PLANNING BY DESIGN
FROM CONCEPT TO COMPLETION

Design and Access Statement

2B Umfreville Road, Hornsey, London, N4 1SB

Change of use from C3 to C2 Children's home

On Behalf of Care Steps UK

Prepared by **Planning By Design**

Application

Planning By Design (The agent) has been instructed to act on behalf of Care Steps UK (the applicant) to submit a planning application to Haringey Council (the Local Planning Authority) for a Change of use from C3 (single dwellinghouse) to C2 (Residential institutions) Children's care home. at: 2B Umfreville Road, Hornsey, London, N4 1SB (the site).

In support of this application, the following Design and Access Statement has been constructed to demonstrate the suitability of this site for this proposal and evaluate its accordance with national and local planning policy along with supplementary design guidance.

Site Location

The site is located in the northern part of London within the Harringay area, approximately midway between Crouch End and South Tottenham. The surrounding properties are predominantly two-storey terraced houses, with limited private open space to the front and modest garden plots at the rear. Tree cover in the immediate vicinity is sparse, but small green pockets such as Chestnuts Park and Downhills Park are accessible nearby.

The property is located within a 'Family Housing Protection Zone' which restrict further residential conversions in areas identified as already having a high concentration of converted properties.

It is located on the southern side of Umfreville Road, comprising a two-storey building. The property is not listed nor does it fall within a conservation area. The site has a PTAL rating of 3 which is average level of access to public transport. It is also located within walking distance to Harringay Train Station. The site is located within Flood Zone 1 which has a low probability of flooding from seas, rivers and surface water.

The property benefits from good proximity to local amenities and services. The area is primarily residential in nature but lies close to several key commercial and mixed-use zones. Just to the west is Green Lanes, a vibrant high street with a variety of shops, restaurants, and supermarkets, including a nearby Sainsbury's. Educational facilities such as Park View School and Chestnuts Primary School are within walking distance, and healthcare and community services are also relatively accessible. The character of the surrounding area reflects a diverse, mixed community with a strong local identity, shaped by both long-standing residents and more recent urban regeneration efforts. Public green spaces, leisure centres, and retail options are all conveniently located, enhancing the liveability of the location.

In terms of accessibility, the property is positioned on the south side of Umfreville Road. The location connects well with the broader road network. Public transport connections are excellent, with Harringay Green Lanes Overground Station a short walk away, and further Underground connections available via Manor House and Seven Sisters stations, both within easy reach.

The existing property is a two-storey house, forming one half of a semi-detached pair, with its principal elevation facing onto Umfreville Road. The property includes a modest bay window on the ground floor and a pitched roof typical of the surrounding Victorian and interwar housing stock. On-street parking is available.

Internally, the house includes living, kitchen, and dining spaces on the ground floor, with 2 bedrooms and a study/playroom above. The architectural character and form are consistent with the local vernacular, contributing to the cohesive streetscape.

The Proposal

Planning permission is sought for Change of use from C3 (single dwellinghouse) to C2 (Residential institutions) Children's care home.

Background to Care Steps UK Ltd

Care Steps UK Ltd is a new Therapeutic Residential Children's Care provider with future plans to grow into supported living. Our overarching aim is to care for children and young people aged 8–18 years who are Looked After by the Local Authority, preparing them to transition from our homes into foster care, or into adulthood and independence.

The provision will be run by an experienced and diverse staff team comprising of:

1. Support Workers
2. Senior Support Workers
3. Deputy Manager
4. Home Manager
5. Psychologist

Aims and Objectives

Care Steps UK Ltd aims to provide children and young people with emotional or behavioural difficulties ('EBD') a safe, therapeutic, and nurturing environment in which to develop their full potential. Our objective is to deliver high-quality care in a warm and welcoming home environment, tailored to the needs of each child or young person.

Our care programmes will focus on five elements of personal development:

- Emotional
- Social
- Intellectual
- Health & Wellbeing
- Cultural

This framework aligns with the Every Child Matters agenda, the Children Act 1989, the Care Leavers Charter, and the Children's Homes (England) Regulations 2018. We work in partnership with parents/families, Local Authorities, education professionals, CAMHS, therapists, and other agencies.

Staffing Arrangements

Staffing ratios will be based on assessed needs, typically a minimum of 1:1 support for each child or young person, with higher ratios provided where required to ensure safety, wellbeing, and therapeutic care.

To meet Ofsted requirements, the homes will be registered under the Children's Homes (England) Regulations 2018. As such, planning consent is required to change the use class from C3 (Dwelling House) to C2 (Residential Care Home).

Staffing and Rota Arrangements

The staffing structure includes a Home Manager, Deputy Manager, Senior Residential Support Workers (Snr RSWs), Residential Support Workers (RSWs), and Waking Night staff. A psychologist will also support the therapeutic model.

