

Cabinet AGENDA

DATE: Thursday 19 February 2015

TIME: 6.30 pm

VENUE: Committee Rooms 1 & 2,
Harrow Civic Centre

MEMBERSHIP

Chair: Councillor David Perry (Leader of the Council, Strategy, Partnerships and Corporate Leadership Portfolio Holder)

Portfolio Holders:

Councillor Sue Anderson	Community, Culture and Resident Engagement
Councillor Simon Brown	Children, Schools and Young People
Councillor Margaret Davine	Adults and Older People
Councillor Keith Ferry	Deputy Leader, Business, Planning and Regeneration
Councillor Glen Hearnden	Housing
Councillor Graham Henson	Performance, Corporate Resources and Policy Development
Councillor Varsha Parmar	Environment, Crime and Community Safety
Councillor Sachin Shah	Finance and Major Contracts
Councillor Anne Whitehead	Public Health, Equality and Wellbeing

(Quorum 3, including the Leader and/or Deputy Leader)

Contact: Daksha Ghelani, Senior Democratic Services Officer
Tel: 020 8424 1881 E-mail: daksha.ghelani@harrow.gov.uk

AGENDA - PART I

1. APOLOGIES FOR ABSENCE

To receive apologies for absence (if any).

2. DECLARATIONS OF INTEREST

To receive declarations of disclosable pecuniary or non pecuniary interests arising from business to be transacted at this meeting from:

- (a) all Members of the Cabinet; and
- (b) all other Members present.

3. PETITIONS

To receive any petitions submitted by members of the public or Councillors.

4. PUBLIC QUESTIONS

To receive any public questions received in accordance with paragraph 16 of the Executive Procedure Rules.

Questions will be asked in the order notice of them was received and there is a time limit of 15 minutes.

[The deadline for receipt of public questions is 3.00 pm, Monday 16 February 2015.

Questions should be sent to publicquestions@harrow.gov.uk

No person may submit more than one question].

5. COUNCILLOR QUESTIONS

To receive any Councillor questions received in accordance with paragraph 17 of the Executive Procedure Rules.

Questions will be asked in the order agreed with the relevant Group Leader by the deadline for submission and there is a time limit of 15 minutes.

[The deadline for receipt of Councillor questions is 3.00 pm, Monday 16 February 2015].

6. KEY DECISION SCHEDULE - FEBRUARY TO APRIL 2015 (Pages 7 - 30)

7. REPORTS FROM THE OVERVIEW AND SCRUTINY COMMITTEE OR SUB-COMMITTEES

- (a) Progress on Scrutiny Projects (Pages 31 - 32)
- (b) Petition: Cambridge Road Car Park – North Harrow: (Pages 33 - 34)
Reference from Overview and Scrutiny Committee.

RESOURCES

KEY 8. CORPORATE PLAN 2015-2019 (Pages 35 - 72)

Report of the Corporate Director of Resources.

9. BUDGET

KEY (a) Final Revenue Budget 2015/16 and Medium Term Financial Strategy 2015/16 to 2018/19:

Report of the Director of Finance and Assurance.

KEY (b) Children and Families - Children's Centres: (Pages 73 - 210)

Report of the Interim Corporate Director of Children and Families.

KEY (c) Environment and Enterprise Medium Term Financial Strategy Implementation Plan: (Pages 211 - 326)

Report of the Corporate Director of Environment and Enterprise.

KEY (d) Housing Revenue Account Budget 2015-16 and Medium Term Financial Strategy 2016-17 to 2018-19: (Pages 327 - 356)

Joint Report of the Director of Finance and Assurance and the Corporate Director of Community, Health and Wellbeing.

KEY (e) Treasury Management Strategy Statement including Prudential Indicators, Minimum Revenue Provision Policy Statement and Annual Investment Strategy for 2015/16: (Pages 357 - 392)

Report of the Director of Finance and Assurance.

KEY (f) Revenue and Capital Monitoring for Quarter 3 as at 31 December 2014: (Pages 393 - 434)

Report of the Director of Finance and Assurance.

KEY 10. CAPITAL PROGRAMME 2015/16 TO 2018/19 (Pages 435 - 454)

Report of the Director of Finance and Assurance.

11. EXPANSION OF HB PUBLIC LAW (Pages 455 - 460)

Report of the Corporate Director of Resources.

12. CALENDAR OF MEETINGS 2015/16 (Pages 461 - 480)

Report of the Director of Legal and Governance Services.

CHILDREN AND FAMILIES

13. PAEDIATRIC SPEECH AND LANGUAGE THERAPY SERVICES (Pages 481 - 488)

Report of the Interim Corporate Director of Children and Families.

14. SCHOOL PERFORMANCE AND STANDARDS (Pages 489 - 520)

Report of the Interim Corporate Director of Children and Families.

15. SCHOOL AMALGAMATION

Report of the Interim Corporate Director of Children and Families.

KEY (a) Proposal to amalgamate Whitchurch First School and Nursery and Whitchurch Junior School: (Pages 521 - 538)

Report of the Interim Corporate Director of Children and Families.

KEY (b) Proposals to amalgamate and expand Welldon Park Infant and Nursery School and Welldon Park Junior School: (Pages 539 - 572)

Report of the Interim Corporate Director of Children and Families.

ENVIRONMENT AND ENTERPRISE

16. CONSULTATION ON THE DRAFT HARROW WEALD CONSERVATION AREAS SUPPLEMENTARY PLANNING DOCUMENT (SPD) (Pages 573 - 720)

Report of the Corporate Director of Environment and Enterprise.

KEY **17. FIXED PENALTY NOTICES FOR ENVIRONMENTAL CRIME ENFORCEMENT - POLICY, OPERATIONAL GUIDANCE AND PROCEDURAL MATTERS** (Pages 721 - 804)

Report of the Corporate Director of Environment and Enterprise.

18. ANY OTHER URGENT BUSINESS

Which cannot otherwise be dealt with.

AGENDA - PART II - Nil

* DATA PROTECTION ACT NOTICE

The Council will audio record items 4 and 5 (Public and Councillor Questions) and will place the audio recording on the Council's website, which will be accessible to all.

[**Note:** The questions and answers will not be reproduced in the minutes.]

Deadline for questions	3.00 pm on 16 February 2015
Publication of decisions	20 February 2015
Deadline for Call in	5.00 pm on 27 February 2015
Decisions implemented if not Called in	28 February 2015

This page is intentionally left blank

London Borough of Harrow

KEY DECISION SCHEDULE (FEBRUARY 2015 - APRIL 2015)

MONTH: February

The following is a list of Key Decisions which the Authority proposes to take at the above Cabinet meeting. The list may change over the next few weeks. A further notice, by way of the Cabinet agenda, will be published no less than 5 clear days before the date of the Cabinet meeting, showing the final list of Key Decisions to be considered at that meeting.

A Key Decision is a decision by the Executive which is likely to:

- (i) result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates; or
- (ii) be significant in terms of its effects on communities living or working in an area of two or more wards or electoral divisions of the Borough.

A decision is significant for the purposes of (i) above if it involves expenditure or the making of savings of an amount in excess of £1m capital expenditure or £500,000 for revenue expenditure or, where expenditure or savings are less than the amounts specified above, it constitute more than 50% of the budget attributable to the service in question.

Decisions which the Cabinet intends to make in private

The Cabinet hereby gives notice that it may meet in private after its public meeting to consider reports which contain confidential information. The private meeting of the Cabinet is open only to Members of the Cabinet, other Councillors and Council officers.

Reports relating to decisions which the Cabinet will take at its private meeting are indicated in the list of Key Decisions below with the reasons for the decision being made in private where appropriate. The Schedule also contains non-Key Decisions which involve Cabinet having to meet in private. Any person is able to make representations to the Cabinet if he/she believes the decision should instead be made in the public Cabinet meeting. If you want to make such representations please contact Democratic & Electoral Services. You will then be sent a response in reply to your representations. Both your representations and the Cabinet's/Leader's response will be published on the Council's website <http://www.harrow.gov.uk/www2/mgListPlans.aspx> at least 5 clear days before the Cabinet meeting.

The Cabinet/Leader will be considering a report prepared by the relevant Directorate. The report together with any other documents (unless they contain exempt information) will be available for inspection 5 clear days before the decision is taken by Cabinet/Leader from Daksha Ghelani, Senior Democratic Services Officer, on 020 8424 1881 or by contacting daksha.ghelani@harrow.gov.uk or by writing to Democratic & Electoral Services, Harrow Council, Civic Centre PO Box 2, Station Road, Harrow, HA1 2UH or on the Council's website. Copies may be requested but a fee will be payable. Reports to be considered at the Cabinet's public meeting will be available on the Council's website 5 clear days before the meeting.

∞

The KDS looks 3 meetings ahead and will be published 28 clear days before the Decision Date / Period of Decision.

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
FEBRUARY 2015						
Treasury Management Strategy Statement, Prudential Indicators and Minimum Revenue Provision (Mip) Policy And Strategy 2015/16	To recommend to Council the approval of: (1) the Treasury Management Strategy and Prudential Indicators, (2) the Minimum Revenue Provision Policy and Strategy, (3) the Counterparty Policy; and (4) Investment Strategy	Cabinet Council	19 February 2015 26 February 2015	Councillor Sachin Shah Simon George, Director of Finance and Assurance ian.talbot@harrow.gov.uk Tel: 020 8424 1450	Open	Agenda Report and any related appendices Consultation: None required
Capital Programme 2015-16 to 2018-19	To recommend to Council the capital programme for 2015-16 to 2018-19	Cabinet Council	19 February 2015 26 February 2015	Councillor Sachin Shah Simon George, Director of Finance and Assurance	Open	Agenda Report and any related appendices: Schedule of Proposed Schemes

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
				dawn.calvert@harrow.gov.uk Tel: 020 8424 1393		Consultation: None required
Final Revenue Budget and Medium Term Financial Strategy 2015-16 to 2018-19	To recommend the budget for 2015-16 and MTFS and Council Tax	Cabinet Council	19 February 2015 26 February 2015	Councillor Sachin Shah Simon George, Director of Finance and Assurance dawn.calvert@harrow.gov.uk Tel: 020 8424 1393	Open	Agenda Report and any related appendices: Budget Proposals Consultation: www.harrow.gov.uk/draftbudget
Children and Families Children Centres	Our aim is to ensure the sustainability of Children's Centres' services for the communities of Harrow whilst also addressing the Council's	Cabinet	19 February 2015	Councillor Simon Brown Chris Spencer, Interim Corporate Director of Children & Families projectwork@harrow.gov.uk	Open	Agenda Report and any related appendices: Consultation document and Objective report Consultation: There is a statutory duty to

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
	budget pressures			Tel: 020 8416 8243 (Hilary O'Byrne)		consult on any closures of Children Centres and the following people/groups have been consulted: Parents/carers, Children's Centre staff, Children's Services staff, Partners, Key Partners including Schools, Clinical Commissioning Group (CCG), Private and Voluntary Sector (PVI) and Health
Environment and Enterprise Medium Term Financial Strategy	To present the implementation plans for key savings proposals to be read in conjunction with the February	Cabinet	19 February 2015	Councillors Varsha Parmar and Keith Ferry Caroline Bruce, Corporate Director of Environment and Enterprise	Open	Agenda Report and any related appendices Consultation: Questionnaires can be accessed via the Council's

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
	2015 Budget Report			andrew.smith@harrow.gov.uk Tel: 020 8424 7698		website and have been sent directly to a range of community groups
Revenue and Capital Monitoring for Quarter 3 as at 31 December 2014	To note the position on Revenue and capital monitoring and approve any necessary virements	Cabinet	19 February 2015	Councillor Sachin Shah Simon George, Director of Finance and Assurance dawn.calvert@harrow.gov.uk Tel: 020 8424 1393	Open	Agenda Report and any related appendices Consultation: None required
Housing Revenue Account Budget and Medium Term Financial Strategy 2015-16 to 2018-19	Recommend the budget for 2015-16 and MTFs	Cabinet Council	19 February 2015 26 February 2015	Councillors Glen Hearndern and Sachin Shah Paul Najsarek, Interim Head of Paid Service, Corporate Director, Community Health and Wellbeing	Open	Agenda Report and any related appendices: Budget Proposals Consultation: TLRCF consulted on rent options prior to December Cabinet

