

1 Amanda Mews, Pretoria Road
Romford, RM7 7BL

Design & Access Statement

Chandran
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Architects

August 2026

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1.0 INTRODUCTION

Executive Summary

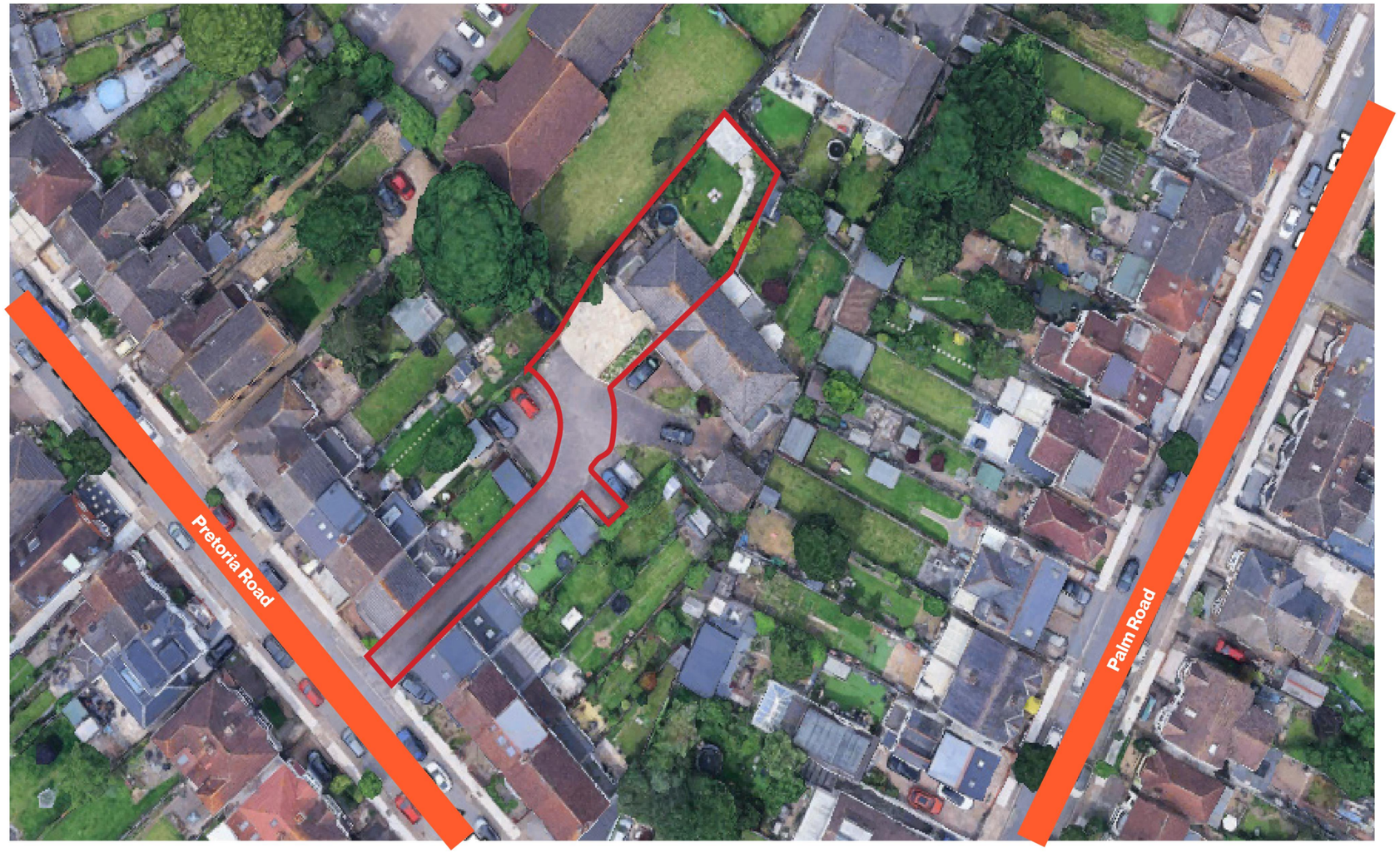
This Design and Access Statement has been prepared in support of a planning application seeking permission for the change of use of the existing dwellinghouse (Use Class C3(a) at 1 Amanda Mews, Pretoria Road, Romford RM7 7BL, to a Children's Home (Use Class C2).

The proposal involves the conversion of the property into a small residential children's home designed to provide a supportive, family-style environment for up to three children. The home will be staffed by appropriately qualified carers working on a 24-hour shift basis to ensure continuous support and supervision for the children.

This application has been prepared by Chandran Hughes Architects Ltd on behalf of Lunna Youth Residential Care LTD, whose objective is to provide high-quality residential care tailored to the individual needs of vulnerable children.

This Design and Access Statement accompanies the submitted architectural drawing pack together with all supporting documents required as part of the planning application.

It should be noted that the granting of planning permission does not, in itself, authorise the operation of the property as a Children's Home. Prior to commencing this use, the provider will undergo a lengthy and rigorous registration process with Ofsted, the body that regulates services for children. This will assess the accommodation, management, and care arrangements to ensure they meet the required regulatory standards.



Location of site

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2.0 SITE ANALYSIS

2.1 SITE LOCATION

The proposal seeks to provide a household environment to accommodate up to 3 no. children aged 8-17.

The existing property is a 3-bedroom 2 storey dwelling, 0.3 miles away (a 7-minute walk) from the nearest Bus Stop on Oak Street.

The Site:
1 Amanda Mews, Pretoria Road, Romford, RM7 7BL

Site Area:	448.45 sqm
Ward:	Rush Green & Crowlands
Local Authority:	Havering
Constituency:	Romford
County:	Greater London

The site is not located in or near a Conservation Area.

Key

Site Boundary



Aerial map showing boundary line

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2.2 EXISTING SITE

The Existing Property

The existing property is a 2 storey, 3 bedroom end of terrace house with a front drive and rear garden.

Planning History

D0102.26/FUL
Certificate of Lawfulness for Use of premises within Class C2 (Residential institutions) as a Children's Home for up to 3 children (aged 8-17) who are looked after by a local authority and 2 carers on a shift basis with a maximum of 3 staff members on site at any one time. - PP is required. - May 2026

P1445.22/FUL
Part single storey, part first floor side extensions.
Approved with cons. - October 2022

Applications of a Similar Nature

P0972.23/FUL
Change of use from a house in multiple occupation (C4 use) to a childrens care home (C2 use).
Approved with cons. - August 2023

P1701.24/FUL
Change of use from C3 single residential dwelling to C2 childrens care home for up to 3 children and 5 staff members.
Approved with cons. - July 2025

P1412.21/FUL
Change of use from use class C3 (residential) to use class C2 (Residential Institution) to create residential home for 4 No. looked after children aged between 11-17.
Approved with cons. - Sept 2021

Site Location

The site is accessed from Pretoria Road via Amanda Mews, and is easily accessible for both pedestrians and vehicles. The surrounding road network provides convenient connections to the wider local area and nearby transport links.

The property's location, together with its proximity to public transport, schools, healthcare facilities, local shops, parks, and other community services, makes it well suited for a small children's home. Secure cycle storage will be provided to encourage sustainable travel and promote healthy outdoor activities for residents.

The site is located within Flood Zone 1 and is therefore considered to have a low probability of flooding from rivers or the sea. The risk of surface water flooding is also low.

Transport Links

Bus Stops:
Oak Street (SE) - 7 minutes walk (0.3 miles)
Como Street (W) - 7 minutes walk (0.3 miles)
Richards Avenue (W) - 11 minutes walk (0.5 miles)
Romford Stadium (E) - 6 minutes walk (0.3 miles)
Richards Avenue (E) - 10 minutes walk (0.4 miles)
Mawney Road (RM7) (W) - 11 minutes walk (0.5 miles)

Rail Stations:
Romford Station: 13-minute drive (1.0 mile)

Healthcare

The property is in close proximity to healthcare, being a 7-minute drive (1.3 miles) to Victoria Hospital, and Queen's Hospital (1.8 miles) with additional medical centres nearby.

Education

The property is close to The Mawney Foundation Primary School and Crowlands Primary School, indicating the location is in an area that supports children's safety.

Amenity

The property benefits from nearby recreation spaces, including Cottons Park (0.4 miles) and Jutsums Park Recreation Ground (0.9 miles). These areas offer a unique opportunity for children to explore nature enjoy well-equipped playgrounds and green areas.

