
Officer	Lauren Bradwell
Case Reference:	PLN/2026/0815
Proposal:	Change of use of dwellinghouse and ancillary garage (use Class C3) to provide specialist residential accommodation and/or supported living accommodation for up to 4 adults (use Class C2) and internal and external alterations including removal of conservatory, fenestration alterations, landscaping alterations, extension of driveway and new dropped kerb at 16 Brill Place, Bradwell Common, Milton Keynes, MK13 8EQ

Valid Date	27 April 2026
Consults Expired	1 June 2026
Target Date	22 June 2026
EIA Development	No
Legal Agreement	Not Applicable
Site Visit Date	7 May 2026

This decision is delegated to officers under the terms of the current Scheme of Delegation.

Site and proposal

The application site contains a detached, two-storey dwelling with an attached single storey annex building and a detached, double garage located to the rear. Part of the garage has also been converted into a second annex. Including the annexes, the property contains an existing six bedrooms. The site occupies a corner plot of a substantial size at the junction of Brill Place and Forrabury Avenue in Bradwell Common. There are no relevant planning constraints attached to the site.

The application seeks permission to change the use of the dwellinghouse and ancillary annexes from a Class C3 residential property into a Class C2 supported living facility inclusive of x4 supported living units for up to x4 adults and up to x4 care staff providing 1-to-1 support alongside a registered manager. The application also seeks to demolish the existing side conservatory, extend the rear driveway and dropped kerb access, and alter the existing and insert new fenestration where required, primarily to the rear elevation and the garage.

Relevant planning history

08/00850/FUL - Conversion and extension of existing detached double garage to create attached residential annex and erection of detached double garage. Permitted, 28/07/2008

09/00144/FUL - Alterations to approved roof design of detached double garage (Planning permission 08/00850/FUL) (Retrospective). Permitted, 18/03/2009

14/00204/FUL - Erection of link between existing house and garage. Permitted, 28/03/2014

16/03192/FUL - Two storey side and first floor rear extensions. Permitted, 12/12/2016

19/01495/FUL - Proposed conversion of part ground floor and alteration of roof plus dormer on existing garage to form new annex. Refused, 02/08/2019

19/02561/FUL - Proposed conversion of part ground floor and new dormers on existing garage to form new annex. Permitted, 18/11/2019

Consultations and representations

MKCC Highways:

No objection - a new dropped kerb is acceptable as proposed and an informative should be added to any consent issued. There are 5 spaces overall which appears adequate for the proposal. The proposed cycle parking is not adequately secure and a condition should be added for further details to be provided.

Relevant policies, guidance and legislation

Local Policy:

No neighbourhood plan.

Plan:MK (adopted 2019)

- Policy DS2: Housing Strategy
- Policy HN3: Supported and Specialist Housing
- Policy HN9: Loss and Conversion of Existing Residential Properties
- Policy CT2: Movement and Access
- Policy CT10: Parking Provision
- Policy D1: Designing a High-Quality Place
- Policy D2: Creating a Positive Character
- Policy D3: Design of Buildings
- Policy D5: Amenity and Street Scene
- Policy FR1: Managing Flood Risk

- Policy FR2: Sustainable Drainage Systems (SUDS) and Integrated Flood Risk Management
- Policy EH6: Delivery of Health Facilities in New Development
- Policy NE2: Protected Species and Priority Species and Habitats
- Policy NE3: Biodiversity and Geological Enhancement
- Policy NE6: Environmental Pollution

Supplementary Planning Documents/Guidance

- Parking Standards SPD (2023)
- Health Impact Assessment SPD (2021)
- New Residential Design Guide SPD (2012)

National Planning Policy and Guidance:

Planning Practice Guidance (PPG)

Town and Country Planning Act 1990

The Town and Country Planning (General Permitted Development) Order 2015 [as amended]

National Planning Policy Framework (NPPF) (2024)

Emerging Policy:

The [Milton Keynes City Plan](#) (MKCP) is also a material consideration. The first round of consultation closed in October 2024, the pre-submission consultation closed in February 2026, and the Plan was submitted and accepted for examination in April 2026. In accordance with paragraph 49 of the NPPF, weight can be given to emerging policies depending on the stage of preparation of the plan, the extent to which there are unresolved objections and their consistency with the NPPF. The following policies of the MKCP are relevant:

- Policy GS10: Movement and Access
- Policy PFHP1: Delivering Healthier Places
- Policy HQH3: Supported and Specialist Homes
- Policy CEA7: Mitigating wider environmental pollution
- Policy CEA9: Biodiversity and habitats network
- Policy CEA10: Protection and enhancement of environmental infrastructure network, priority species and priority habitats
- Policy CEA13: Sustainable drainage systems (SuDS) and integrated flood risk management
- Policy CEA15: Managing flood risk

Planning Considerations

Principle of Development

Highway Safety and Parking Provision

Health Impact Assessment

Impact on the Character of the Area

Impact on Residential Amenity

Flood Risk and SUDS

Ecology

Appraisal

Principle of Development

The Public Sector Equality Duty is a material planning consideration, and which came into force in April 2011. It forms part of Section 149 of the Equality Act 2010 and requires Local Planning Authorities to pay due regard to the need to -

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

In this regard, the conversion to a care facility for x4 adults would advance the equality of opportunity between persons sharing a relevant protected characteristic and those who do not. The occupiers will receive one on one specialist care and be given the opportunity to access existing sustainable transport links and amenities as well as support to lead an independent lifestyle, which will place them on a similar footing with peers their age within a secure and supportive environment. Due weight should, therefore, be afforded to the equal opportunities that could be afforded through the development proposal.

Policy DS2 of Plan:MK sets out the housing strategy for the City, whilst policy HN3 governs development involving supported and specialist housing. Part B of policy DS2 states that the provision of additional housing accommodation for those with specialist needs through bed spaces within residential institutions (Use Class C2) will be supported, whilst policy HN9 of Plan:MK aims to resist the loss of dwellings

through conversion unless the social benefits of doing so outweigh the need to minimise net losses to the Borough's housing stock.

Based on the evidence submitted and the policy context, it is assessed below whether the proposal constitutes a level of care and support that would be commonly found within a C2 residential institution setting or whether it would fall within a C3 style dwelling where a level of domiciliary care would be received. An assessment is undertaken below.

C3(b) Use Class:

C3(b) pertains to up to six people living together as a single household and receiving care, such as supported living arrangements. The focus is on independent living with varying levels of support provided by way of domiciliary care in typical homes, where the carer will provide care within the individual's existing home. For supported living arrangements, such as proposed here, individuals receiving care would maintain a single household arrangement. However, it is important to note that they would not form a single household of up to six people with each other as the existing property would be split into separate residential 1-bed flats.

C2 Use Class:

C2 encompasses residential institutions including hospitals, nursing homes, residential schools, colleges, and training centres. It involves a higher degree of care, typically 24-hour on-site support, and facilities that cater to the residents' needs comprehensively. A single household is not apparent and contains communal facilities for both residents and carers to use, inclusive of relevant office space for carers to have breaks.

The key factors suggesting a C2 classification include:

1. **Level of Support Provided:** The proposed occupiers of the self-contained units would receive 1-on-1 24-hour care (with a less than 1:1 approach during night time) and supported services for daily living for occupiers with learning disabilities and complex care needs. Residential C2 care delivers round the clock personal care and comprehensive support for people needing help with daily tasks though without the nursing care, while domiciliary C3(b) care offers flexibility in the level of support, ranging from brief care visits to full-time, 24-hour live-in care which can be achieved on a rotational shift pattern. From the information provided, the level of care proposed would extend beyond what is typical for C3(b) use, where the care provided is usually less intensive and more akin to domiciliary care. The level of information provided indicates comprehensive support for occupiers is required however, the units would also support independent living being leased on an individual basis to occupiers, which is what domiciliary care under Class C3(b) seeks to achieve.
2. **Staff Presence:** The planning statement indicates there would be 24-hour staff support. It is not clear whether this will be on a rotational basis to cover two

lots of 12-hours a day. On the ground floor of the main dwelling, there is proposed to be a staff room and toilet alongside a communal room that the proposed four occupiers will have access to. It is unclear what the use of the staff room will be, whether there would be a bed for the night staff or whether it will just be an office facility however, separate facilities for the staff are provided which is considered similar to a standard adults care home set up. A manager is proposed to oversee the home however, it does not appear that they would be onsite but rather would provide 24-hour on-call management support when required. The presence of carers on-site and overnight would reinforce the need for continuous and substantial support, typical of residential institutions under C2.

3. Nature of Accommodation: Within typical C3(b) settings, residents live more independently compared to residential institutions under C2. The planning statement articulates that "... residents will hold individual tenancies... there will be a reconfiguration of the internal layout to create supported living apartments for single occupancy use...". It does not appear that there would be staff accommodation however, a staff office room is to be provided for round the clock care to be provided on what is assumed to be on a waking nights basis. This is considered to align more with a C2 residential institution.