To provide consistency of care while minimising local disruption, staff movements are structured:

- Staff shift changes typically occur at 7:00am and 10:00pm
- There are always 4 staff on duty across both homes at any time
- The Home Manager and Deputy Manager work between 9:00am and 5:00pm, Monday to Friday.
- Waking Night staff are on duty between 10:00pm and 7:00am.
- The majority of staff are expected to use public transport, limiting vehicle use.

This structured rota ensures continuity of care, safeguards the children and young people, and reduces unnecessary traffic or parking impact on neighbours. Staffing ratios are maintained at a minimum of 1:1, with higher levels of support where needed.

Children and Young People who will live at the homes

We intend to provide a home for up to 2 children and young people at any one time, aged between 8 and 18. Care Steps UK Ltd has a robust risk assessment process to ensure each child or young person is appropriately matched to the home and receives the correct level of support.

Typical presenting needs may include:

- Challenging behaviours
- Exclusion from school
- History of abuse or exploitation
- Substance misuse
- Mental health needs

Our therapeutic approach is designed to enable children and young people to step down into foster care, or to develop the life skills needed to transition successfully into independent living as adults.

No 2B home includes:

- 2 children's bedrooms
- 1 upstairs bathroom
- 1 downstairs WC
- 1 office/therapy room
- 1 living room
- 1 kitchen/dining room
- A garden

There is parking at the rear, alongside 2 on-street permits. Visitor permits may also be obtained from the council when necessary. However, we expect most staff to use the excellent public transport links in the area (Underground, Overground, and buses). Safe bicycle storage is also provided. The development would therefore be car free, noting the existing CPZ in place. A condition can be required to ensure details of the provision of cycle parking is provided.

Visitors

As with any family home, children and young people are encouraged to maintain positive friendships and relationships. Visitor access is allowed after school hours until 9:30pm during term time, and between 10:30am and 10:00pm at weekends and during holidays, subject to risk assessment, social worker approval, and individual support plans.

Visitors will be monitored through ID checks, signing the visitor book, and restrictions where necessary to safeguard residents and staff. Professional visitors such as Social Workers, CAMHS, and YOT workers will also attend as required.

Community, Safeguarding and General Arrangements

House rules are provided to all children and young people on admission. These encourage respect for neighbours and the local community. Should any concerns arise, the management team will proactively liaise with local residents to address issues. Complaints will be handled in line with our Complaints Policy, and outcomes will be communicated in a timely manner.

We are committed to safeguarding and community integration, working closely with the Local Authority, Haringey Council, Ofsted, and the local neighbourhood policing team.

- Weekly Health and Safety checks will include:
- Room checks
- Water temperature checks
- Fire safety checks
- Health and safety walkarounds

- Regular fire evacuation drills

A responsive maintenance system ensures any issues are logged, prioritised, and repaired within appropriate timescales.

Planning History

There are two applications of relevance including:

- HGY/2025/2003 – 2B Umfreville Road, Hornsey, London, N4 1SB – Change of use from C3 (single dwellinghouse) to C2 (Residential institutions) Children's care home – Refused
- HGY/2025/2002 – 2A Umfreville Road, Hornsey, London, N4 1SB – Change of use from C3 (single dwellinghouse) to C2 (Residential institutions) Children's care home – Refused

Both applications were refused for an identical single reason – the applicant had not demonstrated a localised need for additional C2 children's home capacity within this part of Harringay and that, in the context of the Family Housing Protection Zone, insufficient justification was provided for the loss of family housing.

Planning Policy

National Planning Policy Framework 2024 (NPPF)

Paragraph 39 confirms that Local Planning Authorities should approach decisions on proposed developments in a positive and creative way. They should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible.

Paragraph 48 confirms that planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the Development Plan and is a material consideration in planning decisions. This paragraph also states that decisions on applications should be made as quickly as possible, and within statutory timescales, unless a longer period has been agreed by the applicant in writing.

Paragraph 61 states that planning should address the needs of groups with specific housing requirements.

Paragraph 63 states that planning policies should assess and reflect the housing needs of different groups, including *"looked after children"*.

Paragraph 96 states that planning should achieve healthy, inclusive and safe places that promote social interaction, safety and healthy lives.

Paragraph 98 states that planning policies should plan positively for community facilities and local services and ensure an integrated approach to housing, economic uses and community facilities.

Paragraph 101 states that local planning authorities should give significant weight to new or expanded public service infrastructure when considering development proposals.

Paragraph 102(a) states that planning should consider the safety of children and vulnerable users in assessing development proposals.

Paragraph 124 advises that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions

Paragraph 129 highlights that Planning policies and decisions should support development that makes efficient use of land, taking into account:

a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
b) Local market conditions and viability;
c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
d) The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
e) The importance of securing well-designed, attractive and healthy places.

