Green Arrow Care Properties Ltd
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PROPOSED SUPPORTED LIVING STATEMENT AND SUPPORTING PLANNING JUSTIFICATION

APPLICATION FOR A CERTIFICATE OF LAWFULNESS OF PROPOSED USE

Section 192 – Town and Country Planning Act 1990

Property Address: 53 Heath Park Road, Romford, RM2 5UL
Applicant: Green Arrow Care Properties Ltd
Proposed Care and Support Provider: Green Arrow Care Providers Ltd
Local Planning Authority: London Borough of Havering
Proposed Use: Use Class C3(b) – Dwellinghouse Occupied by Persons Living Together as a Single Household Where Care Is Provided
Maximum Occupancy: Three Adult Residents
Previous Application Reference: D0260.26
Date: 22 October 2026

1. INTRODUCTION AND PURPOSE OF THE APPLICATION

This statement has been prepared on behalf of Green Arrow Care Properties Ltd in support of an application for a Certificate of Lawfulness of Proposed Use under Section 192 of the Town and Country Planning Act 1990 for 53 Heath Park Road, Romford, RM2 5UL.

The application seeks confirmation that the proposed use of the existing dwellinghouse as supported living accommodation for a maximum of three adults with learning disabilities, autism and/or associated care and support needs falls within Use Class C3(b) of the Town and Country Planning (Use Classes) Order 1987, as amended.

The proposed accommodation will provide a permanent home where three adults will live together as a single household, sharing ordinary domestic facilities while receiving care and support according to their individual needs.

Green Arrow Care Properties Ltd is the applicant seeking the Certificate of Lawfulness. Green Arrow Care Providers Ltd is a separate legal entity and will act as the proposed care and support provider.

The applicant acknowledges the refusal of the previous application, reference D0260.26, and has revised the proposal to address the concerns raised by Havering Council regarding the number of residents, staffing levels and the residential character of the accommodation.

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The principal revisions are:

1. Reducing the maximum number of residents from four adults to three.
2. Clarifying the normal number of support workers physically present within the property.
3. Distinguishing between workers providing support inside the dwelling and those accompanying residents outside.
4. Confirming that the property will continue to function as an ordinary shared household rather than an institutional care establishment.

The applicant respectfully requests that the revised proposal be assessed on the specific occupancy, staffing and residential arrangements set out in this statement.

2. DESCRIPTION AND EXISTING USE OF THE PROPERTY

53 Heath Park Road is an existing end-terrace residential dwellinghouse situated within an established residential neighbourhood in Romford.

The property is understood to extend to approximately 144.2 square metres (1,552 square feet) and comprises five bedrooms, including a loft room, a lounge, dining room, kitchen, three toilet/bathroom facilities, a private rear garden and existing off-street parking.

The property was previously occupied as a conventional family home and is understood to have an established residential use within Class C3(a).

The property is currently vacant. The applicant has recently acquired an interest in the property through a company-let arrangement and does not know the precise date on which the previous occupants vacated.

The temporary vacancy is not understood to have resulted in the abandonment or material change of the property's established residential use.

The property retains its ordinary domestic layout and facilities.

No extensions, structural alterations or external changes are proposed. The property will not be subdivided into separate flats, bedsits or self-contained accommodation.

The existing residential appearance of the property will remain unchanged.

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3. PROPOSED RESIDENTIAL OCCUPANCY

The revised proposal will accommodate a maximum of three adult residents aged 18 years and over.

Residents may have learning disabilities, autism and/or associated care and support needs.

The accommodation is intended to provide a stable, long-term home, rather than temporary, short-stay or institutional accommodation.

The three residents will live together as a single household, sharing the existing domestic facilities and participating in ordinary household life according to their preferences and abilities.

Each resident will have their own bedroom and access to the shared kitchen, lounge, dining room, bathrooms, garden and recreation room.

The proposed bedroom allocation is as follows:

Room	Proposed Use
Bedroom 1	Resident 1
Bedroom 2	Resident 2
Bedroom 3	Resident 3
Bedroom 4	Residents' Activity and Recreation Room – Not Tenant Accommodation
Bedroom 5 (Loft)	Sleep-in Staff Room – Not Tenant Accommodation

Fourth Bedroom – Residents' Activity and Recreation Room

The fourth bedroom will provide additional shared domestic space exclusively for the three residents.

It may be used for ordinary recreational activities, including reading, music, arts and crafts, games, hobbies and relaxation.

The room will not operate as a public day centre, commercial activity facility or treatment room and will not be used to accommodate an additional resident.

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Fifth Bedroom – Loft Sleep-in Staff Room

The fifth bedroom is a loft room with sloping ceilings, restricted headroom and reduced usable floor space.

It will be designated for use by one on-duty sleep-in worker where overnight sleep-in support is required.