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
Fixed Penalty Notices for Environmental Crime Enforcement - Policy, Operational Guidance and Procedural Matters	The approval of the policy and operational guidance relating to fixed penalty notices for environmental crime enforcement and procedural matters	Cabinet	19 February 2015	Simon George, Director of Finance and Assurance dave.roberts@harrow.gov.uk Tel: 020 8420 9678 Councillor Varsha Parmar Caroline Bruce, Corporate Director of Environment and Enterprise hanif.islam@harrow.gov.uk Tel: 020 8424 1548	Open	Agenda Report and any related appendices: Environmental Compliance Enforcement Policy; Fixed Penalty Notice Operational Guidance; Crime and Policing Act 2014 Briefing Note; DEFRA Guidance – Litter and Refuse; DEFRA Guidance on the use of FPNs; Equality Impact Assessment

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
						<p>Consultation: Consultation took place on the use of FPNs between 15 August and 5 September 2014. This was via an on-line survey supported by self-completion questionnaires. A total of 327 surveys were completed. The report will also seek agreement on a proposal to consult on designating the borough in terms of land associated with unauthorised leaflet distribution.</p>

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
<p>Proposal to amalgamate Whitchurch First School and Nursery and Whitchurch Junior School</p>	<p>Determination of statutory proposals</p>	<p>Cabinet</p>	<p>19 February 2015</p>	<p>Councillor Simon Brown Chris Spencer, Interim Corporate Director of Children & Families johanna.morgan@harrow.gov.uk Tel: 020 8736 6841</p>	<p>Open</p>	<p>Agenda Report and any related appendices Consultation: Statutory consultation of the school communities about the amalgamation proposal was held from Monday 3 November 2014 until Friday 12 December 2014. Statutory proposals were published on 5 January 2015 with a statutory representation period of 4 weeks until 2 February 2015</p>

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
Proposals to amalgamate and expand Welldon Park Infant and Nursery School and Welldon Park Junior School	Determination of statutory proposals	Cabinet	19 February 2015	Councillor Simon Brown Chris Spencer, Interim Corporate Director of Children & Families johanna.morgan@harrow.gov.uk Tel: 020 8736 6841	Open	Agenda Report and any related appendices Consultation: Consultation with the school communities and local residents about the proposed amalgamation and expansion was held from Monday 29 September to Friday 14 November 2014. Statutory proposals to expand to amalgamate and expand the schools were published on 5 January 2015 for a four week representation period which

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
						closed on 2 February 2015.
Corporate Plan	Agree the Council's Policy Framework and key programmes of work for 2015 - 2018 including the Corporate Equality Objectives for 2015 – 2019	Cabinet Council	19 February 2015 26 February 2015	Councillors David Perry and Graham Henson Tom Whiting, Corporate Director of Resources rachel.gapp@harrow.gov.uk Tel: 020 8416 8774	Open	Agenda Report and any related appendices: Equality Impact Assessment Consultation: During the course of reviewing the corporate equality objectives a questionnaire was sent to all staff, members and key organisations that represent the protected characteristics. There has been engagement with the staff Making a Difference Group,

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
						Corporate Equalities Group and scrutiny
MARCH 2015						
New Homes Bonus LEP Top slice - Funding Agreement Approval	Cabinet approval for Council to enter into a Funding Agreement with the GLA/LEP in respect of this successful funding bid worth £1.06m	Cabinet	19 March 2015	Councillor Keith Ferry Caroline Bruce, Corporate Director of Environment and Enterprise malcolm.john@harrow.gov.uk Tel: 0208 736 6846	Open	Agenda Report and any related appendices: New Homes Bonus LEP top slice bid proposals Consultation: The proposals were developed in discussion with the Youth Development Team, Communications, and Planning. Community and Culture and Housing Services were consulted on the development of

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
						<p>the proposals. Finance was fully informed through E& E's Business Finance Partner. The relevant Portfolio Holder was briefed and provided a letter of support to our NHB applications.</p> <p>Extensive negotiations were undertaken with the GLA to ensure that our proposals did not duplicate existing provision or planned European funded programmes (through ESIF).</p> <p>Proposals were also discussed with Harrow's Business Improvement</p>

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
Procurement of ICT Service	Approval of the selection of the supplier of ICT Services for the next 5 years with a service commencement date of 1 November 2015, with an option to extend for a further three years	Cabinet	19 March 2015	Councillors Graham Henson and Sachin Shah Tom Whiting, Corporate Director of Resources carol.cutler@harrow.gov.uk Tel: 020 8736 6701	Part exempt Information relating to the financial or business affairs of any particular person (including the authority holding that information)	Agenda Report and any related appendices Consultation: The decision taken to re-let the ICT Services contract was taken at the January 2014 Cabinet Meeting. In order to determine the scope and to update on progress the project has consulted and communicated to CSB, Internal
						District, Further Education Colleges, JobcentrePlus and local business support agencies

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
Determination of Community School Admission Arrangements - Academic Year 2016/17	There is a statutory requirement under the School Standards and Framework Act 1998 for admission authorities to determine admission arrangements by 15 April in the determination year (i.e. by 15 April 2015)	Cabinet	19 March 2015	Councillor Simon Brown Chris Spencer, Interim Corporate Director of Children & Families raj.parmar@harrow.gov.uk Tel: 020 8416 8286	Open	Ops Board, the IT User Group, the IT Board, the IT Working Group, appropriate Members including the relevant Portfolio Holders and unions Agenda Report and any related appendices: Outcome of Consultation Consultation: Consultation has been held from 15 December to 6 February 2015 about proposed changes to the Fair Access Protocol

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
West London Mental Health and Employment Trailblazer Grant and Service Level Agreements	Cabinet to approve Harrow Council entering into a Grant Agreement with the Department of Communities and Local Government (DCLG) to accept the Transformation Challenge Award grant and to enter into a Service Level Agreement with the West London Alliance (WLA)	Cabinet	19 March 2015	Councillor Keith Ferry Caroline Bruce, Corporate Director of Environment and Enterprise malcolm.john@harrow.gov.uk Tel: 020 8736 6846	Open	Agenda Report and any related appendices: Transformation Challenge Award bid Consultation: Three co-design workshops were held to develop the application for the Transformation Challenge Award funds. They included representatives of all the WLA boroughs, Cabinet Office, Department of Health, Department for Work and Pensions, Public Service Transformation Network, Central North West

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
						<p>London Mental Health Trust, Centre for Mental Health, West London Mental Health Trust, Mind, Public Health Services IAPTS, UCL Partners, Jobcentre Plus and Work Programme providers.</p> <p>Separate discussions were held with Legal, Procurement and E&E's Finance Business Partner on the content of the Service Level Agreement.</p> <p>We will need to continue to consult public, private and voluntary sector</p>

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
Harrow Tree Strategy	To seek approval for the Harrow Tree Strategy	Cabinet	19 March 2015	Councillor Varsha Parmar Caroline Bruce, Corporate Director of Environment and Enterprise hanif.islam@harrow.gov.uk Tel: 020 8424 1548	Open	<p>organisations about how best to meet the needs of the client groups</p> <p>Agenda Report and any related appendices: Tree Strategy, EqIA</p> <p>Extensive consultation has taken place both internally and externally. The feedback received has been incorporated in the Strategy as appropriate. The following were consulted: Project manager estates management; Bio-diversity officer; Service</p>

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
						<p>Manager – Public Realm; Head of Economic Development; Team Leader – Traffic and Highways Arboricultural Officer</p> <p>Harrow Nature Conservation Forum; The Hatch End Association; Community Champions</p>
Library Strategy 2015-2018	To approve the strategy for the future of library services in Harrow	Cabinet	19 March 2015	Councillor Sue Anderson Paul Najsarek, Interim Head of Paid Service, Corporate Director, Community Health and Wellbeing marianne.locke@harrow.gov.uk	Open	Agenda Report and any related appendices: Future of Cultural Services in Harrow January 2012; Libraries & Leisure Commissioning: Award of contracts June

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
Voluntary and Community Sector: Outcome of consultation on Funding	To inform Members of the outcome of the VCS consultation 2015 with recommendations for delivery of funding decisions 2015-16	Cabinet	19 March 2015	Tel: 020 8736 6503 Councillors Sue Anderson and Margaret Davine Paul Najsarek, Interim Head of Paid Service, Corporate Director, Community Health and Wellbeing marianne.locke@harrow.gov.uk Tel: 020 8736 6530	Open	2013 Consultation: Library users, non-users and key stakeholders consulted December 2014 and January 2015 Agenda Report and any related appendices: Cabinet Report February 2015; Final Revenue Budget and Medium Term Financial Strategy 2015-16 to 2018-19 Consultation: Voluntary and Community Sector and Service Users consultations

Subject	Nature of Decision	Decision Maker	Decision date / Period of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
						January-February 2015
APRIL 2015						
West London Waste Plan (WLWP)	Recommend that Council adopt the document to form part of Harrow's Local Plan	Cabinet	23 April 2015	Councillor Keith Ferry Caroline Bruce, Corporate Director of Environment and Enterprise philip.crowther@harrow.gov.uk Tel: 020 8736 6188	Open	Agenda Report and any related appendices: West London Waste Plan Consultation: Three public consultations (January 2009; February 2011; March 2014) plus an independent examination in public

HARROW COUNCIL CABINET 2014/15

CONTACT DETAILS OF PORTFOLIO HOLDERS

Portfolio	Councillor	Address	Telephone no.	Email
Leader, Strategy, Partnerships & Corporate Leadership	David Perry	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Mobile: 07505 430133 Group Office: (020) 8424 1897	Email: david.perry@harrow.gov.uk
Deputy Leader, Business, Planning & Regeneration	Keith Ferry	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Mobile: 07922 227147 Group Office: (020) 8424 1897	Email: keith.ferry@harrow.gov.uk
Adults & Older People	Margaret Davine	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Home: (020) 8863 3675 Group Office: (020) 8424 1897	Email: margaret.davine@harrow.gov.uk
Children, Schools & Young People	Simon Brown	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Group Office: (020) 8424 1897	Email: simon.brown@harrow.gov.uk

Portfolio	Councillor	Address	Telephone no.	Email
Community, Culture & Resident Engagement	Sue Anderson	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Mobile: 07875 094900 Group Office: (020) 8424 1897	Email: sue.anderson@harrow.gov.uk
Environment, Crime & Community Safety	Varsha Parmar	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Mobile: 07535 064495 Group Office: (020) 8424 1897	Email: varsha.parmar@harrow.gov.uk
Finance & Major Contracts	Sachin Shah	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Mobile: 07949 949745 Group Office: (020) 8424 1897	Email: sachin.shah@harrow.gov.uk
Housing	Glen Hearnden	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Group Office: (020) 8424 1897	Email: glen.hearnden@harrow.gov.uk
Performance, Corporate Resources & Policy Development	Graham Henson	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Mobile: 07721 509916 Group Office: (020) 8424 1897	Email: graham.henson@harrow.gov.uk

Portfolio	Councillor	Address	Telephone no.	Email
Public Health, Equality & Wellbeing	Anne Whitehead	Labour Group Office Room 102, PO Box 2, Civic Centre Station Road HARROW HA1 2UH	Group Office: (020) 8424 1897	Email: anne.whitehead@harrow.gov.uk

PROGRESS ON SCRUTINY PROJECTS

Review	Methodology	Type of report	Expected date for report to Cabinet	Comments
Impact of Welfare Reforms on residents in the borough: Council Tax Support Scheme	Challenge Panel	Final Report to O&S and Cabinet	Nov 2014	Cabinet response noted by O&S 20 th Jan.
The Funding Challenge - saving £75m from the Council's revenue budget	Budget Challenge Panel/Q&A	Final Report to O&S and Cabinet	March 2015	Challenge Panel took place on 14 th January, Budget Q&A took place on 20 th January with Leader, Head of Paid Service. O&S to consider report 24 th Feb
Capital Expenditure and delivery of Programme	Challenge Panel	Final Report to O&S and Cabinet	March 2015	Challenge Panel took place on 21 st January. O&S to consider report 24th Feb.
Continue participation in Joint Overview & Scrutiny Committee (JHOSC) for Shaping a Healthier Future Programme	Joint Committee	Update reports will be provided for O&S/Health and Social Care sub committee and Cabinet (for information)	As required	Next JHOSC meeting due to take place on 3rd March. Independent Healthcare Commission instigated by West London Borough affected by hospital changes as a result of Shaping a Healthier Future is currently taking evidence. Harrow is not a member but does have observer status.
Libraries review	Joint Challenge panel with Ealing	Final Report to O&S and Cabinet	MayTBC	Joint challenge panel with Ealing on the Carillion contract taking place 4 th March. To be followed up with a Harrow specific challenge panel in early March.

