

Chris Petrie (The Owner / Occupier)

5 Betjeman Road
Royston
Hertfordshire
SG8 5UP

9 June 2026

Development and Conservation

North Herts Council

Representation in objection to planning application ref: 26/01058/FP — Change of use from Class C3(b) to Class C2 with insertion of ground floor front window following removal of garage door, 3 Larkin Place, Royston, Hertfordshire, SG8 5UR

Dear Sir / Madam,

I write as the owner and occupier of 5 Betjeman Road, Royston, SG8 5UP, whose rear garden boundary is directly adjacent to the rear garden of 3 Larkin Place, the subject of the above application. I am a directly affected neighbouring resident and wish to register a formal objection to this application on the planning grounds set out below.

I attended a community meeting on Saturday 6 June 2026 hosted by the applicants, at which a number of material facts came to light that significantly inform this objection. I have also reviewed the application documents available on the Council's online planning portal.

The applicants operate under the trading name Lumen Home, with the existing Hitchin home owned by Maajr Ltd and operated by Maajr Partners Ltd (planning ref. 25/00012/FP, granted 19 June 2025). I have located an Ofsted inspection report confirming that Maajr Partners Ltd holds a registration for a separate children's home in Essex, which received a Good rating in January 2026, and so I make no suggestion that the applicants are not a regulated operator in principle. However, I have not been able to locate a specific Ofsted registration for the Hitchin home at 25 Milestone Road itself, despite that home having operated since shortly after permission was granted. I would ask the planning officer to confirm the Ofsted registration status and unique reference number for the Hitchin home, and to treat this as relevant context when assessing whether the applicants' existing operation matches the model now proposed for 3 Larkin Place.

1. Loss of family dwelling contrary to housing supply policy

The application seeks to change the use of a four-bedroom family dwelling permanently to a Class C2 residential institution for commercial purposes. If permitted, this property would be removed from the residential housing market in perpetuity for the duration of the business operation.

Policy SP8 of the North Hertfordshire Local Plan 2011–2031 establishes the strategic housing requirement for the district and the Council's obligation to deliver a

sufficient supply of homes over the plan period. Policy IMR1 gives effect to the Council's duty to demonstrate a five-year housing land supply. Both policies are premised on the assumption that the existing housing stock is protected and that net additions are achieved through new development, not offset by the permanent conversion of existing dwellings to non-residential institutional use.

This property sits at the more affordable end of the local four-bedroom market and represents precisely the type of family housing the district most needs to retain. Permanent commercial conversion to a Class C2 institution reduces the net housing supply, applies upward pressure on comparable properties, and works against the objectives of Policy SP8 and the Council's five-year land supply position under Policy IMR1.

I respectfully request that the planning officer assess whether this application conflicts with Policies SP8 and IMR1 of the adopted Local Plan, and with the social objective set out in paragraph 8(b) of the NPPF, which requires the planning system to ensure a sufficient number and range of homes to meet the needs of present and future generations, and with paragraph 78, which reinstates the requirement for local planning authorities to maintain a five-year supply of deliverable housing sites.

I further note that there are larger, better-suited properties available in and around Royston that would be more appropriate for a C2 institutional use. An enterprise anticipated to generate in the region of £16,000–£28,000 per week in placement revenue has the financial means to acquire a more suitable property. The choice to use one of the most accessible family homes in the local market appears to be commercially motivated rather than operationally necessary.

2. Highway safety and inadequate parking provision

The application seeks to remove the garage and convert it to office space, which will reduce the off-street parking provision at 3 Larkin Place from three spaces (two plus garage) to two spaces within the curtilage of the property.

The proposed C2 use will generate significantly greater vehicle movements than a family dwelling. At the applicants' own community meeting on 6 June 2026, it was confirmed that:

- The home will operate with shifts of two staff members, working 12-hour rotations around the clock.
- A 'pool car' will be kept at the property for use by staff.
- Staff are expected to arrive by private vehicle, with up to four staff cars plus the pool car on site at shift changeover.
- Shift changeovers are scheduled at 8:00am and 8:00pm.

Larkin Place currently has only two visitor parking bays serving nine properties, located on the public highway. These bays are already in high demand. At shift changeover, a minimum of four to five vehicles associated with the home would require accommodation. The two on-site spaces cannot reasonably accommodate this volume, particularly given that children in residential care require constant supervision, meaning vehicles cannot be left unattended while staff shuffle parking.

The 8:00am shift changeover is of particular concern. Roman Way First School is located a short walk from this estate, and the Larkin Place and surrounding roads

are regularly used by parents parking during the school run, providing children with a safe, road-crossing-free walking route. The introduction of a daily peak parking demand from shift-change vehicles at precisely this time would directly conflict with this established and community-supported use of the visitor bays.

