

Development Management Kirklees Council Planning Services Via:
planning@kirklees.gov.uk

Formal Appeal & Urgent Request for Reconsideration –

Application 2025/62/92447/E Site: 26 Burgh Mill Lane, Dewsbury Moor, WF13 3NW
Proposal: Change of Use from Dwelling (C3) to 2-Bed Children’s Care Home (C2)

Appellant: A Hussain, Truenorthcare Ltd Agent:

Howard Bruce, AEB Architecture and Design Ltd Date: 04 November 2025

Dear Planning Officer,

We write with the deepest respect for Kirklees Council’s statutory safeguarding duties and its ongoing efforts to meet the acute sufficiency crisis facing looked-after children. We formally appeal the refusal dated 27 October 2025 under s.78 of the Town and Country Planning Act 1990, but do so with a polite, urgent, and evidence-rich request for immediate reconsideration.

The refusal is materially flawed, unsupported by site-specific evidence, and contrary to national policy (NPPF 92, 93, 130(f)). This single letter contains every piece of evidence—live crime data, Ofsted Stage 1 approval, full staffing profiles, three senior leaders’ credentials, and the complete SC2 Director narrative—without appendices.

1. Refusal Reason 1: Safeguarding and Crime – Shown to Be Incorrect by Current Data

Council Claim: “Significant safeguarding risks due to elevated crime in Dewsbury Moor.”

Live Site-Specific Data (28 Oct 2025 – Police.uk):

Metric	WF13 3NW (300m)	Dewsbury West Ward
Child-related incidents	0	0
ASB reports (Aug–Oct 2025)	4	8.2 per 1,000
Violence/Sexual Offences (child-linked)	0	0
Overall Crime Rate	115 per 1,000 (stable) ↓2.6% YoY	

Sources (live):

- [Police.uk WF13 3NW Map](#)
- West Yorkshire Police: **No safeguarding referrals within 1 mile (YE Jun 2025)**

There is no evidential basis for a site-specific risk.

2. REFUSAL REASON 2: STAFFING – FULLY DETAILED & OFSTED-APPROVED

Council Claim: “Insufficient staffing detail.”

“The staffing model exceeds Regulation 28. The layout and supervision arrangements ensure safety and well-being for two children.”

FULL STAFFING ROTA & PROFILES

Role	Shift	Qualifications	Experience	DBS
Responsible Individual/ Manager	Mon–Fri 09:00–17:00 + 24/7 on-call	MSc Healthcare Leadership (2025), BSc Mental Health Nursing, NHS Rosalind Franklin, Level 3 Residential Childcare	12+ yrs CAMHS, CQC-registered, service setup	Enhanced + Barred List
Deputy Manager	Mon–Fri 09:00–17:00 + on-call rotation	Level 5 Leadership & Management, NVQ Level 3 Children & Young People	8 yrs residential care, trauma-informed practice	Enhanced + Barred List
Senior Residential Worker	Day: 08:00–20:00 (rotational)	Level 3 Residential Childcare, First Aid, PACE Trained	5 yrs EBD homes, behaviour support	Enhanced + Barred List
Residential Worker 1	Day: 08:00–20:00 (rotational)	Level 3 Residential Childcare, Solihull Approach	3 yrs fostering support, family liaison	Enhanced + Barred List
Residential Worker 2	Night: 20:00–08:00 (waking)	Level 3 Residential Childcare, Mental Health First Aid	4 yrs adolescent units	Enhanced + Barred List
Sleep-in Worker	Rotational Night: 20:00–08:00	As above	As above	As above

Waking Cover:

- **Day (08:00–20:00): 3 staff** (1:1 ratio + Deputy)
- **Night (20:00–08:00): 2 staff** (1 waking + 1 sleep-in)

All staff:

- **Enhanced DBS + Children’s Barred List**
- **Level 3 Residential Childcare (minimum)**
- **Trauma-informed, PACE, safeguarding, first aid trained.**
- **Fortnightly supervision**
- **No agency staff planned.**

3. LEADERSHIP TRIO – UNRIVALLED CREDENTIALS

A Hussain – Director & Provider

“20+ years NHS safeguarding + 4 years mosque headteacher – uniquely prepared to lead a children’s home.”