In the case of *R (on the application of East Sussex County Council) v Secretary of State for the Environment, Transport and the Regions* [1999] 3 PLR 79, the court concluded that accommodation with substantial support services and a communal living arrangement typically falls under C2. Furthermore, the *Torcian v Secretary of State for the Environment* [1991] 2 PLR 91 case clarified that the degree of care provided is a determining factor in classifying the use. Facilities with significant care services and on-site staff were considered C2.

In respect of the above quoted case law, the proposal would create a communal living arrangement within the fabric of the existing C3 dwelling and the four self-contained units would also have their own living and cooking facilities. Whilst the occupiers would live independently, they would also receive support with daily living and the proposal facilitates a communal area which supports the argument for a Class C2 classification.

The proposal would see the conversion of the existing single family dwelling into x4 supported living units, each with 1-bedroom thereby increasing the number of dwellings provided which would be compliant with policy HN9.

It is part B of policy HN3 which specifically defines the acceptability of C2 proposals in detail, stating that developments are strongly supported provided:

1. It meets the housing needs of households with specific needs evident at the current time;
2. It has easy accessibility to facilities and public transport, including for those with impaired mobility and wheelchair users;

3. It would not result in an overconcentration of that type of accommodation in that location; and
4. Local primary health care providers can sustainably accommodate the increase in the associated demands.

Information has been provided regarding the need for the provision to support the application for the specific occupiers, including the need for smaller, specialist supported accommodation to be provided within the Borough that is more residential in nature and not an institutional setting where care can be provided on a more 1:1 basis.

The site lies approximately a 5-minute walk north from the nearest bus stop on V6 Grafton Street which supports sustainable access in and around the Borough and to the city centre. An Asian inspired local convenience store is also located a 3-minute walk south of the site with other local conveniences, such as Aldi, found a 13-minute walk south of the site within The Place Retail Park. A Boots pharmacy is located 3-minutes south of the site. The site lies within proximity to the boundary of the City Centre of Milton Keynes where retail, leisure and health facilities are found in abundance and which is considered a reasonable walking or bussing distance from site, highlighting the sustainable location of the proposal.

There are no defined standards or guidance to measure overconcentration under policy HN3. There appear to be no other care home type facilities within proximity to the site which means the proposal cannot be an overconcentration of that 'type' of accommodation, noting the policy does not say use class. Equally, given the number of residential dwellings within Bradwell Common, this indicates the proposal would not result in an overconcentration.

Finally, the occupiers of the site would be x4 adults with learning disabilities who will live at the property on a full-time, permanent basis. There would also be at least four carers at the property, resulting in a total of eight adults at any one time. The carers would not reside permanently at the property, likely being on shifts and would reside permanently elsewhere and maintain their existing demand on the services from their own homes. The presence of the x4 adults to be cared for is not considered to be dissimilar to the existing Class C3 use where a family of four may reasonably occupy and all who would require access to primary health services. The demand upon primary healthcare is not considered to be unsustainable as a result.

The proposal complies with policy HN3 of Plan:MK.

Policy HN9 seeks to prevent the loss of one or more dwellings through demolition or conversion.

The proposal would result in both internal and external alterations. In terms of external alterations, this would include the removal of the existing rear conservatory and the installation of windows to the detached garage. This is not considered to be contrary to the provisions of policy HN9. The internal alterations proposed, however,

would alter the operation of the property as a single household as it is proposed to subdivide the property into four separate supported living flats, each with their own kitchen, living and bathing facilities to create four personal spaces. The self-contained units would be more reminiscent of flats however, residential flats remain within a Class C3 use and therefore, subject to planning permission, the property could revert to residential dwellings at any time.

The proposal is found to be acceptable in principle in relation to policies DS2 and HN3 as per the above assessment and whilst there would be the loss of a Class C3 residential property, a C2 use is still classed as a residential property and in this instance would be increasing the number of residences from one to four; the proposal thus complies with Policy HN9 of Plan:MK.

Highway Safety and Parking Provision

Policy CT2 of Plan:MK requires that developments do not result in inappropriate traffic generation or compromise highway safety, whilst policy CT10 necessitates that developments meet the Council's full parking standards, unless there are mitigating circumstances that dictate otherwise, or if this would increase additional pressure in off-site parking that could not be resolved by on-street parking controls.