Contact: Rachel Gapp, Head of Policy

Tel: 020 8416 8774

This page is intentionally left blank

LONDON BOROUGH OF HARROW

CABINET – 19 FEBRUARY 2015

**REFERENCE FROM OVERVIEW AND SCRUTINY COMMITTEE –
20 JANUARY 2015**

**Reference from Cabinet - 16 October 2014 - Petition On Cambridge Road Car
Park**

A Member introduced the petition, which had the support of all the Headstone North ward councillors, and described the impact of car park charges on local businesses and residents. She stated that local business owners had reported a significant loss in business. A promised free hour of parking had not materialised with the failure of a major supermarket to locate in the area, and this fact, together with the loss of banking facilities, suggested that a 'local' designation was more appropriate. She proposed that a pilot scheme be introduced at a cheaper rate, to be evaluated and monitored over a suitable period.

The Service Manager, Traffic & Highway Network Management, described the 5 planning area designations (4 of which existed in Harrow) and explained that the rationale for aligning the parking charges structure to the planning designations had been to set charges consistently to reflect the retail provision and demand in an area. Amending a planning designation would require changes to a number of statutory documents and would be difficult to justify.

The Service Manager, Traffic & Highway Network Management, described the 5 planning area designations (4 of which existed in Harrow) and explained that the rationale for aligning the parking charges structure to the planning designations had been to set charges consistently to reflect the retail provision and demand in an area. Amending a planning designation would require changes to a number of statutory documents and would be difficult to justify.

The Portfolio Holder for Business, Planning and Regeneration, concurred with the Service Manager, adding that there were criteria governing the designations, and it was not an easy matter to change these. It would also be necessary to consider the impact on neighbouring areas of any proposed changes. He commented that a case could be made for a trial programme to support regeneration.

Members considered whether aligning parking policy to planning area designations allowed sufficient flexibility to respond to community and business needs, and what measures were available to address residents' and traders' concerns. The Service Manager noted that the worst rates for shop vacancies had occurred during a period of free parking. He explained that there was little evidence that concessionary parking charges supported local businesses, and that improvements in vacancy rates in recent years had resulted from targeted initiatives by the Economic Development team. He believed that linking charges to the planning designations was a fair system as it treated similar retail centres equally, and noted that prior to the reform of the charges structure there had been over 30 different charging schemes. He advised careful consideration for determining how one local centre might take priority over another of a similar type.

The Corporate Director of Environment and Enterprise reminded the committee that the proposed change would need the agreement of the Portfolio Holder for Environment, and observed that it would be wise to monitor demand and vacancy rates for another quarter before introducing the change.

A Member stated that the proposal for a trial period at a lower rate, to be monitored and evaluated over a defined period, had cross-party support.

The Chair concluded that it would be appropriate to suggest to Cabinet that consideration be given to the introduction of a lower charge for the first hour for a trial period.

RESOLVED: That the following conclusion be referred to Cabinet:

That consideration be given to the introduction of a lower charge for the first hour of parking in the Cambridge Road Car Park for a trial period, and that economic activity and shop vacancy rates be monitored during this period.

FOR CONSIDERATION

Background Documents:

Draft minutes of the Overview and Scrutiny Committee – 20 January 2015

Contact Officer:

Una Sullivan, Democratic and Electoral Services Officer

Tel: 020 8424 1785

Email: una.sullivan@harrow.gov.uk

REPORT FOR: CABINET

Date of Meeting:	19 February 2015
Subject:	Corporate Plan 2015-2019
Key Decision:	Yes
Responsible Officer:	Tom Whiting, Corporate Director of Resources
Portfolio Holder:	Councillor David Perry, Leader of the Council and Portfolio Holder for Strategy, Partnerships and Corporate Leadership Councillor Graham Henson, Portfolio Holder for Performance, Corporate Resources and Policy Development
Exempt:	No
Decision subject to Call-in:	No, as the decision is reserved to Council
Wards affected:	All
Enclosures:	Corporate Plan 2015-2019 Equality Impact Assessment – Corporate Plan 2015-19

Section 1 – Summary and Recommendations

This report sets out a four year Corporate Plan for 2015-2019. It sets out the key activities and measures that will evidence delivery of the vision and priorities over the next four years and this year includes the Council's Corporate Equality Objectives. Together with the Final Revenue Budget 2015-16, they outline what the Council intends to do and how those actions and

services will be funded. It will be refreshed annually.

The Plan will be being considered at Overview and Scrutiny Committee on the 24th February 2015.

Recommendations:

Cabinet is requested to:

1. Note the four year Corporate Plan
2. Note the revised Corporate Equality Objectives for 2015-2019
3. Recommend the Corporate Plan to Council and to authorise the Leader to make any minor amendments to the Plan as necessary prior to the matter going to Council.

Reason: (For recommendation)

To update the Council's Policy Framework and set out the Council's direction of travel for the next four years.

Section 2 – Report

Introductory paragraph

The Corporate Plan sets out the strategic direction for the authority, it's vision, priorities, core outcomes and key initiatives which describe and illustrate the programme of activity for next four years and against which the Council is happy to be judged. This year the Corporate Plan also includes the Council Corporate Equality Objectives and together with the Final Revenue Budget 2015-16, it outlines what the Council intends to do and how those actions and services will be funded. The funding detail is set out in the budget reports.

Options considered

The Corporate Plan needs to be updated to align with the budget. It is important that the Council have a Corporate Plan. Therefore no other options have been considered.

Background

In May 2014, a new administration took control of the Council, and agreed at Council on the 12th June a new vision and set of priorities:

Vision: *Working Together to Make a Difference for Harrow*

Priorities: *Making a difference for the vulnerable*
 Making a difference for communities
 Making a difference for local businesses
 Making a difference for families

The Plan sets out the Administration's ambition for the borough and the projects and initiatives the Council will prioritise over the next four years to deliver on the vision, priorities and outcomes.

In April 2012, Harrow Council published eight equality objectives as required by the Equality Act 2010 and the Public Sector Equality Duty (PSED). They were developed based on extensive research, consultation and evidence. These objectives must be reviewed at least every four years. The review therefore took place over 3 weeks during November 2014 to align the review period with the political cycle and enable the Corporate Equality Objectives to be integrated with the Corporate Plan. As a result of the review, minor amendments have been made by the Corporate Equalities Group to the equality objectives.

Given the importance of the equalities agenda to the Administration, there was felt to be a logic in merging the Council's Equality Objectives with the Corporate Plan, to give greater status to the Equality Objectives and at the same time rationalise the Council's policy framework. This is in line with the process other authorities have also adopted.

Consultation

In the autumn the Council carried out its 'Take Part' consultation, the start of a conversation with residents about changes the council needs to make over the next four years to meet an estimated budget gap of £75m. The first phase has focused on talking to the community about:

- The indicative savings target of £30m for 2015/16
- Getting feedback on the impacts of proposed savings
- Residents priorities
- Understanding residents views on a proposed Council Tax increase up to the referendum level of 2%
- Exploring new and innovative ways to provide services in the future
- Identify any additional community capacity

As a result of the consultation 66% of people felt better informed about why the council needs to make savings and the top three priorities for residents that responded to the survey were:

1. Bringing together health and social care services so the public can have a better experience
2. Delivering over 3000 new jobs and 500 apprenticeships
3. Building affordable housing and homes for rent

The MTFs report contains more detailed information about the process, feedback and results. Where necessary, further consultation will be undertaken with residents and communities to shape the delivery of the proposals within the Corporate Plan, in keeping with the ambition of the Administration to consult and engage.

As part of the review of the Corporate Equality Objectives an online and hard copy survey was issued to all staff, members and key stakeholders. The results were reported to the Corporate Equalities Group who agreed amendments to the objectives. The amended objectives also went to the Performance and Finance scrutiny sub-committee in January for comment.

Legal Implications

Approving the Council's policy framework is reserved to full council. The Corporate Plan will therefore be considered on 26th February 2015.

Financial Implications

The financial implications of the Corporate Plan are set out in the Final Revenue Budget 2015-16. The Corporate Plan incorporates those key activities that the Administration wish to be delivered between now and 2019 within the current spending envelope.

Performance Issues

A set of performance indicators are presented as measurement of each of the Council Priorities in the Corporate Plan. A more detailed and comprehensive set of indicators that will be used to monitor delivery of the Corporate Plan and the Corporate Equality Objectives will be contained within the Corporate Scorecard which will be signed off by the Portfolio Holder and measured quarterly and presented to Cabinet and Scrutiny through the Strategic Performance Report.

Equalities implications

The equalities implications of the Corporate Plan are set out in the attached EQIA. A number of the activities are proposals where final business cases are still being developed, so EQIAs will be being developed to support these.

The Corporate Plan also now incorporates the Council's Corporate Equality Objectives, which set out the Council's commitment to ensuring equality and diversity is integral to everything we do.

Council Priorities

The Corporate Plan sets the delivery plan for making the Council's corporate priorities a reality.

Section 3 - Statutory Officer Clearance

Name: Steve Tingle	<input checked="" type="checkbox"/>	On behalf of Chief Financial Officer
Date: 12 January 2015		
Name: Jessica Farmer	<input checked="" type="checkbox"/>	On behalf of Monitoring Officer
Date: 16 January 2015		

Ward Councillors notified:	YES, as it impacts on all Wards
EqIA carried out:	YES
EqIA cleared by:	Alex Dewsnap

Section 4 - Contact Details and Background Papers

Contact:
Rachel Gapp, Head of Policy
Tel: 0208 424 8774

Background Papers: None.

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in does not apply, as the decision is reserved to Council]</i>
--	--

This page is intentionally left blank

CONTENTS

- 1. Leader's Foreword*
- 2. Our Borough - Our Harrow*
- 3. Making a Difference for Harrow: A summary of our 4 year Vision*
- 4. Our Vision for Harrow*
- 5. Achievements in 2014/15*
- 6. Our Equalities Priorities*
- 7. Delivery Plan*

1. Leader's Foreword

I fervently believe that being open, honest and willing to involve and work with others is the best form of governance, and with an equally strong belief that we should protect our most vulnerable residents first.

This plan sets out our ambitions for the next four years and, through working with residents, our staff, local businesses, community and voluntary organisations and our partners, how they will be achieved and build a Borough that we can all be proud of.

With the Government imposing a further £82m of cuts from 2014 - 2018 on Harrow Council and a rising need for our services, the Labour administration has been open, honest and transparent about the decisions we are being forced to make – decisions made through listening; guided by the right values.

We have bought stability to the Council through hiring an experienced Chief Executive, with a desire to make residents at the heart of everything we do, particularly with the ambitious regeneration plans we have for Harrow.

We were delighted with the way in which community groups and thousands of residents got involved with our 'Take Part' budget consultation and expressed their views about what areas the Council should be prioritising. Our decisions on the Arts Centre and Harrow Museum are just two of many examples of how residents are influencing the decisions made at the Council.

I am proud that we ensured that Harrow Council pays the 'London Living Wage' to its employees, have invested £200,000 in services to support victims of domestic violence, as well as over £100,000 towards Harrow's Citizens Advice Bureau and £30,000 to support our sporting and health agenda.

Our staff do a magnificent job and are our greatest asset, they have played a pivotal role in implementing all the good work that has happened since the May elections.

We have rolled out a period of free parking in our shopping centres, introduced on the spot fines for littering, cleaned all war memorials in our Borough for the 100th centenary of the beginning of WW1, the re-starting of a council house building programme, started the first stages of redeveloping the Grange Farm Estate, put extra funding into the Xcite unemployment service – I could go on...

These investments show that amidst the challenges and almost impossible decisions we'll have to make, there is still the opportunity for positive developments.

With over a billion pounds of investment potential from a range of public and private sources, we have ambitious plans for Harrow. Through public meetings and resident involvement in the design stage of the plans, we will ensure that local people benefit from this investment; from local jobs, training and apprenticeships, as well as ensuring that we build the affordable houses that are so badly needed.

Throughout this plan the Council sets out how working together we will Make a Difference; for the Vulnerable, for Communities, for Local Businesses and for Families.

Now is the time for residents, local businesses and community organisations to come together and work with us to build a Harrow we can all be proud of, where residents live in strong communities – in neighbourhoods they are proud to call home. It won't be done in one year. But over time, and working together, we can achieve a brighter future for our Borough.

Cllr David Perry

Leader of the Council

2. Our Borough – Our Harrow

Our Borough

Harrow is an extraordinary place: we are the safest Borough in London; one of the most diverse places in the country; a suburb with bountiful green space with just over a quarter of the area (over 1,300 hectares) consists of open space, yet incredibly well-connected to a global airport hub and the centre of the world's greatest city.

Harrow is an outer London Borough in North West London, approximately 10 miles from central London. Covering 50 square kilometres (20 square miles) and is the 12th largest borough in Greater London in terms of size and 20th in terms of population. There are nine district centres, plus Harrow Town Centre which is one of London's twelve metropolitan centres.

