

Evidential responses to objections made by Haringey commissioner to the planning application made by Care Steps UK:

1. Oversupply of Residential Children's Homes in Haringey

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.

Likely number of Haringey children living in children's residential care

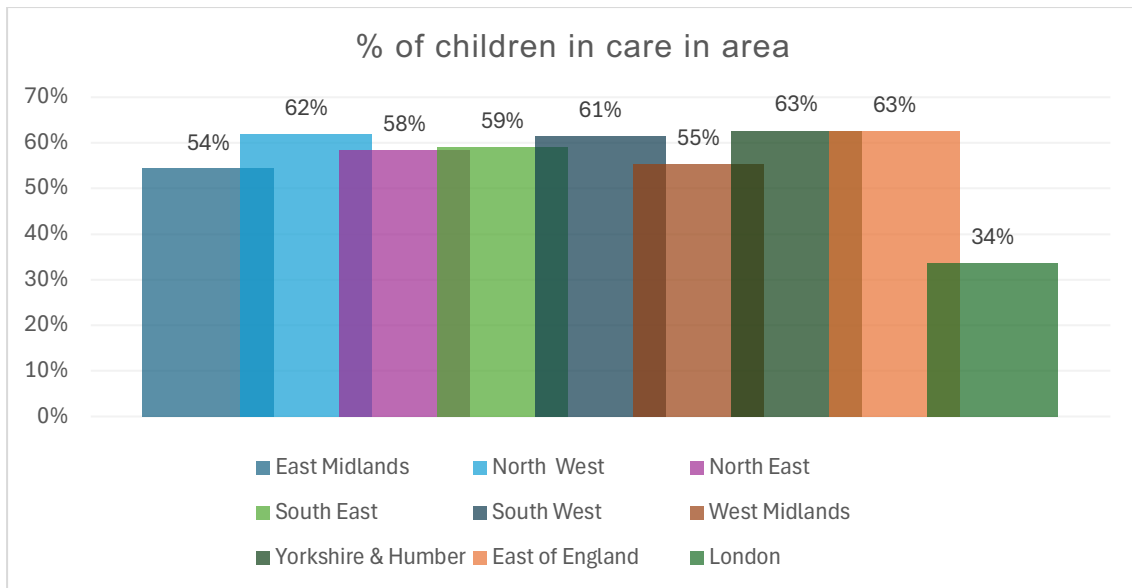
There are currently 11 registered homes in area offering a maximum of 48 registered beds. The national occupancy rate for children's homes is 80% occupancy (Sufficiency.org.uk Nov 2024) meaning there are likely to be circa. 38 children living in these homes.

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.

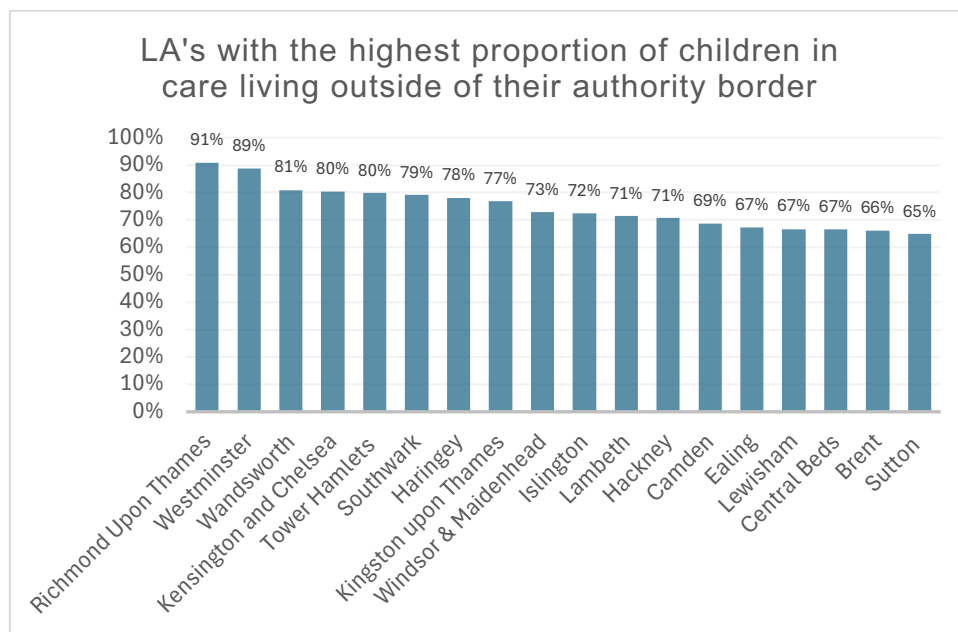
This suggests that the council has a combined total of 24 to 29 children in residential children's homes – an 11% reduction but still a significant cohort of children.

