

Planning Services
Knowsley Metropolitan Borough Council
Municipal Buildings
Huyton
Knowsley
L36 9UX

03 September 2026

Our ref: PAG

Dear Sirs

Change of use from dwellinghouse (Use Class C3) to small children's home (Use Class C2), together with material alterations to the external appearance of the building at 108 Jeffereys Crescent, Liverpool, L36 4JU

1. This Planning Statement is submitted in support of the above application for full planning permission.
2. In addition to this statement the application is accompanied by the following drawings and documents

Drawings

- A502 location plan
- A501 site plans
- A101 plans as existing
- A102 elevations as existing
- A201 plans as proposed
- A202 elevations as proposed.

Documents

- Children's Home Statement
- Management Plan for 108 Jeffereys Crescent.

3. The following documents are included to provide background information
 - Knowsley Council Sufficiency Position Statement 2022-2025
 - Knowsley Council Cared-for-Children-Strategy-2023-2026
 - Knowsley Council Sufficiency Needs Assessment for Children (3 June 2026).

Description of development and consultations

4. Please note the description as given in the application form. National Planning Practice Guidance provides guidance, at Reference ID 14-046-20140306, on when a local planning authority can amend the description. No change should be made to the description without seeking the consent of the Applicant. The Council should not seek to change a description which is accurate.
5. The property will be registered with Ofsted as a children's home. Registration cannot be secured unless Ofsted are provided with documentation to show the home can be used as a children's home. That documentation can take the form of either a

certificate of lawfulness or a grant of planning permission. Without prejudice to whether the proposed change would meet the criteria for a certificate of lawfulness, the Applicant has elected to seek formal recognition the home can be used as a children's home by this application for full planning permission for the change in use.

6. To open and operate as a children's home, it must meet Ofsted's criteria. National Planning Policy Framework decision-making policy DM7 sets out, amongst other matters, that development proposals should be assessed on the basis of whether they would be an acceptable use of land. Planning decisions should not seek to duplicate or extend controls imposed by separate regulatory regimes.
7. On 10 March 2025 a Written Ministerial Statement was made by Matthew Pennycook, Minister of State for Housing and Planning, on reform of the statutory consultee system. The following quotes are from that Statement
 - We need a planning application process which considers the correct statutory and technical issues in a timely and proportionate manner ...
 - It is essential that statutory consultees look to provide practical, pragmatic advice and expertise which is focussed on what is necessary to make development acceptable.
 - ... the role of statutory consultees is to provide evidence of impacts and expertise in a timely manner so that the decision maker has all relevant considerations before them. This should be provided in the form of advice to the decision-maker, and should not be framed as an objection to the development.
8. National Planning Policy Framework decision-making policy DM3(1)(d) sets out that local planning authorities should consult statutory or internal consultees only where it is necessary to do so.

Site and surroundings

9. The site lies within an established suburban location, designated as a Primarily Residential Area on the Council Policies Map. The property is a two-storey, semi-detached house occupying a corner plot overlooking the junction of Jeffereys Crescent and Woodland Road. It has garden front and rear, a single storey side and rear extension, and a driveway with sufficient space for parking one car.
10. The ground floor accommodation comprises a kitchen, a living room / dining room and a garage / store. The first floor accommodation comprises three bedrooms and a bathroom. See accompanying floor plans.

Proposal

11. The application seeks planning permission for a change in use, to operate as a children's home, for up to three children.
12. In addition, it seeks planning permission for material alterations to the external appearance of the building. These comprise the removal of the existing garage door and its replacement with a brick plinth, window and render wall, all to match the existing, and the insertion of a side window.
13. The Applicant is an experienced provider of Ofsted registered homes for looked-after children. The home will provide accommodation for children referred by children's services. Additional information on how the home will operate is set out in the

Children's Home Statement and in the Management Plan, which accompany this application.

14. The Council can impose planning conditions to control the scope of care to be provided, the number of children who can reside at the property and for the care home to operate in accordance with the Management Plan, if it considers such conditions to be necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (see National Planning Policy Framework decision-making policy DM6).

Relevant site history

15. The only relevant planning history relating to the application site is a planning permission for the erection of the single storey side and rear extension (94/00726/APP). Permission was granted on 15 December 1994.

