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Planning Statement

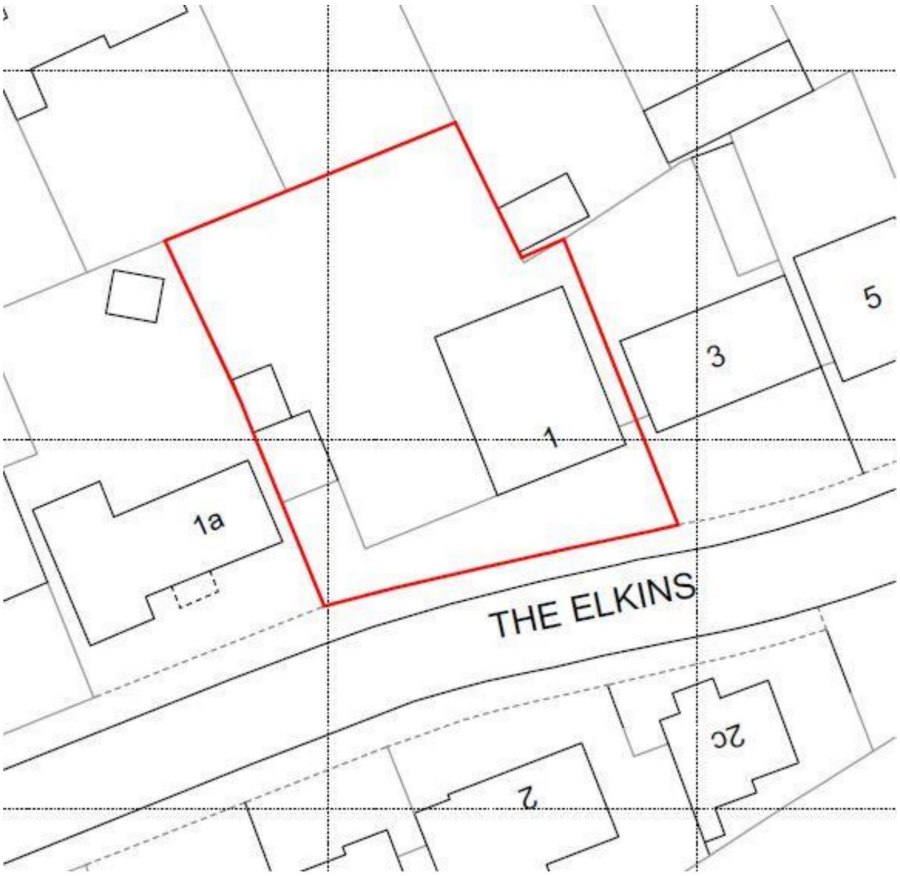
Certificate of Lawfulness for proposed change of use of a Single residential dwelling C3(a) to supported living C3(b) for 4 people receiving care.

at

1 The Elkins

Romford

RM1 4HT



1. Introduction

1.1 This statement has been prepared in support of an application for a Certificate of Lawfulness of Proposed Use or Development (CLPUD) under Section 191 of the Town and Country Planning Act 1990.

1.2 The application seeks to confirm that the proposed use of the property as a Class C3(b), a small-scale supported living environment for up to four residents, living together as a single household with appropriate care and support will be lawful.

2. Description of the site and Context

2.1 The site is located on the North side of The Elkins close to its junction with Pettits Lane. The overall Site area is 622 Square metres.

2.2 The site comprises a two-storey double-fronted detached house with a garage, side and rear gardens.

2.3 The Elkins is characterised as a suburban residential street with two storey detached houses.

Recent Front view

Recent Rear view

3. Relevant Planning History

3. No relevant planning history was found on Council's records.

4. Layout of the property and Current use.

4.1 Application property features a through two living rooms, an open plan kitchen-dinning area, a guest bed/ reception and a cloak room on ground floor level. First floor offers 4 spacious bedrooms and two bathrooms.

4.2 The property benefits from a garage and a large garden to the rear and side.

4.3 The property is currently vacant however the lawful use remains as a single family dwelling Use Class C3(a)

5. Proposed Use

5.1 Use Class C3(b) as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended) (UCO) refers to the use of a property as a dwellinghouse (whether or not as a sole or main residence) 'by not more than 6 residents living together as a single household (including a household where care is provided for residents)'. The Inspector in Appeal Decision ref: APP/B5480/X/24/3339187 noted that

"For the use of the property to fall within Class C3(b), it must be a dwellinghouse; there must be no more than six residents; those residents must live there as their sole or main residence; they must live together as a single household; and care is provided for the residents. Class C3(b) envisages an element of care that can be provided by staff. Whether the occupants of the appeal property form a single household is a matter of judgement."

5.2 'Care', as defined in Article 2 of the UCO, means 'personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder.

Number of proposed Residents and Staff:

5.3 The intended use of the property is to provide care and support for up to four adults aged between 18 and 65 who are capable of living independently but require structured support to manage daily life challenges, including disabilities, mental health conditions and learning difficulties.

Staffing levels will be flexible and adjusted in line with individual needs, ensuring safe and effective support at all times but will not exceed more than 2 at any given time.

5.4 Residents will engage in activities together, despite being unrelated individuals. They will share a common need and will collaboratively live in the house with support from support workers (not living in) who will provide care on-site. Support will be provided for essential tasks such as cleaning, maintaining the home, purchasing meals, and ensuring household security.