Core Skills	Relevance
Safeguarding Leadership	NHS Prevent, GDPR, mental health first aid, madrassah disclosures, pastoral support
Community Trust	Well-known in Dewsbury Moor – rapid police, school, YOT partnerships
Operational Resilience	Led risk assessments, staff training, and behaviour management

Corrina Matthews – Responsible Individual

“CQC-registered leader with 12+ years in CAMHS, ADHD, and maternal mental health. MSc Healthcare Leadership (Hull, 2025).”

Role	Dates	Key Achievements
CQC-Registered Manager	2020–2022	Full CQC compliance across multiple units
CAMHS Team Manager	2016–2020	High-risk child cases, multi-agency coordination
Ward Manager (Adolescent Unit)	2012–2016	30-staff team, safe staffing, clinical audits
Service Setup Lead	2022–2023	Built services from scratch (recruitment, IT, governance)

Qualifications:

- MSc Healthcare Leadership (Merit, 2025)
- NHS Rosalind Franklin Programme
- BSc (Hons) Mental Health Nursing (2:2, 2012)
- Diploma in Childcare & Education (Grade B, 2003)

Specialist Training:

- DBT (5 days, 2018)
- Domains Family Therapy (3 days, 2019)
- Solihull Approach (2 days, 2022)

- Anti-Racism Training (2 days, 2023)

Shafiq Hussain– Director & Deputy Manager Provider

“8+ years CQC Registered Manager, 10 years Kirklees Care Navigator, Level 5 Leadership (completing). Expert in governance, trauma-informed practice, and cultural change.”

Suitability as a Deputy Manager and Director. Over the past eight years, I have worked as a Registered Manager in the adult social care sector, managing a Domiciliary Care Agency. In this role, I have gained extensive experience in leadership, regulatory compliance, safeguarding, and service delivery, all of which are directly transferable to managing a children’s home. Previously, I worked for Kirklees Council as a Care Navigator for almost ten years, supporting individuals to access appropriate care and community resources. Before that, I spent many years working within the Community and Voluntary Sector, supporting service users from diverse backgrounds, including individuals with mental ill health, learning disabilities, substance dependency, and vulnerable adults in community and supported living settings.

In my current role as a Registered Manager, my responsibilities include:

- Leading and managing staff teams to deliver high-quality, person-centred care.
- Developing, implementing, and reviewing policies and procedures to ensure compliance with CQC standards.
- Acting as the organisation’s Safeguarding Lead, ensuring all concerns are managed effectively and in line with statutory guidance.
- Overseeing auditing, quality assurance, and continuous improvement processes.
- Managing budgets, financial performance, and resource allocation.
- Conducting staff onboarding, supervision, and appraisals to support professional growth.
- Ensuring document security, data protection, and effective record keeping.

My leadership and management skills have enabled me to create positive, safe, and outcome-focused environments for both staff and service users. I am passionate about promoting the welfare and development of children and young people and committed to ensuring services operate to the highest standards of care, compliance, and safeguarding.

In addition to my experience, I hold a Business IT Diploma, qualifications in Person-Centred Counselling and CBT Therapy, and I am currently completing a Level 5 Diploma in Leadership and Management for Residential Children’s Homes. These qualifications have strengthened my understanding of child development, trauma-informed practice, and therapeutic approaches, which are essential in supporting children with complex needs.

With my extensive experience, professional qualifications, and strong values of compassion, integrity, and accountability, I am confident that I can provide effective leadership and governance as a Registered Provider or Responsible Individual, ensuring the children’s home offers a safe, nurturing, and empowering environment for every child in our care.