The borough is divided into 21 wards and each served by three directly elected members. We currently have a Labour administration with 34 elected members and the opposition groups comprise 26 Conservative, 2 Independent, and 1 Liberal Democrat members. Of the total of 63 members, 25 are women (14 Labour, 10 Conservative and 1 Independent).

Our Harrow

Harrow is one of the most ethnically and religiously diverse boroughs in the Country with people of all different backgrounds and life experiences living side by side. It is the richness of this diversity, and the positive impact that it has on the borough and our communities, that we believe helps make Harrow such a great place to live, work and visit.

Despite our rich heritage, we face some exceptional challenges. We have more young and more elderly than ever to take care of, but our budgets are falling. We have great wealth and beautiful architecture, but we also have more low-paid jobs than nearly anywhere else in London and are caught in London's housing crisis.

In serving a diverse population, the Council aims to ensure there is equality of opportunity for its residents, service users, employees, elected members, stakeholders and partner organisations irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

As a community leader, we will continue to bring together public partners such as the NHS, police and fire brigade, and residents who want to make a difference in their communities like the Community Champions to ensure we achieve this vision for our borough.

3. Making a Difference for Harrow: A Summary of our Vision

Our vision and priorities:

Working Together to Make a Difference for Harrow

What we will do...

Making a Difference for the Vulnerable

- Our most vulnerable residents are safe from harm and abuse
- Support our residents who fall on hard times and give them the opportunities they need, such as welfare support or employment opportunities
- Harrow residents live as independently as they can
- The mental health and well-being of residents improves
- Minimise health inequalities within the borough

Making a Difference for Communities

- Harrow is a pleasant place to live
- Maximise opportunities for volunteering
- Collaborative working with the voluntary and community sector
- Harrow is one of the safest boroughs in London
- Residents are empowered to influence local decisions
- People from all backgrounds are respected and treated fairly

Making a Difference for Local Businesses

- Residents and businesses benefit from local economic growth
- Sustainable business growth
- The skills and apprenticeship opportunities for residents improve
- Provide the homes, schools, jobs and infrastructure needed through regeneration
- Create and maintain strong local links and partnerships between the Council and local businesses

Making a Difference for Families

- Families live in quality, affordable homes
- Help is targeted at those families most in need of support
- Improve skills and apprenticeship opportunities for residents
- Secure an excellent education for every child

We will do this by:

ECONOMIC GROWTH & REGENERATION

Our proposed regeneration programme is a once in a generation opportunity to make a difference to the borough and residents' health and quality of life by accelerating the delivery of new homes, creating new jobs, commercial workspace and high quality town and district centres, increasing primary school provision and investing in leisure and sport facilities, an energy network and our transport infrastructure.

PROTECTING THE MOST VULNERABLE

There are people who are in real need of help and support in the borough. It is our role to do all we can to keep them safe and improve their quality of life, health and wellbeing. We will prioritise support to carers, quality health and social care provision, helping people deal with the rising cost of living and the education and protection of our young people.

ENGAGING WITH RESIDENTS DIFFERENTLY

Resident engagement will lie at the heart of how we work with the community to deliver those services most needed. We will seek to empower and inspire local people to become more active citizens, able to contribute to local decision-making and play a greater part in their community through volunteering.

A FAIR & EQUAL BOROUGH

Ensuring fairness and equality of opportunity for all residents and communities in Harrow is critical and we believe that it is fundamentally right that residents are aware of their rights and responsibilities and that Council services are underpinned by fairness for all.

ENSURING AN EFFICIENT AND EFFECTIVE ORGANISATION

We want to be a modern and efficient Council, with an outcomes-focused culture to help us meet the challenges ahead. We will work with our partners, in particular, health and social care and other councils to explore further opportunities for integrated and shared services. We will continue to reduce bureaucracy and embrace the opportunities that digital and smart technologies have to offer.

ALTERNATIVE SOURCES OF INCOME

We need to do all we can to diversify our income given the significant pressures on our budgets from ever decreasing government grant. We will seek to generate alternative long-term income streams for the Council so we are able to continue to provide important and vital services.

WORKING IN PARTNERSHIP WITH OTHERS

We will develop strong relationships with residents, staff, external partners and the local voluntary & community sector; consultation and engagement will lie at the heart of everything we do as a Council.

How we will do it...

4. Our Vision for Harrow

This Plan sets out the Council's vision and ambitions for the borough over the next four years and how we intend to achieve them. It is clear that during this time we will continue to face significant challenges and the services residents use, whether run by the Council, NHS or central government will continue to change because of the continuous squeeze on public finances. Through our Take Part campaign we have been open and honest with residents about what the impact of the budget cuts will mean for the Council. With less resource, it is important that we are clear about our strategic direction and priorities for investment.

Therefore, in order to make a difference for the vulnerable, communities, families and businesses over the next four years, the Council will be focussing its attention on: economic growth and regeneration; protecting the most vulnerable people; putting equality, fairness and engagement at the heart of what we do; ensuring the Council is as efficient and effective as possible and securing alternative sources of income.

Economic Growth & Regeneration

Harrow as a place has significant potential and large regeneration opportunities. The proposed regeneration programme for the borough is a once in a generation opportunity to make a real difference to the place and people's quality of life by building new houses and schools, encouraging business development, improving the town centre and district centres and creating new job opportunities. Encouraging growth in the local economy is a vital component in being able to offset some of the worst effects of the public sector spending cuts. It raises much needed income to invest in social infrastructure such as schools, leisure and sports facilities and transport improvements that the people of Harrow can be proud of.

Regeneration provides an ideal opportunity to meet our council priorities and make a difference for:

1. Communities, by accelerating the delivery of new council housing, affordable private rented homes and homes for shared ownership and outright sale, vibrant town centres that attract business investment and jobs and offer enhanced leisure and sport facilities, transport infrastructure and an energy network.
2. Business, by providing new commercial workspace, support to access markets, advice and finance, addressing skills shortages.
3. Vulnerable residents, by breaking down the barriers to employment, reducing fuel poverty, tackling overcrowding and lowering crime and anti-social behaviour.
4. Families, by providing new family homes, renewing our housing estates and delivering new and expanded schools.

We are currently consulting residents, businesses, investors and our partner public sector bodies on this strategy and exploring alternative options. We will also be considering how the regeneration programme may have a positive impact on the health of Harrow residents and create a healthier place to live.

Our ambition is deliver 5,500 new homes within the heart of Harrow between now and 2019 which would also contribute to the creation of over 500 jobs and secure essential new infrastructure including two new primary schools, additional nursery provision, a new central library, potential for a new civic centre, junction improvements, enhancements to playing pitches and sports facilities, a new health centre and new public parks and civic spaces in the borough.

Demand for affordable housing to rent and buy in Harrow is high and growing as the cost of rented and housing for sale rises. So the Council has drawn up plans to restart council house building. The Homes for Harrow programme aims to build up to 500 much needed new affordable homes for rent or shared ownership on Council estates where there is suitable land or underused garages. We are also looking at some of our existing estates to see if they could be redeveloped to provide more and better quality homes.

Protecting the most vulnerable people

Harrow is a great place to live, however, there are many people who are in real need of help and support due to ill-health, poor housing, financial hardship or the impacts of welfare reform. We will continue to prioritise our core commitment to help and support those most in need in our community. For example, in Harrow there are a larger proportion of older people, when compared to the London average, and older people generally have greater support and care needs. We will therefore work closely together with the Clinical Commissioning Group (CCG) and other health partners to ensure quality health and social care provision for those in need, strengthen our autism support and advice, refresh our Health and Well-being Strategy and implement the Care Act.

Another important way in which we can help vulnerable residents improve their quality of life, health and wellbeing in these difficult times is to help them get out of or avoid poverty and help them to deal with the rising cost of living and welfare changes by helping them find work through our Xcite programme, our mental health and employment project and the creation of new jobs and apprenticeships on the back of our regeneration plans.

Harrow Council is also committed to working with families and their communities to educate, support and protect children and young people and ensure they achieve their potential throughout their journey to adulthood. We will continue to work with partner agencies to provide a range of services that: identify and support the needs of children and families before they become acute; prioritise the mental and physical health of all our children and families; aim to ensure everyone in Harrow is safe from harm and narrow the gap in educational attainment for disadvantaged pupils.

Active residents, either through caring for a relative or friend, or supporting those who need help to travel around the borough are vital for our success in helping those most in need. The Council owes a great debt of gratitude to carers within Harrow and we must never take them for granted. We will therefore invest in support for carers and listen to individuals and groups in the community to see how they can be better supported to continue to do the things which make such a real difference to the lives of so many people.

We also recognise that for some, the last few years of 'austerity' have been a struggle. We want to make sure that Harrow is a place where individuals and families can thrive and the aspirations of all residents can be met, whether it be from good quality, affordable housing and safe neighbourhoods, or good schools, vibrant town centres and new jobs. We know that the cost of living has risen in Harrow, and we will do all we can to support residents through this. The Council is already leading by example by paying the London Living Wage to its employees. Through our contracts and procurements we will work with and encourage our business partners to also pay the London Living Wage.

Engaging With Residents Differently

To achieve our vision, the Council wants to encourage residents to become more active citizens by providing support and opportunities to contribute to the decision-making process and playing a greater part in their community to make Harrow better. We will place engaging and involving the community at the centre of our approach over the next four years. We will do this by working more closely with partners such as the voluntary and community sector whilst, at the same time, being more innovative and saving money in the Council. For instance, we will look at how we can make better use of technology, recognising that many residents in Harrow are online, and develop more innovative ways to get the views of those residents who rarely contact the Council or have previously found it difficult to get into a meaningful conversation with us.

We want to create a new model of local government where the Council works with local people and the voluntary sector every step of the way. We will look at how, by working with residents and the voluntary and community sector, we can improve the capacity and resilience of all communities within the borough to be able to come up with solutions to the challenges that they face, and be able to step in where public services can no longer operate or are affordable.

Harrow already has a high proportion of residents who volunteer in their communities, gaining new skills and friends while helping others. We know volunteering is beneficial for health and wellbeing and can reduce social isolation, exclusion and loneliness. We want to build on the local resourcefulness within our communities. It will be the role of councillors to bring people together to

make a real and positive difference to their area. Councillors should be leaders in their local community and therefore rooted in the area that they serve and be seen to be active; contributing to what matters to the community; facilitating debate; bringing people together and acting to deliver those things that make a big difference to communities.

Ensuring the Council is as efficient and effective as possible

We know there are tough times still ahead. Given that the Government's deficit reduction plan will continue until at least 2018, the need for the Council and other parts of the public sector to continue to make savings will not go away. Harrow Council is already a low spend authority that has made savings of £62m since 2010/11 and 75% of the savings proposals identified in the 2015/16 budget come from further efficiencies, contract savings, management savings and additional income. We will continue to seek efficiencies, reduce management costs and bureaucracy and get the best value for money from our contracts. But we will also have to reform the way in which the Council operates to be more resident and outcomes focused and re-design services together with the community to ensure they continue to be as efficient and effective as possible. We will also: explore all options for further collaboration and partnership working; seek to expand shared service arrangements such as HB Law; look at ways of generating alternative sources of income; and the look into the opportunities that new digital and smart technologies can offer to enable greater access to our services.

Our workforce is our most important asset and we are very proud that our investment, support and management of staff has been recognised with our Investors in People accreditation. During these tough times however, it will be important that we continue to broaden and deepen our levels of engagement with staff about the future of the Council. We will continue to encourage our staff to be the best they can be to meet the future challenges. We will enable employees to lead healthier lives, ensure our workforce is at capacity by developing recruitment and retention packages that maximise our employment offer and ensure that we have the right workforce size and mix of people and skills to deliver the services residents want and need.

Alternative sources of income

As part of our ambition to reform the Council and given the significant pressures on our budgets from ever decreasing government grant, we will be seeking to generate alternative long-term income streams for the Council so we are able to continue to provide important and vital services and strengthen the Council's financial position. For example, rather than sell off all our assets outright when development opportunities arise, our intention is to retain freehold ownership and set up an arms-length trading company that could then manage new private rented housing on behalf of the Council. This would generate long-term revenue income for the council with sustainable returns, address the housing shortage in the borough, provide greater choice for those reliant on the private rented sector and improve standards of property management, condition and service.

Working in partnership with others

The staff are the lifeblood of any organisation, we are lucky in Harrow to have magnificent staff who serve residents. We will take every opportunity to support and engage with staff – our staff consultation regarding the Chief Executive was indicative of the open and transparent way in which we work. We will also develop strong relationships with our external partners, whether they are public sector organisations such as the NHS or private developers and local businesses as a part of the regeneration plans for Harrow. We are incredibly lucky to have a local voluntary & community sector that delivers outstanding services to our residents. We value all the work they do and want them to be at the heart of decision making, which is why we pledges to have a member of the local voluntary sector on Cabinet. We have also pledged that all Labour Councillors will do a minimum of 50 hours a year volunteering in the community.

