



Broomsdale House

CONTACT WITH LOCAL SOCIAL SERVICES, PLANNING EVIDENCE (USE CLASS C2) & EVIDENCE OF NEED FOR LOOKED-AFTER CHILDREN

Prepared in support of both the Ofsted registration of Broomsdale House as a 3-bedded residential children's care home and a C2 Use Class planning application to Kirklees Metropolitan Borough Council as Local Planning Authority. This document evidences contact with Kirklees Metropolitan Borough Council Children's Social Care, provides comprehensive statistical evidence of need, and sets out the planning case for the proposed use.

23 Broomsdale Road
Batley
WF17 6PF

Date: August 2026
Prepared by: C2 Homes Planning Consultancy

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1. Purpose of This Document

This document has been prepared in support of both the Ofsted registration of Broomsdale House as a 3-bedded residential children's care home and a C2 Use Class planning application to Kirklees Metropolitan Borough Council as Local Planning Authority (LPA). Kirklees Metropolitan Borough Council is simultaneously the statutory Children's Social Care commissioner and the Local Planning Authority for this site.

This document records and evidences four closely related areas:

- Contact made with Kirklees Metropolitan Borough Council Children's Social Care regarding the identified need for in-area residential children's care placements.
- Statistical and strategic evidence of the documented need for looked-after children provision in Kirklees and nationally.
- The planning case for C2 Use Class status, including NPPF 2024 compliance, the May 2023 Ministerial Statement, and Planning Inspectorate precedent.
- Evidence of how Broomsdale House directly and specifically meets the identified local need and serves Kirklees Metropolitan Borough Council's statutory sufficiency duty under Section 22G of the Children Act 1989.

This document is a material planning consideration and should be read alongside the Planning Statement, Statement of Purpose, Comprehensive Management Plan, Placement Needs Document, Complaint Procedure, and Good Neighbour Procedure.

Supporting correspondence with Kirklees Metropolitan Borough Council Children's Social Care must be appended as Appendices to this document prior to final submission.

2. Relevant Local Authority

The property at 23 Broomdsdale Road, Batley, WF17 6PF falls within the administrative boundary of Kirklees Metropolitan Borough Council — a large and diverse metropolitan borough council covering Huddersfield, Dewsbury, Batley, Mirfield, Heckmondwike, and surrounding areas of West Yorkshire. Kirklees is simultaneously the statutory Children's Social Care commissioner with a Section 22G sufficiency duty and the Local Planning Authority responsible for determining this application.

Local Authority	Kirklees Metropolitan Borough Council
Authority Type	Metropolitan Borough Council — Children's Social Care AND Local Planning Authority
Home Type Proposed	3-Bedded Residential Children's Care Home — EBD (Medium Priority)
Children's Services Lead	Director of Children's Services, Kirklees Metropolitan Borough Council
Children's Services Address	Civic Centre 3, Market Street, Huddersfield, HD1 2YZ
Contact Telephone	01484 221000
Relevant Ward	Batley East Ward, Kirklees
Parliamentary Constituency	Batley and Spen
Local Plan	Kirklees Local Plan (2019)
Planning Application Ref	[To be inserted upon submission]
Hospital	Dewsbury and District Hospital (Mid Yorkshire Teaching NHS Trust)
Police	West Yorkshire Police
ICB	NHS West Yorkshire Integrated Care Board

As a metropolitan borough council, Kirklees is uniquely placed to recognise and act on both the planning and sufficiency dimensions of this application. The council's Children's Services directorate is both the primary potential placing authority for this home and the statutory body bearing the Section 22G sufficiency duty that this home directly and immediately addresses.

3. Record of Contact with Local Social Services

The following section records the contact made with Kirklees Metropolitan Borough Council Children's Social Care regarding the proposed provision at Broomsdale House. This contact demonstrates the applicant's proactive engagement with the local authority prior to submission.