No member of staff will permanently reside at the property or hold tenancy rights in the dwelling.

Where waking-night support is provided instead, the worker will remain awake throughout the shift.

The loft will not be used as permanent accommodation for an additional resident.

The property will therefore provide three permanent resident bedrooms, additional shared recreational space and a designated room for overnight sleep-in support when required.

4. SINGLE-HOUSEHOLD LIVING ARRANGEMENTS

The principal characteristic of the proposal is that the three adults will occupy the property together as a single household.

Residents will share the kitchen, dining room, lounge, bathrooms, garden and activity and recreation room.

They will be supported to participate in ordinary household activities, including preparing meals, shopping, maintaining their home, managing domestic responsibilities and enjoying shared recreational activities.

Residents will retain choice and control over their personal routines, relationships and daily lives.

Each resident is intended to occupy the accommodation under an appropriate individual tenancy or occupancy agreement, with applicable housing rights and protections.

The provision of care and support will be separate from the housing arrangements.

Staff will attend to assist residents in their own home, rather than operate the property as a residential institution.

There will be no public reception, nursing station, clinical treatment room, commercial day-service facility or permanent management office.

The property will not be divided into separate self-contained residential units.

The applicant considers that the proposed shared facilities, communal occupation and ordinary domestic arrangements demonstrate the intended operation of a single household within an existing dwellinghouse.

5. PROPOSED CARE AND STAFFING ARRANGEMENTS

Care and support will be delivered by Green Arrow Care Providers Ltd according to residents' individually assessed needs.

Support may include personal care, medication assistance, meal preparation, household activities, shopping, attending appointments and accessing the local community.

The staffing information below is provided principally to clarify the number of workers normally physically present at the property and to address the concerns identified in the previous refusal.

5.1 Normal Daytime Staffing

The normal daytime shift will operate from **08:00 to 20:00**, with one support worker physically present within the property providing shared support.

A second support worker may attend for approximately two to four hours where additional individual assistance is required.

This may include accompanying a resident to appointments, shopping, community activities or providing specific support within the dwelling.

Where the second worker accompanies a resident outside, that worker will not simultaneously be present within the property.

Occasionally, two workers may be present together within the home for planned individual or household activities.

The normal operating arrangement will not involve three to five care workers routinely present within the dwelling simultaneously.

5.2 Relief Cover and Handovers

Relief workers will ordinarily replace an existing worker rather than constitute an additional routine staffing post.

Brief periods of overlap may occur during shift handovers or where necessary to maintain continuity of support.

Such overlaps will be temporary and will not represent the normal staffing complement.

5.3 Overnight Staffing

The overnight shift will operate from **20:00 to 08:00**.

The intended normal arrangement will involve one sleep-in support worker.

Where a resident's assessed needs require waking-night support, one waking-night worker will replace the sleep-in worker.

Sleep-in and waking-night support are alternative arrangements and will not operate as two simultaneous routine overnight posts.

The proposed overnight staffing complement is therefore one worker.

No care worker will permanently reside at the property.

5.4 Management Visits

Occasional management or supervisory visits may take place, normally for approximately one to two hours.

These visitors will not constitute a permanently based management team or additional routine care workforce within the property.

The proposed staffing arrangements will be subject to residents' assessed needs. Prospective placements will be considered for compatibility with this defined operating model. Where substantially more intensive staffing is required, the suitability of the placement and any planning implications will be reconsidered.

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6. RESPONSE TO PREVIOUS REFUSAL – APPLICATION D0260.26

The applicant acknowledges Havering Council's refusal of the previous Certificate of Lawfulness application, reference D0260.26, dated 2 September 2026.

The refusal identified concerns regarding the proposed intensification of use, particularly the accommodation of four residents and information indicating that between three and five staff members could be present on site simultaneously, excluding visitors.

The Council was not satisfied that the proposed operation would have the communal characteristics of a typical household and concluded that the information submitted had not demonstrated that the proposal would fall within Use Class C3(b).

The applicant has carefully considered these concerns and revised the proposal accordingly.

6.1 Reduction in Occupancy

The previous proposal was for a maximum of four adult residents.

The present application reduces this to a maximum of three adults.

Only three bedrooms will be used as permanent resident accommodation.

The fourth bedroom will instead be used as an additional shared activity and recreation room, providing more communal domestic space for the residents.

The fifth loft room will be reserved for use by one on-duty sleep-in worker when required and will not provide permanent accommodation for an additional resident.

6.2 Clarification of the Number of Staff Present

The applicant recognises that the staffing information accompanying the previous application did not sufficiently distinguish between the number of workers potentially rostered during the day and the number physically present within the property simultaneously.

In particular, references to additional individual support, relief cover and management visits could have created the impression that several additional workers would routinely be present together.

The revised proposal clarifies that one support worker will normally be physically present during the day.