Legal Duties

16. The Council must have regard to its general duties under the Children's Act 1989 and in particular to
 - section 17, to safeguard and promote the welfare of children within their area who are in need
 - section 20, to provide accommodation for any child in need within their area who appears to them to require accommodation, and
 - section 22A, to provide a child in their care with accommodation.
17. The Council must have regard to its general duties under the Equalities Act 2010 and in particular to section 149, to have due regard in the exercise of its functions to, among other matters, eliminate discrimination and advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, including taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. Age is a relevant protected characteristic.

Policy Context

18. Applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.
19. The relevant development plan coverage for the area is provided by the Knowsley Local Plan Core Strategy (Jan 2016) ('the Core Strategy') and the Knowsley Replacement Unitary Development Plan (June 2006) ('the UDP').
20. Despite the age of the development plan documents, those policies which are relevant to the proposed development are not materially inconsistent with the national decision-making policies in the Framework (see below) and therefore the development plan can be considered up-to-date (see Framework paragraph S3(1)(c)).
21. There is no neighbourhood plan in place covering the location of this site.

22. Relevant policies from the development plans include

From the Core Strategy

- SD1 Sustainable development
- CS7 Transport networks
- CS16 Specialist and supported accommodation
- CS19 Design quality and accessibility in new development

From the UDP

- H5 Development within primarily residential areas
- H7 Provision of residential homes
- H8 Extensions and alterations to properties.

23. Material considerations can include emerging development plan proposals. According to the Council website (28 August 2026), the Council is preparing to embark on the production of a new local plan but has not yet formally begun the process. Currently, therefore, there are no draft emerging policies to be taken into consideration when determining applications for planning permission.
24. Material considerations also include locally adopted supplementary planning documents. The following documents are relevant
- Householder Development (June 2016)
 - Ensuring a Choice of Travel (Sep 2010).
25. Material considerations include statements of national planning policy and guidance. The new edition of the National Planning Policy Framework, published on 17 August 2026 ('the Framework') is a material consideration of critical importance (Framework paragraph 1). The Framework is supported by a suite of planning practice guidance ('the Guidance') and, notwithstanding that the Courts have held it to have equivalent legal status with the Framework¹, the government intends it to play an important but supporting role to the Framework and for its status to be regarded in that light (Framework paragraph 14).
26. The national decision-making policies in the Framework should be read alongside the policies in the development plan (Framework paragraph 3). Development plan policies which are materially inconsistent with national decision-making policies in the Framework should be given very limited weight (Framework Annex A (implementation) paragraph 1). Relevant decision-making policies from the Framework² include
- S3 Presumption in favour of sustainable development
 - S4 Principle of development within settlements
 - HO7 Meeting the need for homes
 - HO9 Specialist forms of accommodation
 - TR4 Street design, access and parking.

¹ Mead Realisations Limited v Secretary of State for Housing Communities and Local Government and North Somerset Council [2025] EWCA Civ 32 (paragraph 33)*

² Plan-making policies should not be used when making decisions on development proposals. (Framework paragraph 8)

27. Written Ministerial Statements are also material considerations, The statement made on 23 May 2023 on Planning for Accommodation for Looked After Children (government reference HCWS795), is relevant to this application.

Principle of development

28. The proposed use of the site as a small children's home is for a residential use in a residential area. As such it is in accordance with UDP Policy H5, subject to meeting the impact criteria set out in sub-paragraphs 2(a) and 2(b). These detailed matters will be considered further below.
29. Similarly, the proposed change of use of the existing property to a residential home is in accordance with UDP Policy H7, subject to meeting the criteria set out in sub-paragraphs 1(a) to 1(d). Again, these detailed matters will be considered further below.
30. The proposal would make use of a unit of existing housing stock to meet the need of looked after children for supported accommodation. This is in accordance with Core Strategy Policy CS16, subject to meeting the criteria set out in part 2 of the policy.
31. Core Strategy Policy SD1 provides in principle support for sustainable development, in line with the terms of national planning policy current at the time it was drafted, saying a positive approach will be taken when considering development proposals, which reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
32. Core Strategy Policy SD1 remains consistent with the new Framework. National decision-making policy S3 sets out that decisions on development proposals should apply a presumption in favour of sustainable development. This means applying decision-making policy S4 when considering development within settlements, as is the case here. In all locations, development proposals which accord with both an up-to-date development plan and the decision-making policies in the Framework should be approved without delay.
33. National decision-making policy S4 says that development proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework. Part (2) sets out a non-exhaustive list of the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects. None of the circumstances in S4(2)(a) or (b) apply to the development proposed in this application. Having regard to sub-paragraph (c), the Framework does not identify which policies to refer to. From a review of the Framework as a whole, it is submitted there are 15 policies which set out circumstances under which proposals should normally be refused. They are