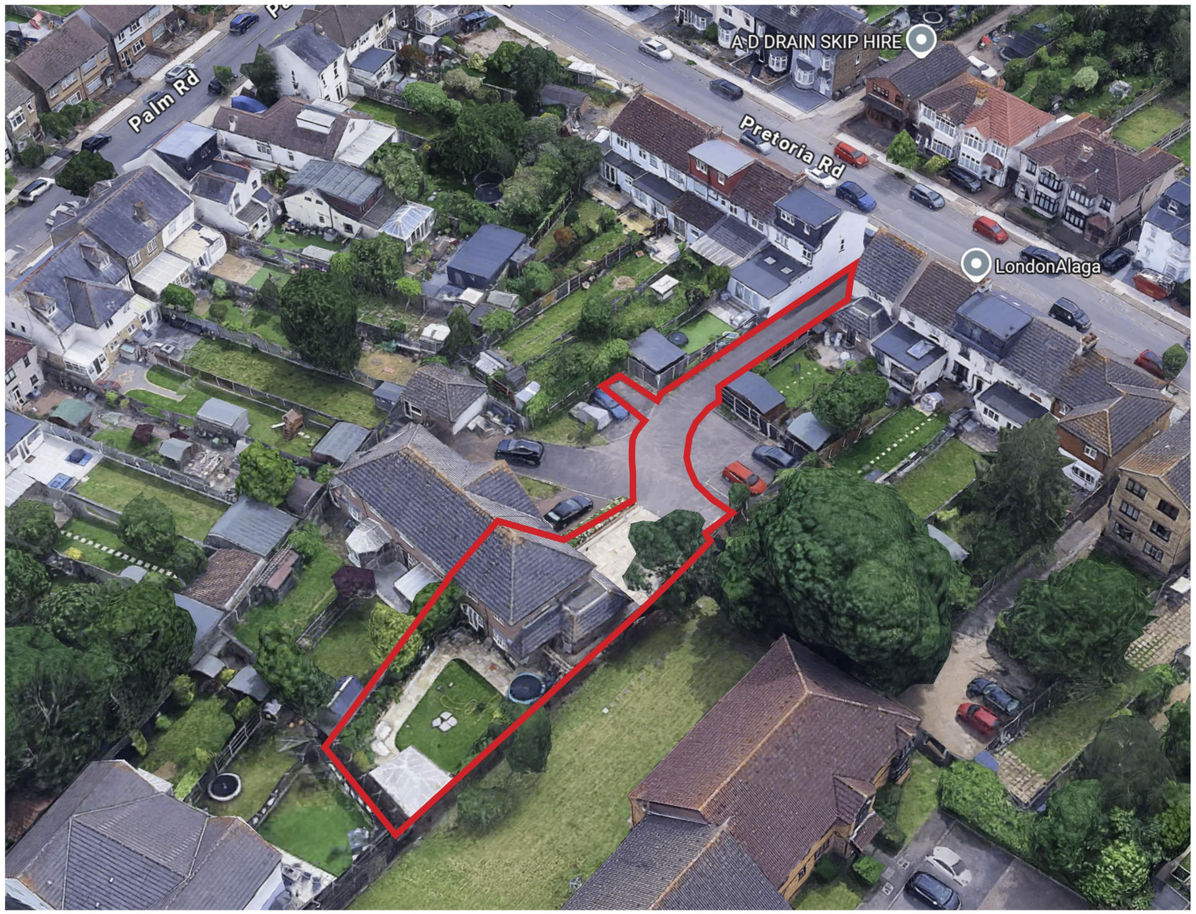


View of front of property

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2.3 SITE AERIAL VIEWS





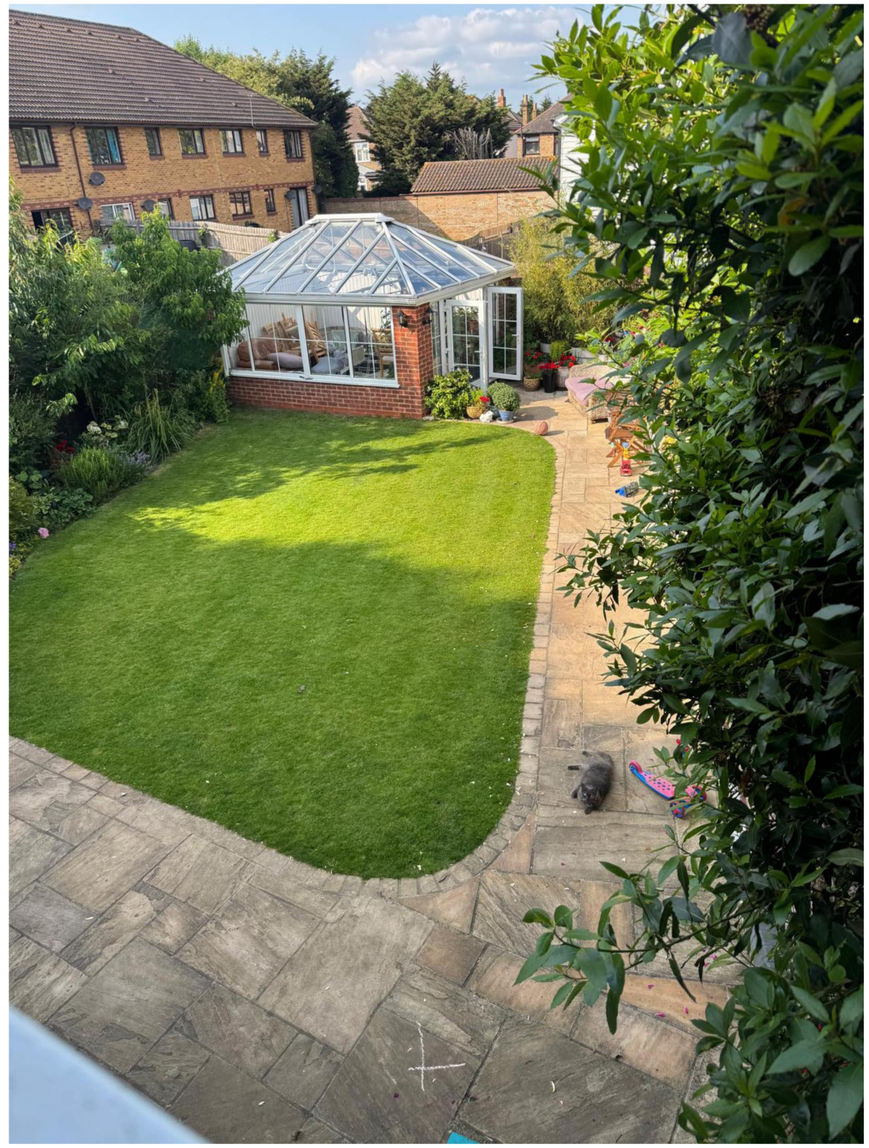
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2.4 SITE PHOTOS (EXTERIOR)









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2.4 SITE PHOTOS (INTERIOR)







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3.0 THE PROPOSAL

3.1 PRINCIPLES & OBJECTIVES

The Applicant's Ethos

LUNNA Youth Residential Care Ltd is committed to providing a safe, stable and nurturing family-style home for up to three children aged 8–17 who are unable to live with their families.

"Our aim is to provide a caring environment where every child feels respected, listened to and supported to achieve their full potential.

The home will provide personalised care that promotes education, emotional well-being, independence and positive relationships. Staff will work closely with social workers, schools, healthcare professionals and families to achieve the best possible outcomes for each child.

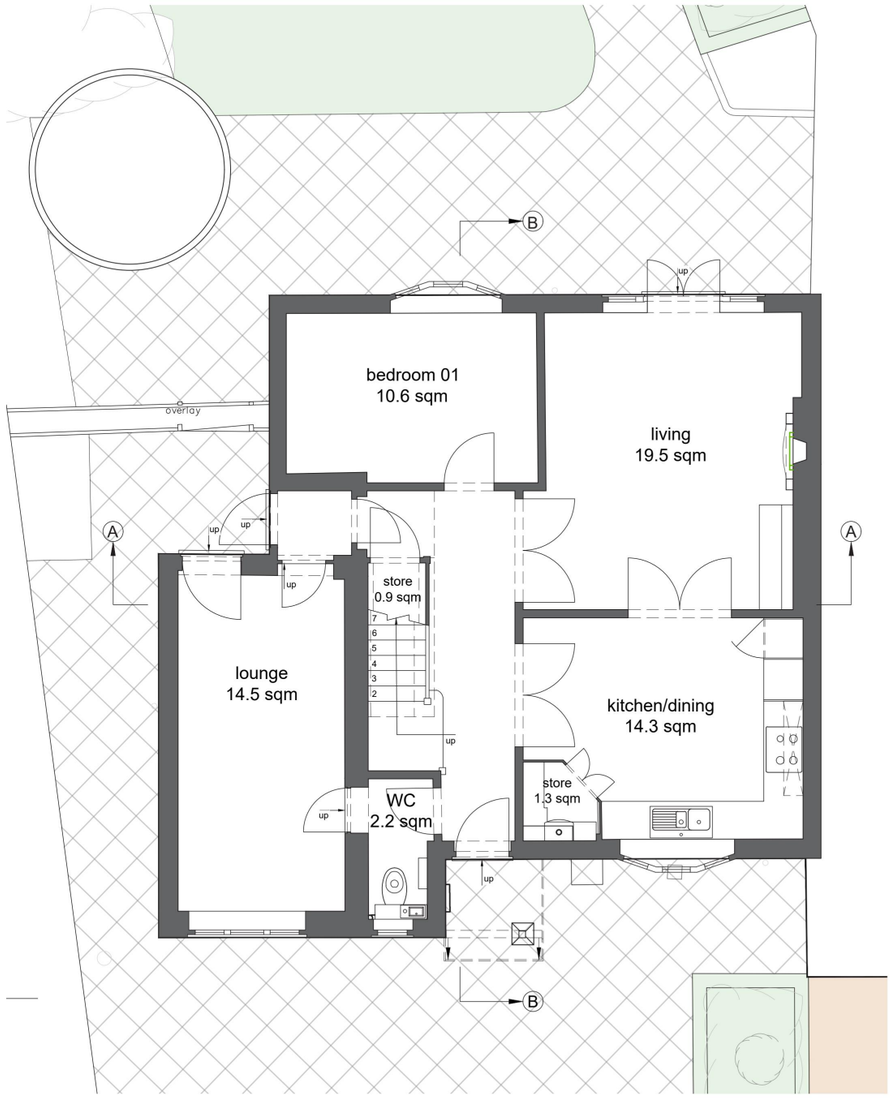
The small size of the home allows children to receive individual attention and consistent support within a calm residential setting that integrates well into the local community.

LUNNA Youth Residential Care Ltd will operate in accordance with Ofsted regulations, the Children's Homes (England) Regulations 2015 and the Quality Standards, promoting safeguarding, equality, dignity and positive life opportunities for every child."

