LRJ PLANNING

Planning, Design and Development

PLANNING STATEMENT

SCHEME: CERTIFICATE OF LAWFULNESS (PROPOSED USE) APPLICATION - SUPPORTED LIVING ACCOMMODATION FOR UP TO FOUR ADULTS (USE CLASS C3(B))

SITE: 294 ELM PARK AVENUE, ELM PARK, RM12 4DA

DATE: OCTOBER 2026

1.0 Introduction

This Planning Statement has been prepared by LRJ Planning in support of an application for a Lawful Development Certificate (Proposed Use) pursuant to Section 192 of the Town and Country Planning Act 1990.

The application seeks formal confirmation from the London Borough of Havering that the proposed use of 294 Elm Park Avenue, Elm Park, RM12 4DA, as supported living accommodation for a maximum of four adults falls within Use Class C3(b) of the Town and Country Planning (Use Classes) Order 1987, as amended.

The proposed arrangement would provide a domestic residential environment for up to four adults who require varying levels of care and support in connection with their individual circumstances. Residents would occupy the property as their home, each having a private bedroom whilst sharing the principal communal facilities of the dwellinghouse.

The defining characteristics of the proposal are that no more than four residents would occupy the property, the residents would live together as a single household, and care and support would be provided in accordance with their assessed needs..

2.0 Site and Property Description

The application site comprises a four-bedroom dwellinghouse situated at 294 Elm Park Avenue, within the established residential area of Elm Park in the London Borough of Havering.

The property is of a domestic residential form and has recently undergone substantial refurbishment and improvement works intended to enhance its internal condition. The development was carried out in accordance with planning permission reference: P0646.25.



The works undertaken include:

- Installation of a new electrical system;
- Installation of a new central heating system;
- Replacement or installation of double-glazed windows throughout;
- Installation of a Megaflo hot water system;
- Provision of an accessible ground-floor wet room with WC;
- Provision of a separate ground-floor WC;
- Upgrading of bathroom facilities;
- Installation of a stairlift;
- Internal refurbishment and redecoration throughout.

These improvements have enhanced the functionality and accessibility of the existing dwellinghouse without subdividing the property into separate residential units.

Internal Accommodation

The property is arranged over two floors and retains the layout and principal characteristics of a conventional dwellinghouse. The ground floor provides:

- Two accessible bedrooms'
- An accessible wet room incorporating a WC;
- A separate WC;
- A large communal kitchen;
- A spacious communal living room incorporating a designated dining area;
- Home office;
- Side access; and
- Rear access to the garden.

The first floor provides:

- Two double bedrooms;



- A family bathroom; and
- Stairlift access to assist residents with mobility requirements.

The accommodation provides a combination of private sleeping areas and shared domestic facilities, enabling residents to maintain personal privacy whilst participating in communal household activities.

The property's adaptations are intended to facilitate occupation by adults with differing mobility, personal care and support requirements.

The principal accessibility features include ground floor bedroom accommodation, an accessible wet room, a separate WC, stairlift access to the first floor and convenient access to the rear garden.

The upgraded heating and hot water facilities further support the practical operation of the property as residential accommodation. Notwithstanding these adaptations, the property remains a single dwellinghouse. No independent flats, self-contained residential units or separate households are proposed. The alterations are ancillary to the intended residential occupation and do not, in themselves, change the fundamental domestic function of the building.

3.0 Proposed Use

The proposed use would accommodate a maximum of four adults aged 18 years or over in a supported living arrangement.

Residents may include individuals with learning disabilities, autism spectrum conditions, mental health support needs, physical disabilities, acquired brain injuries, sensory impairments or other assessed support requirements. The precise nature and level of support provided would be determined by the individual needs of the residents and the relevant care arrangements.



Each resident would occupy an individual bedroom within the dwellinghouse. The kitchen, living room, dining area, bathrooms and garden would be available for shared use in accordance with the practical arrangements of the household.

The property would operate as the residents' home, providing a domestic setting in which individuals could develop and maintain independence, undertake everyday activities and access appropriate support

The proposal does not envisage the creation of separate accommodation units or the operation of individual room lettings as independent residential arrangements.

The maximum proposed occupancy of four adults is below the numerical limit of six residents specified in the definition of Use Class C3(b), subject to the requirement that residents live together as a single household and receive care.

4.0 Planning Analysis

The Town and Country Planning (Use Classes) Order 1987, as amended, identifies Use Class C3(b) as encompassing use of a dwellinghouse by not more than six residents living together as a single household where care is provided for residents.