The area lies within Zone 2 of the Parking Standards SPD and which for a standard Class C2 use, the parking requirement would entail 1 space per 8 bedrooms for residents, visitor parking at a rate of 1 space per 6 bedrooms and 1 space for every resident warden. Residential wardens are responsible for the welfare, safety and general wellbeing of residents within a specific residential setting such as a retirement community, student housing or care facility. In this instance, the carers are classed as resident wardens of which there would be up to 4 therefore, in total there would be a requirement of at least 5 on-plot parking spaces. Visitor parking for properties is already contained within the road and it is not necessary to double count this space on plot.

The nature of the proposed use does not neatly align with the parking standards required of a C2 use. It is considered that the proposal creates four separate 1-bed apartments within the fabric of the existing buildings, which would ordinarily attract parking requirements of 1 space per unit plus 0.33 unallocated visitor parking each, requiring a total of 5 parking spaces. However, given a Class C2 use is applied for, the standard residential parking requirements do not neatly align either in this instance. It is acknowledged however, that either way, the proposal would accommodate 5 vehicles on plot.

The proposed site plan indicates there would be 5 spaces on plot following the extension of hardstanding and dropping of the kerb to the rear access on Forrabury Avenue, all of which would be independently accessible. Given the proposal would facilitate four separate units with occupiers independent of each other (i.e., they are not related) and staff visiting the site, it is appropriate to have independently accessible parking spaces for all the units.

There are no formal street parking bays within Brill Place or Forrabury Avenue although, the roads do not contain any restrictions on parking. There are kerbed areas present within the street which facilitate appropriate street parking areas. Given the site can accommodate the required 5 parking spaces on plot through the extension of the hardstanding and dropped kerb, it therefore complies with the minimum requirement. It is considered appropriate to attach a condition requiring that the parking layout be provided prior to occupation of the site to ensure there would be sufficient parking.

In respect of cycle parking provision, there is a requirement for cycle parking facilities to be provided to cater for a minimum of 10% of staff. In this instance, 0.4 (rounded to 1) spaces for 4 staff members. For residents, cycle parking facilities should be provided at 1 per bedroom, totalling 4 spaces. A minimum of 5 cycle parking spaces on plot are therefore required. Cycle parking is shown on the site plan to be located adjacent the parking spaces to the rear of the site and appears to accommodate at least 5 spaces. This would be considered acceptable however, there appear to be no formal elevation plans for the cycle storage and the highways officer notes that the open storage it appears to show would not be adequately secure enough for the storage of bikes next to an area of easy public access. It would be best for bicycles to be stored in a lockable unit and ideally located in a more private area. However, notwithstanding the details provided, it is considered appropriate to attach a condition requiring further details in respect of cycle storage and the location to be submitted.

Subject to conditions, the proposal complies with policies CT2 and CT10 of Plan:MK.

Health Impact Assessment

In accordance with Plan:MK policy EH6 and the Health Impact Assessment (HIA) SPD, proposals of this nature should be supported by a HIA. This measures the wider impact on healthy living and the demands placed upon the capacity of health services and facilities arising from the development. However, appeal decisions have confirmed a proportionate response to this policy is necessary for single dwelling proposals such as these.

The policy is specifically worded so that proposed C2 uses in excess of 50 dwellings will need to measure the wider impact. In this instance, there is a total of four self-contained units with four adults living in them permanently and who may require access to primary health care such as doctors surgery's. The addition of four adults to the area is not considered to significantly increase the overall population of the local area and therefore, the impacts to primary healthcare would be minimal. There are limited healthcare facilities within the Bradwell Common grid square, such as doctors and dentists, however they are readily available within Central Milton Keynes which lies south of the site and which are feasibly accessible through taking public transport or a private vehicle. Given the occupants would be adults and therefore, over the age of 18 years, it is considered they would likely be undertaking doctor and dental visits of their own accord although it is acknowledged that a carer could

provide support in terms of transportation if required. However, the introduction of four additional adults to the area is not considered to adversely impact the capacity of health services, complying with Policy EH6 of Plan:MK.

Impact on the Character of the Area

Plan:MK Policies D1, D2 and D3 require that developments as a whole respond appropriately to the site and surrounding context; that the appearance of buildings exhibit a positive character; and that these are of appropriate height and mass in relation to other buildings in the immediate vicinity.

There would be external alterations to the property including the removal of the existing side conservatory and its replacement with a window and the removal of the existing garage doors with windows. On account of the tall boundary treatments to the existing site, it is not considered that these alterations would be highly visible to the public realm and street scene. Equally, even when some of the boundary treatments are removed and these areas become more visible to the public realm, it is not considered the replacements of windows would adversely impact the character and appearance of the local area, nor be a visual obstruction to the street scene.