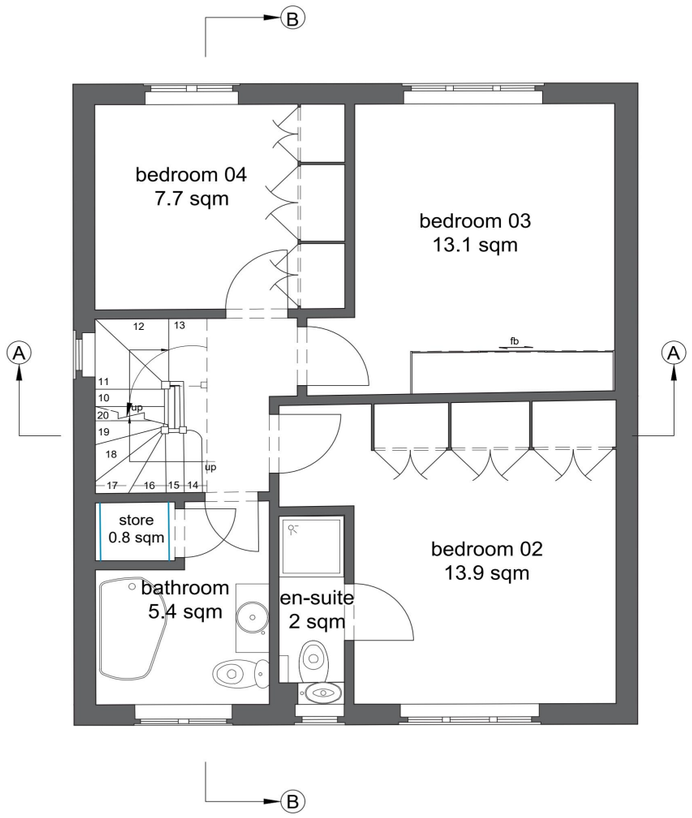
LUNNA
YOUTH RESIDENTIAL CARE
LTD
CHILDREN'S HOMES

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3.2 EXISTING DESIGN



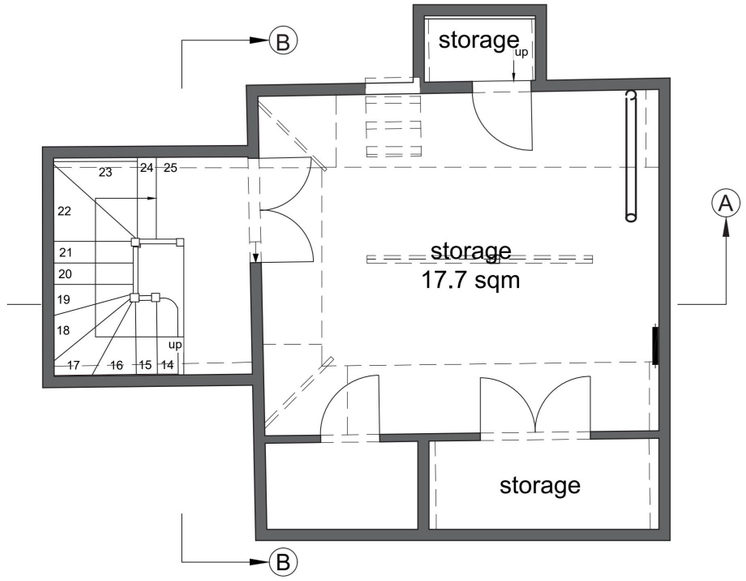
Existing Ground Floor Plan



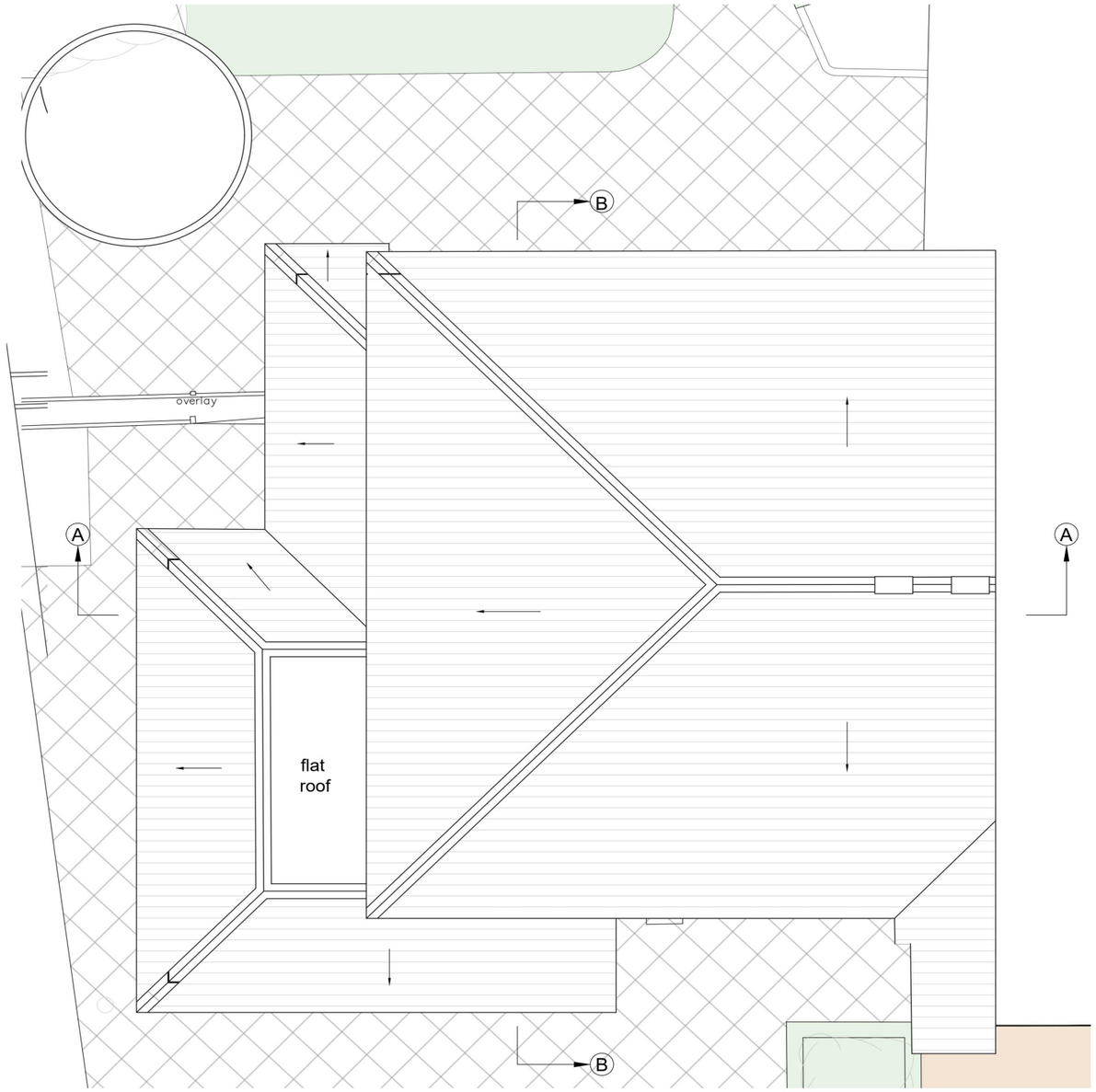
Existing First Floor Plan

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3.2 EXISTING DESIGN



Existing Loft Floor Plan



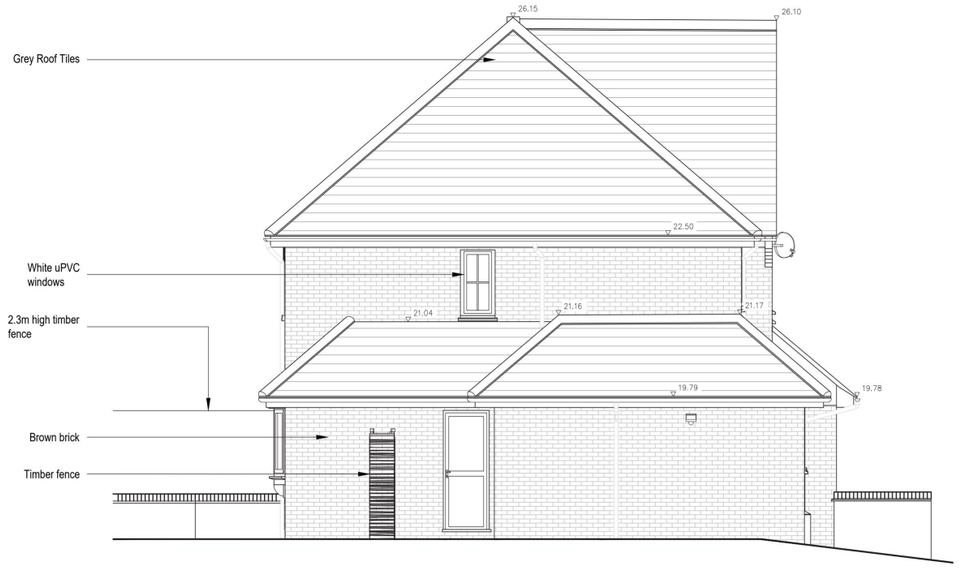
Existing Roof Plan

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3.2 EXISTING DESIGN



Existing Front Elevation



Existing Side Elevation



Existing Rear Elevation

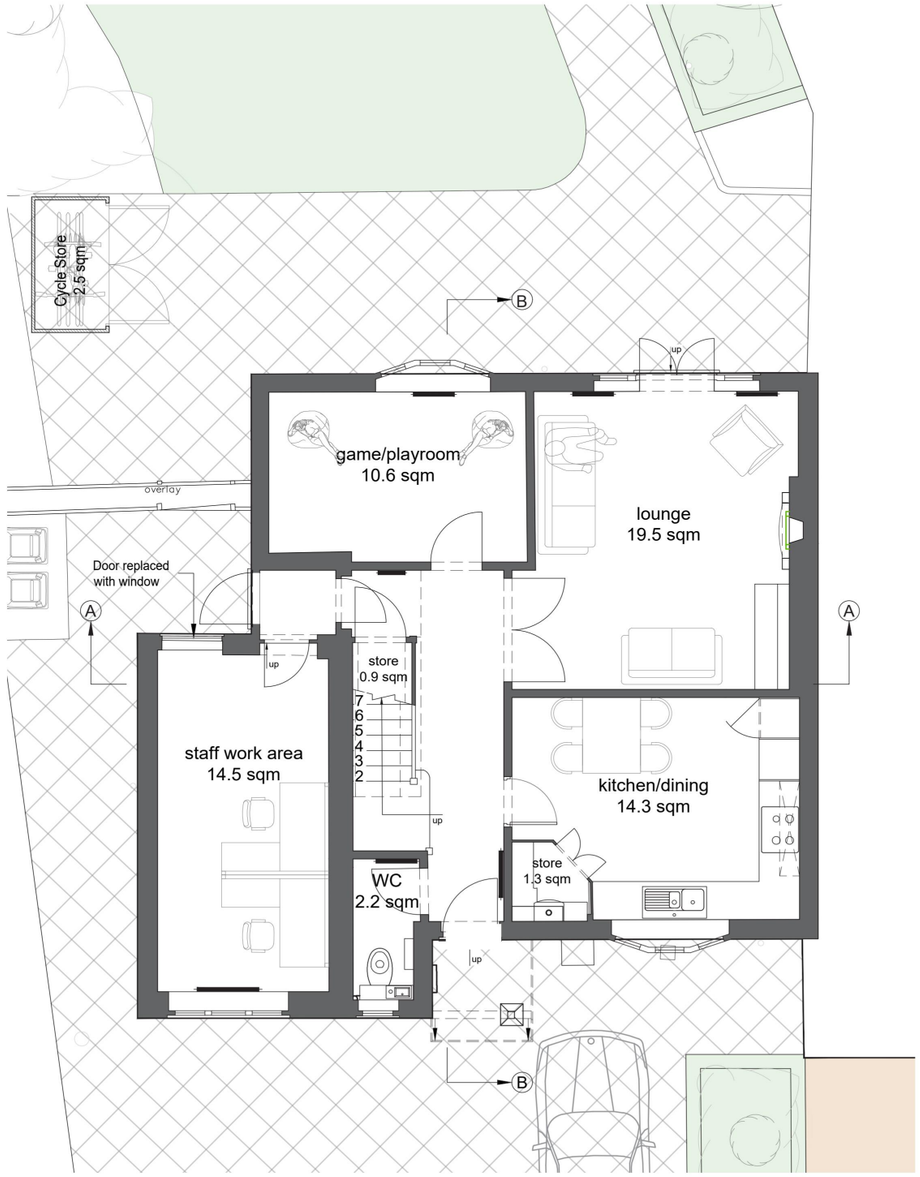
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3.3 PROPOSED DESIGN

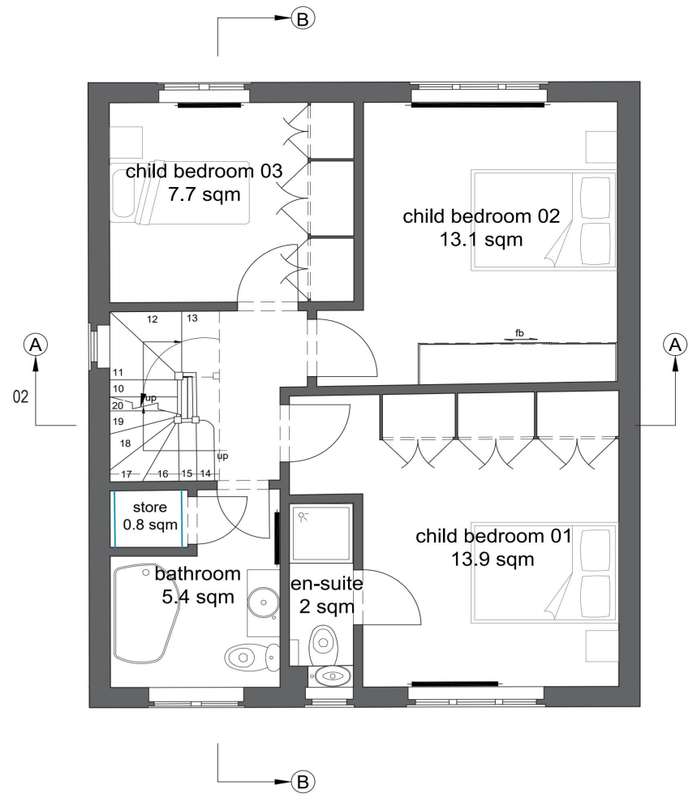
No significant external alterations to the property are proposed. The only change to the rear elevation is the replacement of the existing door serving the staff work area with a window.

