



Frank 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 Frank House as a 3-bedded residential children's care home and a full planning application for change of use to Class C2 to Kirklees Council as Local Planning Authority. This document evidences contact with Kirklees Children's Social Care, provides comprehensive statistical evidence of need, and sets out the planning case.

38 Frank Lane
Dewsbury
WF12 0JN

Date: September 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 Frank House as a 3-bedded residential children's care home and a full planning application for change of use to Class C2 to Kirklees Council as Local Planning Authority (LPA). Kirklees is simultaneously the statutory Children's Social Care commissioner and the Local Planning Authority — uniquely placed to recognise the planning and sufficiency benefits of this application.

This document evidences four closely related matters:

- Contact made with Kirklees 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 the change of use to Class C2, including compliance with the Kirklees Local Plan (2019), the National Planning Policy Framework (August 2026), and the May 2023 Written Ministerial Statement.
- Evidence of how Frank House directly and specifically meets the identified local need and serves Kirklees 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, Management Plan, Placement Needs Document, Complaint Procedure, and Good Neighbour Procedure.

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

2. Relevant Local Authority

The property at 38 Frank Lane, Dewsbury, WF12 0JN falls within the administrative boundary of Kirklees Council — the metropolitan borough covering Huddersfield, Dewsbury, Batley, the Spenn Valley, the Colne and Holme Valleys, and surrounding West Yorkshire communities. The property is situated in the Thornhill area of Dewsbury. Kirklees Council is simultaneously the statutory Children's Social Care commissioner and the Local Planning Authority for this site.

Local Authority	Kirklees Council
Authority Type	Metropolitan Borough — 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 Council
Children's Services Address	Civic Centre 3, High Street, Huddersfield, HD1 2TG
Contact Telephone	01484 221000
Relevant Ward	Dewsbury South Ward, Kirklees Council
Parliamentary Constituency	Dewsbury and Batley
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 both the LPA and Children's Social Care commissioner, Kirklees is uniquely placed to recognise and act on both the planning and sufficiency dimensions of this application simultaneously. 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 Council Children's Social Care regarding the proposed provision at Frank House.

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 38 Frank Lane, Dewsbury, WF12 0JN as a 3-bedded EBD residential children's care home (medium priority); Kirklees'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 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

81,770	67%	44%
Children in care in England (DfE, March 2025)	Children in children's homes placed outside their LA (NAO, 2025)	LAC placed out-of-area (2025)

9,480	49%	£3.1bn
Children in registered homes (DfE, 2025)	Children in children's homes placed 20+ miles from home (NAO, 2025)	Residential care spend 2023–24 (NAO, 2025)

4.2 The Statutory Sufficiency Duty

Under Section 22G of the Children Act 1989, every top-tier local authority — including Kirklees 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.

The financial and human costs of failing this duty are significant: expensive out-of-borough placements; poorer outcomes for displaced children; 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	81,770 (DfE, year ending March 2025) — 67 per 10,000 children
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)
Children in children's homes placed away from home	67% outside their local authority; 49% more than 20 miles from home (NAO, September 2025)
Residential children's care spend 2023–24	£3.1 billion — nearly double the cost five years earlier (NAO, September 2025)
Government capital investment in children's homes	£90 million (Autumn Budget 2024, HM Treasury)
Yorkshire and the Humber LAC rate per 10,000 children	Above the England average (DfE 2024)
West Yorkshire out-of-area placement rate	Significant commissioning pressure across West Yorkshire authorities (DfE 2025)

Indicator	Figure & Source
West Yorkshire EBD residential provision	Documented regional undersupply relative to LAC population (Ofsted, 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.
- Significant increase in extra-familial harms: CSE, CCE, county lines, domestic violence, and exploitation — particularly acute in West Yorkshire.
- Rising poverty and cost-of-living pressure — particularly significant in the Kirklees area which includes areas of concentrated deprivation.
- Post-COVID-19 increase in complexity of presenting needs among children entering care.
- Growing numbers of children with EBD for whom foster care is no longer viable.
- A significant national shortage of regulated residential care places — driving up costs and out-of-area placements.

4.5 Kirklees Council: Local Sufficiency Data

Need Area	Evidence & Local Data
Rising CiC population in Kirklees	Dewsbury and the wider Kirklees district experience sustained and significant demand for children's social care services, driven by population growth, significant deprivation in parts of the district, and the complex social pressures affecting West Yorkshire families. Kirklees Council has an identified and documented need for in-area residential children's care placements, with significant numbers of looked-after children placed outside the district at considerable financial and human cost. Frank House provides a direct, high-quality, and immediately deliverable response to this identified need — keeping children from Kirklees and West Yorkshire within their own communities, close to their families, schools, and cultural connections.
Shortage of in-area residential placements	Kirklees Council's Sufficiency Strategy explicitly identifies an ongoing need for additional regulated residential children's care placements within the borough boundary. Placing children close to their families, community connections, cultural identities, and schools is a stated commissioning priority — one directly served by this home.
High out-of-area placement rate	44% of all looked-after children nationally are placed outside their home local authority (DfE 2025). West Yorkshire authorities, including Kirklees, face particular pressure from high demand for residential placements and a limited supply of suitable in-area homes. Out-of-area placements generate significant financial, educational, relational, and safeguarding costs. This home provides an immediate, direct, and measurable contribution to reducing this rate.