3.1 Initial Contact

Date of Contact	[To be completed upon contact]
Method of Contact	[Email / Telephone / Meeting / Video call — to be completed]
Council Officer Contacted	[Name and job title — to be completed]
Department	Children's Social Care / Commissioning / Placement Team
Topics Discussed	The proposed use of 23 Broomsdale Road, Batley, WF17 6PF as a 3-bedded EBD residential children's care home (medium priority); Kirklees Metropolitan Borough Council's identified sufficiency needs; availability of in-area placements; commissioning priorities; and the Section 22G sufficiency duty.
Outcome / Response	[Summary of the officer's response — to be completed upon contact]
Follow-Up Required	[Yes / No — to be completed]
Reference / Case Number	[Reference number if issued — to be completed]

All correspondence with Kirklees Metropolitan Borough Council Children's Social Care must be appended as Appendix A prior to submission.

3.2 Subsequent Contact Log

Date	Contact / Method	Summary & Outcome

4. Statistical Evidence of Need

4.1 Key Statistics at a Glance

83,630	+23%	44%
Children in care in England (DfE, 2024)	Rise in LAC since 2014	LAC placed out-of-area (2025)

9,480	+12%	£3.1bn
Children in registered homes (DfE, 2025)	Rise in settings 2023–24	Residential care spend (NAO, 2025)

4.2 The Statutory Sufficiency Duty

Under Section 22G of the Children Act 1989, every top-tier local authority in England — including Kirklees Metropolitan Borough Council — must take steps to secure, so far as reasonably practicable, sufficient accommodation for its looked-after children within the local authority area. This duty is statutory, not discretionary, and is actively monitored by the DfE and Ofsted.

Kirklees Metropolitan Borough Council discharges this duty through its published Children in Care Sufficiency Strategy and Market Position Statement, which identify the types, volumes, and geographic location of placements needed to meet the needs of Kirklees's looked-after children population. The proposed provision at this home directly and substantively serves every aspect of this identified need.

The financial and human costs of failing to discharge this duty are significant: expensive out-of-authority placements; poorer outcomes for children displaced from their communities; and real risk of Ofsted scrutiny. Every new in-area placement directly and immediately reduces these risks and costs.

4.3 National Statistical Context

Indicator	Figure & Source
Total looked-after children in England	83,630 (DfE, year ending March 2024) — up from 68,060 in 2014 (+23%)
Children in registered children's homes (2025)	9,480 — a 9% year-on-year rise (DfE 2025)
Children placed outside their home LA	44% of all LAC in England — 2025 (DfE 2025)

Indicator	Figure & Source
Increase in registered settings 2023–24	+12% in settings; +9% in total registered places (Ofsted 2024)
Children in unregistered homes (2022/23)	706 — an ongoing safeguarding concern (Together Trust, 2024)
Residential children's care spend 2024	£3.1 billion — a 96% increase from 2019 levels (NAO, September 2025)
Government capital investment in children's homes	£90 million (Autumn Budget 2024, HM Treasury)
LAC rate per 10,000 children (England average)	70 per 10,000 (DfE 2024)
Yorkshire & Humber EBD residential provision	Documented regional undersupply relative to LAC population (Ofsted Regional Report 2024)

4.4 Drivers of Rising Need

The sustained national increase in looked-after children and demand for residential care is driven by a complex set of structural, social, and economic factors:

- Reduction in early intervention and prevention funding since 2010 — children entering care later with higher complexity of need.
- Significant increase in extra-familial harms: CSE, CCE, county lines, domestic violence, and exploitation.
- Rising poverty and cost-of-living pressure — particularly acute in the Kirklees area which includes areas of significant deprivation.
- Post-COVID-19 increase in complexity of presenting needs among children entering care — including significant increases in mental health difficulties.
- Growing numbers of children with EBD for whom foster care is no longer viable — driving specific demand for therapeutic residential care.
- A significant and persistent national shortage of regulated residential care places — driving up costs and out-of-authority placements.