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.

LA's 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 health 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 has to 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 isn't able to 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

Of the 35 mainstream homes within 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.

2. Interdependent Nature of the Proposal

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.

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 within 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.

3. Unsuitability of Location

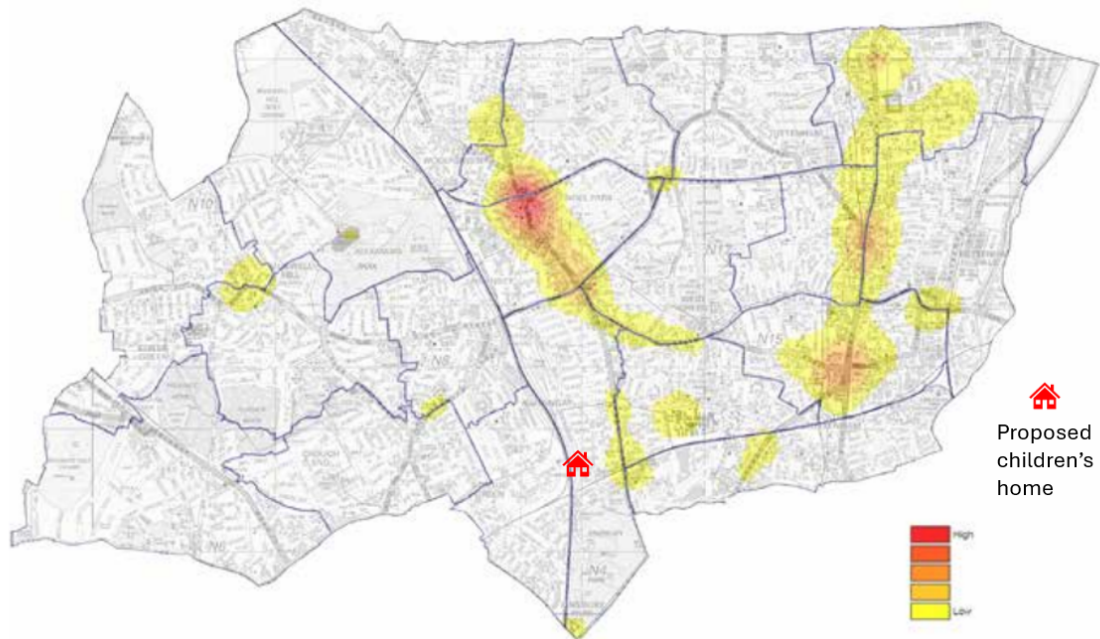
The proposed homes are located in close proximity to an address known for high levels of criminal activity. There are potentially increased vulnerabilities in care for and supervision, of children in area frequented by people engaging in criminal activity. Placing vulnerable children in such an environment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

Suitability of the location

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"

Non-Domestic Violence with Injury



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. In particular, 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".

[Young People at Risk Evidence Base](#)

Mitigation of any potential locality risks - A location risk assessment will be completed to manage any potential areas of concern alongside the local authority safeguarding teams and community policing.

As we know there is always risk about placing children in residential homes near other residential homes – the proposed home/s also appear to not be located near any other registered children's homes.

All children and young people will be given adequate supervision in and outside of the home to keep them safe from any locality risks.