The internal layout has been modified to better accommodate the operational requirements of the Children's Home. The existing front lounge will be used as a staff work area, while the existing rear bedroom will be converted into a play area/ games room.

The first-floor layout will remain unchanged, with the three existing bedrooms providing sleeping accommodation for the three children.



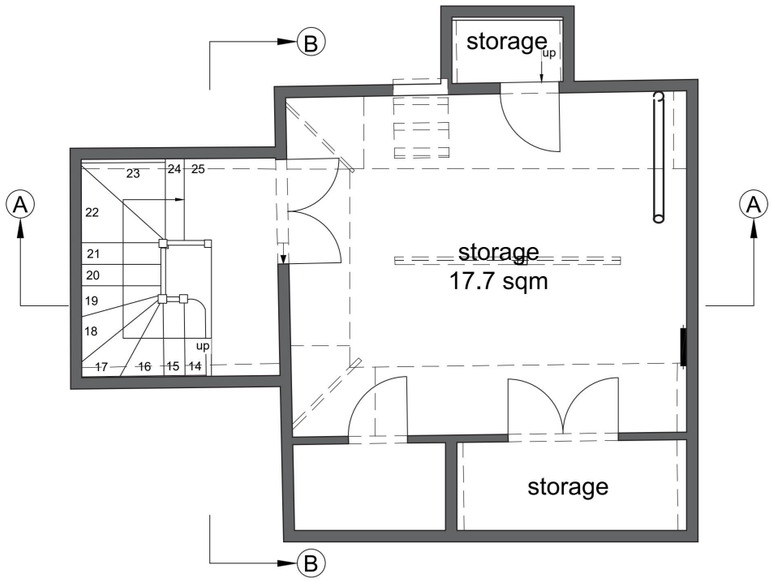
Proposed Ground Floor Plan



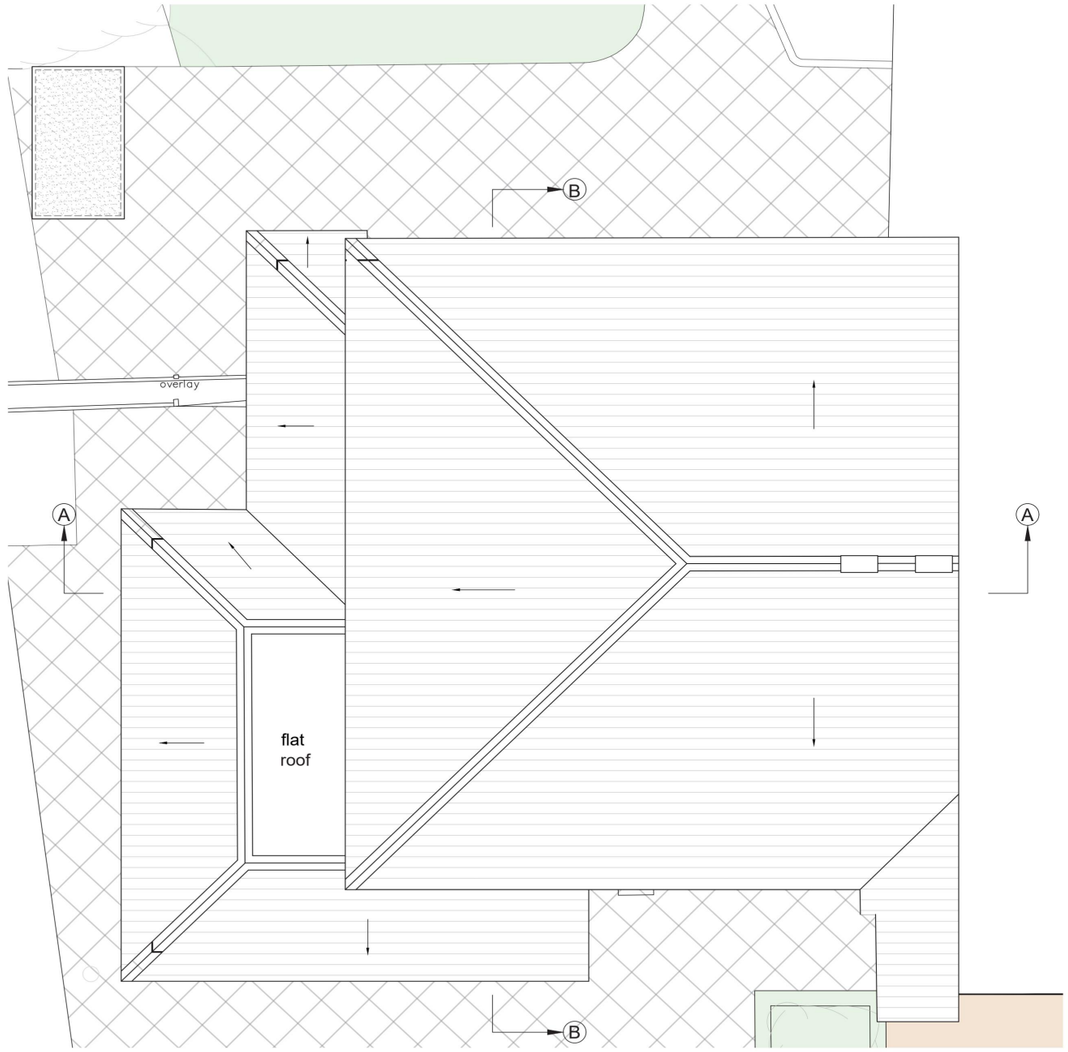
Proposed First Floor Plan

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3.3 PROPOSED DESIGN



Proposed Second Floor Plan



Proposed Roof Plan

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3.4 PROPOSED USE, LAYOUT & AMOUNT

Proposed Use

The proposed use will provide local placements that support continuity of education, access to health and community services, and integration within the local area where it is in the best interests of the children to remain close to their existing support networks. The home will operate in accordance with relevant children's home regulations and safeguarding standards.

The development will not give rise to material harm in terms of residential amenity, noise, parking demand, or the character of the surrounding area. As such, the proposal represents a sustainable and policy-compliant form of development within an established residential setting.

Amount and Scale

The proposed development does not increase the external floor area, and the overall scale and massing of the building remain unchanged.

Internally, there will be some minor amendments to the layout to facilitate the operations of the children's home, whilst creating a homely and supportive environment.

Space Standards

The proposed development has a Gross Internal Area (GIA) of 181.8 sqm, including the garden conservatory, which will form an integral part of the home's operations. The overall accommodation therefore meets the requirements of the Nationally Described Space Standard. The internal floor space ensures that each room meets or exceeds the minimum space requirements set out in the Nationally Described Space Standards, ensuring that the accommodation is both functional and provides a comfortable living environment for its occupants.

Sensory Awareness

The interiors of the property are of a high standard and take into consideration the following:

- appropriate levels of glare-free controllable lighting
- good quality acoustics, taking into account the needs of children with communication and interaction needs.
- visual contrast and texture, which can be used for sensory wayfinding
- reduced levels of stimuli, (for example, avoiding sensory overload for a child with autism) to provide a calming background to learning
- sensory elements - using colour, light, sound, texture and aroma therapeutically

Acoustics

Many children who may require residential care, including those with trauma and attachment difficulties, emotional dysregulation, emotional and behavioural difficulties, learning disabilities, sensory impairments or communication difficulties, can be particularly sensitive to their acoustic environment.

Good sound insulation and acoustic conditions are therefore important in creating a calm, predictable and supportive home environment. Reducing noise transmission between rooms and from external sources can minimise distraction and sensory overload, support concentration and communication, and help children to feel settled and secure within the home. This is particularly important for children who may have heightened sensitivity to noise or difficulties processing competing sounds.

The home will incorporate measures to support a comfortable acoustic environment, including the use of soft furnishings such as rugs, curtains and upholstered furniture where appropriate to absorb sound and reduce reverberation. The arrangement and use of spaces will also seek to provide quieter areas where children can retreat, relax and regulate when required.