TC3(4)	town centres
M5(1)	peat extraction
M5(2)	coal and onshore oil-gas
L3(4)	density
GB6(2)	green belt
DP3(3)	design
TR6(4)	transport
HC5(1)	hot food takeaways
F6(1)(a)	flood risk (rivers / sea)
F7(2)	flood safety
F9(1&3)	coastal change

- N4(2) protected landscapes
- N6(1)(a) international biodiversity sites
- N6(2) irreplaceable habitats
- HE6(5) designated heritage assets.

34. None of these 15 policies are applicable to the proposed development.
35. The proposed development therefore has the support of national decision-making policy S4, and by virtue of that, S3, subject to no other adverse effects existing which would substantially outweigh the benefits of approving the proposed development, when assessed against the national decision-making policies in the Framework. These detailed matters will be considered below.

Residential amenity

36. Core Strategy Policy CS19 sets out that to maintain a good standard of amenity for all existing and future occupiers, development proposals will be required to meet three criteria. Having regard to those three criteria, the following submissions are made.
37. The only potential impact on neighbours may arise from comings and goings to the property. The property is currently vacant but as a three-bed family home it would not be unreasonable to expect it could be occupied by two adults with children, and with two cars. Both cars might be used to commute to work at conventional peak hour times, Monday to Friday, or one might and the other might make perhaps one journey a day (one departure and one arrival) to no set time. There may also be occasional visits from friends, family and perhaps others, across the week.
38. Under the proposed use there would be two arrivals and two departures at around 10am every day. On alternate weekdays a manager will arrive by 9.30 and depart by 5.30 (Mon-Wed-Fri). Across the week there might be up to one other arrival and departure associated with each child (up to three visits therefore in total), from other care professionals. There would be few if any comings and goings after 5.30, and not normally any between 10pm and 7am.
39. Vehicle movements will take place to the west of the application house. The other half of this pair of semis will be screened from what activity there will be. The way in which 108 Jeffereys Crescent is angled away from its neighbour to the west (106 Jeffereys Crescent) will also help alleviate any impact. Jeffereys Crescent itself is a long residential street and traffic levels can be expected to be low to moderate. The movements associated with the application site must be seen in the context of a residential street where other comings and goings across the day will be associated with other properties.
40. Vehicle movements will be distributed across the day (and not in the evenings or at night) and across the week. Other than at staff handover, usually only one vehicle at a time will be coming or going. The overall difference is not considered to be material and the overall level will not be high enough to cause any harm to the standard of amenity neighbouring residents currently enjoy, especially when also taking into account the relationship of the application plot to its neighbours and the wider context of the nature of Jeffereys Crescent.
41. The house forms one half of a pair of semi-detached houses which are angled at about forty-five degrees to their neighbours, so as to overlook the junction of Jeffereys Crescent and Woodland Road. 108 Jeffereys Crescent has windows in the front elevation which overlook this junction. These clear glazed windows serve the

entrance porch and living room on the ground floor and two of the bedrooms on the first floor. As part of the change in use the existing living room will be divided in two, and the front space will be used as one of the bedrooms for use by staff when staying overnight. It will also act as an informal office space (in the same way as is now common for people working or studying from home) and so will be used for some periods during the day. Overall, the level of passive surveillance over the front of the house and the junction of Jeffereys Crescent with Woodland Road will not be materially different from the existing level.