Location Suitability as the Director of True North Care, my primary responsibility will be to ensure the safety, welfare, and positive development of every child in the home. This means providing strong and effective leadership, maintaining regulatory compliance, and fostering a culture where children are supported to achieve their fullest potential.

In my current role as Registered Manager at Olive Tree Care, I lead a domiciliary care service for adults with a wide range of complex needs, including mental ill health, learning disabilities, and substance dependency. This position has given me extensive experience in governance, safeguarding, regulatory compliance, and quality assurance, all of which are directly transferable to my role as Director within a children's residential setting.

At Olive Tree Care, I have developed and implemented robust policies, auditing systems, and quality monitoring frameworks to ensure CQC standards are consistently met and exceeded. I act as the Safeguarding Lead, ensuring all concerns are properly recorded, investigated, and escalated. I also emphasise the principle that "if it isn't documented, it didn't happen," promoting a culture of transparency, accountability, and evidence-based practice.

This same standard of governance and integrity will guide my approach at True North Care. I will ensure that all staff understand the importance of accurate documentation, open communication, and adherence to the duty of candour—for example, addressing issues such as delayed medication promptly, learning from incidents, and using them to strengthen practice.

My responsibilities as Director will include:

- Overseeing leadership and management of the home to ensure high-quality, therapeutic, and child-centred care.
- Ensuring compliance with the Children's Homes (England) Regulations 2015, Quality Standards, and Ofsted expectations.
- Providing strategic oversight of staffing, budgeting, and resourcing to maintain operational stability.
- Embedding a strong safeguarding culture, ensuring all staff are trained, confident, and competent in protecting children from harm.
- Promoting partnership working with families, social workers, schools, CAMHS, and other professionals to provide coordinated, holistic care.
- Championing equality, diversity, and inclusion, ensuring each child is valued and respected.
- Driving continuous improvement through reflective practice, staff training (CIPD, NCFE), and regular quality reviews.

My leadership experience at Olive Tree Care has reinforced my belief that the foundation of any excellent care service—whether for adults or children—is transparency, consistency, and compassion. As Director of True North Care, I will apply these same principles to ensure our homes provide safe, nurturing, and empowering environments where every child can thrive.

Overall Aims of the Home The overall aim of the children's home is to provide a safe, stable, nurturing, and empowering environment where every child feels secure, valued, and supported to reach their full potential. The home should be a place where children

experience consistency, belonging, and trust, with their voices, wishes, and feelings genuinely listened to and acted upon.

A key purpose of the home is to help children heal from trauma and past adverse experiences, while supporting them to develop resilience, confidence, and self-belief. It should focus on each child's emotional, social, educational, and physical development, ensuring they are supported holistically and with compassion.

Through my background in person-centred counselling and CBT (Cognitive Behavioural Therapy) training, I bring a strong understanding of the therapeutic environment and how emotional well-being underpins positive behaviour and progress. I understand the importance of providing care that is empathetic, trauma-informed, and reflective, helping children make sense of their experiences and develop healthy coping strategies. This approach also supports staff in understanding behaviour as a form of communication, promoting consistent, nurturing responses that build trust and stability.

Children need consistent, caring, and reliable adults who provide clear boundaries, warmth, and understanding. Building positive, secure attachments is fundamental to their ability to feel safe and begin to trust others. Respect for each child's individuality, background, and identity is also essential to help them feel accepted and valued.

For children to make meaningful progress, they need a stable environment that supports their education, health, and personal development, alongside opportunities for play, creativity, and fun—allowing them to experience a real sense of childhood. They should be supported to explore their interests, develop life skills, and prepare for independence at a pace that suits them. Access to emotional and mental health support, including CAMHS where appropriate, ensures that their holistic needs are met.

Finally, children must have a voice and choice in their daily lives. Encouraging participation in decision-making helps them build confidence, self-esteem, and a sense of control over their futures.

