



09/04/2026

To: Planning Department
London Borough of Havering

Re: Certificate of Lawfulness (Proposed) – Use Class C3(b)
1 The Elkins, Romford, RM1 4HT

Dear Sir/Madam,

We write in support of the application for a Certificate of Lawfulness (Proposed) in respect of the above property, to confirm that its use as supported living accommodation under Use Class C3(b) would be lawful.

Home From Home Support Services Ltd is an established provider of supported living services across Havering and neighbouring boroughs, working closely with Local Authorities and NHS services to support adults with mental health needs, learning disabilities, and other vulnerabilities to live independently within the community.

Local Need and Commissioning Context

There remains a demonstrable and ongoing demand within the London Borough of Havering for small-scale supported living provision. Local commissioning priorities continue to focus on:

- Reducing hospital admissions and supporting timely discharge
- Providing step-down accommodation from inpatient settings
- Supporting individuals to live independently within the community
- Reducing reliance on higher-cost residential or institutional care

This proposal directly supports those priorities by delivering a low-density, community-based supported living environment for up to four residents, consistent with Havering's approach to promoting independence and community integration.

Nature of the Use and C3(b) Compliance

As detailed within the submitted Planning Statement, the proposed use falls squarely within Use Class C3(b), as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended).

The property will operate as a single household, with:

- A maximum of four residents living together as one household
- Shared use of all facilities, including kitchen, living areas, and bathrooms
- No subdivision of the property into separate units
- No institutional or commercial characteristics
- Care and support provided on a 24-hour basis, without the presence of live-in staff



The level of support proposed is low to moderate and non-intensive, focused on promoting independence, maintaining tenancies, and supporting daily living, rather than delivering high-dependency or clinical care.

Materiality of the Proposed Use

It is our clear position, supported by established case law and appeal decisions (as referenced within the Planning Statement), that the proposed use:

- Remains within the C3 use class
- Does not represent a material change of use from a single dwellinghouse (C3(a))
- Will function in a manner comparable to a family household

The occupation levels, activity patterns, and day-to-day operation of the property will not materially differ from that of a typical residential dwelling.

Impact on Residential Amenity and Character

The proposal will not give rise to any material impact on the character of the surrounding area or neighbouring occupiers. In particular:

- The number of residents (maximum of four) is consistent with a family dwelling
- There will be no external alterations or visual changes to the property
- Noise levels and general activity will be comparable to a typical household
- Comings and goings will be limited and managed, with no material increase in traffic or parking demand

The property will continue to function as a domestic residence, maintaining the established residential character of the area.

Management and Safeguards

Home From Home Support Services Ltd operates in accordance with:

- Care Quality Commission (CQC) standards
- Local Authority commissioning frameworks
- Robust safeguarding and risk management procedures

The service is structured to ensure that residents are appropriately supported while maintaining a stable, well-managed, and low-impact living environment.

Conclusion

In light of the above, and as demonstrated within the accompanying Planning Statement, the proposed use of the property as supported living accommodation under Use Class C3(b):

- Falls within the same use class as a dwellinghouse



- Does not constitute a material change of use
- Will have no adverse impact on residential amenity or the character of the area
- Responds directly to an identified local need within the Borough

We therefore respectfully request that the Council issues a Certificate of Lawfulness (Proposed) for the development.

Please do not hesitate to contact us should you require any further information.

Yours faithfully,

Samantha Combie

Director

Home From Home Support Services Ltd