A second worker may attend for specific support requirements, including accompanying a resident outside the property.

Where a resident is supported in the community, the accompanying worker will not be physically present within the dwelling during that activity.

Relief cover will ordinarily replace existing staff, rather than routinely increase the number of workers present.

The normal overnight arrangement will involve one worker, either providing sleep-in or waking-night support.

The revised proposal does not involve three to five workers routinely present at the property simultaneously.

6.3 Continued Residential and Single-Household Character

The proposed accommodation will remain the permanent home of three adults living together as a single household.

Residents will have their own bedrooms and share ordinary domestic facilities, including the kitchen, lounge, dining room, bathrooms, garden and recreation room.

Care workers will attend to assist residents in their home rather than operate an institutional establishment.

No permanent staff accommodation, administrative office, nursing station, public reception or institutional treatment facilities are proposed.

The property will retain its existing domestic layout and residential appearance.

6.4 Revised Proposal for Consideration

The applicant respectfully requests that Havering Council assess the present application according to the revised maximum occupancy of three residents, clarified staffing arrangements and proposed single-household living arrangements.

The applicant recognises that reducing occupancy alone does not automatically establish the lawfulness of the proposed use.

However, the applicant considers that the revised arrangements, assessed together, address the specific matters identified in the previous refusal and demonstrate the intended residential character of the property.

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7. PLANNING JUSTIFICATION – USE CLASS C3(b)

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

The applicant considers that the proposed use satisfies this description for the following reasons:

Number of residents: The accommodation will be limited to a maximum of three adult residents, below the six-resident limit specified in Class C3(b).

Single household: The residents will live together within one dwellinghouse, sharing domestic facilities and participating in ordinary household life.

Provision of care: Residents will receive care and support according to their individual needs within their own home.

Residential character: The property will retain its existing domestic layout, facilities and external appearance.

Staffing arrangements: The normal daytime arrangement will involve one worker physically present, with additional support provided for specific activities where required. Overnight support will involve one sleep-in or waking-night worker.

No institutional facilities: There will be no subdivision into separate accommodation units, nursing station, public reception, permanent management office or institutional treatment facility.

The applicant recognises that the statutory limit of six relates to residents and that visiting support workers are not automatically treated as permanent residents.

Nevertheless, the number and activities of staff are relevant when considering the actual character and intensity of a proposed use.

The applicant therefore relies on the defined staffing arrangements, the shared household facilities and the domestic nature of the accommodation as evidence supporting the proposed classification.

The applicant considers that the proposal, assessed as a whole, falls within Use Class C3(b) and would not constitute a material change of use requiring planning permission under Section 55 of the Town and Country Planning Act 1990.

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8. SUPPORTING DOCUMENTARY EVIDENCE

The application will be supported by the relevant documents submitted through the Planning Portal, including:

1. Site Location Plan;
2. Existing Floor Plans;
3. Proposed Floor Plans identifying three resident bedrooms, the shared activity and recreation room and the loft sleep-in staff room;
4. This Proposed Supported Living Statement and Supporting Planning Justification;
5. A summary of the proposed staffing arrangements;
6. Previous Refusal Notice, reference D0260.26; and
7. Any additional available evidence relevant to the property's established residential use.

Property agreements, photographs and other relevant documents may be provided where necessary to clarify the application.

Only documents actually accompanying the application should be represented as submitted evidence.

9. CONCLUSION AND REQUEST FOR CERTIFICATE OF LAWFULNESS

Green Arrow Care Properties Ltd respectfully requests that the London Borough of Havering grant a Certificate of Lawfulness of Proposed Use under Section 192 of the Town and Country Planning Act 1990 for the revised supported living proposal at 53 Heath Park Road, Romford, RM2 5UL.

The proposed accommodation will provide a permanent home for a maximum of three adult residents with learning disabilities, autism and/or associated care and support needs.

The residents will live together as a single household, sharing ordinary domestic facilities and receiving appropriate support within their home.

The applicant has revised the previous proposal by reducing the maximum occupancy from four adults to three and clarifying the staffing arrangements.

The normal daytime arrangement will involve one care worker physically present, with a second worker attending for specific activities where required. Overnight support will involve one worker, either sleep-in or waking-night.

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Staff will not permanently reside at the property, and three to five care workers will not routinely be present simultaneously.

The property will retain its domestic character, shared household facilities and residential appearance.

The applicant considers that these arrangements address the concerns identified in the previous refusal under reference D0260.26 and demonstrate that the specific proposed use falls within Use Class C3(b).

Green Arrow Care Properties Ltd therefore respectfully requests that the Local Planning Authority confirm the lawfulness of the revised proposed use by issuing a Certificate of Lawfulness.

Submitted on behalf of:
Green Arrow Care Properties Ltd

Proposed Care and Support Provider:
Green Arrow Care Providers Ltd

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