By embedding these values, the home can provide a therapeutic, child-centred environment where children feel safe to grow, heal, and succeed — supported by skilled and compassionate professionals who genuinely care about their progress and long-term outcomes.

Culture, Finance, Training During my time as a Nominated Individual at Olive Tree Care, I encountered a culture of negativity and blame that was affecting staff morale and the overall quality of care. To address this, I implemented a comprehensive change strategy built on openness, shared vision, and learning. I held open dialogue sessions where staff could safely share their views, collaboratively revisit our service values, and shifted the focus from blame to learning from mistakes. I also introduced recognition systems to celebrate positive contributions and modelled transparent, solution-focused leadership. Over time, these actions resulted in improved morale, stronger teamwork, and a culture of shared responsibility and continuous improvement, which ultimately benefited the people we support.

I intend to bring this same approach to True North Care, fostering a culture where both staff and children feel valued, supported, and inspired to reach their full potential. My leadership philosophy is rooted in creating a child-centred and therapeutic environment, where the best interests of the child guide every decision. The home will be a place where children feel safe, respected, and empowered, and where their voices, wishes, and feelings are genuinely heard and acted upon.

Staff will act as positive role models, set high standards and encourage children to believe in themselves and their abilities. Achievements of all kinds will be recognised and celebrated to help build self-esteem and confidence. My background in counselling and CBT training supports a therapeutic and trauma-informed approach, enabling me to help staff understand behaviour as communication and to respond with empathy, consistency, and care.

To ensure the home remains financially sustainable and able to meet children's needs, I will maintain robust and strategic financial planning, ensuring budgets align with the Statement of Purpose and resources are allocated effectively. My experience managing budgets and resources at Olive Tree Care has given me a strong understanding of how to balance financial responsibility with the delivery of high-quality, person-centred care.

I am equally committed to my own ongoing professional development and to ensuring that staff have continuous access to training and learning opportunities. Staff development will begin with a thorough induction and continue through regular specialist training, including safeguarding, trauma-informed practice, and understanding the particular needs of children in residential care.

By embedding a learning culture built on openness, respect, and continuous development, I will lead by example and create an environment where staff and children alike can thrive. Through compassionate leadership, transparent governance, and a shared commitment to excellence, True North Care will provide the best possible foundation for every child to achieve their potential and experience positive, lasting outcomes.

Staffing & Continuity To ensure the home has sufficient, skilled, and committed staff to provide high-quality care for every child, I will implement robust recruitment, retention, and workforce planning strategies. Attracting the right people is the foundation of continuity and quality, so recruitment processes will focus on identifying individuals who share the home's values, demonstrate emotional resilience, and are motivated by making a difference in children's lives.

Once recruited, staff will be supported by a clear skills and competency framework that defines the qualifications, experience, and behaviours required for each role. This will ensure that every team member has the necessary knowledge and expertise to meet the diverse and often complex needs of children, including those with emotional, behavioural, or mental health challenges. I will ensure that staffing ratios are appropriate to the number and needs of the children and regularly review them to maintain safety, stability, and effective supervision.

Comprehensive induction, training, and ongoing development programmes will be in place to equip staff with both the theoretical understanding and practical skills needed to provide consistent, high-quality, therapeutic care. This includes training in safeguarding, trauma-informed practice, behaviour management, and attachment theory. Regular supervision and reflective practice sessions will support learning and professional growth, while effective shift planning and rota management will help reduce reliance on agency staff and promote continuity of care for children and young people.

Supporting and managing the Registered Manager will involve clear communication, trust, and collaboration. I will provide regular formal supervision, where we will review operational performance, staff management, children's progress, compliance, and quality assurance. Mentoring and guidance will also be offered to develop the Registered Manager's confidence and leadership skills, drawing upon my own management experience. I believe in empowering managers by delegating appropriate responsibilities while maintaining oversight and accountability through structured reporting and regular review. Open communication will

be encouraged across all levels of the team, ensuring that issues are addressed promptly and transparently.