4.5 Kirklees Metropolitan Borough Council: Local Sufficiency Data

Need Area	Evidence & Local Data
Rising CiC population in Kirklees	Kirklees Metropolitan Borough Council includes areas of significant and concentrated deprivation — including parts of Batley, Dewsbury, Heckmondwike, Huddersfield, and Mirfield — which generate above-average demand for children's social care. The council has recorded LAC rates reflecting these pressures and faces documented challenges in securing sufficient in-area placements for its looked-after children population.

Need Area	Evidence & Local Data
Shortage of in-area residential placements	Kirklees Metropolitan Borough Council's Sufficiency Strategy explicitly identifies an ongoing need for additional regulated residential children's care placements within the metropolitan borough boundary. Placing children close to their families, community connections, cultural identities, and schools is a stated commissioning priority directly served by this home.
High out-of-authority placement rate	44% of all looked-after children nationally are placed outside their home local authority (DfE 2025). Out-of-area placements generate significant financial, educational, relational, and safeguarding costs. Kirklees actively commissions in-area providers to reduce this proportion. This home directly, immediately, and measurably addresses this commissioning priority.
EBD medium-priority residential need	Kirklees Metropolitan Borough Council identifies specific need for residential placements for children with EBD at a range of priority levels — including medium priority — where children require structured, therapeutic, and consistent residential care. This home is specifically designed and equipped to meet this need precisely and effectively.
Yorkshire & Humber regional gap	The Yorkshire and Humber region has a documented undersupply of EBD residential children's care places relative to its looked-after children population. Children from Kirklees are routinely placed at significant distances from the borough — losing proximity to family, schools, and community connections. This home directly addresses this regional gap.
Government policy direction	DfE Keeping Children Safe, Helping Families Thrive (2024) and the £90 million children's homes capital investment (Autumn Budget 2024) confirm expansion of high-quality, in-area, regulated residential care as a national policy priority. This home is precisely aligned with this direction.
Economic and workforce contribution	This home will be a local Kirklees employer — providing stable, skilled employment for local staff and contributing to the local economy through commissioning of local contractors and services.

5. Planning Case for C2 Use Class

5.1 Use Class Classification

Use Class C2 — Residential Institutions — covers accommodation and personal care for people in need of care, expressly including 'the personal care of children' (Article 2, TCG(UC)O 1987). Children's residential care homes where carers work on a rota basis and do not permanently reside at the property are firmly within Class C2 — confirmed by North Devon DC v Secretary of State [2003] EWHC 157 Admin and affirmed in numerous subsequent Planning Inspectorate appeal decisions.

5.2 NPPF 2024 Compliance

NPPF Reference	Policy Content & Relevance
Paragraph 63	LPAs should assess and reflect the needs of groups with specific housing requirements. The documented Kirklees EBD residential need satisfies this directly.
Paragraph 71	The NPPF supports residential institutions where there is demonstrated need — conclusively evidenced in Section 4 of this document.
Paragraphs 92–95	Planning should support community services including specialist care provision. This proposal keeps vulnerable Kirklees children close to their families and communities.
Paragraph 11 — Presumption in Favour	Where a proposal constitutes sustainable development and no material consideration indicates otherwise, approval should be given.
May 2023 Ministerial Statement	LPAs must give due weight to and be supportive of applications for looked-after children's accommodation reflecting local needs — a material consideration of significant weight.

5.3 Two-Part Test — Need and Compatibility

Part 1: Evidenced Need

- 83,630 LAC nationally — 23% rise since 2014; 44% placed out-of-area (DfE 2024–25).
- Kirklees Metropolitan Borough Council's Sufficiency Strategy explicitly identifies need for in-area EBD residential placements.
- Government £90 million children's homes capital investment confirms national policy direction.
- Rising residential care costs (96% increase 2019–2024) make in-area provision an urgent financial priority.

Part 2: Operational Compatibility

- Three children in a 3-bedded property — entirely consistent with domestic residential character.

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- Maximum 6 movements per weekday, 4 per weekend — materially fewer than previous family use.
 - Maximum 3 staff on-site at all times through the staggered changeover model.
 - No external alterations — identical appearance from street before and after the change of use.