The National Planning Policy Framework states that planning should aim to ensure that developments function effectively and contribute to the overall quality of an area. Development must respond to local character and history, reflect the identity of local surroundings and materials and should be visually attractive as a result of good architecture and landscaping.

Paragraph 135 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Development should:

a) Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
b) Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) Be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
e) Optimise the potential of the Site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;
f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

London Plan (2021)

London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, in specific stating that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing.

London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.

Local Plan (2017)

Policy DM1 'Delivering High Quality Design' states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid overlooking and loss of privacy and detriment to amenity of neighbouring resident.

Policy DM12 'Housing Design and Quality' states that extensions or alterations to residential buildings, including roof extensions will be required to be of a high, site specific, and sensitive design quality, and respect and/ or complement the form, setting, period, architectural characteristics, detailing of the original building, including external features such as chimneys, and porches. High quality matching or complementary materials should be used appropriately and sensitively in relation to the context. DPD Policy DM1 'Delivering High Quality Design' requires development proposals to relate positively to their locality.

Policy DM15 ´Specialist Housing´ states that proposals for new special needs housing must show; that there is an established local need for the type of special needs housing being sought, with regard to Haringey's Housing Strategy and Older People Strategy; The standard of housing and facilities are suitable for intended occupiers in terms of: provision of amenity space, parking and servicing, the level of independence, and the level of supervision, management, and care/support; That there is a good public transport accessibility level, and good access to local shops; and lastly that the proposed development would not be detrimental to the amenity of the local area or to local services.

Policy DM15 part B(d) specifies that proposals for special needs housing must demonstrate that the impact of the proposed development would not be detrimental to the amenity of the local area or to local services.

Policy SP11 ´Design' requires the highest standard of design that respects local context and character and historic significance.

Haringey Looked After Children Sufficiency Strategy (2021–2023)

The Haringey Looked After Children Sufficiency Strategy (2021–2023) remains the most up-to-date statement of strategic intent, makes clear that there is a significant and ongoing shortage of local residential placements for children in care. The strategy explicitly identifies the need to "increase the number and range of local placements in and close to Haringey", particularly for children requiring residential care (p.21).

The document clearly states:

- High levels of out-of-borough placements: As of the strategy's publication, almost half (48%) of all children in care were placed over 20 miles from Haringey, which is above the London average. This distance disrupts continuity of education, family contact, and local support systems.
- Lack of appropriate residential provision: The strategy states that residential care is the placement type with the greatest distance from Haringey, and that "the market is not delivering" the local placement options needed (p.14).
- Strategic priority to expand local provision: A central goal of the strategy is to "work with local providers to increase provision within Haringey", especially small homes for children with complex needs (p.14, p.21). It emphasises that localised, therapeutic provision is essential to achieving placement stability, safety, and improved outcomes for children.

The proposed children's home at 2B Umfreville Road would directly address these strategic priorities by providing a small-scale, therapeutic residential setting within the borough, supporting the Council's aim of developing locally accessible, high-quality provision. The scale and model of the proposal are aligned with the strategy's call for "smaller homes offering high levels of care and support" (p.14), capable of meeting more complex needs without necessitating distant placements.

Therefore, based solely on the adopted LAC Sufficiency Strategy, the application responds to a recognised and ongoing shortfall in provision, and is compliant with Policy DM15 (B[a]) of the Haringey Development Management DPD.

Assessment

The previous application for the change of use of 2B Umfreville Road from a Class C3 (Dwellinghouse) to a Class C2 (Residential Institution – Children's Home) was refused by the London Borough of Haringey under application reference HGY/2025/2003.

The following section outlines in suitable detail the principal planning concerns identified in the delegated officer report and decision.

1. Lack of Demonstrated Local Need

The fundamental reason for refusal was the failure to demonstrate an *established local need* for the proposed specialist housing, contrary to Policy DM15 (Part B[a]) of Haringey's Development Management DPD. This policy requires that applications for special needs housing demonstrate need regarding local strategic documents, including the Haringey Housing Strategy.

In the refused application, the Council's Children's Services team raised significant objections, asserting that Haringey already had enough children's homes (11 operational and 3 with permission but pending Ofsted registration), totalling 14 homes. They stated this was adequate to meet both current and projected demand and aligned with the borough's strategic aim of placing children in family-based settings where possible. While the applicant referenced national shortages and lack of London-wide provision, the Council maintained its position that planning applications must be justified by local demand in the specific area of the borough in question.

The delegated report gave "great weight" to the formal objection from the Children's Services team and found that the application failed to include a sufficiently detailed spatial or demographic needs assessment that would justify the introduction of a children's home in this location. The application was also not supported by evidence of pre-application engagement with the Council regarding local need.

