

OPERATIONAL RESPONSE TO CONSULTATION REPRESENTATIONS

Prepared on behalf of: Praveen Videlpap

Site address: 29 Cartmel Close, Unsworth, Bury, BL9 8JA

Application type: Full Planning Permission

Prepared by: Inhaus Planning, Suite Ra01, 195–197 Wood Street, London, E17 3NU

1.0 Purpose of this Document

This Operational Response to Consultation Representations has been prepared by Inhaus Planning on behalf of Praveen Videlpap in response to the further representations submitted on behalf of residents of Cartmel Close dated 17 August 2026. It addresses in forensic operational detail each specific concern raised about the practical management of the home, including staffing at handover, agency and relief staff, school transport, professional visitors, unplanned attendance, emergency access, and the use of the pedestrian route and ginnel at the eastern end of Cartmel Close.

This document should be read alongside the Planning Statement, the Parking Management Plan, and the Sustainable Travel Policy.

2.0 The Four-Staff-at-Handover Scenario

Residents' representations assert that a shift changeover may involve two outgoing and two incoming staff members simultaneously, producing four staff vehicles that cannot be accommodated within two off-street parking spaces.

The applicant addresses this directly. The 1:1 staffing ratio refers to the on-duty supervisory ratio during normal operations, not to the number of staff physically present during a handover briefing. In practice, a handover at a two-place home involves one outgoing staff member briefing one incoming staff member. The briefing takes between 15 and 30 minutes. During this window, two vehicles are on the driveway: one belonging to the outgoing staff member and one to the incoming staff member. The outgoing staff member departs on completion of the handover. At no point during a standard handover do four staff vehicles need to be present simultaneously.

The 1:1 ratio is maintained throughout the handover because the outgoing staff member remains on duty and responsible for supervision until the handover is formally concluded. The incoming staff member does not take responsibility until the outgoing staff member has departed. This is precisely the function the handover process performs: continuity of supervision is guaranteed throughout. There is no window during which the ratio is breached.

3.0 Agency, Bank, and Relief Staff

Residents cite DfE workforce evidence on sector recruitment and retention difficulties and suggest that agency or bank staff cover at short notice may produce materially different patterns of arrival from those described in the applicant's documents.

The extended 24-to-48-hour shift pattern significantly reduces the reliance on short-notice cover: because shifts are longer, there are fewer shift transitions per week and therefore fewer occasions requiring emergency relief staff. When agency or bank staff are required, the same parking requirements apply as for permanent employees. Any agency or bank staff member attending will be briefed on the home's parking requirements before arrival, both through the agency's contractor briefing and through direct communication from the on-call senior manager. Compliance with the Parking

Management Plan is a condition of engagement for all agency and bank staff.

4.0 School Transport

Residents ask where school transport will park if the driveway is occupied during a handover. School transport times are fixed and known in advance. The Parking Management Plan requires changeovers to be scheduled to avoid overlap with school collection times wherever practicable. The Registered Manager reviews the school transport schedule at the start of each week and plans changeovers accordingly.

In the event that a changeover and school collection cannot be separated — for example, in an emergency cover scenario — the school transport vehicle will be directed to the driveway while the handover vehicle parks briefly on Cartmel Close in accordance with the Parking Management Plan. This scenario results in one vehicle briefly on Cartmel Close, not multiple. School transport in this context is typically a private hire taxi collecting one young person, not a large minibus requiring extended waiting.

5.0 Professional Visitors, Deliveries, and Unplanned Attendance

Professional visits are arranged in advance through the appointments system and are not scheduled to coincide with changeovers or school transport. The Registered Manager's weekly scheduling review identifies all known attendance and manages conflicts before they arise.

Routine deliveries — food, household supplies, parcels — do not require a parked vehicle. The delivery driver stops briefly at the kerb, delivers, and departs: the same pattern as any family home on Cartmel Close. Contractor attendance is booked in advance and scheduled outside changeover and school transport windows.

Emergency or unplanned professional attendance — social workers, safeguarding professionals, Greater Manchester Police, or emergency services — is by definition unscheduled. The applicant does not suggest otherwise. Emergency service vehicles attending any address on Cartmel Close will park in the manner required by the emergency, as they do at any residential address. This is not a consequence of the planning use that can be mitigated by parking policy and is not unique to children's homes. The test under paragraph 116 of the NPPF (December 2024) is whether the residual cumulative impact is severe. Emergency attendance at a residential care home does not constitute a material and predictable burden on the highway that approaches this threshold.

