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From: L.Bloor (Horton Lodge) <[REDACTED]>
Sent: 30 July 2026 15:32
To: Planning Comments (SMDC)
Cc: Cox, Jo (Cllr)
Subject: Horton Lodge Response to SMD/2026/0250

Categories: [REDACTED]

Dear Planning Support

I am writing on behalf of Horton Lodge Special School in relation to planning application SMD/2026/0250 concerning the proposed change of use at the former John Munroe Independent Hospital site from Use Class C2 to Use Class C2A (Secure Residential Institution).

Horton Lodge Special School is located in very close proximity to the application site and serves children and young people with a wide range of complex special educational needs and disabilities. In addition to providing day education, the school operates a residential provision, meaning that highly vulnerable children are present on site beyond the normal school day and overnight alongside a small staff team. Given the significant vulnerabilities of our pupils, we believe that any development which could have implications for safeguarding, wellbeing, security or public confidence must be subject to particularly rigorous scrutiny.

Whilst we recognise that the site has historically operated within Use Class C2, we consider the proposed change to Use Class C2A to represent a materially different form of use, occupation and management. The proposal introduces the potential for a secure residential institution in immediate proximity to a specialist educational setting, yet the application provides very limited information regarding how this change would be managed. As submitted, the proposal lacks sufficient detail to allow neighbouring organisations, parents, staff or the wider community to fully understand the proposed development and its implications.

Of particular concern is the absence of information relating to safeguarding and risk management. The application provides no clear detail regarding security arrangements, staffing levels, operational policies, incident response procedures, emergency management arrangements or the measures that would be implemented to ensure compatibility with neighbouring uses. Given the nature of the proposed use, these matters are fundamental considerations.

We are also concerned about the potential impact on staff and parental confidence. Horton Lodge provides a safe, therapeutic and nurturing environment for children with some of the most complex learning, communication, sensory, physical and medical needs. The ambiguity within the application is concerning, particularly given the long-term nature of any proposed change of use. While specific operators and management arrangements may change over time, the planning permission would remain in place, creating ongoing uncertainty regarding future ownership, governance, operational standards and accountability. This uncertainty is likely to generate understandable concerns amongst parents, carers and staff.

The proposed change of use has the potential to negatively impact on the therapeutic aims of our provision and the extensive use of outdoor learning environments. Outdoor education forms a significant part of our curriculum and therapeutic approach, supporting pupil wellbeing and regulation. Activities at the John Munroe site are clearly audible from within the school grounds and the site is visible from areas used by pupils. Based on previous experience, sounds originating from the site have at times been distressing and unsettling for some of our children and young people. Any increase in such impacts would have the potential to affect pupil wellbeing and feelings of safety.

We are also concerned that the application does not adequately assess the potential traffic and transport implications associated with a C2A use. A secure residential institution has the potential to generate materially different traffic patterns. The roads serving both the application site and neighbouring schools and residential properties are relatively narrow and already experience significant traffic volumes. As a special school supporting pupils with complex medical needs, ambulances and other healthcare transport vehicles regularly require access to our site. Increased traffic could adversely affect access to both sites, creating additional pressures on an already constrained road network and potentially impacting upon the safety and wellbeing of pupils, families, staff and residents.

We note that the proposed operator has a very limited operating history. More importantly, however, the change of use being sought would create a permanent planning position that could enable future operators, management structures or ownership arrangements which are currently unknown. The application therefore needs to be assessed not only on the basis of current intentions but also in relation to the full range of uses and operational models that could be facilitated through a C2A consent.

We respectfully request that the Council gives these matters careful consideration.

Yours sincerely

Lucy Bloor - Headteacher



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