The borough currently has 11 Ofsted-registered children's homes, with 3 additional homes having received planning approval and pending Ofsted registration. This brings the total to 14 homes subject to Ofsted approval, which is sufficient to meet the current and projected demand for residential placements. Moreover, the number of children entering care in Haringey is declining, and the borough's strategic priority is to support children in family-based settings, such as foster care. These environments are proven to offer better outcomes for children, including stronger emotional development, improved social integration, and a greater sense of belonging. The addition of another residential children's home is unnecessary and could lead to an oversupply of such facilities.

2. Location within Family Housing Protection Zone

Although Policy DM15 does not expressly refer to the loss of family housing, the officer's report emphasised that the application site lies within a designated *Family Housing Protection Zone*. These areas were established through a 2017 Article 4 Direction to restrict conversions of single-family dwellings in neighbourhoods already under pressure from non-family uses.

While the policy framework does not preclude the change of use in such areas, the presence of the site within this protected zone reinforces the need for robust justification for any conversion. The Council concluded that in the absence of demonstrated need, the proposal risked undermining the objectives of the Protection Zone by facilitating the erosion of family housing stock.

Justification

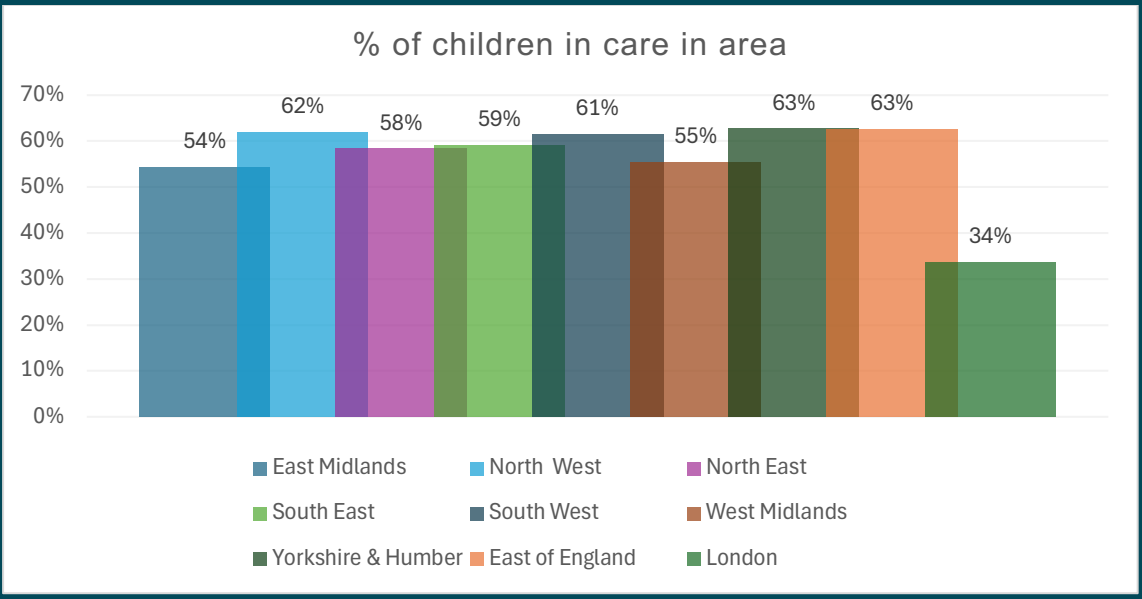
There are currently 11 registered homes in area offering a maximum of 48 registered beds. The national occupancy rate for children's homes is 80% occupancy (Sufficiency.org.uk Nov 2024) meaning there are likely to be circa. 38 children living in these homes.

Haringey Council declared in a FOI (Oct 2024) that they had 27 children placed in external residential children's homes and 5 or less placed in their own children's home. In a further FOI (Nov 2025) the council declared 24 children in external residential children's homes and 5 or under living their own 6 bedded children's home.