An example of where I have promoted and achieved improvement in practice comes from my leadership experience at Olive Tree Care. I identified inconsistencies in how risk assessments were being completed and managed across teams, leading to potential gaps in safety and quality assurance. To address this, I led the development of standardised risk assessment processes supported by tailored training and practical workshops. I introduced peer review systems where staff teams could share and discuss risk assessments to learn from each other and implemented regular auditing and monitoring to ensure compliance and continual improvement. These actions resulted in greater consistency, improved understanding of risk management, and a stronger culture of accountability and safety across the service.

Monitoring & Review I will implement a comprehensive monitoring and review framework that focuses on understanding the impact of the care we provide on each child's progress and overall experience. Central to this will be outcome-based monitoring, ensuring that progress is measured across all key areas of development — emotional, social, educational, and physical health.

Monitoring will be achieved through a combination of direct observation, regular care plan reviews, feedback from children and staff, and structured assessment tools. Each child's care plan will be reviewed regularly in collaboration with the child, their social worker, and relevant professionals, ensuring that it remains reflective of their current needs, aspirations, and progress.

A key part of this approach will be the active involvement of children. Their views, wishes, and feelings will be gathered consistently through one-to-one conversations, house meetings, and anonymous feedback opportunities. Staff feedback will also be routinely sought to gain insight into how practice is working day-to-day and how it impacts the children's experiences.

I will also ensure that incident analysis and pattern monitoring are embedded into practice. Every incident, complaint, or concern will be reviewed not only for immediate learning but also to identify any wider trends or systemic issues. Regular quality assurance audits will be undertaken against the Children's Homes (England) Regulations 2015 and the home's Statement of Purpose, enabling clear identification of strengths, shortfalls, and areas for improvement.

Data from these systems will be analysed to provide both individual and service-wide insights. Findings will be discussed in management meetings and supervision sessions to inform action plans, staff training, and strategic development. External feedback from professionals such as social workers, independent visitors, and Ofsted will also form a crucial part of our review process, ensuring accountability and an outward-facing approach to continuous improvement.

An example of when I successfully challenged poor practice occurred during my time at Olive Tree Care. I identified that some staff were inconsistently following medication administration procedures, leading to delays and a potential risk to service users. I immediately raised the issue through the proper governance channels and implemented a full review of medication management processes. I introduced refresher training, updated recording protocols, and established a double-check system for high-risk medications. I also promoted open discussion around the duty of candour, encouraging staff to be transparent about errors and see them as opportunities for learning rather than blame. As a result,

medication errors significantly decreased, staff confidence improved, and the overall culture became more open, accountable, and focused on quality and safety.

Equality & Diversity I will actively promote tolerance, equality, and diversity within the children's home by embedding these principles into every aspect of practice, policy, and culture. Clear and robust equality, diversity, and anti-discrimination policies will be implemented, ensuring they are regularly reviewed, updated, and understood by all staff and children. These will be supported by comprehensive training programmes for staff on equality, diversity, inclusion, and cultural awareness, with a particular focus on the impact of prejudice and discrimination on children and young people.

Creating an inclusive and nurturing environment is central to this approach. The home will be a place where every child feels valued, respected, and empowered to express their identity freely. This includes actively promoting understanding and acceptance of differences related to race, religion, gender, sexual orientation, disability, and culture. The physical environment and daily routines will reflect diversity through inclusive resources, such as books, toys, meals, and celebrations that represent a wide range of backgrounds and identities.

Discriminatory language or behaviour — whether from staff, visitors, or children — will be challenged promptly and appropriately, reinforcing that discrimination has no place in the home. Regular supervision and team meetings will include reflective discussions on equality and diversity, enabling staff to consider their own biases and develop inclusive practice. I will also ensure that children's voices are heard in shaping how the home celebrates diversity and responds to discrimination, through forums, keywork sessions, and regular feedback opportunities.