Need Area	Evidence & Local Data
EBD medium-priority residential need	Kirklees 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 identified need precisely and effectively.
West Yorkshire regional gap	West Yorkshire 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 district — losing proximity to family, schools, community, cultural, and faith connections. This home directly and immediately 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 policy direction.
The 3-Bedded Model and Kirklees	The 3-bedded residential care model is particularly valuable in a Kirklees context: its domestic scale fits naturally within established residential streets such as Frank Lane; the model generates a very small community impact; and the highly individualised care provided is particularly appropriate for the complex and high-need LAC population of West Yorkshire authorities.

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 fall firmly within Class C2 — confirmed by North Devon DC v Secretary of State [2003] EWHC 157 Admin and affirmed in numerous Planning Inspectorate appeals.

5.2 National Planning Policy Framework (August 2026)

NPPF Reference	Policy Content & Relevance
Policy HO1	Housing needs assessments must include looked after children, with evidence of need found in the local authority's Children's Social Care Sufficiency Strategy. Kirklees' Placement Sufficiency Strategy identifies the need this home meets.
Policy HO9	Community-based accommodation should be supported by a management plan showing how it will provide a safe and secure environment for residents — provided by the Comprehensive Management Plan.
Policy S4	Development within settlements should be approved unless the benefits are substantially outweighed by adverse effects. The site lies within the built-up area of Dewsbury.
Policies TR6, DP3 and P3	No unacceptable impact on highway safety; no change to the building's appearance or context; healthy living conditions for residents and neighbours.
May 2023 Ministerial Statement	LPAs must give 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

- 81,770 looked-after children in England (DfE, March 2025); 44% placed outside their local authority, rising to 67% of children in children's homes (NAO, 2025).
- Kirklees 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.
- Residential care costs have nearly doubled in five years to £3.1 billion a year (NAO, 2025), making in-area provision an urgent financial priority.

Part 2: Operational Compatibility

- Three children in a 3-bedded property — a small, domestic-scale residential care configuration.

- A maximum of 8 vehicle movements per weekday and 6 at weekends — comparable with a family occupying a house of this size.
- Normally 3 staff on-site, with a maximum of 4 for up to 30 minutes during the staggered morning handover.
- 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 Dewsbury — directly addressing Kirklees'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.
- The 3-bedded model addresses a specific commissioning need — the most highly individualised residential therapeutic care available, for children who need it most.
- Provider commits to active engagement with Kirklees commissioning and placement teams.
- Three children remain in Dewsbury — maintaining family, school, community, and cultural connections.
- Local employer contributing to the Dewsbury and Kirklees economy.
- Well-located: Dewsbury railway station provides direct rail access to Leeds, Huddersfield, and Manchester for children's school, health, and family contact needs.
- 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, communities, and schools. This home provides a direct, proportionate, and high-quality solution.

7. Financial Cost of Insufficient In-Area Provision

7.1 The National Financial Picture

The NAO'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. Metropolitan authorities in West Yorkshire, including Kirklees, face acute financial pressure from rising looked-after children numbers and high per-placement costs for out-of-area residential care.

When Kirklees Council is forced to place a child out-of-borough, the financial cost is directly attributable to the council's sufficiency deficit. Every new in-area placement directly reduces this financial burden.

7.2 The Human Cost

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. 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.

7.3 Regulatory Risk

Kirklees Council faces genuine regulatory risk from persistent failure to secure sufficient in-area provision. 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 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 38 Frank Lane, Dewsbury, WF12 0JN 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.
- That the proposal is supported by the Kirklees Local Plan (2019), the NPPF (2026), the May 2023 Ministerial Statement, established Planning Inspectorate precedent, and national and local statistical evidence.
- That the home will be regulated by Ofsted — providing robust, independent quality assurance.

8.2 Final Statement

Frank House, 38 Frank Lane, Dewsbury, WF12 0JN, 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 Council's own Sufficiency Strategy are actively seeking to facilitate.

Kirklees Council is respectfully, professionally, and confidently invited to grant planning permission — and to play its part in delivering safe, stable, high-quality therapeutic care for three looked-after children within its own community.

9. References and Source Documents

Kirklees Council

- Kirklees Council Placement Sufficiency Strategy (current version)
- Kirklees Council Market Position Statement
- Kirklees 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)

Ofsted, NAO and Parliament

- Ofsted — Main Findings: Children's Social Care in England 2024
- Ofsted — Children's social care in England 2024: regional data (Yorkshire and the Humber)
- National Audit Office — Managing Children's Residential Care, September 2025
- 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), August 2026
- North Devon DC v The Secretary of State [2003] EWHC 157 Admin
- Kirklees Local Plan Strategy and Policies (adopted 2019) — Policies LP1, LP2, LP11, LP21, LP22, LP24 and LP52
- Dale Road Appeal (APP/P1045/X/20/3263178) | Egerton Appeal (APP/E2205/X/16/3161037)
- Kirklees Highways Design Guide SPD
- West Midlands Probation Committee v Secretary of State for the Environment (1998) 76 P&CR 589 (fear of crime)

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 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 full planning application for change of use to Class C2 for Frank House.

Name	[To be completed by Responsible Individual or Registered Manager]
Job Title / Role	[To be completed upon submission]
Organisation	Frank House
Home Type	3-Bedded Residential Children's Care Home — EBD (Medium Priority)
Address	38 Frank Lane, Dewsbury, WF12 0JN
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.

This document, together with the six companion documents in the Frank House planning and registration suite, provides a comprehensive, evidenced, and professionally prepared basis for both the Ofsted registration and the full planning application for change of use to Class C2. The applicant is confident in the quality and completeness of this submission.

C2 Homes Planning Consultancy is available to provide further information, clarification, or supplementary evidence as required by Kirklees Council's planning department or Ofsted.

The applicant is committed to transparent, co-operative, and professional engagement with all regulatory and statutory bodies throughout the registration and planning process.

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