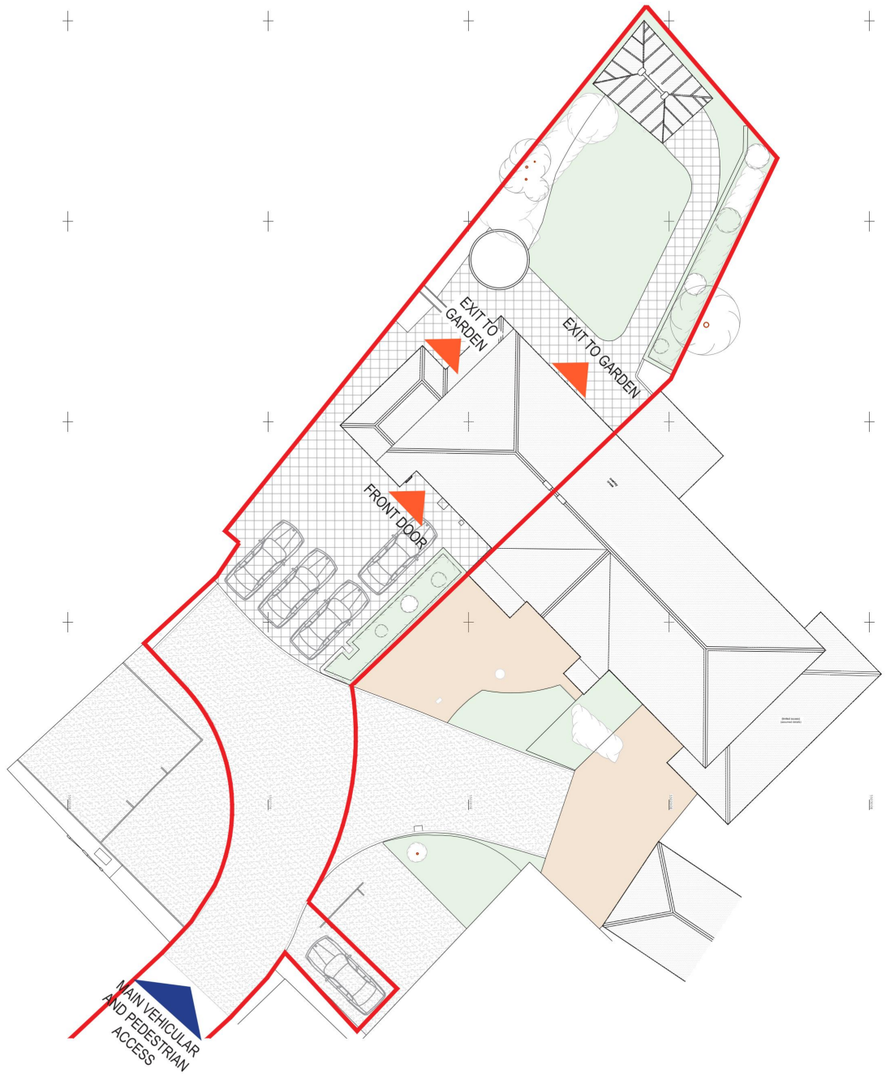
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3.5 ACCESS & MOVEMENT

Access

The proposed arrangement will provide a secure and controlled main entrance to the property, with the rear garden accessed internally from the dwelling, as well as through a side entrance.

The internal layout provides clear and practical circulation between the dwelling and the external amenity space, while maintaining appropriate separation between the private garden and the public street. This supports the safe day-to-day operation of the Children's Home and provides a secure environment for the children and staff.



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3.6 AMENITY, LANDSCAPING & BIODIVERSITY

The property benefits from an established private garden of approximately 223.40 m², incorporating mature fruit trees, planted areas and space currently used for growing vegetables. The existing landscaping and boundary treatments will be retained and maintained, preserving the established character and visual amenity of the garden.

The garden provides a generous, safe and high-quality outdoor amenity space for the children, offering opportunities for recreation, relaxation, gardening and nature-based activities. The established planting and vegetable-growing areas provide an interactive environment that supports children's well-being and encourages engagement with nature.

The retention of the existing vegetation will also maintain the garden's ecological value, providing food and habitat for birds, insects and other garden wildlife. Any future planting will, where appropriate, favour species that support pollinators and local biodiversity.

Overall, the proposal retains and makes positive use of the existing garden, providing a well-established, attractive and functional outdoor environment that supports the children's recreational needs and well-being, while preserving the site's existing landscape character and biodiversity.



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3.7 CAR PARKING

The London Borough of Havering assesses parking provision for Children's Homes falling within Use Class C2 on a case-by-case basis, having regard to the scale and nature of the proposed use, staffing levels, operational requirements, site accessibility and the potential for parking overspill onto the surrounding highway network.

The London Plan also identifies parking associated with C2 care homes and secure accommodation in relation to staff and residents, with operational parking requirements assessed having regard to the specific circumstances of the development.

Typically, the proposed Children's Home will accommodate three children supported by two care staff and one Registered Manager. Based on the operational requirements of the proposed use, the anticipated parking demand is primarily associated with staff and management, together with occasional visitors and professional services.

The proposed parking provision is therefore calculated as follows:

4 spaces for staff members on the front drive
1 space for visitors on the Mews

This results in a total proposed provision of 5 off-street parking spaces.

This provision is considered appropriate and proportionate to the scale of the proposed Children's Home and is sufficient to accommodate the anticipated staff and visitor parking demand without reliance on the surrounding highway. The arrangement will also allow staff and management vehicles to be accommodated on the site during shift changes and normal day-to-day operation.

The remaining parking spaces within the Mews are not available for visitors, as they belong to the other houses. Only the one space highlighted on the drawings is available to be used by visitors.

The proposed development is therefore not expected to result in significant overspill parking, additional pressure on surrounding residential streets, or any adverse impact on highways safety.

One of the parking spaces on the driveway will be provided with an active EV charging point from first occupation. This represents 25% of the four parking spaces provided on the driveway.

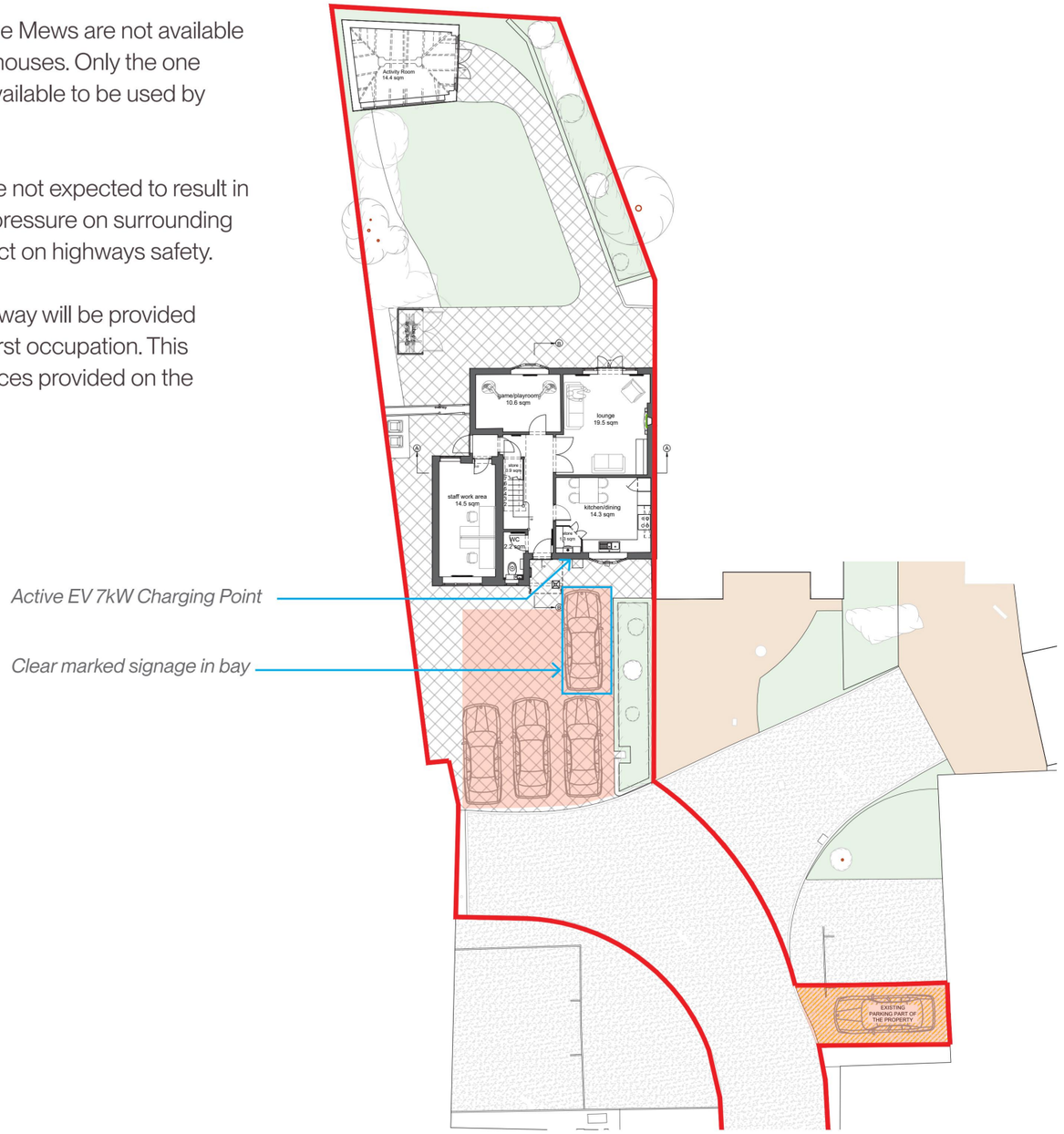


Diagram illustrating proposed car parking spaces

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3.8 BICYCLE STORAGE

The London Borough of Havering supports the provision of secure and accessible cycle parking in accordance with London Plan Policy T5, which requires development proposals to provide appropriate levels of cycle parking that are secure, conveniently located and fit for purpose.

The proposed Children's Home will accommodate three children, supported by two care staff and one Registered Manager. In accordance with the London Plan minimum cycle parking standards for C2 care homes / secure accommodation, long-stay cycle parking is calculated at one space per five full-time equivalent staff, with short-stay provision calculated at one space per twenty bedrooms.

Based on the proposed staffing and occupancy levels, the calculated requirement is:

Long-stay cycle parking: 3 staff ÷ 5 = 0.6 spaces, rounded up to 1 space;
Short-stay cycle parking: 3 bedrooms ÷ 20 = 0.15 spaces, rounded up to 1 space.

In accordance with the London Plan's minimum provision, the proposal will provide 2 long-stay and 2 short-stay cycle parking spaces, providing a total of 4 cycle parking spaces.

The cycle parking will be provided within a secure, covered and conveniently accessible storage area within the site, allowing cycles to be safely stored and protected from the elements. The facility will be located so that it is readily accessible to staff and visitors without creating conflict with pedestrian or vehicle movements.

The proposed cycle parking provision is considered appropriate and proportionate to the scale and operational requirements of the Children's Home. The secure and accessible storage arrangements will encourage sustainable modes of transport and ensure that adequate cycle storage is available for staff, residents and visitors. The proposal is therefore considered acceptable in terms of cycle parking and sustainable transport provision.