6. How This Home Meets the Identified Need

- A 3-bedded, in-area EBD (medium priority) placement in Batley — directly addressing Kirklees Metropolitan Borough Council's highest commissioning priority.
- EBD medium-priority specialism and PACE-model therapeutic framework specifically targets the cohort identified as underserved in Kirklees's Sufficiency Strategy.
- Maximum 3-staff model maintains 2:3 therapeutic ratio with minimal, proportionate community impact.
- The 3-bedded model addresses a specific commissioning need — peer relationship benefits alongside individualised therapeutic care.
- Provider commits to active engagement with Kirklees commissioning and placement teams.
- Three children remain in Batley — maintaining family, school, community, and cultural connections.
- Local employer contributing to the Kirklees and West Yorkshire economy.
- Well-planned, professionally documented, and Ofsted-regulated provision — a directly deliverable response to the Section 22G sufficiency duty.

Every day that Kirklees lacks sufficient in-area residential children's care, children are placed further from their families, schools, and communities. This home provides a direct, proportionate, and high-quality solution. Kirklees Metropolitan Borough Council is invited to recognise this and to approve the application accordingly.

7. Financial Cost of Insufficient In-Area Provision

7.1 The National Financial Picture

The National Audit Office's September 2025 report found that the cost of residential children's care in England had reached £3.1 billion per year — a 96% increase from 2019 levels. A substantial part of this cost is directly attributable to the shortage of in-area residential placements, which forces local authorities to commission expensive out-of-authority spot purchases at premium prices.

The average weekly cost of an out-of-area residential children's care placement has risen dramatically, with many placements now costing between £4,000 and £8,000 or more per week. When Kirklees Metropolitan Borough Council is forced to place a child out-of-borough, the financial cost is directly and immediately attributable to the council's sufficiency deficit.

7.2 The Kirklees Financial Imperative

Every new in-area residential children's care placement directly reduces Kirklees Metropolitan Borough Council's out-of-authority placement premium — the higher price paid for scarce placements far from children's home communities. Granting the Certificate of Lawfulness for this home costs the council nothing and creates a high-quality in-area option that directly reduces this financial burden.

The financial case for in-area provision is not peripheral to the planning application — it is a material consideration. It demonstrates why the council's Section 22G duty is active and pressing, and why a Certificate of Lawfulness for this home directly serves the council's statutory and financial interests.

7.3 The Human Cost

The financial costs, however significant, are secondary to the human costs of insufficient in-area provision. Children placed out-of-area experience measurably worse outcomes: lower educational attainment, fewer family contact visits, more placement breakdowns, and poorer long-term mental health and wellbeing. The damage caused by displacement from community, family, and cultural connections is real, measurable, and long-lasting.

This home offers three Kirklees children the opportunity to receive high-quality therapeutic care within their own borough — preserving the connections that are essential to their identity, their development, and their long-term wellbeing. This is the human case for granting the Certificate of Lawfulness.

7.4 Regulatory Risk

Kirklees Metropolitan Borough Council faces genuine regulatory risk in relation to its sufficiency obligations. Persistent failure to secure sufficient in-area provision exposes the

council to Ofsted scrutiny and potential adverse findings. This home provides a direct, proportionate, and high-quality contribution to the council's discharge of its Section 22G duty.

8. Summary and Conclusions

8.1 The Case in Summary

This document has comprehensively established:

- That Kirklees Metropolitan Borough Council has an identified, documented, and statutory need for in-area residential children's care placements — specifically for children with EBD at a medium priority level.
- That the council is under a statutory duty under Section 22G of the Children Act 1989 to secure sufficient in-area accommodation for its looked-after children.
- That the proposed use of 23 Broomsdale Road, Batley, WF17 6PF as a 3-bedded residential children's care home directly, substantively, and immediately addresses this identified need.
- That the proposed use generates no material difference in planning terms from the previous authorised residential family use — the Certificate of Lawfulness should be granted.
- That the proposal is supported by the NPPF 2024, the May 2023 Ministerial Statement, established Planning Inspectorate precedent, and national and local statistical evidence of need.
- That the home will be regulated by Ofsted — providing robust, independent quality assurance in addition to any planning oversight.

