

Melissa Taylor
North Herts Council
Planning Department
Council Offices
Gernon Road
LETCHWORTH
SG6 3JF

Date 23rd August 2024
Your Ref: 24/01760/LDCP

Re: 25 Milestone Road, Hitchin

Dear Melissa,

I write in reference to the change of use application to 'Use of existing house for the provision of care to no more than 3 young people living together as a single household (Class C3b)' at 25 Milestone Road, Hitchin.

As residents of Milestone Road, we do not support this application as the reasons mentioned (and supported by the petition signed by neighbouring residents) in our letter dated 18th July 2024 are still relevant.

As a reminder, we expressed our concerns regarding this application for the following reasons:

- In reference to the letter dated 25th June 2024 from the Crime Prevention Design Advisor (Ref: CPD 11652024), it states that parts of Westmill are currently being regenerated to the Police preferred minimum security standard that is Secured by Design (SBD), which should help lower the crime levels. A home of this nature could potentially *increase* crime levels.
- The same letter states that the local Crime Prevention Design Advisor is not able to fully support the application due to concerns over the property potentially becoming a secure unit which could result in increased calls to the police, pressure on an already overstretched service.
- This is seemingly a 'for profit' children's home; research suggests that '*children's homes operated by profit-making firms had a disproportionately higher number of police callouts compared with those of not-for-profit providers*'¹.
- The applicant is the owner of Bluebird Care, which is based in Uxbridge, Ickenham and Hayes²; the areas they cover are all based in London or a London Borough. Why are they looking at a property in Hitchin? Does this meet a 'Local Housing Need' and were the Local Authority consulted? According to the Government website, a local area risk assessment must be carried out³. Has this been done, and are we permitted to view this?
- Neither we nor the Crime Prevention Design Advisor can see that the company is OFSTED registered, so if it is regarded as 'unregulated', you could forgive us as residents for fearing that this is purely a business decision rather than something taken with the welfare of vulnerable children at the forefront of their minds. The number of those living in unregulated care rose by 45% from 2018-22, according to Department for Education figures⁴, and children are increasingly being placed far from their home⁵. In moving away from their home area, these children lose their support networks, are at greater risk of going missing and become ready-made targets for exploitation by criminal gangs⁶.

- There is also evidence to suggest that *'Children living in children's homes are being criminalised at excessively high rates compared to other boys and girls, including those in other types of care'*⁷
- Based on our research, unregulated care homes in the private sector do not seem to have the children's best interest at heart and we fear that the outcomes for them would not be positive.
- An alternative location should be considered with better accessibility and facilities, such as the town centre. The current location is more than a 30 minute walk from the town centre in a quiet residential street among vulnerable elderly residents and families with young children whose safety and wellbeing could be compromised as a result of this dwelling.
- There is a bus stop between 25 and 27 Milestone Road which is utilised throughout the day from Monday to Saturday, with elderly people and young children waiting for the bus. There is currently no fencing to separate the path from the bus stop and we are concerned that an unsecured unit means that if a resident were to leave of their own accord, there is no protection for residents.

As this is still of great concern to the residents of Westmill for the aforementioned reasons, and it is not serving a local need, we ask you to consider this when reviewing the application. There is clearly a strong need for reassurance that this will be closely monitored if it does go ahead.

Additionally, the case law information on the refusal document for application 24/01308/LDCP did not meet the criteria last time around, so please could you clarify what is different this time? As local residents with a vested interest in this, it seems that the applicants have found a loophole and we fear that the change of use will 'creep' into operating as per the original application which was initially refused.

We await your response.

Yours sincerely

Holly Madgwick and Simon Brooks of 27 Milestone Road, Hitchin
Gill and Dave Chivers of 23 Milestone Road, Hitchin

Enc.: re-sending copy of petition signed by concerned residents, which is still in support of our above points.

CC: Cllrs Clare Billing and Nigel Mason

Alistair Strathern, Member of Parliament for Hitchin

Mark Montgomery, Crime Prevention Design Advisor, Hertfordshire Constabulary

Children's Services, Hertfordshire County Council (contact@hertfordshire.gov.uk)

References:

1. <https://www.theguardian.com/society/2022/jun/28/serious-incidents-more-common-in-for-profit-childrens-homes-in-england>
2. <https://www.bluebirdcare.co.uk/uxbridge-ickenham-hayes/about-us/1501/meet-the-team>
3. <https://socialcareinspection.blog.gov.uk/2021/09/15/applying-to-register-a-childrens-home-top-tips/>
4. <https://explore-education-statistics.service.gov.uk/find-statistics/looked-after-children-aged-16-to-17-in-independent-or-semi-independent-placements/2022>
5. <https://www.communitycare.co.uk/2023/04/25/more-children-in-care-placed-far-from-home-increasing-risk-of-lower-wellbeing-finds-research/>

6. <https://www.communitycare.co.uk/2023/03/29/the-wrong-people-are-running-the-care-system-and-getting-it-badly-wrong/>
7. <https://howardleague.org/news/criminalcare/#:~:text=Among%20to%2015%2Dyear,a%20non%2Dlooked%20after%20child.>

Other sources:

- <https://www.crestadvisory.com/post/unregulated-care-homes-and-county-lines>
- https://www.london.gov.uk/sites/default/files/rescue_and_response_county_lines_project_strategic_assessment_2019.pdf