5. Achievements in 2014/15

Despite the challenging financial situation we find ourselves in, the Council continues to work with local people, business and partners to provide high quality, low cost services and make improvements across the borough. This section sets out some of the Council's most significant successes and achievements during the past year.

Making a Difference for the Most Vulnerable

- Secured £38k to support residents with mental health issues into sustainable employment.
- An extra £200k has been invested in domestic and sexual violence and strategy and an action plan for how to use that extra investment was agreed at Cabinet in September 2014.
- Invested £120k into Harrow's Citizen's Advice Bureau, for face to face support services with our most vulnerable residents
- An additional £715k has been committed to recruiting more Children's social workers to meet rising demands.
- Harrow's Emergency Relief scheme has been successful in helping over 600 residents
- We have supported the voluntary sector to launch the *Harrow Advice Together* portal.
- M4Money Credit Union has been promoted to staff and residents. The Council is also promoting access to business loans for Harrow businesses through North London Credit Union.
- Work to protect vulnerable people from spiralling debt has included banning access to pay day loan websites from all Council computers and the libraries' Wi-Fi.
- Over half of eligible Adult social care users have a cash Personal Budget
- Over 250 adult social care clients now use My Community ePurse
- Shared Lives participants have trebled over the last year. This voluntary scheme matches carers and service users in a family-like relationship.
- The Families First project has so far helped some 300 families out of 395 identified with complex needs to make the improvements sought by the national Troubled Families programme and has qualified to continue with phase two.
- The Firs respite care centre for children has again been graded Outstanding by Ofsted inspectors
- Helped vulnerable residents ensure that their home is a warm and a healthy place to live
- Launched a community campaign to target high rates of Tuberculosis in the borough
- Improved the confidence, resilience, health and wellbeing of people with long term conditions and their carers by running a volunteer-led self-management programme.
- Launched a walk programme for people with learning disabilities in addition to the 10 already established health walks

Making a Difference for Communities

- Streets are cleaner – 90% litter free (up from 86%)
- Achieved 50% recycling rate (up from 46%)
- 99.5% of our street lights are functioning
- Introduced Fixed Penalty notice scheme for low level environmental crimes such as spitting and littering
- Pledged that all Councillors will do a minimum of 50 hours a year volunteering in the community; this was kick-started in January 2015
- Creating a new Town Park and Performance Space in Lowlands
- Introduced a pilot project for snow champions with training and provision of materials to volunteer residents to support the gritting of streets
- The Community Champions Scheme has been launched with an updated website and annual conference, as a joint initiative between Harrow Council and the Metropolitan

- Police aiming to encourage more people to volunteer.
- Trained 45 local people to support residents to improve health and wellbeing and signpost them to services
- The Borough has the lowest levels of Anti-Social Behaviour in London
- A draft Regeneration strategy and Action Plan were approved by Cabinet.
- Invested £10m in highway improvements and maintenance.
- The Council's Carbon Reduction achievement exceeded its target
- The Council has re-launched its Fairer Grants campaign.
- £50,000 was made available to Harrow's Community Sport and Physical Activity Network.
- There were 3,451 responses to *Take Part*, a programme of consultation and engagement with residents to discuss how together we can meet the challenges of the future.
- The Under One Sky festival was successfully delivered in partnership with community organisations
- The Council held its annual volunteer award scheme - Harrow's Heroes, that celebrates the work of volunteers across the borough
- Cleaned all war memorials in our Borough for the 100th centenary of the beginning of World War 1
- Helped residents to bring three neglected and underutilised sites back to life for growing food.

Making a Difference for Local Businesses

- Rolled out a period of free parking in all our district centres
- Supported 300 local businesses with business support events including Barclays Ready for Business Seminar (for start ups), the regular big mentoring seminar in partnership with Ministry of Growth and Harrow College (for established enterprises) and the annual NatWest mobile Business School in Harrow Town Centre which offered free advice, one to ones and bite size seminars to would be entrepreneurs
- Won the High Impact Award for contributions to Global Entrepreneurship week.
- Supported the development of Harrow's first Business Improvement District
- Supported plans for Crossrail expansion
- Successful roll out of a period of free parking in our district shopping centres
- Invested in the Council's Xcite programme to help over 200 workless residents into employment and developed a 'How to' guide for taking on apprentices.

Making a Difference for Families

- A Housing Zone Bid for up to £35m to accelerate the delivery of new houses on major sites within the Heart of Harrow Area Action Plan has been submitted.
- A pilot scheme to introduce selective licensing for private-sector landlords is to be introduced in Edgware which will give the Council significantly greater powers to tackle rogue landlords.
- Proposals for estate regeneration across a number of sites have been developed
- A Housing Growth fund bid of £1.7m for phase 1 of the HRA new build programme has been approved
- A further £3.6m has been awarded from the Housing Growth fund for phase 2 of the HRA new build programme
- Harrow's homelessness prevention work is amongst the most successful in London against a background of increasing demand
- We have helped ensure that 98% of 16-18 year olds are in education, training or employment
- Created and recruited ten apprentices within the Council
- Strong schools inspection results continue
- Our Schools Expansion Programme sees a £45m investment in our Schools to meet increasing demand for school places and Special Educational Needs schools. We

permanently increased Reception intakes at 8 primary schools in September 2013 and will deliver a further 15 by September 2015.

- Implemented the Special Educational Needs and Disabilities provisions of the Children and Families Act 2014

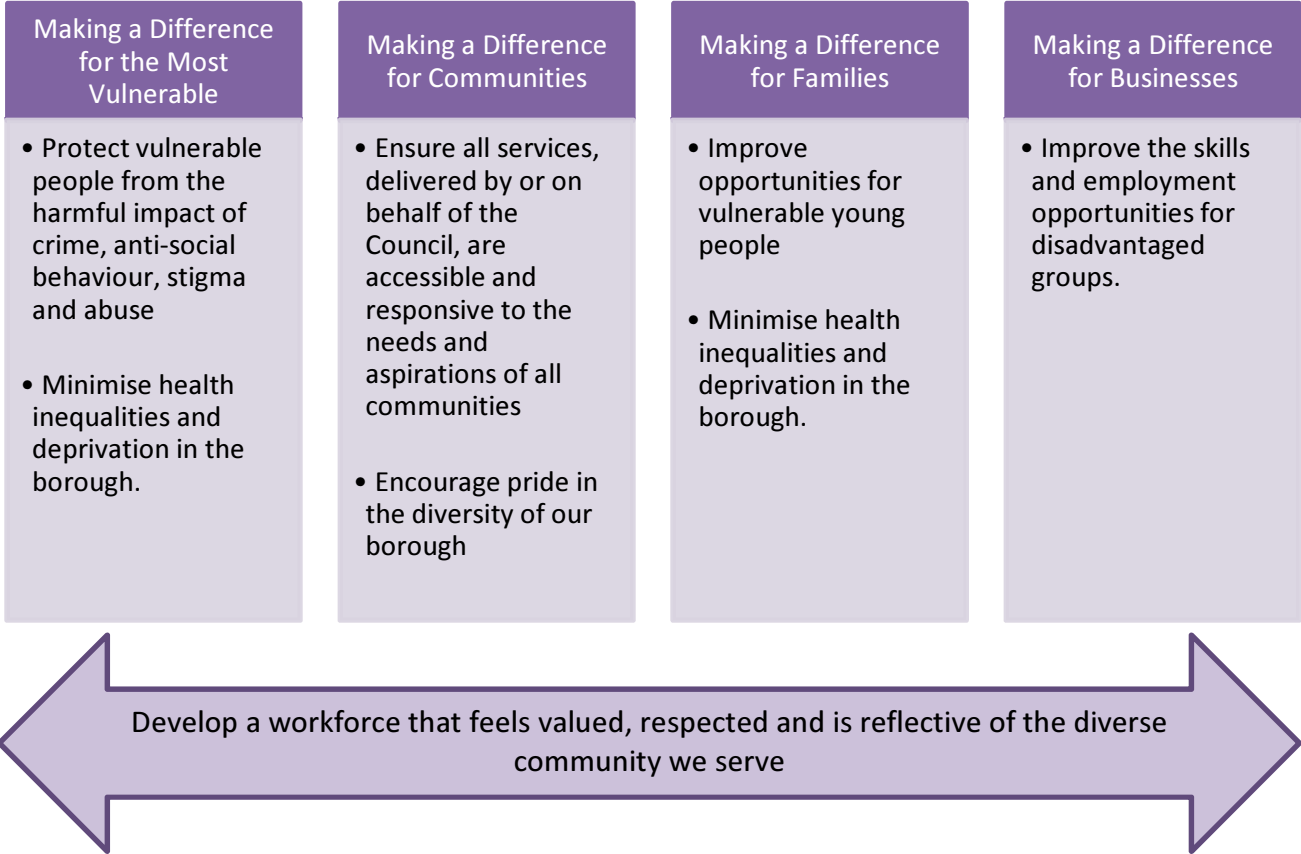
Efficient and Effective Organisation

- 68,500 residents now have Access Harrow accounts
- 75% of customer interactions are by self-service
- Satisfaction with the One Stop Shop remains very high at 96%
- The Council as an organisation has been awarded the Investors in People mark, while the Resources Directorate and the Housing service gained the IIP Gold award
- A review was completed into the reinstatement of the post of Chief Executive and an appointment to the position was confirmed by Council on 13 November 2014.
- Delivered £12m of cashable savings in 2014/15
- Over 120 staff have successfully completed our Leadership Development Programme which has also been accredited by the Institute of Management and Development

6. Our Equalities Priorities

Harrow is one of the most ethnically and religiously diverse boroughs in London and this richness of diversity is something to value and encourage as we believe it helps make Harrow a great place. As a Council, we are committed to ensuring equality and diversity is integral to everything we do irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

That is why we have included our key equality objectives for 2015-2019 in this plan. They set out our commitment as a community leader to work in partnership with the public, voluntary and private sectors to ensure we recognise the needs of every local community and promote inclusion, cohesion, fairness and justice. Our commitment as an employer is to employ a diverse workforce, to help us to understand and relate to the communities we serve. And our commitment as a service provider and commissioner is to ensure our services are open, fair and accessible.



Measures for each equality objective are integrated into the Council’s overall performance scorecard. This is then reviewed quarterly through the Council’s performance management framework and reports to Cabinet and Scrutiny through the Strategic Performance Report.

We will continue to ensure all key decisions have an Equalities Impact Assessment that highlights any disproportionate impact and enables the Council to put in place appropriate mitigations.

7. Delivery Plan

This section sets out the key projects and initiatives the Council will prioritise over the next four years to make the ambition, priorities and outcomes of this Council Plan a reality. It also sets out some of the key measures and targets we will use to evidence our performance (The full list of our performance measures is contained within our Corporate Scorecard and reported to Cabinet and Scrutiny through the Strategic Performance Report. The reports are available on the Council's website at: www.harrow.gov.uk/strategicperformance.)