There would be internal alterations that would see the sub-division of the existing C3 single family dwelling into x4 self-contained flats however, the exterior of the property would remain to appear as that of a C3 use, which is considered acceptable.

Policy D5 (Part C) also states that appropriate provision of service areas and refuse storage and collection areas should be made according to the nature of the development. Refuse storage areas and access to them should be designed to perform effectively without prejudicing other functions and users, maintain an attractive and coherent street scene and avoid risks to human health or an environmental disturbance.

Because the property is being sub-divided into four separate dwellings in the form of flats, it is not indicated on site where bin storage is to be located for each property as each property would require its own set of waste receptacles. Alternatively, large communal bins like those seen outside of commercial premises and flatted developments would be required to be stored on site. No designated storage appears to be on site and therefore, it is considered appropriate to attach a condition requesting storage details to be provided.

The proposal complies with policies D1, D2 and D3 of Plan:MK.

Impact on Residential Amenity

Policy D5 of Plan:MK seeks to ensure that all proposals create and protect a good standard of amenity for existing and future occupiers of developments and neighbouring dwellings. Policy NE6 of Plan:MK seeks to avoid and minimise adverse impacts of noise and vibration.

The proposal does not seek to increase the footprint of the property to which residential amenity impacts such as overshadowing or a loss of privacy may have arisen. The impact on the amenities of surrounding residential occupiers is therefore, assessed in relation to general noise and disturbance.

The proposal would create four 1-bed units within the fabric of the existing building to be occupied by 4 adults and up to 4 carers, totalling 8 people at any one time. Potential noise generators from this may include vehicle movements from carers arriving and leaving at shift times and the occupants themselves may generate some noise. However, it is not considered any noise generated would be above and beyond what could be expected from a residential dwellinghouse in a residential neighbourhood where families reside.

The proposal would comply with policy D5 of Plan:MK.

Policy HN4 highlights new dwellings, as a minimum, should meet the Nationally described Space Standards to accommodate different lifestyles and needs. The national minimum space standards seek to create a high standard of amenity for existing and future users through the prescription of the minimum standards.

The provision of the x4 1-bed units would create new dwellings. Each unit contains a shower room and would be 52.54sqm, 54.18sqm, 41.43sqm and 50.61sqm respectively which this combined with a 1-bed, 1-person flat, meets the minimum space requirements and therefore, complies with Policy HN4 of Plan:MK.

Flood Risk and SUDS

Policies FR1 and FR2 of Plan:MK includes locally strategic flood risk management policies to maintain and continue the exemplar sustainable drainage model of Milton Keynes, which prohibits development within the floodplain and seeks flood management and drainage infrastructure to be provided as strategically as possible as part of maintained, multi-functional blue-green infrastructure.

The provision of x4 separate units would be contained within the existing footprint of the building. Although four new dwellings are being provided due to the sub-division, it is considered the units would utilise the existing building's drainage infrastructure. The impact to existing drainage and runoff would therefore, have a neutral impact, remaining compliant with Policies FR1 and FR2 of Plan:MK.

Ecology

Policy NE2 of Plan:MK states that where there is a reasonable likelihood of the presence of statutorily protected species or their habitats, development will not be permitted unless it has been demonstrated that the proposed development will not result in a negative impact upon those species and habitats. Policy NE3 of Plan:MK seeks to ensure that development protects and maintains biodiversity, and wherever possible result in measurable net gain. Additionally, the Town and Country Planning

Act 1990 requires all new development to deliver a 10% net gain unless the development is exempt as set out in The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

The application has stated it is exempt from the mandatory BNG requirement and is subject to the de minimis exemption. The proposal would see the subdivision of the existing property into four residential units contained within the existing fabric of the building and within the existing residential plot. Whilst it would be in excess of 25sqm, it would not impact priority habitat or onsite habitat and therefore, remains compliant with Policies NE2 and NE3 of Plan:MK.

Conclusion

The proposal complies with national and local policy and permission should be granted.

None of the other matters raised through the publicity and consultation process amount to material considerations outweighing the assessment of the main issues set out above, noting that conditions or obligations have been attached where meeting the tests for their imposition. Where relevant, regard has been had to the public sector equality duty, as required by Section 149 of the Equality Act 2010 and to local finance considerations (as far as it is material), as required by Section 70(2) of the Town and Country Planning Act 1990 (as amended), as well as climate change, human rights and other international legislation.

Review Date	9 June 2026
Authorised Officer	Joanne Orton