5.5 Residents will regularly use shared spaces such as the kitchen-dining area and living room for communal activities.

5.6 On-site staff will be assisting with wellbeing, daily living, maintaining independence and social integration. They will also provide supervision, safeguarding and support with maintaining the household environment.

Residents Needs and Support Provision

5.7 The service will support adults with low to moderate support needs who are able to live largely independently. The focus will be on independent living, with staff providing light-touch, person-centred support to promote wellbeing, maintain tenancies, and encourage engagement with the community. Support may include guidance with daily routines, accessing local services, and general welfare checks, rather than intensive or high-dependency care.

Expected visits (Comings and Goings)

5.8 There will be regular but controlled visits from professionals such as care coordinators, community mental health teams, GPs, and other healthcare practitioners. On average, we anticipate approximately 5–10 visits per month, though this may vary depending on residents' needs. Family visits may also occur periodically but will be managed in line with house rules to ensure minimal disruption to neighbours and the local environment.

In short the comings and goings will not be materially different from a single family dwelling.

Day-to-Day Operation of the Premises

5.9 The property will operate similar to a domestic household and not as an institution, hostel, or care home. There are no treatment rooms, no clinical services delivered on site, and no institutional features. Staff presence is solely to provide supervision, safeguarding, structure, and support with daily living and emotional wellbeing.

5.10 As mentioned above, being a single household is one of the essential criteria to be qualified as supported living accommodation under Use Class C3(b). This Statement illustrates different ways how the proposed use will function as a single household. For example, support will be provided for essential tasks such as cleaning, maintaining the home, purchasing meals, and ensuring household security, fostering a shared living environment. The residents will share routines and household responsibilities functioning together as a single domestic unit rather than as separate individuals.

5.11 Furthermore, shared spaces such as the kitchen-dining area and living room will be regularly used for communal activities. Therefore the residents will undertake activities together, have a relationship beyond that of a common need, jointly seek to run the household, and become semi-reliant on each other due to the level of interaction. This is consistent with a previous appeal decision (Appeal Ref. APP/Z4310/X/23/3316521) in 2023.

5.12 The proposal therefore remains within the wider C3 residential use class and does not constitute a material change to a non-residential or commercial use.

5.13 There will be no internal subdivisioning or individualised occupation of the property.

5.14 The scale, intensity and pattern of occupation will remain comparable to that of a typical family dwelling.

5.15 The residents will share routines and household responsibilities, functioning together as a single domestic unit rather than as separate individuals.

6. Planning, Appeal Decisions and Case Law Supporting C3(b) Use

6.1 Recent Planning approvals and appeal decisions confirm that supported living arrangements within the statutory definition of Class C3(b) do not constitute a material change of use . Some of the similar recent examples relate to

39 Rush Green Road Planning ref: D0557.25 CLD issued 15th December 2025

and

32 Squirrels Heath Road ref: D0022.26 CLD issued 2nd April 2026.

6.2 Appeal Ref: APP/B5480/X/24/3339187 (33 Gubbins Lane, Havering). The Planning Inspector concluded that a property occupied by up to six residents with care provision fell within Class C3(b) and issued a Lawful Development Certificate. Key point: no material change of use outside C3.

6.3 High Court: Crawley Borough Council v Evesleigh Group [2004] EWHC 160 (Admin) held that residents forming a “single household” under C3(b) *does not* require live-in carers, so long as the residents function as a household. Planning Inspectors routinely cite this case when interpreting C3(b) in planning appeals.

6.4 Conclusion from Planning and appeal Decisions:

Small-scale supported living arrangements are treated as single households in C3(b), with no material change of use from a typical dwellinghouse.

6.5 Character of the Area: The proposed use will not materially alter the character of the surrounding residential area. The property will continue to operate as a single household and occupancy levels (maximum 4 residents) are consistent with a family dwelling. There will be no subdivision or intensification beyond standard residential use. Panning and Appeal decisions confirm that supported living arrangements do not materially differ from standard dwellings in appearance or function.

6.6 The scale, intensity and pattern of occupation will remain comparable to that of a typical family dwelling.

7. Impact on Residential Amenity

7.1 The proposal will not give rise to adverse impact on neighbouring occupiers due to

a)Limited number of residents (maximum 4)

b) Structured and supervised environment

c) No high turnover or transient occupation

d) Activity levels comparable to a normal household

Appeal inspectors consistently find that such uses do not create materially greater noise or disturbance than a conventional dwelling.

7.2 The operator has extensive existing experience delivering similar supported living services within the Borough without adverse impact on the residential amenity of the neighbourhood

8. Highways and Parking

8.1 There currently is a garage for car parking which will be used for the staff and residents will not have cars. The proposed use is not expected to result in a material increase in traffic or parking demand due to modest occupancy levels, managed staff presence and generally trip generation comparable to a family household

8.2 Appeal evidence supports that C3(b) uses have similar highway impacts to C3(a) dwellings.

9. Conclusion

9.1 The Planning Statement has demonstrated that the proposed change of use from C3 (a) Single Dwellinghouse to Supported Living accommodation C3(b) is not a material change of use requiring planning permission.

9.2 The proposed C3(b) supported living use will serve local needs and improve social care capacity in the Borough and aligns with established decisions within the Borough where similar suppored living schemes have been confirmed as lawful under Use Class C3(b).

9.3 On this basis the Council is respectfully requested to issue Certificate of Lawful Development for the proposed use.