The proposed occupation must therefore be assessed against the relevant characteristics of the statutory use class, including the number of residents, the nature of the household arrangement, the provision of care and the continued residential function of the property.

Number of Residents

The proposed maximum occupancy is four adults. The number of residents would therefore remain below the maximum of six permitted under the relevant definition of Use Class C3(b).



Single Household Arrangement

The proposed living arrangement would be organised around a shared domestic environment rather than separate and independent residential occupancies. Residents would have their own bedrooms but would share the principal communal facilities, including the kitchen, living room and dining area. The property would not be divided into separate units, and the proposed arrangement is intended to operate as a single household.

The assessment of whether the occupation constitutes a single household must, however, be informed by the actual living arrangements and management of the accommodation, rather than solely by the number of residents or the sharing of facilities.

Provision of Care and Support

Care and support would be provided in response to residents' assessed needs. Depending on individual requirements, assistance may include support with daily living skills, household management, community access, medication-related needs and personal care where required.

The intended arrangement is to enable residents to live within a domestic setting whilst receiving appropriate assistance. The precise care arrangements and their relationship to the residents' occupation should be consistent with the proposed C3(b) use.

Continued Use as a Dwellinghouse

The building would continue to function as a dwellinghouse, with bedrooms and shared domestic facilities arranged to support ordinary residential living.

The proposal would not involve the formation of self-contained flats, the subdivision of the building into separate dwellings or the introduction of a communal institutional accommodation model.



The presence of support staff and the provision of adapted facilities would be ancillary to the residential occupation, provided that the scale and nature of the operation remain consistent with the proposed household arrangement.

On the basis of the stated occupancy and intended arrangements, the proposal is considered capable of falling within Use Class C3(b).

Staffing and Management Arrangements

Support staff would attend the property to deliver assistance in accordance with residents' assessed needs and the applicable care arrangements. The assistance provided may include support with daily living skills, domestic activities, community participation, medication-related needs and personal care where required.

No staff member is proposed to reside permanently at the property. An home office is provided within the outbuilding to facilitate ancillary administrative and support functions associated with the residential arrangement. This space is not intended to operate as an independent office or separate commercial premises.

The attendance of support staff is integral to the intended provision of care. Nevertheless, the nature, intensity and organisation of staffing must remain consistent with the proposed use of the property as a domestic dwellinghouse occupied by a single household.

The arrangements described do not, of themselves, establish an institutional use. The final planning classification will depend on the actual operation of the accommodation as a whole.

The proposal has been assessed with reference to the nature of the property, the intended occupancy, the proposed household arrangement, the provision of care and the continued domestic function of the dwellinghouse.



The principal characteristics of the proposed use are as follows:

- A maximum of four adult residents;
- Occupation of the property as a home;
- Individual bedrooms for residents;
- Shared use of principal domestic facilities;
- Provision of care and support according to assessed needs;
- Retention of the property as a single dwellinghouse;
- No proposed subdivision into separate residential units; and
- No permanent residential occupation by support staff.

Taken together, these characteristics support the proposed classification as Use Class C3(b), provided that the actual occupation and care arrangements accord with the description submitted with the application.

The refurbishment and accessibility improvements are consistent with the intended residential function of the building and do not, in themselves, indicate a change to an institutional or multi-unit use.

The proposal should therefore be considered on the basis of its actual and intended planning characteristics, rather than solely by reference to the fact that the occupants will receive support or that staff will attend the property.

5.0 Conclusion

This application seeks confirmation that the proposed use of 294 Elm Park Avenue, Elm Park, RM12 4DA, as supported living accommodation for a maximum of four adults is lawful under Section 192 of the Town and Country Planning Act 1990.

The proposed arrangement is intended to provide a domestic residential environment in which residents occupy individual bedrooms, share communal household facilities and receive care and support appropriate to their assessed needs.



The property would remain a single dwellinghouse and would not be subdivided into independent residential units. No permanent residential occupation by support staff is proposed.

Having regard to the proposed maximum occupancy, the intended single-household arrangement, the provision of care and the continued domestic function of the building, it is respectfully submitted that the proposed use falls within Use Class C3(b) of the Town and Country Planning (Use Classes) Order 1987, as amended.

The Applicant therefore respectfully requests that the London Borough of Havering issue a Lawful Development Certificate (Proposed Use) confirming that the proposed use of the property as supported living accommodation for up to four adults is lawful.