Proposed bicycle store (Brighton Bike Sheds)

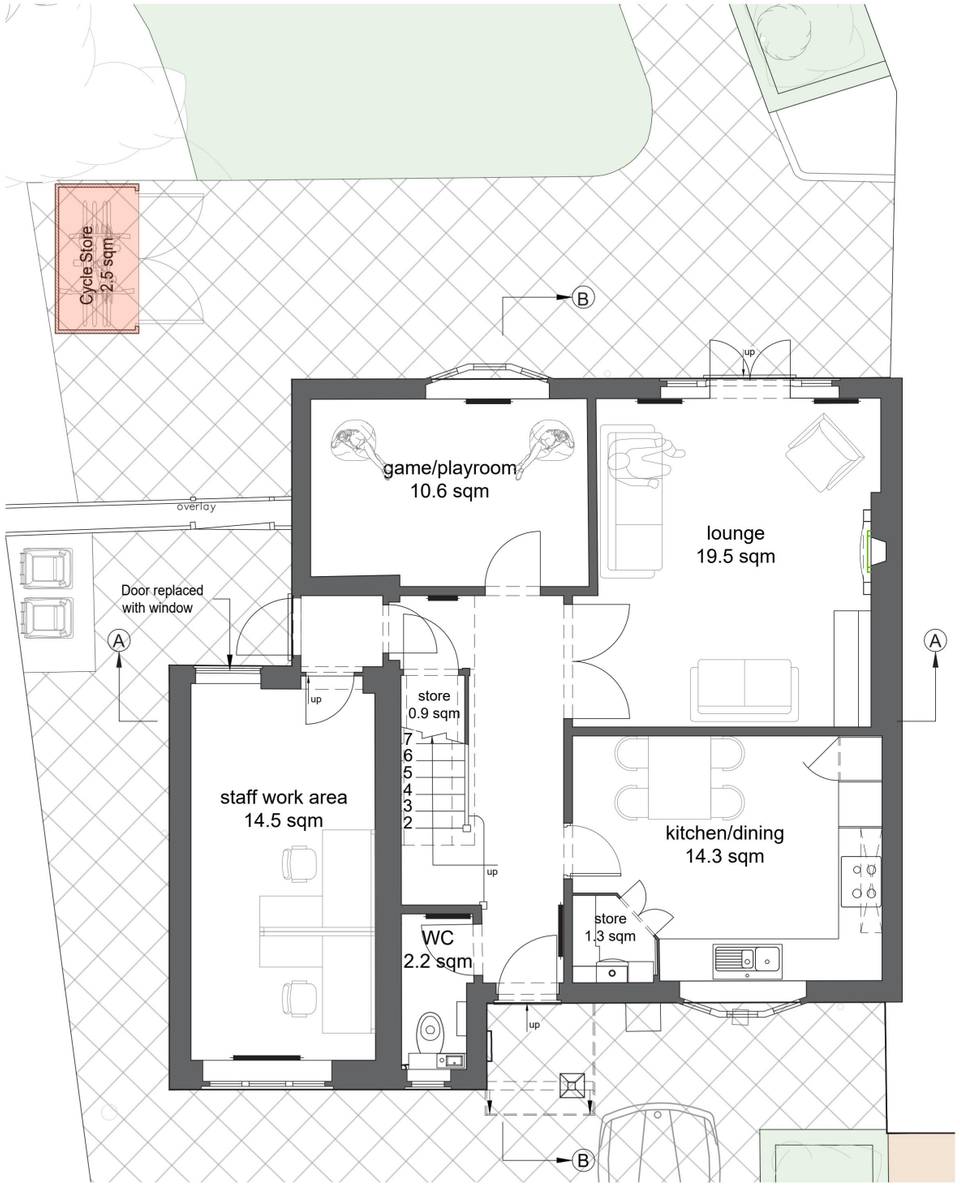


Diagram illustrating proposed Cycle parking spaces

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3.9 REFUSE & RECYCLING

The development will provide appropriate facilities for the storage and collection of general refuse and recyclable waste in accordance with Havering Local Plan Policy 35 and the Council's Waste Management Practice Planning Guidance.

The proposal will (as per the existing waste strategy) provide:

1 No. 240-litre general refuse bin; and
1 No. 240-litre recycling bin.

The bins will be positioned within the recommended 30m of the collection point and with a suitable accessible route for collection.

The proposed refuse and recycling provision is therefore considered appropriate for the development and will support effective waste separation, storage and collection without adversely affecting neighbouring residential amenity.

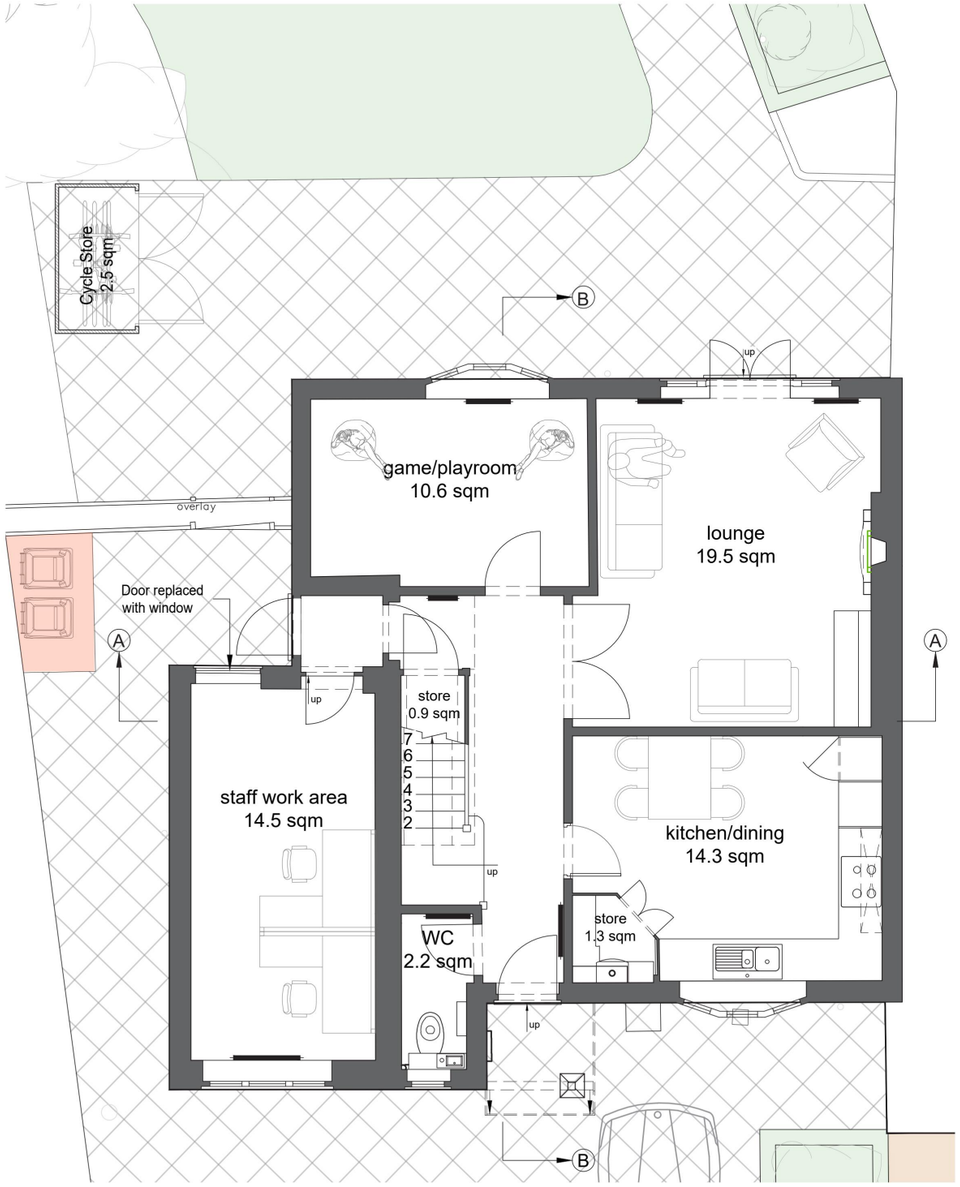


Diagram illustrating proposed refuse storage

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3.10 FIRE SAFETY

To ensure the highest standard of fire safety, the proposal will comply with the requirements of the Regulatory Reform (Fire Safety) Order 2005 and Approved Document B (Fire Safety) of the Building Regulations 2010.

All staff will complete mandatory training within their first three months of employment as part of their probationary period. A fire safety induction will be provided to all new staff on commencement, with at least one suitably first-aid-qualified member of staff on duty at all times. Refresher training will be provided at appropriate intervals so all staff will be fully prepared to follow best-practice procedures in the event of a fire.

Smoke Detection

The home will be fitted with a mains-powered, interlinked smoke detection system compliant with BS EN 14604 and BS 5839-6:2019 (Grade D1, LD1). Smoke alarms will be installed in hallways, with heat detectors in kitchens where required by the Building Control Officer (BCO). All detectors will be positioned within 7.5m of each habitable room door and at least 300mm from walls and light fittings.

Emergency Lighting

Emergency lighting will be provided in accordance with BS 5266 Part 1, covering all communal escape routes and stairwells. Additional fittings will be installed where escape routes are long, complex, or insufficiently lit. Monthly testing will be carried out, with records kept on site.

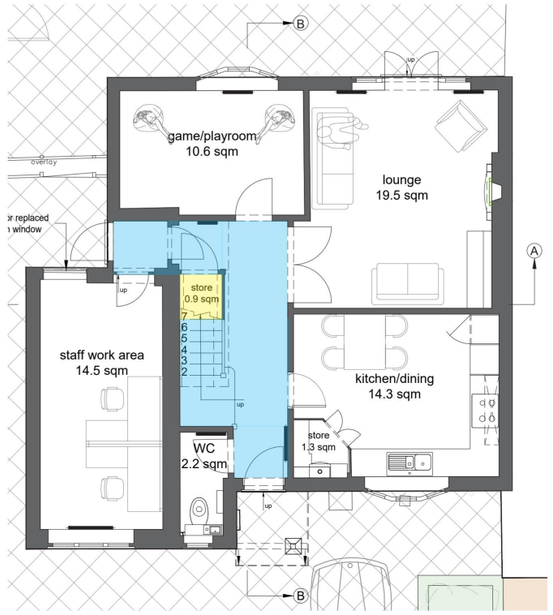
Means Of Escape

A protected escape stairway will be provided, constructed with 30-minute fire-resistant walls, floors, and ceilings. The stairway will lead directly to an external exit and must not contain inner rooms. All doors opening onto the escape route will be upgraded to FD30 fire doors (BS 476-22:1987) fitted with intumescent strips. Any glazing along the route will provide a minimum of 30 minutes fire resistance.

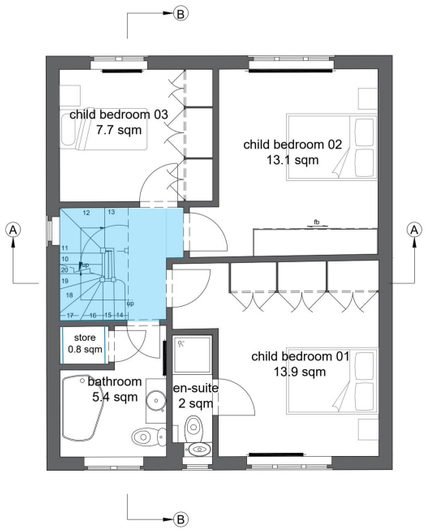
Evacuation Areas

In accordance with Approved Document B, escape routes must lead residents to a place of safety clear of fire danger. Courtyards or enclosed garden spaces will be assessed to ensure compliance with Diagram 2.5 of Part B, ensuring they are suitable for safe evacuation.