42. At present there is one side window overlooking the side garden and Jeffereys Crescent to the west, which is a clear glazed window serving the landing on the first floor. The main front door faces west over Jeffereys Crescent. These will both be retained as existing. A new window will be introduced at ground floor level which will serve a small office. This will be used for some periods during the day and will deliver a modest increase in the level of passive surveillance over the adjacent section of Jeffereys Crescent.
43. Overall, the proposed changes will maintain the current level of passive surveillance, helping to minimise crime and the fear of crime and anti-social behaviour.
44. The Applicant business and the business which owns the property are both owned by the same party. The property is an asset of the business. The owner therefore has an interest in maintaining the property and grounds in good condition. The property will be occupied and operated as close as possible as a normal residential property would be, and the property and grounds will be managed by the Applicant in line with normal residential maintenance and management practices.
45. Having regard to UDP Policy H5(2)(a), the proposed use
 - will not generate more noise than a normal residential use would,
 - (as set out above), will not cause materially more disturbance than a normal residential use would and certainly not at a level which would have an unacceptable impact on the amenity of neighbouring occupiers
 - the physical alterations will not lead to any overlooking and loss of privacy for either neighbours or future occupiers, and will not cause any visual intrusion, and
 - the proposed use will not generate any smells or fumes.
46. On-street parking is considered below. There is no aspect of the use which would otherwise cause harm to the amenity of neighbouring occupiers.
47. Having regard to UDP Policy H7 and the submissions already made above, the proposed use is in accordance with Policy H7(1)(a). Vehicle parking and bin storage are considered below. Clothes drying outdoors can be done in the rear garden, as at present, with no detriment to the visual amenities of the area. The size and character of the property is ideally suited to the proposed use. The staff rooms are for staff staying overnight and will not be their normal place of residence.

Accessibility, highway safety, parking and servicing

48. Core Strategy Policy CS7 covers a range of issues relating to transport. Those of most relevance to this application are parts CS7(2)(a), on the location and design of new development, and CS7(2)(d) on parking provision. Policy CS7(2)(a) is consistent

with Framework decision-making policy HO9(1)(b)(ii), on sustainable locations for development.

49. The application site is an existing residential property in an established residential area. The children will have the same access to sustainable modes of travel and to frequently used services as any other children would have in that house and as their neighbours have.
50. The nearest bus stops are just over 300 metres away on Western Avenue and Charnwood Road (a four to five minute walk according to Google Maps). The nearest train station is Roby, which is about 650 metres away, a near ten minute walk (according to Google Maps), via Woodland Road and a path across Roby Field, or, alternatively, just under a kilometre away via Western Avenue and Church Road, which is about a fifteen minute walk (according to Google Maps).
51. It is about 2km to Huyton Village Shopping Centre, which is about a half hour walk or ten minute cycle ride, via Western Avenue and Rupert Road (according to Google Maps). This destination can also be reached by bus along Western Avenue. In the other direction, on Pilch Lane, there is a convenience store and a parade of shops. This is just under a kilometre away and about a ten to fifteen walk (according to Google Maps). There is a small newsagent store on Woodland Road, just over 300 metres away, a four minute walk (according to Google Maps).
52. The nearest primary school is Huyton With Roby C of E Primary School, on Rupert Road. It is about 1,600 metres away, which is a twenty to twenty five minute walk (according to Google Maps). The nearest secondary school is Lord Derby Academy on Seel Road, the other side of Huyton village centre. It is nearly 3km away and is accessible by bus.
53. The nearest GP surgery appears to be to the north on Liverpool Road, about 1,500 metres and a 15 minute walk (according to Google Maps). There are a range of dental surgeries in the area, all of which are at least 1,500 metres away. The nearest public open space is Roby Field, just a few minutes walk to the south, off Merton Crescent.
54. Generally, cycle distances and timings have not been provided above. Given the walking times, all the services and facilities mentioned will also be easily accessible on bike. Given the distances and timings set out above, the location is considered to be accessible and sustainable. There are light controlled pedestrian crossings at the junction of Pilch Lane East and Page Moss Lane, enabling access to the Pilch Lane parade. There is no pedestrian crossing on Western Avenue, to reach or return from bus stops on the north side of the road, however, Western Avenue is subject to a thirty mile per hour speed limit, is a straight road with good visibility, equipped with speed control measures (for example 'speed cushions' adjacent the north side bus stop closest to the junction with Jeffereys Crescent) and is, in the area of the bus stops closest to the application site, predominantly residential. All roads have pavements and are lit. There are therefore no significant safety issues which compromise access on foot to the local facilities.
55. As such, the proposed development is in accordance with Core Strategy Policy CS7(2)(a) and Framework decision-making policy HO9(1)(b)(ii).
56. Car and bicycle parking standards are set out in the supplementary planning document (SPD) on ensuring a choice of travel, in Appendix A. The closest relevant standard given is C2, residential institutions, residential care homes. The application