Corporate Priority	Making a Difference for the Vulnerable
Outcomes we want to achieve	<ul style="list-style-type: none"> a. Our most vulnerable residents are safe from harm and abuse b. Support our residents who fall on hard times and give them the opportunities they need, such as welfare support or employment opportunities c. Work with our partners in the NHS to ensure that Harrow residents live as independently as they can d. The mental health and well-being of residents improves e. Minimise health inequalities within the borough
Key projects and initiatives to deliver the Council Plan	<ul style="list-style-type: none"> ○ <i>Invest an extra £1m into domestic violence, support to carers and those in need</i> ○ <i>Provide investment for extra children's social workers</i> ○ <i>Deliver our Child Sexual Exploitation action plan to help keep children safe</i> ○ <i>Deliver our offer around Special Educational Needs & Disability provision</i> ○ <i>Joint working with the CCG and health partners to ensure quality health and social care provision for those in need</i> ○ <i>Implementation of the Care Act which is making major changes to the way in which adult social care is funded</i> ○ <i>Deliver the West London Mental Health and Employment Integration Trailblazer to help support people with mental health issues into work</i> ○ <i>Bring together autism support across the borough to create a strong, coherent support package</i> ○ <i>Prevent homelessness by helping families stay in their homes or find suitable alternative accommodation</i> ○ <i>Invest in extra staff in Access Harrow to deal with residents' Council Tax enquiries</i> ○ <i>Campaign for a fairer grant for Harrow residents</i> ○ <i>Work with and encourage businesses to pay the London Living Wage as a minimum</i> ○ <i>Refresh the Health and Well-being strategy for the borough</i> ○ <i>Tackle fuel poverty in the Borough</i>
Key Performance Indicators and targets	<p>The extent to which those with long term support had their care needs reviewed during the year</p> <p>Percentage of children with Child Protection Plan for over two years</p> <p>Stability of placements of Children Looked After (% with more than 2 placement moves)</p> <p>Repeat referrals to Children's Social Care (within 12 months)</p> <p>% of social care users who receive self-directed support</p> <p>% of carers who receive self-directed support</p> <p>Council adaptations: average time taken from assessment to completion</p> <p>Number of eligible people receiving health checks</p> <p>Adult participation in sport and active recreation</p> <p>Number of people setting a quit date with Smoking Cessation services who successfully quit at 4 weeks</p> <p>Violence with injury - Domestic abuse</p> <p>% of street lights functioning</p> <p>Number of schools registered for the Healthy Schools London Awards</p>

Corporate Priority	Making a Difference for Communities
Outcomes we want to achieve	<ul style="list-style-type: none"> a. Harrow is a pleasant place to live b. Maximise opportunities for volunteering c. Collaborative working with the voluntary and community sector d. Harrow is one of the safest boroughs in London e. Residents are empowered to influence local decisions f. People from all backgrounds are respected and treated fairly
Key projects and initiatives to deliver the Council Plan	<ul style="list-style-type: none"> o <i>Restart a council house building programme</i> o <i>Begin the regeneration of key sites in the Borough, such as the Civic site, Greenhill Way, Grange Farm Estate and Gayton Road</i> o <i>Develop a resident engagement & involvement agenda, with a residents regeneration board and greater citizen control over budgets</i> o <i>Secure improvements to public transport – access to Harrow on the Hill Tube station and a potential crossrail link to Harrow & Wealdstone station</i> o <i>Invest in improved social infrastructure – new urban parks and spaces, new central library, arts provision and new restaurant offers in key regeneration sites across the borough</i> o <i>Engage with key stakeholders to consider the redevelopment of the Leisure Centre and surrounding site.</i> o <i>Maximise further opportunities for volunteering in the borough</i> o <i>Design and deliver a new ‘Community Champions’ volunteering scheme</i> o <i>Set up Park User Groups</i> o <i>Support and promote greater community engagement to give residents more control over local decisions and make neighbourhoods more pleasant places for residents to live</i> o <i>Ensure that residents have access to sport facilities and opportunities for physical activity</i> o <i>Explore opportunities for a sustainable future for both the Arts Centre and Harrow Museum, as well as exploring the development of cultural opportunities within the Borough</i> o <i>Ensure that the centenary of the First World War is commemorated each and every year</i> o <i>Tackle fly-tipping in the Borough and introduce on the spot fines for littering and spitting</i>
Key Performance Indicators and targets	<ul style="list-style-type: none"> Street and environmental cleanliness – litter, detritus, graffiti (excluding private land), fly posting Number of active park user groups No. of hours contributed by volunteers supporting the direct delivery of Community & Culture services Number of trained Community Champions Number of voluntary & community sector events supported in the delivery of Harrow’s Cultural Calendar Percentage of food establishments broadly compliant with food hygiene law Residents who are satisfied with the safety of Harrow Town Centre Residential burglaries Rate of proven re-offending by young offenders Percentage of residents who feel that they can influence decisions affecting their local area Percentage of residents who agree that people from different backgrounds get on well together in their local area

Corporate Priority	Making a Difference for Local Businesses
Outcomes we want to achieve	<ul style="list-style-type: none"> a. Residents and businesses benefit from local economic growth b. Sustainable business growth c. The skills and apprenticeship opportunities for residents improve d. Provide the homes, schools, jobs and infrastructure needed through regeneration e. Create and maintain strong local links and partnerships between the Council and local businesses
Key projects and initiatives to deliver the Council Plan	<ul style="list-style-type: none"> o <i>Create up to 3,000 new jobs and 500 apprenticeships for young people through the delivery of the regeneration strategy and action plan</i> o <i>Support low paid residents to gain higher level skills, through employment and training plans with developers and contractors and Harrow's Employment and Construction Training Initiative</i> o <i>Provide free recruitment service through Job Fairs and Xcite to help business recruit locally</i> o <i>Work with businesses to encourage them to pay the London Living Wage</i> o <i>Deliver the commercial and procurement strategy to support local business and achieve additional social value that meets the needs of Harrow's residents and businesses</i>
Key Performance Indicators and targets	Vacancy rates in Town Centre
	Resident perceptions of town centre and range of shops
	Number of businesses supported by the Council (annual)
	Percentage of 3rd party contract spend placed with local organisations
	16 to 18 year olds who are not in education, employment or training (NEET)
	Number of residents supported in sustained employment with job outcomes sustained for 6 months or more
	Number of apprenticeships / work experience places offered by the Council
	The number of young people supported into apprenticeships and jobs
	Net number of new homes completed

Corporate Priority	Making a Difference for Families
Outcomes we want to achieve	<ul style="list-style-type: none"> a. Families live in quality, affordable homes b. Help is targeted at the families most in need of support c. Create skills and apprenticeship opportunities for residents improve their life chances d. Secure an excellent education for every child
Key projects and initiatives to deliver the Council Plan	<ul style="list-style-type: none"> ○ <i>Deliver the schools expansions programme and build 2 new primary schools in the borough</i> ○ <i>Seek to close the educational attainment gap for disadvantaged groups of young people</i> ○ <i>Implement the Homes for Harrow Programme to build new council houses through the renewal of Grange Farm estate and an infill programme</i> ○ <i>Tackle landlords that are trying to take advantage of families, through licensing, support and the tenants and landlords charter</i> ○ <i>Help turn around the lives of families with complex needs by delivering the second phase of the national Troubled Families Programme</i> ○ <i>Help parents meet the cost of childcare, and ensure they have all the support they need</i> ○ <i>Support low paid residents to gain higher level skills, through employment and training plans and the creation of 500 apprenticeships</i>
Key Performance Indicators and targets	<ul style="list-style-type: none"> Number of affordable family homes completed Number of social housing homes freed up through Council intervention/Grants2Move Total number of households to whom we have accepted a full homelessness duty Adult and Community Learning - success rates (annual) 16 to 18 year olds who are not in education, employment or training (NEET) Number of residents supported into employment by the Council The % of children with a good level of development. Children are meeting or exceeding the Early Learning Goals The percentage inequality gap in achievement across all the Early Learning Goals at Early Years Foundation Stage Achievement gap between pupils with special educational needs and their peers, based on pupils achieving level 4 or above in reading & writing and mathematics at Key Stage 2 The Special Educational Needs (SEN) / non-SEN gap – achieving 5 A*- C GCSE inc. English and Maths GCSEs (equalities measure) Permanent and fixed term exclusions as percentage of Harrow school population Termly rate of overall absence in primary and secondary schools Achievement gap between pupils eligible for free school meals and their peers, based on pupils achieving level 4 or above in Reading & Writing and mathematics at Key Stage 2 and 4 Percentage of Children Looked After for 1 year plus achieving Level 4+ at KS2 in both English and Maths Percentage of Children Looked After for 1 year plus achieving 5+ A*-C GCSEs including English and Maths GCSEs at KS4

	Efficient and Effective Organisation
Outcomes we want to achieve	We want to be a modern and efficient Council, able to meet the challenges ahead. In order to help protect frontline services we will continue to deliver support functions in the most cost effective way, seeking alternative sources of income and continuing to collaborate with regional bodies and other boroughs on shared services and procurement opportunities. We will protect people and Council assets from risks and retain our customer services in Harrow where possible, modernising and simplifying the access channels to the Council, making more services available online and therefore accessible on a more 24/7 basis.
Key projects and initiatives to deliver the Corporate Plan	<ul style="list-style-type: none"> ○ <i>The development of a commercialisation strategy for the Council</i> ○ <i>Look at ways of increasing alternative sources of income, i.e. Private Rented Sector Programme Pilots</i> ○ <i>Implement a senior management restructure</i> ○ <i>Continue to ensure appropriate use of agency and interim staff</i> ○ <i>Put consultation and resident engagement at the heart of everything the Council does</i> ○ <i>Work with our partners and other councils to explore further opportunities for integrated and shared services</i> ○ <i>Rationalise and maximise the use of all Council assets</i> ○ <i>Consider the options for a cost-effective re-provision of the Civic Centre</i> ○ <i>To be the leader in cross council working in west London</i>
Key Performance Indicators and targets	Percentage of residents who agree the Council provides good value for money
	Percentage of residents who feel the Council keeps them informed of services & benefits it provides
	Percentage of residents who are satisfied with the way the Council runs things
	Customer enquiries that should not have been necessary (percentage)
	The proportion of enquiries that were resolved at the first point of contact
	Proportion of web forms and web visits as a percentage of overall contact
	Average wait on calls in Access Harrow
	Average cost per transaction (£) (Access Harrow)
	Total debt collected, at year to date, as a % of total debt raised
	Percentage of Council Tax collected
	Percentage of non-domestic rates collected
	Variation in business rate yield
	Time taken to process housing benefit and council tax benefit new claims and change events
	Staff sickness - average days per FTE excluding schools
Workforce with appraisal in last 12 months (previously IPAD)	

This page is intentionally left blank

Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan	✓	Corporate Strategic Board	
Other		Other	✓
In year cost savings		Full Council	
Title of Project:	Corporate Plan		
Directorate / Service responsible:	Resources, Strategic Commissioning		
Name and job title of lead officer:	Alex Dewsnap		
Name & contact details of the other persons involved in the assessment:	Rachel Gapp		
Date of assessment:	January 2015		

Stage 1: Overview

<p>1. What are you trying to do? (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<p>In May 2014, a new Labour administration took control of the Council, and agreed at Council on the 12th June a new vision and set of priorities:</p> <p>Vision: <i>Working Together to Make a Difference for Harrow</i></p> <p>Priorities:</p> <ul style="list-style-type: none"> <i>Making a difference for the vulnerable</i> <i>Making a difference for communities</i> <i>Making a difference for local businesses</i> <i>Making a difference for families</i> <p>The Plan sets out the Administration's ambition for the borough and the projects and initiatives the Council will prioritise over the next three years to deliver on the</p>
--	--

vision, priorities and outcomes. The delivery Plan and measures have also been updated to reflect the projects and initiatives that the council will prioritise over the next 4 years.

This EQIA accompanies the new Corporate Plan, which is drawn from the approved versions of the Corporate Plan in July 2014, February 2013 (The agreed Corporate Plan covered two years including 2014/15) and February 2014.

The Corporate Plan will be delivered within the same cost envelope as the approved MTFs in February 2015. Given the approved budget, there are no new savings proposals being put forward as part of this Plan. There are therefore no equality implications from the perspective of additional savings.

From the perspective of the activity which is set out within the Plan they are all supporting the Corporate Priorities which encompass all protected characteristics. Therefore there are no direct adverse implications from the delivery plan. However, for some of the substantial areas where work is to start on developing business cases or on new ways of delivery, officers will need to carry out initial EQIAs to ensure that any indirect implications are appropriately managed and mitigated against.

60

Residents / Service Users	Partners	Stakeholders
Staff	Age	Disability
Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
Race	Religion or Belief	Sex
Sexual Orientation	Other	

2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)

3. Is the responsibility shared with another directorate, authority or organisation? If so:

- Who are the partners?
- Who has the overall responsibility?
- How have they been involved in the assessment?

Some of the activities proposed in the Corporate Plan are delivered in partnership with statutory partners like the health service, e.g. related activity to deliver health and social care services to adults. For activity involving partners which is new within the Corporate Plan EQIAs will be completed where appropriate to do so.

Stage 2: Evidence / Data Collation

4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

The following table has been taken from the Harrow Annual Equality in Employment Monitoring Report 2012/13, the 2011 census. It shows the known make up of staff working for Harrow Council and residents in Harrow.