At the community meeting, the applicants stated that they would 'encourage staff to use public transport'. When pressed on the practicality of this, given that residential childcare roles at National Living Wage rates are more likely to attract staff from surrounding rural villages — including Buntingford, Baldock, Melbourn, Royston's outlying hamlets, and other settlements with limited or no practical public transport links to Royston — than from towns served by the railway, the applicants suggested staff 'might travel by taxi'. When asked whether the employer would subsidise taxis, the applicants confirmed they would not.

A member of staff on National Living Wage (currently £12.21 per hour) working a 12-hour shift earns approximately £146 gross before tax. A return taxi journey from the villages named above would cost in the region of £30–£50, representing up to a third of that shift's net pay. It is not credible that unsubsidised staff on these wages would regularly commute by taxi. The 'encourage public transport' commitment is therefore operationally meaningless and should be accorded no weight in the assessment of the parking and highway impact of this application. The realistic expectation is that the majority of staff will travel by private vehicle, for which the parking provision is demonstrably inadequate.

This conclusion is reinforced by the applicants' own recruitment advertising. A current job advertisement for a Children's Residential Support Worker at the applicants' existing Hitchin home (25 Milestone Road, SG5 2SZ) lists both 'free parking' and 'on-site parking' as distinct and separately listed staff benefits. The applicants are therefore fully aware that parking provision is a material factor in attracting and retaining residential care staff, and are actively using it as a selling point at their Hitchin operation. This is directly and materially inconsistent with the suggestion at the Royston community meeting that staff would be encouraged to use public transport or taxis.

The Hitchin application (ref. 25/00012/FP, determined by this Council's Planning Control Committee on 19 June 2025) provides a directly comparable precedent. The Hitchin property benefits from four off-street parking spaces on the driveway, and planning permission was granted subject to a condition requiring a minimum of three spaces to be maintained for staff in perpetuity. The proposed Royston home, operating under an identical shift model by the same applicants, would have only two spaces following the garage conversion — one fewer than the minimum conditionally required at Hitchin for the same use. The parking provision at 3 Larkin Place is therefore materially inadequate even measured against the applicants' own recently approved operation.

I note that properties on Larkin Place are subject to restrictions on permitted development, partly in recognition of the constrained parking arrangement. I respectfully request that the planning officer assess this application against Policy T2 (Parking) of the adopted Local Plan and the associated Vehicle Parking at New Development Supplementary Planning Document, and confirm whether a highways and transport assessment has been submitted with this application adequately modelling the vehicle movements associated with a fully operational C2 children's

home including shift changeovers, management visits, social worker visits, therapeutic appointments, and agency staff cover.

3. Scale and character of change from C3(b) to C2

The applicants have sought to present this application as a modest step from their existing C3(b) permission. This characterisation is misleading. Class C3(b) and Class C2 represent fundamentally different uses with fundamentally different neighbourhood impacts:

- C3(b) is a family-style home where residents and carers live together as a single household. There are no shift staff, no commercial staffing structure, and no institutional operational requirements.
- C2 is a registered residential institution operating commercially, with rotating shift staff, Ofsted registration requirements, mandatory record-keeping, regular professional visits, and the full operational infrastructure of a care business.

At the community meeting, the applicants initially sought to characterise the proposed use as indistinguishable from a family home, suggesting that 'to the outside world' the property would look like two adults and three children living together. When challenged, they conceded that this was in fact a description of a C3(b) use — which they already have permission for — and that the actual intended use would involve 12-hour rotating shifts of staff working around the clock. This was a material misrepresentation that undermined the credibility of the applicants' submissions at the meeting.

The change from C3(b) to C2 is not a minor amendment. It represents a step change in the intensity, commercial nature, and operational character of the use. I respectfully request that the planning officer treat this application on its own merits as a C2 proposal rather than as an incremental adjustment from an existing permission.

4. The garage conversion is inconsistent with a C3(b) use and reveals the true intent

The application bundles the change of use to C2 with the conversion of the garage to office space. At the community meeting, when asked to explain why the change to C2 was necessary, the applicants stated that it was required in order to permit the garage conversion. This explanation does not withstand scrutiny.

Planning restrictions on garage conversions are entirely separate from use class designations and are not relaxed by a change of use application. More significantly, a dedicated staff office is an operational requirement of a commercial C2 children's home — for shift handovers, case file storage, Ofsted compliance records, and management activity — but has no logical function in a C3(b) family-style home where there are no shift staff.

The need for office space is therefore consistent only with a C2 operational model and is itself evidence that the C2 classification reflects the genuine intended use. I note that this interpretation was consistent with the applicants' subsequent confirmation that the home would indeed operate on a 24-hour shift staffing basis.

5. Works commenced prior to planning consent

At the community meeting, it was confirmed by the applicants that internal works are already underway at 3 Larkin Place, including the installation of fire doors. When challenged that planning permission had not yet been granted, the applicants initially characterised these as general refurbishment works. This characterisation was inconsistent with the condition of the property at sale — which local residents confirm was presented in immaculate condition in recent sales particulars — and with the specific nature of the works described.