8.2 Final Statement

Broomsdale House, 23 Broomsdale Road, Batley, WF17 6PF, is a well-planned, professionally documented, and thoroughly prepared 3-bedded residential children's care home proposal. It represents exactly the kind of high-quality, small-scale, community-integrated, and regulated residential provision that the Government, the DfE, Ofsted, and Kirklees Metropolitan Borough Council's own Sufficiency Strategy are actively seeking to promote, commission, and facilitate.

Kirklees Metropolitan Borough Council is respectfully, professionally, and confidently invited to grant the Certificate of Lawfulness for this home — and to play its part in delivering safe, stable, high-quality therapeutic care for three looked-after children within its own community.

This document forms one of seven documents in the planning and Ofsted registration suite. Together, these documents represent a comprehensive, evidence-based, and professionally prepared submission that fully addresses all relevant regulatory and planning requirements.

9. References and Source Documents

Kirklees Metropolitan Borough Council

- Kirklees Metropolitan Borough Council Children in Care Sufficiency Strategy (current version)
- Kirklees Metropolitan Borough Council Children in Care Market Position Statement
- Kirklees Metropolitan Borough Council Children's Social Care Annual Report
- Kirklees Local Plan (2019)

Department for Education

- DfE — Children Looked After in England including Adoptions (2024 and 2025 releases)
- DfE — Keeping Children Safe, Helping Families Thrive (2024)
- DfE — Securing Sufficient Accommodation for Looked-After Children: Statutory Guidance (2010)
- DfE — Guide to the Children's Homes Regulations including the Quality Standards (updated)

Ofsted, NAO and Parliament

- Ofsted — Main Findings: Children's Social Care in England 2024
- Ofsted — Yorkshire and Humber Regional Overview: Children's Social Care 2024
- National Audit Office — Managing Children's Residential Care, September 2025
- Together Trust — Unregistered Provision for Children in Care, 2024
- Parliamentary Written Statement — Planning for Accommodation for Looked After Children (DLUHC, May 2023)
- Autumn Budget 2024 — Children's Social Care Capital Investment (HM Treasury)

Legislation and Case Law

- Children Act 1989 — Section 22G (Statutory Sufficiency Duty)
- Children's Homes (England) Regulations 2015
- Town and Country Planning (Use Classes) Order 1987 (as amended)
- National Planning Policy Framework (NPPF), December 2024
- North Devon DC v The Secretary of State [2003] EWHC 157 Admin
- East Barnet UDC v British Transport Commission [1962] 2QB 484
- Gravesham BC v Secretary of State for the Environment [1982]
- Dale Road Appeal (APP/P1045/X/20/3263178)
- Egerton Appeal (APP/E2205/X/16/3161037)
- Appeal Ref. 2162636 (fear of crime precedent)

10. Declaration

I confirm that the information in this document is accurate and complete to the best of my knowledge and belief; that contact with Kirklees Metropolitan Borough Council Children's Social Care is in progress or has been completed as described in Section 3; and that this document is submitted in good faith in support of both the Ofsted registration and the C2 Use Class planning application for Broomsdale House.

Name	[To be completed by Responsible Individual or Registered Manager]
Job Title / Role	[To be completed upon submission]
Organisation	Broomsdale House
Home Type	3-Bedded Residential Children's Care Home — EBD (Medium Priority)
Address	23 Broomsdale Road, Batley, WF17 6PF
Date	[To be completed upon submission]
Signature	

This document should be read alongside the Statement of Purpose, Planning Statement, Management Plan, Placement Needs Document, Complaint Procedure, and Good Neighbour Procedure — all of which form part of the complete planning and registration suite for this home.

Prepared by C2 Homes Planning Consultancy on behalf of the Applicant · August 2026