		Whole Council Workforce 5,125 employees	Harrow Community Data 2011 Census
Ethnicity	BAME	36.08%	57.75%
	White	52.08%	42.25%
	Unknown	11.84%	0.00%
Sex	Male	22.36%	49.40%
	Female	77.64%	50.60%
Disability	Yes	1.81%	16.40%
	No	93.66%	83.60%
	Unknown	4.53%	0.00%
Age	16 to 24	3.34%	11.70%
	25 to 34	17.39%	30.40%
	35 to 44	22.67%	
	45 to 54	32.76%	23.60%
	55 to 64	21.15%	
	65+	2.69%	14.10%

Age (including carers of young/older people)	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
Disability (including carers of disabled people)	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
Gender Reassignment	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
Marriage / Civil Partnership	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
Pregnancy and Maternity	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
Race	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
Religion and Belief	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
Sex / Gender	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
Sexual Orientation	For activity which is new within the Corporate Plan which has a potential impact on this group an Initial EQIA will be completed where appropriate to do so.			
5. What consultation have you undertaken on your proposals?				
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation	

<p>The delivery plan is updated from the Plan agreed at July 2014 Council. Where there are similar projects and activities being delivered, the relevant consultation will have either been undertaken before these were put forward to be incorporated in the Plan, or will have consultation as part of their next steps towards delivery.</p> <p>Where there are new elements in the plan, these are based on the Labour Party Manifesto, which is been developed in consultation with Harrow residents. Where necessary, further consultation will be undertaken with residents and communities to shape the delivery of these proposals, in keeping with the ambition of the Administration to consult and engage.</p>	<p>There were a range of consultation methods used in developing the proposals for the previous Plan, including surveys, user groups and stakeholder meetings.</p> <p>For the additional areas, consultation was undertaken with community groups, including women's groups, Trades unions and businesses.</p>	<p>Given the Delivery Plan has within it projects which are either about the creation of efficiencies (i.e. no impact on outcome but reduction in resource investment) or activities which will enhance quality of life there is no disproportionate impact of different groups.</p>	<p>with the affected groups, revising your proposals).</p> <p>No equalities issued identified</p>
<p>6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</p> <p>List the Title of reports / documents and websites here.</p>		<p>N/A</p>	

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	X	X	X	X	X	X	X	X	X

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

05

Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

(include this evidence, including any data, statistics, titles of documents and website links here)

9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation)

						with the affected groups, revising your proposals).

Stage 5: Assessing Impact and Analysis

10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Adverse ✓	Positive ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)				
Disability (including carers of disabled people)				

Gender Reassignment									
Marriage and Civil Partnership									
Pregnancy and Maternity									
Race									
Religion or Belief									
Sex									
Sexual orientation									
11. Cumulative Impact – Considering what else is happening within the								Yes	No impact

Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?										
If yes, which Protected Characteristics could be affected and what is the potential impact?		Yes		No						
<p>11a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?</p> <p>If yes, what is the potential impact and how likely is to happen?</p> <p>12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation</p>										
		Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
08	Yes									
08	No									
<p>If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)</p> <p>If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.</p> <ul style="list-style-type: none"> If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4) If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4) 										
Stage 6: Decision										
<p>13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)</p> <p>Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and</p>										
									X	

all opportunities to advance equality are being addressed.	
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals.	

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.					
Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
All	Ensure that where appropriate key initiatives set out within the Delivery Plan of the Corporate Plan have initial Equality Impact Assessments undertaken.	Documentation completed in accordance Council policy	Before the end of 2015/16	Rachel Gapp, (Head of Policy)	
All	The Council's Strategic Performance Report includes monitoring of the Council's key deliverables, including the delivery plan of the Corporate Plan. This is reviewed by Cabinet quarterly and also includes progress against the Council's agreed Equality Objectives.	Quarterly performance monitored through CSB and Cabinet	To fit with Quarterly performance cycle	Alex Dewsnap, Divisional Director, Strategic Commissioning	

Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

<p>15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>The Council's Strategic Performance Report includes monitoring of the Council's key deliverables, including the delivery plan of the Corporate Plan. This is reviewed by Cabinet quarterly and also includes progress against the Council's agreed Equality Objectives.</p>
<p>16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>As above, through the Strategic Performance Report</p>
<p>17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>No</p>

Stage 9: Public Sector Equality Duty

18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

<p>20 Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)</p>		
<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010</p>	<p>Advance equality of opportunity between people from different groups</p>	<p>Foster good relations between people from different groups</p>
<p>The Priorities agreed by Council encompass all the Protected characteristics, and the Delivery Plan if effectively delivered, will support the Council in eliminating discrimination, harassment and victimisation.</p>	<p>The Priorities agreed by Council encompass all the Protected characteristics, and the Delivery Plan if effectively delivered, will support the advancement of equality of opportunity.</p>	<p>The Priorities agreed by Council encompass all the Protected characteristics, and the Delivery Plan if effectively delivered, will support the fostering of good relations between different groups.</p>

Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

<p>19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p>	None at this stage		
<p>Signed: (Lead officer completing EqIA)</p>	Rachel Gapp	Signed: (Chair of DETG)	Alex Dewsnap
<p>Date:</p>	13/01/15	Date:	13/01/15
<p>Date EqIA presented at the EqIA Quality Assurance Group</p>	19/01/15	Signature of ETG Chair	

This page is intentionally left blank

REPORT FOR: CABINET

Date of Meeting:	19 February 2015
Subject:	Children and Families - Children's Centres
Key Decision:	Yes
Responsible Officer:	Chris Spencer, Interim Corporate Director of Children and Families
Portfolio Holder:	Councillor Simon Brown, Portfolio Holder for Children, Schools and Young People
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendix 1 Consultation Analysis report Appendix 2 EqlA Appendix 3 EqlA information analysis Appendix 4 Letters from organisations responding to consultation Appendix 5 Petitions Appendix 6 Health analysis paper

Section 1 – Summary and Recommendations

This report sets out the proposals for the future model of Children's Centres in order to address proposed savings; it includes consultation feedback and analysis of impact on particular community groups. The report recommends one option, based on this analysis.

Recommendations:

Cabinet is requested to:

1. Note the outcomes of the Children's Centre consultation.
2. Subject to the overall Council budget approval at Full Council in February 2015, approve Option 3 as the preferred future model, namely:

Retain 2 Children's Centres at Cedars and Hillview that fulfils the statutory definition of Children's Centres.

Operate 8 "delivery sites" that will continue to offer access to some of the early childhood services on behalf of the 2 children's centres.

- a) Close St. Josephs Children's Centre.
- b) Close Whitefriars Children's Centre merging the services with Cedars and retaining Whitefriars as a delivery site.
- c) Close Kenmore Park Children's Centre and merge services with Hillview retaining Kenmore Park as a delivery site.
- d) Close Rayners Lane, Earlsmead, Vaughan, Roxbourne and The Pinner Centre, Children's Centres as delivery sites.
- e) Retain The Pinner Centre building as a community resource building.

Reason:

To ensure the sustainability of Children's Centres' services for the communities of Harrow within a reduced budget, whilst also addressing the Council's budget pressures.

Option 3 allows for the possibility of community-run projects, potentially offering:

- Greater opportunities for reaching those most in need of support
- Sustaining and increasing places for 2, 3 and 4 year olds
- A space for the Harrow Preschool Language unit to rent
- Social enterprise opportunities
- Expenses for the Pinner Centre building, with potential to support Health and PVI services to continue

Section 2 – Report

Introductory paragraph

1. There are proposed changes to the Children’s Centres’ model as part of Children’s Services and specifically Early Intervention Service, linked to Harrow Council’s challenge of delivering £83 million of cuts to its budget over the next four years.
2. The Council have already, at this time, and for this current level of savings required, considered and discarded, the option of moving to 1 core Children’s Centre. The aim is to ensure the sustainability of Children’s Centres’ services for the communities of Harrow whilst also addressing the Council’s current budget pressures. The belief is that Harrow can meet the statutory requirements to deliver Children’s Centre services within a reduced budget.
3. The consultation outcome demonstrates strong opposition to closing Children’s Centres. 69.95% of respondents strongly disagree or disagree with savings being made to Children’s Centres budgets. 13.7% of respondents strongly agree or agree with savings being made through Children’s Centres budgets.
4. Option 3 emerges as the option that users of centres, partners, staff and residents prefer if closure of some centres is necessary.

Background

5. The core purpose of Children’s Centres (taken from Children’s Centres statutory guidance, April 2013) is to improve outcomes for young children and their families, with a particular focus on families in greatest need of support in order to reduce inequalities in:
 - Child development and school readiness
 - Parenting aspirations and parenting skills
 - Child and family health and life chances
6. This contributes to local authorities fulfilling their wider duty to improve the well-being of young children in Harrow and to reduce inequalities. (Well-being in this wider context is defined by the Act as: physical and mental health and well-being; protection from harm and neglect; education, training and recreation; the contribution made by them to society; social and economic well-being.)
7. The guidance also describes another outcome as: families are able to access all the early childhood services they need through Children’s Centres. Local authorities should consider how they can use their network of Children’s Centres to the greatest effect through links with other services, including through links with midwifery, GP’s and health visitors.

8. Long standing working partnerships with Health Visiting and Midwifery Services will allow positive outcomes from any necessary changes e.g. relocation of service delivery to an alternative Children's Centre location. Option 3 offers opportunity for minimal disruption to these service provisions. Consideration has been given to how any impact on Health delivery will be mitigated and the analysis is contained in Appendix 6.
9. There is a need to ensure that the Council's Children's Centres continue to provide universal and targeted services to meet the needs of the local communities and have the flexibility to respond to changes to promote a sustainable model.

Current situation

10. The current structure of Harrow's Children's Centres follows 2 previous reorganisations and is developed around 3 Children's Centre 'Hub' groups. These include 5 Children's Centres, with 11 'delivery points'.
11. The current reach for each group is:
 - Cedars Hub (including 5 sites): 2,805 children, 2,080 children from deprived areas
 - Hillview Hub (including 7 sites): 2,780 children, 1,985 children from deprived areas
 - Kenmore Hub (including 4 sites): 2,535 children, 1,650 children from deprived areas

Why a change is needed

12. Harrow Council has the challenge ahead of delivering £83 million of cuts to its budget over the next four years. The Draft Revenue Budget 2015-16 and Medium Term Financial Strategy 2015-16 to 2018-19 was approved by Cabinet in December 2014 which included savings proposals totalling £1.189m in respect of Early Intervention and Children's Centres services and management. These proposals for savings include changes to Children's Centres services which include closing some centres.
13. All 3 options proposed would offer the same level of savings totalling £1.189 million from the Children's Services budget.

Options considered

14. The Council has at this time, and for the current level of savings required, already considered, and discarded, the option of moving to 1 core Children's Centre. The aim is to ensure the sustainability of services for the communities of Harrow whilst also addressing the Council's budget pressures. Whilst there is a need to make significant

savings from front line services, it is believed that the statutory requirements to deliver services within a reduced budget can be met.

The three options proposed to meet the proposed budget savings and consulted on for the future of Harrow's Children's Centres were:

- Option 1: Retain 3 Children's Centres and 4 'delivery points'
- Option 2: Retain 3 Children's Centres and 6 'delivery points'
- Option 3: Retain 2 Children's Centres and 8 'delivery points'

These options were developed based on data used by Children's Centre managers and staff, together with feedback from our partners, staff, parents/carers and children. The Ofsted framework for Children Centre inspections recognises that can be delivered by a single centre, but with services delivered from satellite sites. The Children's Centre's leadership and management team will have overall responsibility for services delivered from external sites.

The Council also has the option to maintaining the current level of children's centres; however this will impact on the proposed budget. The Council's overall budget is being considered at February Cabinet, for recommendation up to full Council. If savings are not made from the children's centre budget, the Council will have to consider what alternatives are available to meet its anticipated budgetary shortfall. Alternatives could include cutting services elsewhere, use of reserves and increasing council tax. Information on these options are included in the budget report, which is being considered at the same Cabinet meeting as this report.

There are 3 approaches to the legal framework for inspecting Children's Centres; standalone, collaborative and group, Harrow Centres would have been inspected as 2 collaborative and 1 standalone; in the future they will be inspected as 2 standalones.

A standalone is where there is a 'Main' centre that has its own manager, has other places identified to provide services (delivery sites), and does not have another main centre within its organisation.

The inspection looks at access to services and activities by families through the main centre and the delivery sites; the services on offer; and the impact they have. It does not make separate judgements about the individual delivery sites.

Consultation information

15. The council consulted on the possibility of closing children's centres as part of the Take Part consultation. The result of this consultation was fed back to cabinet in December 2014 and can be viewed at: - <http://www.harrow.gov.uk/www2/documents/s118033/Appendix%206%20->

[%20Take%20Part%20feedback%20presentation.pdf](#). Following the Take Part consultation, it was considered necessary to carry out a specific consultation with stakeholders on the options around children's centres.

16. As part of Take Part, petitions were submitted, which are attached at Appendix 5. The Children's Centre petitions derived from the Take Part consultation.
17. Specific consultation took place between the dates Tuesday 11th November 2014 through to Sunday 4th January 2015. This included term time and school holidays as use of the centres differs during these periods.