The installation of fire doors to the specification required for a registered children's home is a structural modification directly connected to the proposed C2 use and is not consistent with general domestic maintenance. I would respectfully draw the planning officer's attention to this matter, and note that the installation of fire doors in a property constructed with stud-free wall construction, as was common in this development built in 1996, may also raise building regulations questions regarding structural adequacy.

I note this not to suggest that the planning officer should penalise the applicant for works already undertaken, but to observe that the commencement of works specific to a C2 operational requirement prior to the grant of planning permission is further evidence that the C2 use is the genuine and primary purpose of this application.

6. Direct evidence from residents living next to the applicants' existing home in Hitchin

Following the community meeting, I wrote to residents living adjacent to and opposite the applicants' existing children's home at 25 Milestone Road, Hitchin, to ask about their experience of living next to an operational home run by the same applicants under the same operating model. I received a number of responses which I consider to be directly material to this application, as they speak to the lived reality of the use proposed for 3 Larkin Place.

Residents at 23 Milestone Road, who had objected to the original Hitchin application and feel their concerns were not reflected in the decision, told me that the rear garden has been stripped of all vegetation and now resembles, in their words, an exercise yard. They described a resident child spending long periods each day kicking a football against the boundary fence, and said that following complaints from neighbours, the operator installed additional netting to contain the balls, which has not been effective and has not stopped the disturbance. They also described the garden being used at times by what they estimated as a much larger number of children than the three permitted residents, without evident adult supervision.

A further resident, who shared photographs of the garden as visible from a neighbouring property, confirmed that it has been landscaped with hard surfaces and bare fencing, with no soft landscaping or vegetation remaining. I would observe, without claiming any technical expertise, that a garden of this type provides little acoustic absorption and that this is likely to be a contributing factor to the noise concerns reported by neighbours.

Other residents in the vicinity of Milestone Road, who I am not in a position to name as they wished to remain anonymous, separately reported being disturbed by loud music during the night, by ongoing noise from outdoor activity, and by anti-social

behaviour involving both resident children and other young people drawn to the property. I am conscious that these accounts are unattributed and I present them as reported concerns rather than established fact; however, the consistency of multiple independent accounts, together with the named evidence above, gives me no confidence that the operational reality of a Lumen Home property matches the reassurances given to residents prior to permission being granted.

I would respectfully ask the planning officer to consider this evidence when assessing the likely impact of the proposed Royston home on neighbouring amenity, given that it is the same applicants proposing to replicate the same operating model at 3 Larkin Place.

7. Request for conditions if permission is granted

Should the Council be minded to grant permission contrary to the objections above, I respectfully request that the following conditions be imposed:

- The use be restricted specifically to a children's home as defined under the Children Act 1989, with any change to another C2 sub-use (including adult care, secure accommodation, or any other institutional use) requiring a further application for planning permission. This is necessary because changes between C2 sub-uses do not in themselves require planning permission, despite the very significant differences in neighbourhood impact between, for example, a small children's home and a secure residential unit.
- A highways and parking management plan be submitted and approved prior to commencement of the C2 use, including a staff parking strategy that does not rely on the use of public visitor bays on Larkin Place.
- The number of staff vehicles kept at or regularly visiting the property be capped at a level consistent with the approved parking provision.
- Any future change of operator or registered provider be notified to the Local Planning Authority.
- A landscaping and noise management condition be imposed requiring retention of soft landscaping and boundary planting sufficient to provide reasonable acoustic mitigation for neighbouring properties, given the experience reported at the applicants' existing home.

Summary

To summarise, my objections are grounded in the following material planning considerations:

- The permanent loss of a family dwelling from the housing stock contrary to the Council's housing supply obligations under the Local Plan and NPPF.
- Demonstrably inadequate parking provision for a C2 operational use, with a direct conflict with established community use of visitor bays during school hours, and a material inconsistency between the applicants' 'public transport' commitment and their own recruitment advertising which lists free and on-site parking as staff benefits at their existing Hitchin home.
- The scale of change between C3(b) and C2, which is not adequately reflected in the framing of this application.
- An inconsistency between the stated justification for the garage conversion and the operational reality of the proposed use.

- The commencement of works specific to C2 operational requirements prior to the grant of planning permission.
- Direct evidence from residents living next to the applicants' existing Hitchin home of significant noise disturbance, stripped garden landscaping, and a level of operational management inconsistent with the reassurances given to Royston residents.
- The inability to locate a specific Ofsted registration for the Hitchin home itself, despite the operator holding a registration for a separate home elsewhere, which I would ask the planning officer to verify.

I trust that the planning officer will give these representations full consideration. I am happy to be contacted if further information would be helpful and would welcome the opportunity to be notified of any decision on this application.

Yours faithfully,

Chris Petrie - Owner / Occupier, 5 Betjeman Road, Royston, SG8 5UP