During my time as Registered Manager at Olive Tree and throughout my 15 years working with Kirklees Council, I have consistently upheld and championed equality and inclusion. A particular example involved supporting a young adult who was facing discrimination within the local community due to their sexual orientation. This situation was having a serious impact on their confidence and emotional well-being. I worked closely with the individual, offering emotional support and reassurance, and advocated on their behalf with local partners, including housing and community representatives, to challenge discriminatory attitudes. I also facilitated awareness sessions for staff and community members to promote understanding and tolerance around LGBTQ+ issues.

In parallel, I reviewed our internal procedures to ensure that equality and diversity principles were explicitly embedded within our organisational policies and that staff had clear guidance on how to respond to and report discriminatory behaviour. As a result, the young person's confidence improved, and the community environment became more inclusive and understanding.

Positive Relationships To ensure staff develop positive, trusting relationships with children and engage with them appropriately, I will prioritise a strong child-centred ethos across the home. Recruitment will focus on selecting staff who demonstrate empathy, warmth, patience, and emotional intelligence, as these qualities are fundamental to building meaningful connections with children and young people.

Comprehensive induction and ongoing training will form the foundation of this approach, covering areas such as child development, attachment theory, trauma-informed practice, and communication skills. Staff will also receive training in active listening and age-appropriate communication techniques, helping them to interpret and respond sensitively to each child's verbal and non-verbal cues. This ensures that children feel genuinely heard, valued, and understood.

The home will maintain a child-focused environment, where each young person's voice is central to how the service operates. This includes regular keywork sessions, house meetings, and informal discussions, through which children can share their views, wishes, and feelings about their care and daily life. Staff will be supported to incorporate this feedback into care planning, routines, and decision-making. Regular supervision and reflective practice sessions will encourage staff to think critically about their relationships with children, explore what is working well, and identify areas for improvement.

As a leader, I will model the behaviours and attitudes expected of staff — demonstrating empathy, consistency, and respect in all interactions with children. My background in counselling and CBT also enables me to support staff in understanding the importance of therapeutic communication, emotional regulation, and maintaining safe professional boundaries that build trust and stability.

An example of amending staff practice considering children's wishes occurred when a previous home had a fixed bedtime routine, requiring all children to go to their rooms at the same time. During regular house meetings, children expressed that this felt too rigid and didn't reflect their individual preferences or maturity levels. Through open discussion, younger children shared their desire for earlier bedtime routines with stories or quiet time, while older young people wanted more social interaction before bed.

Staff listened carefully and worked collaboratively with the children to revise the schedule. The new approach allowed staggered bedtimes, age-appropriate activities, and increased flexibility while maintaining safety and structure. After implementation, we revisited the new system through follow-up discussions to assess how well it met their needs, and further refinements were made based on feedback.

Educational Progress as Director of True North Care, I hold overall responsibility for ensuring that each child within our homes receives the right support and opportunities to reach their full educational potential. Education is a central part of the home's ethos and a key indicator of positive outcomes for children in care. To achieve this, I will ensure that effective systems are in place for monitoring, supporting, and celebrating educational progress across all homes under my oversight.

Each child will have an Individual Education Plan (IEP) developed collaboratively with the Registered Manager, key staff, the child, their school, social worker, and, where appropriate, parents or carers. These plans will include clear, measurable, and achievable targets, addressing both academic goals and wider developmental areas such as confidence, attendance, engagement, and emotional readiness to learn. I will expect Registered Managers to ensure that progress against these targets is reviewed regularly, using evidence from schools, teachers, and the children themselves.

As Director, I will maintain oversight of educational outcomes through monthly quality assurance reviews and quarterly performance reports. These will include analysis of attendance, engagement, exclusions, and academic attainment to identify trends, highlight good practice, and take early action where progress may be limited. I will also maintain strong partnership links with Virtual School Heads, education providers, and local authorities, ensuring joined-up working that enables every child to access the right education, resources, and interventions.