site is outside of the town centre and of the district and local centres. The maximum permissible number of car parking spaces is to be calculated at a rate of one car parking space per five beds, of which at least one should be suitable for use by the disabled. There should be a minimum of 1 bicycle parking space per 40 beds. The SPD also says there should be a minimum of two motorcycle parking spaces. It is also worth having regard to the parking standard for the property as existing, which is two car parking spaces, two allocated and one communal bicycle parking spaces, and nil motorcycle spaces.

57. The SPD says at paragraph 4.8 that details of dimensions for parking can be found in Manual for Streets (2007) and in the Council's Design Quality in New Developments SPD, but the information could not be found in either document. Notwithstanding this, a widely accepted dimension for a car parking space is 2.4 x 4.8 metres.
58. The property currently has a garage and space to park a car on the driveway leading to it; see drawing A501, Site Plans. The internal dimensions of the garage are 4.755 x 3.2 metres. Therefore, the garage can accommodate a parked car.
59. At one on-site car parking space (wide enough to serve the needs of the disabled), the proposed development is in accordance with the parking standard set out in the SPD Appendix A. Secure cycle parking is available in the back garden. Motorcycles can also be parked in the rear garden.
60. If space to park a second car is required, then this can be accommodated on the highway immediately adjacent to the house, southwest of its crossover. Some on-street parking is an established feature of Jeffereys Crescent. Having regard to UDP Policy H5(2), a modest level of on-street parking associated with the proposed use will not have an unacceptable impact on the amenity of neighbouring occupiers nor the character of the area.
61. The level of parking is in accordance with the SPD, and accordingly therefore with Policy CS7. The on-site space is existing and as such the proposed development does not give rise to any conflict with UDP Policy H7(1)(b) or H8(e).
62. The proposed use will not give rise to any special requirements in respect of bin capacity and storage. The home will operate as close as possible to normal domestic arrangements. The use will not generate any 'commercial' type waste. Normal refuse bins and collection arrangements can be retained. Bins will be kept in the rear garden, to avoid detriment to the visual amenity of the street scene.

Design and street scene

63. The proposed material alterations to the external appearance of the building comprise the replacement of the garage door with a picture window with the surround made up to match the existing walls (brick base and render finish above), and the insertion of a side window, to match existing windows.
64. Having regard to UDP Policy H5(2)(b), the material alterations to the external appearance of the building will complement the existing building and will not adversely effect the character or street scene of the area. As such the proposed material alterations are also in accordance with the supplementary planning document on Householder Development (paragraph 6.10), Core Strategy Policy CS19(1)(a) (materials) and UDP Policy H8(b).

Closing comments

65. Applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.
66. The above demonstrates that the proposed development is in accordance with the relevant policies of the development (of the Core Strategy and the UDP).
67. Relevant material considerations suggest the application should be determined in accordance with the development plan. The above demonstrates the proposed development is in accordance with the relevant supplementary planning documents.
68. The chief material consideration is the Framework (a material consideration of critical importance³). The above has demonstrated the proposed development is in accordance with the relevant policies of the Framework, including decision-making policies S3 and S4, which engages the presumption in favour of sustainable development. This lends very substantial weight to a decision in accordance with the development plan, to grant planning permission.
69. The legal duties to which the Council must have regard also support the provision of specialist residential accommodation to meet the needs of looked after children.
70. Framework decision-making policy S3 says development proposals that accord with both an up-to-date development plan and the decision-making policies in the Framework should be approved without delay.
71. I trust the Council finds the above sufficient to demonstrate the proposed use is in accordance with the development plan and benefits from the presumption in favour of sustainable development. Accordingly, the Council is respectfully requested to grant planning permission.

Yours sincerely

Adrian Thompson MRTPI
Director, Lightwater TPC

³ Framework paragraph 1