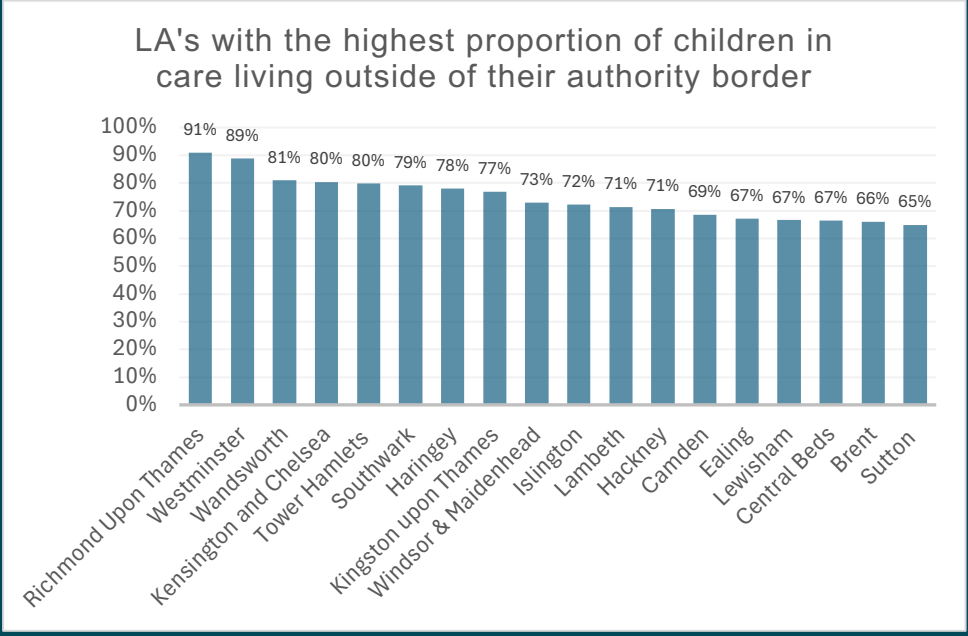
This suggests that the council has a combined total of 24 to 29 children in residential children's homes – an 11% reduction but still a significant cohort of children.

How many Haringey children in care are living in the local area

An FOI in April 2025 declared that Haringey Council was responsible for 315 children in care, of these children 78% are living out of area which equates to 246 children.



The London average is 66% with Haringey having the 7th highest proportion of children living out of area out of all the London boroughs.



Ranked in order, Haringey's children are placed in Enfield, Waltham Forest, Havering, Essex, Hackney, Hertfordshire, Redbridge, Barking and Dagenham, Islington, Barnet and also Luton, Camden, Bromley, Surrey, with small numbers in other areas.

Using this indicative data, it is highly likely that circa. 21 children placed in children's homes out of area probably leaving only 6 to 11 children living in borough. A FOI sent in Nov 2025 confirmed that only 5 or under children in residential children's homes are placed in borough with 24 living outside of the borough.

Local Authorities who have children placed in Haringey

Across London boroughs, children and young people are placed cross border; Newham, Waltham Forest, Havering, Westminster, Camden, Hackney, Islington and Milton Keynes have all stated that they have their children placed in Haringey. Five of these boroughs are where Haringey children are placing their children in care - an unintentional arrangement based on limited local and regional sufficiency strategies.

Commissioned Arrangements

Care Steps would prefer to have local children in their homes as it allows children to maintain and improve relationships with family and friends, continue to attend their school and receive local heath offer. The organisation would be pleased to work closely with Haringey to offer spaces in these homes to local children in the first instance to improve the opportunity of these children and young people returning home or finding a setting more appropriate for their care plan.

Sufficiency Duty

The Statutory duty in section 22G of the Children Act 1989 states that a Council must secure, sufficient accommodation for looked after children within their local authority area ("the sufficiency duty"), along with those in respect of whom they are unable to make arrangements under section 22C (children not placed with individuals through fostering, adoption etc). It sets out the duty of a Local Authority to take steps to secure, as far as reasonably practicable, sufficient accommodation for looked after children within their local authority area.

Currently, Haringey cannot meet this duty with over 78% of all children in care living outside of the local authority area and at least 83% of children in children's homes living out of borough. It isn't clear why the council isn't using the local external homes and instead placing children and young people as far as Surrey, Essex and Hertfordshire. This provision will offer an opportunity to reduce this over reliance of children's homes outside of the area.

Sub-regional sufficiency - bordering boroughs

Local Authority name	All CYP in children's homes	Children's home places in area at 80% occupancy average	% of need met in area
Waltham Forest	24	28	117%
Enfield	43	45	105%
Haringey	27	35	130%
Camden	30	18	60%
Barnet	45	30	67%
Islington	11	4	36%
Hackney	31	2	6%
Total	194	162	84%

When we consider the total number of children in mainstream children's homes in Haringey and the 6 bordering boroughs there are 162 usable beds to support the need for 194 children or young people requiring this type of care. This means that if all the usable beds were taken by these 7 boroughs, then only 84% of need would be met, leaving the area with 16% less provision than required.

Type of Provision

Off the 35 mainstream homes withing the 7-borough area only 5 are homes offering intensive support to 1 or 2 complex children. In Haringey there are only 2 homes offering this type of support. These small homes are more able to support both increased complexity and same day referrals due to increased matching potential.

In line with Paragraphs 61, 63, and 98 of the NPPF (2024), which require that planning policies positively respond to the needs of specific groups — including looked-after children — and that planning systems enable delivery of appropriate community facilities, the application

contributes to a critical area of unmet need. Furthermore, Paragraph 101 of the NPPF requires that significant weight be given to new or expanded public service infrastructure, which this proposal constitutes.

Accordingly, the development complies with Policy DM15(B)(a), meets the aims of the Children Act 1989, and is supported by the broader objectives of the National Planning Policy Framework (2024) in promoting inclusive, responsive and need-led development.