6.0 The Pedestrian Route, the Ginnel, and the Footpath to Sunny Bank Road

Residents draw particular attention to the footpath and ginnel at the eastern end of Cartmel Close that provides a pedestrian through-route to Sunny Bank Road, used by schoolchildren and other pedestrians accessing local schools and play facilities.

The applicant accepts that this pedestrian route gives Cartmel Close a higher level of pedestrian activity than a typical cul-de-sac and that it makes the management of any on-street parking particularly important. The Parking Management Plan specifically requires any vehicle that parks on Cartmel Close during a changeover to park in the section of road closest to Randale Drive, away from the turning head, ginnel access, and eastern footway, without obstructing the footway at any point. Staff receive a specific briefing on this requirement that explains the function of the pedestrian route and identifies the section of footway that must remain clear.

The pedestrian conditions on Cartmel Close, including the existing reduction in footway width caused by on-street parking, are pre-existing. The proposed home will contribute, at most, one vehicle briefly

during daily changeovers, parked in a specified location that does not obstruct the footway or the ginnel. This is a negligible and managed addition to pre-existing conditions.

7.0 Police and Emergency Service Attendance

Greater Manchester Police and other emergency services attend residential care homes in the same way they attend any residential address: in response to a call, parking wherever is necessary to access the property. This is true of children's homes, foster placements, supported living, and ordinary family homes. The planning use does not create a unique or disproportionate burden of emergency attendance.

The home will maintain a proactive relationship with Greater Manchester Police's neighbourhood policing team. Where a young person's risk profile suggests a higher likelihood of police involvement, this will be flagged to the local policing team in advance so that any attendance can be coordinated where possible. Emergency attendance is not a reason to refuse planning permission for a two-place children's home that is otherwise consistent with the development plan and national policy.

8.0 The Small Family Characterisation

Residents challenge the applicant's description of the home as comparable to a small family household, noting that the applicant's own documents describe a continuously staffed operation with formal shift handovers, a Registered Manager, professional visitors, incident procedures, and possible police involvement.

The comparison to a family household is made in the specific context of planning impact assessment — noise, traffic generation, visual character, and amenity — not in the context of the internal management of the home. In those planning terms, two residents generate a level of noise, traffic, and physical presence comparable to a small family. This is a well-established and legitimate principle in planning policy and practice, supported by the May 2023 Ministerial Statement.

The internal management of the home is, by design and regulatory requirement, more structured than that of a family household. That is not a planning objection; it is a safeguarding strength. The regulatory framework of the Children's Homes (England) Regulations 2015 and Ofsted inspection ensures that children in residential care receive a higher standard of care and oversight than an unregulated family setting. The professional management of the home does not increase its planning impact on Cartmel Close; in many respects, particularly in relation to noise and behaviour management, it reduces it.

9.0 The Applicant's Positive Planning Case

The applicant does not produce an independent highway report, parking survey, or swept-path assessment in response to those produced by residents. The applicant's case is that the proposed home will not materially worsen the pre-existing conditions on Cartmel Close. The residual cumulative impact of the proposed use — one vehicle, briefly, during daily changeovers, parked in a managed location — measured against an existing baseline of 8 to 16 parked vehicles, does not approach the severe threshold in paragraph 116 of the NPPF (December 2024). The Council's highways officers are the appropriate technical assessors of this question.

The positive planning case for this application remains strong. With 81,770 looked-after children in England as at 31 March 2025, including 9,480 in children's homes, a figure that rose 9% in a single year, the national placement shortage is acute and well-evidenced. The two-place home at 29 Cartmel Close will provide a safe, stable, and nurturing environment for two young people in the Greater Manchester area. The applicant invites the Council to grant permission.

10.0 Conclusion

This Operational Response has addressed in detail each specific concern raised by residents of Cartmel Close in their representations dated 17 August 2026. The four-staff-at-handover scenario does not reflect the operational model of a two-place home; the 1:1 ratio is maintained throughout changeovers by the outgoing staff member who remains on duty until departure. Agency and bank staff are subject to the same parking requirements as permanent employees. School transport is coordinated with changeover scheduling. Professional visitors are managed through an appointments system that prevents conflicts. Emergency attendance is addressed through proactive police liaison and does not constitute a planning ground for refusal. The pedestrian route to Sunny Bank Road via the ginnel is specifically protected by the Parking Management Plan requirements on parking location.

The applicant respectfully maintains that the proposed development is acceptable in planning terms and invites Bury Metropolitan Borough Council to grant Full Planning Permission.