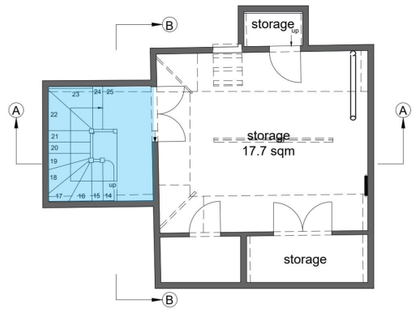




Ground Floor Plan



First Floor Plan



Loft Floor Plan

Unobstructed area for evacuation

Protected staircase

Unobstructed area for storage of fire equipment

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3.11 SECURITY

The existing boundary treatments will remain unchanged and will be retained and maintained as part of the proposed children's home. Any existing gates providing access to the rear or side of the property will remain securely maintained to help prevent unauthorised access to the rear garden, either via the side access route or neighbouring premises.

It is proposed for CCTV to be installed at the main entrance to monitor movements around the principal access point and assist with the security of the property. In some circumstances, staff may carry personal attack alarms and, where appropriate, body-worn video (BWV) cameras for safety purposes, subject to the home's operational policies and relevant privacy and data protection requirements.

External lighting will be used at the main entrance and other relevant access points to support safe movement and natural surveillance during hours of darkness. Lighting will be positioned sensitively to avoid unnecessary glare or disturbance to neighbouring properties.

The existing external door currently accessing the lounge will be replaced with a window. The remaining existing doors and windows will remain in place, unless requiring an upgrade to comply with UK Building Regulations.

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3.12 PLANNING POLICY

The proposal must be assessed against the following key planning documents:

- **National Planning Policy Framework 2026 (NPPF)**
- **The National Design Guide 2019**
- **Technical Housing Standards - nationally described space standards 2015**
- **London Borough of Havering Local Plan (2021)**

National Planning Policy Framework August 2026

The proposal has been considered against the National Planning Policy Framework (NPPF). The following policies are particularly relevant to the proposed children's home:

Policy HO7: Meeting the Need for Homes
The proposal contributes towards meeting an identified local need for specialist accommodation for children with a combination of trauma, attachment difficulties, emotional dysregulation, appropriately assessed self-harming behaviours, emotional and behavioural difficulties, learning disabilities and vulnerabilities relating to CSE/CCE and other forms of exploitation. The home is meeting this need whilst making effective use of an existing residential property.

Policy HO9: Specialist Forms of Accommodation
The proposal provides community-based specialist accommodation in an established residential area, with access to services for the children, such as education, healthcare, shops and activities. The accompanying Operational Management Plan demonstrates how the home will be safely and effectively managed, with appropriate staffing, supervision and operational arrangements in place.

Policy HC4: Proposals for new and improved community facilities, public service infrastructure and development providing public health benefits
This is specialist residential accommodation providing a public service to a particularly vulnerable group of children, therefore contributing to local health, well-being and social care provision.

Other Relevant NPPF Sections
Chapter 4 – Achieving Sustainable Development
Chapter 6 – Delivering a Sufficient Supply of Homes
Chapter 14 – Achieving Well-Designed Places
Chapter 16 – Promoting Healthy Communities

London Borough of Havering Local Plan (2021)

Policy 6 - Community Facilities
Supports the provision of community facilities that meet an identified local need, provided they are compatible with the surrounding residential environment and do not result in unacceptable impacts on neighbouring amenity, parking or highway safety. The proposed Children's Home will provide a home for children in an established residential area, contributing towards the provision of essential social infrastructure whilst maintaining the character and function of the existing dwelling.

Policy 7 - Residential Design and Amenity
Seeks to ensure that development protects the amenity of existing and future occupants through appropriate design, layout and operation. The proposed Children's Home will retain the appearance of a single dwellinghouse and will operate at a scale comparable to a family home, with limited staffing and activity levels that are not expected to adversely affect neighbouring properties.

Policy 24 - Transport and Parking
Requires development to provide appropriate parking and servicing arrangements whilst maintaining highway safety and encouraging sustainable travel. The property benefits from off-street parking for staff and visitors together with secure cycle storage, ensuring that the proposal will not generate unacceptable parking demand or traffic impacts within the surrounding residential streets.

Policy 26 - Urban Design
Promotes development that responds positively to local character and contributes to a high-quality built environment. The proposal involves no significant external alterations and will retain the existing residential appearance of the property, ensuring that it integrates successfully within the surrounding streetscape.

Policy 34 - Amenity
Requires development to avoid unacceptable impacts arising from noise, disturbance, traffic or other environmental effects. The proposed Children's Home will accommodate a small number of children in a domestic environment with low staffing levels and managed visitor arrangements, resulting in activity comparable to that of a typical family dwelling and preserving the residential amenity of neighbouring occupiers.

London Plan Policy H12 - Supported and Specialised Accommodation
Supports the delivery of specialist accommodation where there is an identified need and where proposals are well integrated within existing communities, have good access to local services and public transport, and provide an appropriate standard of accommodation. The proposed Children's Home meets these objectives by providing high-quality specialist accommodation within an accessible residential location close to schools, healthcare facilities, public transport and other local amenities.

Other relevant policies and guidance include:

- **Policy 16 - Housing Mix and Choice** – Supports the provision of a range of housing and accommodation to meet the diverse needs of the borough, including specialist forms of residential accommodation.
- **Policy 27 - Heritage and Townscape** – Ensures development respects the character of the surrounding area.
- **Policy 29 - Sustainable Design and Construction** – Encourages sustainable development and efficient use of existing buildings.

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3.13 EVIDENCE DEMONSTRATING NEED

Context and Need

Ofsted, the regulator for children's social care, continues to report significant pressures across the sector. Its national research highlights persistent challenges in securing suitable homes for young people, particularly those with complex needs. As Ofsted states, "More than nine in 10 local authorities struggle to find homes for children with complex needs," with many existing homes reluctant to accept such placements, further reducing availability.

According to Main findings: children's social care in England 2023 (Gov.uk), there were 2,880 registered children's homes as at 31 March 2023, representing a 9% increase on the previous year. These homes collectively provided 10,818 places, a 7% uplift from 2022. Although 365 new homes opened during the period, 116 closed, and overall growth continues to fall short of demand.

England is home to nearly 12 million children, of whom over 400,000 (3%) are involved with children's social care at any given time. Around 82,000 are children in care. Responsibility for meeting these needs lies with 152 local authorities, each required to ensure sufficient, appropriate placements.

Despite incremental growth, research consistently identifies a national shortfall in suitable provision. Studies by Research in Practice, the Children's Commissioner, and the Local Government Association have all called for reform of children's residential care, highlighting systemic challenges and the urgent need for more local, high-quality placements.

The Sufficiency Challenge

Ofsted has repeatedly raised concerns about placement availability. Its 8 July 2022 press release noted that many children are placed far from home simply due to the lack of suitable provision nearby. This is at odds with each local authority's statutory sufficiency duty, which requires them to secure, as far as reasonably practicable, enough accommodation within their area to meet the needs of children in care.

One of the most significant issues is the uneven distribution of children's homes across the country. As Ofsted explains in What types of needs do children's homes often care for?:

"Sufficiency of places in children's homes is an ongoing area of concern... the uneven distribution of homes across the country means that a child may be moved a long way from their family and friends... alongside concerns about the availability of nearby homes that can accommodate children with particular needs."

This lack of capacity disproportionately affects children with complex behavioural, emotional, and therapeutic needs, for whom finding appropriate placements is most challenging.

Policy Framework

National policy strongly emphasises the importance of high-quality, stable, and nurturing provision for children who cannot live with their families. The Secretary of State's foreword to the Department for Education's Government Consultation Response on National Standards (December 2021) states:

"Every child in this country deserves a stable loving home which keeps them safe, meets their needs and enables them to access a high-quality education... This is equally important for those children who are unable to stay with their families."

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3.13 EVIDENCE DEMONSTRATING NEED

Ofsted, the Office for Standards in Education, Children's Services and Skills inspect and regulate services that care for children and young people. The following pieces of text are extracts from research and analysis articles published by Ofsted, available on www.gov.uk.

A report by Ofsted says "More than nine in 10 local authorities struggle to find homes for children with complex needs", highlighting a reluctance by homes to accept such referrals as a key factor behind the lack of suitable provision.

According to "Gov.uk - Main findings: children's social care in England 2023" there were 2,880 children's homes as at 31 March 2023, a 9% increase (238 homes) from the previous year (2,642). These 2,880 homes were registered for 10,818 places, a 7% increase from 10,113 at 31 March 2022. Both the number of homes and places had a faster rate of growth this year than the rate in 2022, when the number of homes grew by 7% and places by 4%. This was accounted for by 365 homes opening and 116 homes closing. Out of the nearly 12 million children living in England, just over 400,000 (3%) are in the social care system at any one time. Just over 82,000 of these children are children in care. As at 31 March 2023, across England, 152 LAs were responsible for ensuring and overseeing the effective delivery of social care services for children.

According to "Gov.uk - Main findings: children's social care in England 2023" as at 31 March 2023, across England, 152 LAs were responsible for ensuring and overseeing the effective delivery of social care services for children.
According to statistics from "Children accommodated in secure children's homes" (https://explore-education-statistics.service.gov.uk/find-statistics/children-accommodated-in-secure-childrens-homes/2025), "between 2010 and 2023 there was an overall gradual decline in children accommodated in secure children's homes to 139 children in 2023, but in the last two years the number has risen slightly. Children accommodated in secure children's homes increased to 170 in 2025, up by 9% (14 more children) compared to 2024"

According to "Gov.uk - Why do children go into children's homes" (attached as part of this application), there is clear evidence for the need for children's homes. "Children's Homes are never far from the forefront of public debate. In 2020 alone, Research in Practice and the Children's Commissioner both published major research on children's homes. Both challenged the status quo on the subject and proposed an overhaul of the care sector. More recently, in 2021, the Local Government Association published research on the topic, and it is an important focus of the Independent Care Review.

According to a Press Release from Ofsted published on 8 July 2022, "Children in the care system are often placed in homes far away from their families because of a lack of suitable places near to where they live." (https://www.gov.uk/government/news/many-children-placed-in-homes-far-away-from-their-families-amid-national-sufficiency-challenge)

According to a Press Release on Gov.uk, Each LA in England has a 'sufficiency duty' to ensure, as far as is 'reasonably practicable', that there is sufficient accommodation within its area to meet the needs of its children in care. The lack of suitable accommodation for children and the uneven distribution of children's homes across the country is well documented. This is alongside an increasing need for homes and carers that can meet the diverse and complex needs of children. Across the country, there are children who are living outside of their LA, particularly in children's homes. (For some children, this may be by choice and be a positive outcome for them.)

According to an Ofsted Press Release on Gov.uk: (https://www.gov.uk/government/news/children-with-complex-needs-can-wait-years-for-a-stable-home) large numbers of children with complex needs live in homes alone, often with high numbers of staff. Although this may be right for some children, the report warns it should not be the default when planning children's care as it risks leaving them isolated and vulnerable to mistreatment.

