning Statement has demonstrated that the proposed change of use at Edgley is both sustainable and compliant with the North Hertfordshire Development Plan. The 1:3 staffing ratio ensures high-quality care while the shift-based, non-resident model ensures activity levels remain consistent with a standard C3 dwelling.

The proposal addresses an urgent local and national need for high-quality, domestic-scale care for young people. By operating under a strict Site Management Plan and maintaining the "Family Home" ethos, the home will remain indistinguishable from a standard residential dwelling.

As there is no material intensification of use compared to the lawful fallback positions (HMO or C3b), and given the clear precedent for such conversions within the District, we respectfully suggest that the presumption in favour of sustainable development applies. It is therefore requested that planning permission be granted without delay.