3. Interdependency and Operational Concerns

The application was submitted concurrently with a similar application for the adjoining property at 2A Umfreville Road as is the current case. Children's Services expressed concern that, despite being separately registered, the two homes would be operationally interdependent — particularly in terms of staffing — potentially leading to resource stretching, especially in emergencies. While the applicant indicated that staff would be assigned independently to each home, the Council maintained that the close proximity of the two sites made this interdependence likely and problematic.

This raised concerns about whether the proposal could deliver truly independent care environments and meet the operational standards expected of such facilities.

While Care Steps have indicated in additional documents submitted that their intention is to apply for dual registration and to assign staff and children to specific properties, the operational model described in the proposals remains interlinked. There is still a risk of inter-dependency as the properties will be in close proximity, leading to potential that staff will be stretched across the two and which is envisaged could lead to vulnerabilities in staffing quotas particularly in scenarios requiring emergency cover or staff shortages.

Ofsted Registration

The organisation is committed to ensuring both sites are suitably staffed and managed. Having two independently operated homes with a single manager will allow for better matching for children with complex support needs. The proximity of the homes should not exacerbate any of the staff shortage scenarios. Ultimately it will be the very stringent Ofsted registration and inspection process that will ensure that adequate and well-supported and trained staffing is in place.

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The proposal fully accords with Policy DM15(B) of the Haringey Development Management DPD. Part (b) of the policy requires that proposals for special needs housing demonstrate that "the standard of housing and facilities are suitable for intended occupiers" in terms of care and support. The provider's operational model includes waking night staff, a full-time manager, 1:1 staffing ratios, and therapeutic input from psychologists – all of which exceed the baseline requirements and are proportionate to the needs of the intended residents.

Additionally, the proposals align with the aims of the National Planning Policy Framework (2024), particularly Paragraphs 96 and 98, which support developments that foster inclusive, safe, and well-supported environments for vulnerable groups. Paragraph 101 further emphasises that significant weight should be given to new or expanded public service infrastructure – including children's care homes – where these meet an identified need.

There is no evidence that the dual proposal would give rise to any unacceptable harm to residential amenity, character, or local services, and the arrangements proposed fall within the scope of acceptable operational flexibility in a residential context. Concerns about staffing resilience and dependency are best addressed through the robust regulatory oversight of the care sector and are not sufficient to warrant refusal under planning policy.

4. Perceived Crime and Safety Issues

Objections were also received from Councillors and local residents who argued that the area had elevated levels of crime and anti-social behaviour, making it an unsuitable environment for vulnerable children. Children's Services echoed this concern, stating the location was in close proximity to an address known for high levels of criminal activity.

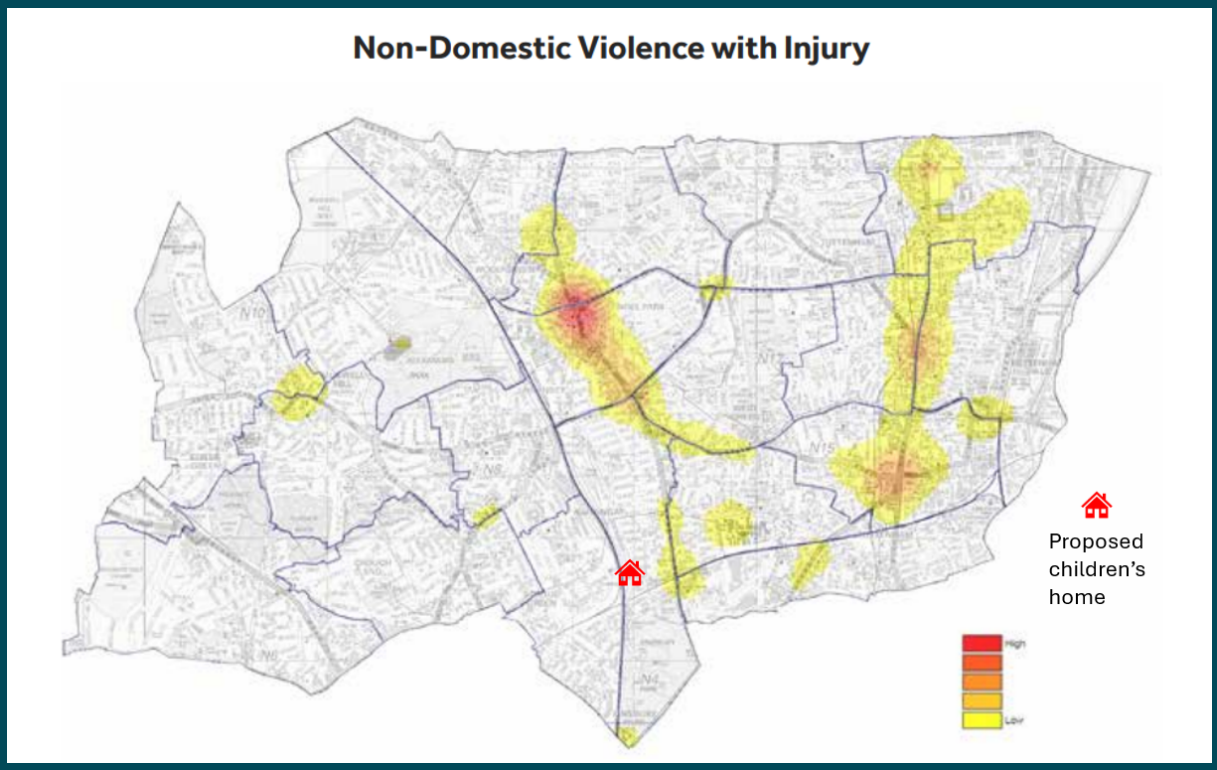
Although the officer acknowledged that this is not strictly a planning matter under Policy DM15, these concerns influenced the overall assessment of the location's suitability. The matter of safeguarding and child protection in higher-risk urban environments remains a