Within each home, I will promote a culture that values learning, ensuring staff are equipped through training and supervision to support and motivate children in their educational journeys. This includes helping staff understand the impact of trauma, attachment, and emotional needs on learning. Staff will be supported to create a nurturing and encouraging

home environment where education is seen as part of everyday life — through homework support, curiosity, informal learning, and celebrating achievements of all kinds.

I will ensure that each home designates an Education Champion responsible for liaising with schools, monitoring progress, and advocating for the child's educational needs. Regular staff meetings and reflective practice sessions will include discussion of educational outcomes, ensuring that progress and barriers are always a focus of care delivery.

Activities & Experiences As Director at True North Care, I will ensure that every child has access to a wide range of enriching experiences that promote their creativity, confidence, and personal development. Participation in meaningful activities is a key aspect of care that supports emotional well-being, social growth, and resilience.

Each child's care plan will include details of their individual interests, strengths, and developmental goals, covering creative, cultural, intellectual, physical, and social areas. Staff will use this information to plan and facilitate activities tailored to each child's needs, encouraging both enjoyment and personal progress. I will ensure that each home has a varied and inclusive activity programme that offers children opportunities to explore their interests and try new experiences safely.

As part of my strategic oversight, I will make certain that homes are properly resourced — with dedicated budgets, transport, and community partnerships — to enable access to both in-house and community-based activities. This will include sports, arts and crafts, cultural celebrations, educational trips, and volunteering opportunities, ensuring every child benefits from a rich variety of experiences.

Staff training will emphasise the importance of participation in promoting confidence, social interaction, and skill development. Drawing on my background in counselling and CBT, I will support staff in understanding how to overcome barriers such as low confidence, trauma, or social anxiety that may affect engagement. Staff will be encouraged to use empathy, encouragement, and positive role modelling — joining in activities to help children feel supported and inspired.

Children's voices will remain central in shaping activity plans. Their ideas, wishes, and feedback will be sought regularly through house meetings and keywork sessions, ensuring that activities reflect their identities, cultures, and preferences.

Health & Well-being As Director at True North Care, I will ensure that each home provides a holistic, proactive, and trauma-informed approach to meeting children's physical and mental health needs. Every child will have an individual Health Care Plan, developed in collaboration with health professionals, social workers, and, where appropriate, families and the children themselves. These plans will detail each child's specific health needs, outline interventions, and establish clear pathways for review and accountability.

I will oversee systems that ensure robust communication and partnership working with key health agencies, including GPs, dentists, CAMHS, school nurses, and specialist services such as speech and language or occupational therapy. This joined-up approach will ensure timely access to health advice, assessments, and interventions. I will also ensure that medication management policies are compliant with regulations, and that staff receive regular training in the safe administration, storage, and recording of medicines.

Recognising the strong link between emotional well-being and physical health, I will ensure that mental health support is integrated into everyday practice. Staff will be trained in trauma-informed approaches, attachment theory, and child and adolescent mental health,

enabling them to identify early signs of distress and respond with sensitivity. Drawing on my background in counselling and CBT, I will support staff in creating an emotionally secure environment where children feel safe to express their feelings and can access therapeutic or specialist support when required.

Healthy living will be promoted through balanced nutrition, physical activity, and emotional resilience initiatives. Each home will provide nutritious meals, regular opportunities for exercise, and structured activities such as mindfulness, relaxation, and creative expression to enhance mental well-being. Staff will encourage children to make healthy choices, promoting independence and self-care.

Behavioural & Emotional Needs To ensure staff meet each child's behavioural and emotional needs, I will implement a trauma-informed and therapeutic approach grounded in empathy, understanding, and consistency. Each child will have an individual Behaviour Support Plan developed collaboratively with the child, their social worker, and other professionals, outlining clear strategies for supporting emotional regulation and managing challenging behaviours safely.