"The number of children's homes continues to grow, but not in the right places or all offering what children need. I hope this report encourages local authorities and children's homes to work together in planning what is needed and where, in the best interests of children." - Yvette Stanley, Ofsted's national director for social care

"Councils want every child in their care to thrive in the best possible home for their needs, but as this report highlights, finding those homes can be exceptionally challenging, especially where children have complex needs." - Councillor Louise Gittins, chair of the Local Government Association's Children and Young People's Board

According to an article in the Guardian "Care Homes in England reject vulnerable children to protect Ofsted Ratings.", (https://www.theguardian.com/society/2024/feb/11/care-homes-england-reject-complex-needs-children-protect-ofsted-ratings) , "...demand for care home placements is outstripping supply, with rising numbers of children in care, many care homes only having a small number of places and new settings often opening hundreds of miles from where they are most needed." This article highlights a sustained increase in the number of children in care, with 720 additional children recorded between March 2021 and March 2024. This upward trajectory is expected to continue in the absence of significant investment in preventative and early intervention services, placing increasing pressure on local authorities to secure appropriate placements within their areas.

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3.14 CATERING FOR LOCAL NEED

Children's Services Sufficiency Needs Assessment and Strategy 2025- 2028

Local Need and Sufficiency

The proposed children's home has been specifically designed to respond to an identified need within the London Borough of Havering. The proposal is for a small, three-child residential home for children with a combination of trauma, attachment difficulties, emotional dysregulation, appropriately assessed self-harming behaviours, emotional and behavioural difficulties, learning disabilities and vulnerabilities relating to CSE/CCE and other forms of exploitation.

These characteristics closely reflect the specific cohort identified within Havering's Children's Services Sufficiency Needs Assessment and Strategy 2025–2028.

A growing need for residential care

Havering's children in care population has increased significantly. Between 2020 and 2024, the number of children in care increased from 232 to 280, while the number of children living in children's homes increased from 19 in 2018 to 41 in 2024. The proportion of children in care living in children's homes consequently increased from 7.6% to 14.6%. The Strategy also records a 50% increase in the use of children's homes between 2020/21 and 2021/22, followed by a further 33% increase in 2023/24.

Demand is particularly significant amongst older children. Between 2023 and 2024, the number of children aged 10–15 in care increased by 50%, from 81 to 120. This group represented 42% of Havering's children in care in 2024 and was also the largest group entering care during the year.

A specific need for trauma-informed and specialist provision

Importantly, the Strategy identifies the nature of the children requiring residential care, rather than simply identifying a requirement for additional places.

It states that 75% of children living in children's homes, representing 34 children, primarily require services because they have experienced traumatic early care. It specifically identifies the need for children's homes to support children experiencing:

dysregulated emotions;
attachment disorders;
self-harming behaviours;
dangerous decision-making; and
inappropriate relationships with peers or older adults.

This is a particularly strong alignment with the proposed cohort. The proposal is therefore not for a generic children's home, but for a small, specialist residential environment designed around the needs of children whose characteristics are expressly identified within the Council's own assessment of residential demand.

The Strategy also identifies a growing group of young people who have experienced exploitation from an early age. These children may come to the Council's attention following a crisis at home or through the criminal justice system, with risk assessments sometimes resulting in placements in rural communities at significant distance from Havering.

The proposed ability to accommodate children with appropriately assessed CSE/CCE vulnerabilities therefore responds directly to another identified element of local demand.

A shortage of appropriate local provision

The Strategy identifies a particular issue with children requiring specialist care being placed outside the borough.

During 2023/24, there was an increase in children with disabilities requiring residential education, alongside several children requiring specialist care following concerns relating to exploitation and gang violence. The Strategy states that these groups increased the proportion of children requiring care outside Havering's boundaries.

Although the Strategy, using its relevant 2024 evidence base, identifies 13 private children's homes providing a maximum of 55 places, it makes clear that the existence of nominal capacity does not necessarily meet the needs of Havering's children. At 31 December 2024, only four Havering children were placed in these local homes.

This demonstrates the importance of appropriate and suitably specialised local provision, rather than simply increasing the overall number of children's home beds.

Direct alignment with the Council's Sufficiency Strategy

The Council has identified the creation of local children's home capacity as a specific strategic priority.

Action 7 states that the Council needs to develop commercial relationships with local children's home providers to create local capacity through a care framework, with the stated objective that providers understand Havering's needs so that children can remain living in the borough.

The Council also intends to develop its own children's home provision for children requiring specialist care following discharge from CAMHS Tier 4 hospitals, including provision that can provide an alternative pathway to hospital admission. It separately identifies plans for children's home provision for children with disabilities.

The proposed development directly supports these strategic objectives by providing three additional local residential places for children with complex emotional, behavioural, developmental and safeguarding needs.

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3.14 CATERING FOR LOCAL NEED

The proposal responds directly to a clearly evidenced local need identified by Havering's Children's Services Sufficiency Needs Assessment and Strategy.

The Strategy identifies:

- a growing number of children requiring care and increasing reliance on residential provision;
- a significant residential cohort affected by traumatic early care, emotional dysregulation, attachment difficulties and self-harming behaviours;
- a growing number of children requiring specialist support because of exploitation and safeguarding vulnerabilities;
increasing demand for provision for children with disabilities and additional needs; and
- a requirement for greater local children's home capacity, particularly to reduce the need for specialist out-of-borough placements.

The proposed three-child home is therefore a proportionate and targeted response to an identified local need. Its intended cohort closely matches the characteristics identified within the Council's own evidence base, while its small-scale, domestic model provides an opportunity for children with complex needs to receive appropriate care within their local community, where this is safe and in their best interests.

The proposal would consequently make a tangible contribution towards Havering's stated objective of creating appropriate local capacity so that children can remain living in the borough.

Freedom of Information Request

As part of establishing the current local context for children's residential care provision, the Applicant submitted a Freedom of Information request to the London Borough of Havering seeking the most recent information on children's homes, looked-after children, out-of-borough placements and the Council's current residential care requirements.
The Council's response confirms that there are currently 25 registered children's homes within Havering, operated by 21 independent companies, with none operated directly by the Council. However, the response also confirms that **321 looked-after children are currently the responsibility of Havering Council, of whom 193 are placed outside the borough. This represents approximately 60% of Havering's looked-after children being accommodated outside the borough.**

The Council's response states that there is an "over supply of children's homes in Havering" when considering overall registered provision. However, this should be considered alongside the substantial number of Havering children currently accommodated outside the borough and the Council's stated intention to develop two additional children's homes through the DfE children's home scheme. The FOI response therefore demonstrates that the Council continues to recognise a requirement for further residential provision, notwithstanding the stated overall supply of registered homes.

Most importantly, the FOI response should be considered alongside the Council's Children's Services Sufficiency Needs Assessment and Strategy, which identifies that the principal issue is not simply the numerical availability of children's homes, but the availability of appropriate provision capable of meeting the particular needs of Havering's children. The Strategy identifies a significant cohort requiring specialist residential care due to traumatic early experiences, dysregulated emotions, attachment difficulties, self-harming behaviours, exploitation and other complex needs, and identifies that these requirements have contributed to children being placed outside the borough.

The proposed three-child home is specifically intended to meet this identified specialist need. It is not proposed as a generic increase in children's home capacity, but as a small-scale, purpose-designed residential environment for a clearly defined cohort whose needs correspond directly with those identified within Havering's own sufficiency evidence.

The proposal would therefore make a proportionate contribution towards Havering's wider objective of developing appropriate local residential capacity, while providing an opportunity for children with complex needs to be accommodated closer to their local community, family, education and support networks where this is safe and appropriate.

Correspondence with Children's Team

The Applicant contacted Havering Children's Commissioning Team (Simon Brown - Commissioner) to obtain further information regarding local need for children's residential care provision. No response had been received at the time of submission.

The Applicant understands that, as part of the planning consultation process for this application, the Council's Children's Services and/or Commissioning Team will be consulted. The Applicant therefore anticipates that the Council will be able to provide any relevant information or evidence it holds regarding local need as part of its consideration of the application, in line with the Sufficiency Strategy.

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3.15 SUPPORTING DOCUMENTATION

Operational Management Plan

An Operational Management Plan is submitted in support of the planning application to provide clarity on the day-to-day operation and management of the proposed children's home. It sets out the staffing, visitor, travel, noise and neighbour liaison arrangements to demonstrate that the home will be responsibly managed and operate compatibly with the surrounding residential area.

Location Risk Assessment

The Location Risk Assessment prepared by the Applicant outlines the education, healthcare, community, and support services available within Romford/Havering and the locality surrounding 1 Amanda Mews, demonstrating the suitability of the location to support the well-being, development, and day-to-day needs of young people.

Statement of Purpose

The Statement of Purpose is a mandatory document for children's home providers as part of the Ofsted registration process and sets out how LUNNA Youth Residential Care will operate, including its purpose, intended age range and occupancy, the needs of the children it will support, its care approach, staffing and management arrangements.

It is submitted in support of the planning application to provide the Local Planning Authority with a clear understanding of the proposed use and demonstrate that the proposal is for a small-scale, carefully managed residential care home for up to three children, operating within a domestic and family-style environment designed to support their safety, welfare and well-being.

Freedom of Information Response

A Freedom of Information request was submitted to Havering Council to obtain up-to-date information regarding the provision of children's residential care within the borough and to assist in understanding the local context and need for such accommodation.

The Council's response is submitted in support of the planning application as relevant evidence for the Local Planning Authority to consider when assessing the proposed children's home and its contribution to the borough's existing residential care provision.

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3.16 CONCLUSION

The proposed change of use from a Dwellinghouse (Use Class C3) to a Children's Home (Use Class C2) represents an appropriate and sustainable form of development that will provide high-quality residential care for a small number of children within an established residential neighbourhood.

The proposal has been carefully designed to operate in a manner comparable to that of a typical family dwelling, with limited staffing levels, low traffic generation and no significant external alterations to the property. Adequate off-street parking, secure cycle storage and suitable refuse and recycling facilities will be provided, ensuring compliance with the London Borough of Havering's transport, waste management and sustainable development objectives.

The development preserves the character and appearance of the existing dwelling, safeguards the amenity of neighbouring occupiers and will not give rise to unacceptable impacts in terms of noise, parking demand, highway safety or residential amenity. Furthermore, the site's accessible location, close to public transport, schools, healthcare facilities and local services, makes it well suited for the proposed specialist residential use.

The proposal accords with the relevant policies of the Havering Local Plan, the London Plan and the National Planning Policy Framework by delivering an essential community facility that meets an identified need while integrating successfully within the surrounding residential environment.

In light of the above, it is respectfully requested that planning permission for the change of use from a Dwellinghouse (Use Class C3) to a Children's Home (Use Class C2) be granted.

> *"I want all children to have the brightest future possible. I will advocate for positive change for all children and particularly those who are most disadvantaged."*
>
> *~ Anne Longfield, Former Children's Commissioner for England*

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Chandran
Hughes
Architects