sensitive issue in public perception and local politics and was treated as a contextual planning consideration.

The proposed homes are located in close proximity to an address known for high levels of criminal activity. There are potentially increased vulnerabilities in care for and supervision, of children in area frequented by people engaging in criminal activity. Placing vulnerable children in such an environment could pose serious safeguarding risks. Children in care often have complex needs and histories of trauma. This would be a significant cause for concern.

Haringey Borough Council's Young People at Risk Strategy published in 2024 discusses the Serious Youth Violence Evidence Base 2019-2023. The report does not highlight Umfreville Road area as being in any hotspot for youth violence.

"Across London almost 62% of violent offenders were from BAME backgrounds. In Haringey, young Black people are significantly disproportionately overrepresented in the youth justice cohort, compared to the borough-wide demographic, with the greatest number coming from Northumberland Park, Tottenham Hale and White Hart Lane wards".



The report's analysis of violent offending and gang activity in Haringey suggested "that young people living in certain neighbourhoods are more likely than their peers to be exposed to violence in the community. Young people living in North Tottenham, Wood Green, and large social housing estates such as Broadwater Farm and the Lightfoot Estate are more exposed to community violence. Demographically, these young people are more likely to be from deprived backgrounds and BAME communities".

In respect of operational safeguarding, Care Steps UK Ltd has embedded robust and proactive safeguarding procedures to mitigate any residual or perceived risks associated with locality.

A comprehensive Location Risk Assessment will be undertaken in consultation with the placing authority, community policing teams, and local safeguarding partnerships prior to occupancy. This ensures that any local concerns are addressed in advance and ongoing risks monitored and responded to in real time.

Each child's placement will be subject to individual risk assessment and care planning, ensuring that their needs and vulnerabilities are matched appropriately with the home and neighbourhood. Supervision ratios are high, with a minimum 1:1 support model provided at all times, and higher levels where necessary. This level of staffing, combined with waking night staff and a therapeutic environment, ensures that children and young people are consistently supervised and supported both within and outside the home.

Importantly, the home is not in close proximity to any existing registered children's homes, thereby avoiding potential clustering effects that can give rise to social safeguarding concerns or disproportionate pressure on community services. The home is embedded within a conventional residential street and designed to function indistinguishably from any other household, thereby supporting integration and reducing stigma.

The management structure of Care Steps UK includes experienced practitioners and a psychologist, ensuring that trauma-informed care and behavioural management strategies are consistently delivered. In the event of concerns from neighbours or professionals, the registered provider operates a clear complaints and escalation policy, in compliance with Ofsted and statutory requirements. Local residents will also be provided with a point of contact to raise concerns or queries directly with the management team, supporting positive community engagement.

The proposed development complies with Policy DM15 (B)(d) of the Haringey Development Management DPD, which requires that proposals for specialist housing must not be detrimental to the amenity of the local area.

Furthermore, the home will provide a safe, inclusive and appropriately managed environment in accordance with Paragraphs 96, 98, 101, and 102(a) of the National Planning Policy Framework (2024), which seek to ensure that planning decisions promote social integration, protect vulnerable groups, and support safe, inclusive communities. There is no evidence that the location poses an inherent safeguarding risk, and the operational model ensures robust measures are in place to protect the welfare of children and young people at all times.

5. Parking and Transport

Haringey's transport team noted that although the application claimed to offer parking to the front and rear, access to the rear parking area was impractical and often blocked. The site lies within a Controlled Parking Zone (CPZ) and has a moderate Public Transport Accessibility Level (PTAL 3). The proposal was required to be "car-free", and officers recommended that conditions would need to secure cycle storage.