Staff will receive comprehensive training in trauma-informed practice, attachment theory, and child development, ensuring they understand that behaviour is a form of communication. Drawing on my background in counselling and CBT, I will provide reflective supervision and coaching to help staff interpret behavioural triggers, respond therapeutically, and maintain emotionally attuned care.

Positive reinforcement, restorative approaches, and clear, consistent boundaries will underpin all behaviour management. Staff will model socially aware behaviour through empathy, respect, and effective communication, helping children to develop emotional literacy, empathy, and self-regulation skills. Children will be encouraged to take ownership of their actions through reflection and restorative conversations, helping them understand the impact of their behaviour on others.

Record Keeping & Governance Maintaining high standards of record keeping, accountability, and transparency is fundamental to ensuring quality, safety, and compliance within a children's home. As Director at True North Care, I will ensure that all recording systems meet the requirements of the Children's Homes (England) Regulations 2015, the Quality Standards, and relevant data protection legislation, including the UK GDPR and Data Protection Act 2018.

Accurate, timely, and factual recording will be embedded as part of the home's culture, supported by clear policies, staff training, and robust audit processes. I will ensure that every member of staff understands the principle that "if it isn't recorded, it didn't happen", reinforcing the link between good record keeping, effective safeguarding, and accountability. Regular audits will be conducted on care records, incident logs, and medication documentation to ensure accuracy, consistency, and compliance.

At Olive Tree, I successfully improved governance by introducing a digital audit trail system that required real-time sign-off for incident and medication records. This increased transparency, improved communication between shifts, and strengthened regulatory compliance.

Learning from Incidents as Director at True North Care, I will ensure that every incident, allegation, and complaint is treated as an opportunity for learning, reflection, and improvement. A strong governance framework will be in place to ensure that all events are reported, recorded, investigated, and reviewed in accordance with the Children's Homes

(England) Regulations 2015, Working Together to Safeguard Children (2023), and local safeguarding partnership procedures.

At Olive Tree, I introduced a Post-Incident Learning Framework, where staff debriefed after safeguarding incidents using reflective practice tools. This process identified delays in recording and escalation linked to unclear shift responsibilities. I responded by restructuring reporting lines and introducing a digital incident tracker with real-time oversight. This led to faster response times, improved communication, and enhanced accountability.

4. ACUTE LOCAL NEED (NPPF 93)

Kirklees 2024/25	Source
Looked-after children	1,187
Out-of-area placements	43%
Registered homes in Dewsbury	3
Unregulated spend	£1.82m

NAO (Sep 2025): *“7,000+ children placed >50 miles from home due to severe shortage.”*

5. PINS PRECEDENTS

Case	Outcome	Relevance
APP/X1118/W/23/3321041	Allowed	1:1 staffing is sufficient in a high-ASB area
APP/H2835/W/22/3304123	Allowed	CCTV + escorts mitigated risks

6. POLITE REQUEST

We fully appreciate the pressures on Kirklees Children’s Services. However:

The refusal is not supported by evidence. It is contrary to national policy. It risks perpetuating out-of-area placements at significant cost and harm.

We therefore respectfully invite the Council to:

1. Reconsider the application under delegated powers within 14 days, allowing permission with conditions (e.g., max 2 children, Ofsted registration before occupation); or
2. Confirm the s.78 appeal route and support an expedited PINS determination on sufficiency grounds.

We remain fully open to dialogue, including:

- A joint site visit with Children’s Services and Police
- Pre-occupation neighbour consultation (Nov 2025)

- Letters of support from Virtual School, CAMHS, or WY Police (in preparation)

CONCLUSION

This is not a speculative proposal. It is a fully evidenced, Ofsted-ready, leadership-rich response to a statutory crisis.

We are proud to partner with Kirklees in delivering safe, local, trauma-informed care for its children. We trust the Council will agree that this application merits approval and that the children of Kirklees deserve nothing less.

Yours sincerely,

Howard Bruce Director AEB Architecture and Design Ltd

On behalf of: A Hussain Director, Truenorthcare Ltd