While these issues were not, in themselves, determinative in the refusal, they added to cumulative concerns about the appropriateness of the site for intensified institutional use.

The application site at 2B Umfreville Road is located within a Controlled Parking Zone (CPZ) and has a Public Transport Accessibility Level (PTAL) of 3, indicating moderate access to public transport. This is reinforced by the site's proximity to Harringay Green Lanes Overground Station, and two nearby Underground stations – Manor House and Seven Sisters – both accessible on foot or by short bus journeys. These connections provide reliable access across London and reduce the need for private vehicle travel, particularly for staff commuting to and from the site.

The proposed development will operate as a two-child residential care home, supported by staff working in structured shift patterns, with changeovers typically occurring at 7:00am and 10:00pm. Staff movements are not continuous or overlapping in a way that would lead to increased parking pressure. Furthermore, the staff rota has been designed so that most employees utilise public transport, as is common in urban care settings. The applicant has committed to this sustainable travel approach, and car ownership among staff is expected to be minimal.

In terms of parking provision, the property benefits from on-street permit eligibility and informal access to rear parking, though the site is being proposed as a "car-free" development in accordance with Haringey's transport policies. It is acknowledged that the rear parking space may be difficult to access due to existing physical constraints, but its availability provides a degree of flexibility for infrequent use, such as emergency or maintenance access. The provision of secure cycle storage is proposed, and a planning condition can be imposed to ensure this is implemented prior to occupation. This supports sustainable transport modes in line with London Plan Policy T5 and Local Plan Policy DM31.

Given the limited number of occupants (2 children) and the small, consistent staffing team, the overall impact on the highway network and local parking availability is expected to be negligible. There is no intensification of vehicle use that would result in harm to highway safety or local amenity.

The proposal complies with London Plan Policies T5 and D14, and Local Plan Policies DM31 and DM15, which require development to support sustainable transport choices, minimise parking stress, and avoid adverse impact on local transport infrastructure. The scheme also aligns with Paragraphs 105 and 110 of the NPPF (2024), which require planning decisions to promote sustainable transport, provide appropriate access, and reduce car dependency in well-connected urban locations.

<u>Impact on Neighbour Amenity and Character of Area</u>

While not central to the refusal, objections from neighbours highlighted fears that the change of use would intensify activity and materially alter the character of the Harringay Ladder. However, officers concluded that the increase in comings and goings (from two children and a rotating team of staff) was not excessive for a residential context and would not cause undue disturbance or loss of amenity. The application was found compliant with Policy DM15 Part B(d) in this regard.

The proposal has been carefully designed to minimise any impact on the amenity of neighbouring residents and preserve the established character of the Harringay Ladder. The scale and intensity of the use are modest, with accommodation for only two children, and a small team of staff operating in shifts to provide 1:1 care. The nature of the use is therefore domestic in scale, and operationally comparable to that of a typical single-family dwelling in terms of noise, movement, and day-to-day activity.

There is no physical extension or alteration to the building proposed, and as such there will be no change to massing, outlook, or built form that could result in overshadowing, loss of light, or visual intrusion. Internally, the dwelling will retain its existing residential character, with minor reconfiguration to accommodate the children's needs and staff support spaces.

Concerns were raised in the previous application regarding the potential cumulative effect of the adjacent property (2B Umfreville Road) also being converted to C2 use. However, each home will be separately registered and independently operated, with clear delineation between staff teams, child placements, and management oversight. As such, the proposed care home will not result in a significant or material intensification of use in the street, nor will it undermine the prevailing residential character.

The proposal is fully compliant with Policy DM15 (Part B[d]), which requires that specialist housing should not cause harm to the amenity of the surrounding area. The site is situated within a Family Housing Protection Zone, but no external alterations or subdivisions are proposed that would undermine the objectives of the zone. The children residing at the property will be integrated into the community, and the operational model includes structured visitor management, safeguarding supervision, and proactive engagement with neighbours and local services to address concerns.

Furthermore, the proposed care model promotes stability, routine, and social development for children, meaning the home is designed to foster calm and predictable behaviour. Staff are trained in therapeutic support and are subject to Ofsted inspection, adding a further layer of safeguarding and quality assurance.

The proposal complies with Local Plan Policies DM1, DM15, and SP11, as well as London Plan Policy D6, which seek to ensure development respects the character of an area, preserves neighbouring amenity, and integrates well within existing communities. The development also aligns with Paragraphs 96, 99, and 135 of the NPPF (2024), which emphasise the need for inclusive, well-designed places that promote safety, well-being, and high standards of residential amenity for existing and future occupants.

Conclusion

For the above reasons, we see no reason for the Council to withhold our request for planning permission and kindly request that the council make a reasonable decision on this submission in line with the developmental objectives and timescales of the National Planning Policy Framework.