There were many ways used to gain views:

- online survey at www.harrow.gov.uk/CCconsultation
- Fill in a paper copy of the survey, available at all Children's Centres
- Join the conversation on Facebook at www.facebook.com/harrowcc
- Drop in to one of 18 'Have Your Say' engagement events

The standard online platform the council uses for hosting surveys; Objective system – Have Your Say - was used to record all online and hard copy survey results.

The analysis of the consultation questions has been completed and is available at appendix 1.

18. A best practice EqIA stakeholder group was set up and met on 3 occasions with positive results in assessing the responses received to the consultation and therefore allowing intervention to support increased representation from underrepresented groups.
19. There were eleven questions consulted on to determine; which centres are usually used, the demography of those responding, the savings options, the option/s that meet the needs of the communities, meeting needs of the deprived areas, community projects, the preferred proposed option, the best option, the potential impact, proposed staffing and the proposed closures of centres. There was opportunity for any other comments to be offered. There is a belief that the petitions had an impact on the number of people completing the consultation survey. There was some confusion shared by residents about the 'Take Part' consultation as people informed that they had completed a survey and it then emerged that it was the 'Take Part' one and not the Children's Centre Have Your Say, therefore the results from both consultations should be taken into account.
20. The final report from the Have Your Say entry was created on 7th January 2015. The response was considered to be a 'good' level of response.
 - 504 Total respondents were entered into the online survey

- 271 of these respondents completed these via a paper survey
 - 16 emails
 - 7 phone calls
 - 15 letters from head teachers, school governors, preschools managers, LSCB chair, Clinical Commissioning Group, North West London Health Trust
 - 2 parent led petitions and 1 school/governor led petition with a total of 1,065 signatures
 - Consultation event notes were collated
 - Quantitative question responses and interpretation of the data
 - Full feedback paper available.
21. The response via the Have Your say Objective system has offered statistical, graphical and narrative feedback to support decision making. The levels of response differed for each question. Feedback was received which indicated that for some of the population of respondents the questions were not clear to them as individuals and some suggested that they did not have access to enough information to make a response, or in some cases an informed response.
22. The paper supporting the consultation was a separate paper to the survey and one could consider that some people were not referring to this when answering the questions e.g. Response: *'it is difficult to comment without knowing the current structure'*, and yet the current structure was within the paper.
23. The EqIA scrutiny demonstrates that our engagement with different groups of users was satisfactory or above.
24. The overall strong outcome in response to the future preferred model was that if Children's Centres are required to close then option 3 was preferred to effectively meet needs.
(Amended figures)

Option 1

- **26.39% strongly agree or agree**
- **27.78% strongly disagree or disagree**
- 33.54% either did not respond or 'don't know'
- 12.30% were neutral

Option 2

- **32.34% strongly agree or agree**
- **21.63% strongly disagree or disagree**
- 33.73% did not respond or 'don't know'
- 12.30% were neutral

Option 3

- **42.46% strongly agree or agree**
- **16.27% strongly disagree or disagree**
- 28.57% did not respond or 'don't know'
- 12.70% were neutral

25. Seventy five additional comments were received related to this question and there were no comments that favoured fully the preferred option 3 instead there were a number of comments that had the following themed points:-

'I think closing any of the centres will mean some families in need simply won't be able to access these essential services, but of all the options I believe option 3 to be the best choice for families within the borough'.

'I feel the services provided at the moment only just meet the needs of the community'.

Full responses to all questions are available via the objective report at:-
http://harrow-consult.limehouse.co.uk/public/cs/childrens_centres/childrens_centres_consultation
and further responses are included in the analysis report in appendix 1.

Respondents

26. Data

- 66.87% of respondents were parent /carers of a child under 5 years old
- 8.73% were parents/carers of a child aged 5-12 years
- 1.98% were parents/ carer of a child aged 13-17 years
- 16.87% were 'other' which includes:- staff, partners from health, midwifery, health visiting, PVI sector, therapy services, G.P's, CCG, LNWHHT, schools, Head Teachers, Governors, nurseries, preschools, L.A officers, adult learners, traveller liaison officer, residents, grandparents.

The following themes emerged from the comments in the consultation responses:

- Impact of the decision on other early years providers, including private nurseries and childminders;
- Services to over 5's – whilst there were mixed views, a number of respondents felt that if services had to be cut, then it was reasonable to cut services for over 5 year olds, as these children attend school. After school support was considered important as well as services for children with SEN;
- Impact on families – there was a high level of concern about the impact on children and families, including lower levels of development, higher rates of post natal depression and isolation and increasing reliance on other statutory agencies;
- Distance – some respondents commented that some centres were quite closely located, however a number of respondents commented that distance would hinder their ability to attend centres, as they would not be within walking distance;
- Services offered – there were differing opinions between having fewer centres offering more services and current services being

- over capacity. Using the buildings for other uses and charging for services were put forward as options for consideration.
- SEN – there were comments that children with SEN should be protected and that services offered to these children and their families were vital.

Letters were received from the Local Safeguarding Children Board and North West London Health Trust, Clinical Commissioning Group, plus a letter which was submitted by 10 different schools. These are attached at Appendix 4.

There were 3 petitions received (Appendix5) with a total of 1,065 signatures, 2 were 'Save Harrow's Children's Centres' and the other stated:-

'We the undersigned petition Harrow Borough Council to maintain the current levels of service provided by the Children's Centres. These are key to supporting children's development across the borough. Failing to maintain this service will have a long term impact on individual children and their families. The loss of this service will also have long term financial implications for Harrow Council. We think that this should be prioritised at the expense of other areas of the council's budget, outside of Children's Services'.

Women

Women are more likely to be affected than men as women are more often the main carer of children, and maternity services and breastfeeding services are provided through centres. The intention with option 3 is that these services are not affected, instead if required in the case of one centre for the service to be relocated.

Women are well represented as users of Children's Centres, which is an expectation as prenatal services are provided, and mothers are registered as main carers.

73.21% of respondents stated that they were women. 6.55% of all parents completing the survey were lone parents, a higher proportion than expected as data shows that there are 3.3% of all parents accessing centres are lone parents.

There are no specific services for lone parents, universal and specialist services are accessed by lone parents. Views of lone parents were represented well in respondents.

There are some specialist interventions and services for teenage parents these are not affected in the changes whichever option is chosen. Teenage parents were well represented in the survey. 4.56% of all parents completing the survey were teenage parents, a higher proportion than expected as data shows that there are 0.5 % of all parents accessing centres are teenage parents.

Children with SEN and children with disabilities

The centres where there are specific facilities and services for children with SEN and children with disabilities are retained in option 2 and 3 with option 3 offering maximum opportunity to meet the needs of these children. Therapy services and interventions are retained fully and have opportunity for enhancing in option 3.

Children with SEN and children with disabilities are welcome and integrated at all services in centres and clearly respondents considered that the more places for services to be provided the least impact this would have on communities including those with specific needs.

Travel

Option 3 maximises the opportunity to reduce the impact of accessing relocated services as the retention of 10 places to provide services gives greater choice for location and less changes to current delivery of services than option 1 or 2 offer.

It is clear that there will be a need for some families to travel further to access services, the centres and delivery sites have been chosen to reach the highest level of families in deprived areas; retain health service access, and maximise space and facilities available within them.

Work has been undertaken to explore bus and train travel facilities in relation to the locations of the centres and delivery sites.

Recommendations

27. It is recommended that cabinet approve option 3 in its entirety which is:
 - 2 Children's Centres: Cedars and Hillview as Full Core Offer Centres
 - 8 Delivery sites: Kenmore Park, Gange, Chandos, Stanmore Park, Whitefriars, Grange, Elmgrove and Pinner Wood that will continue to offer access to some early childhood services on behalf of Cedars and Hillview
 - the proposed staffing structure
 - an additional building retained; The Pinner Centre, for community run projects and health services.
28. The reason for approving option 3 is that the option will maximise the opportunities to:
 - Respond to the voice of the people contributing to the Children's Centres Have Your Say consultation

- Respond positively to the views they expressed that it is most able to meet the needs of the communities in Harrow
- Reach 7,115 children under 5 years with 5,715 of these from the deprived areas of the borough
- Maintain delivery of core services and the majority of wider services currently provided by the 5 existing Children's Centres
- Improve targeting of services for those most in need
- Maintain delivery of midwifery, health visiting services at 2 centres and 5 delivery points
- Relocate some services to 3 other delivery points
- Continue delivery of speech and language therapy services
- Relocate some services at closed sites to different centres
- Offer outreach services to additional venues
- Increasing our current support to the private, voluntary and independent sectors
- Sustain a preschool provision for 2, 3 and 4 year olds at Cedars, Gange and Stanmore Park
- Increase the number of pre-school places for vulnerable children and 2 year olds
- Offer opportunities to develop community-run projects at Pinner Centre
- Ensure that supervised contact can be provided without incurring additional costs to other children's services departments e.g. targeted services / looked after children
- Balance the pressure on the Council to reduce its budget with the need to provide services to families through Children's Centres.

Implications of the Recommendation

Considerations

29. There is a need to ensure that the Council's Children's Centres continue to provide universal and targeted services to meet the needs of the local communities and have the flexibility to respond to changes to promote a sustainable model; and are able to meet increasing pressures, such as:
- Unavoidable financial pressures arising from reduced public sector funding
 - The need to improve outcomes for children in health, well-being, school readiness and end of foundation stage results
 - Increase in demand to support parenting aspiration and parenting support
 - Demographic changes including the increase in under-fives and child population and an increase in ethnic groups requiring particular types of services
 - Higher levels of deprivation and an increase in the numbers of children eligible for Free School Meals
 - Offering 2, 3 and 4 year olds access to education
 - An increase in children with special educational needs and children with disabilities

30. The recommended option places centres in the best position to respond to and minimise the impact of reorganisation despite the savings. This option offers greatest opportunity to meet statutory requirements and provide a wide range of more localised universal and targeted services, targeted to meet the needs of the communities in Harrow. The option also reduces the impact of relocation of health services and offers good opportunity for sustaining partnership working.
31. The proposed reach to communities that are in need of support has been devised and the demography data for each Hub will need to be reviewed, this implies that there will be a learning curve for the managers and staff at centres.
32. Centres managers will need to become even more targeted in their approach to planning provision, whilst at the same time maintaining important services, both for families most in need and the wider community.
33. Services will be provided through a new staff structure; streamlining management and increasing staff providing services directly for children under 5 years old and their families. The new structure offers staff new opportunities and also means that there will be potential redundancies.
34. Government frameworks for Children's Centres recognise that services can be delivered by single centres under one management team, with services being available from delivery sites. When the standalone centres are inspected, the services delivered at the satellite sites will be considered at the same time.
35. Option 3 supports best the inspection process and the opportunity to have good and outstanding outcomes from inspection. There will be an 'at risk' period through the reorganisation implementation; however this will be managed by following the Protocol for Managing Organisational Change. Further detail is set out in the staffing/workforce section.
36. The Hub approach is already embedded in the Harrow Children's centre offer; working as a network, sharing expertise, knowledge and having a considered coordinated, joined up consistent approach. This has supported the previous 2 reorganisations therefore implementing the new model will be managed by individuals who are practiced at doing so, reducing negative implications of change.
37. Key considerations have been:
 - Reducing the number of Children's Centres which offer all core services
 - Focusing on services for children under 5 years old
 - Reducing the number of senior roles
 - Reviewing our data to determine the borough's most deprived areas
 - Reducing services to children over 5 years old (school age)

- Reviewing the delivery of services, targeting our provisions for children most in need
- Increasing links to other areas of Children’s Services, together with the private, voluntary and independent sectors. This includes exploring opportunities for community-run projects.
- The need for future conversation with schools related to the provision of after school clubs and holiday scheme provision. It is the intention that a piece of work is undertaken by the council officers in response to this need.

Staffing/workforce

38. The workforce will be affected by the proposals with potential redundancies, potential reduction in some posts and potential increase in other posts. There are some current vacancies that support the potential impact on all staff.
39. Staff will be supported through any necessary change process and the protocol for Managing Organisational Change will be implemented at all stages.
40. The proposed staff structure (full time equivalents) for this option would be:
- 2 Hub Managers
 - 3 Project and Network Coordinators
 - 10 Practitioners
 - 4 Educators
 - 3.5 Cleaners
 - 1.5 staffing cover

Plus: 1 Service Manager shared across the Early Intervention Service (Early Intervention Teams and Children’s Centres).

The current staffing structure (full time equivalents)

- Service Manager
- 3 Hub Managers
- 2 Coordinators
- 4 Hub and Spoke Coordinators
- 1 Project and Network Coordinator
- 10 Practitioners
- 6 Educators
- 1 Handyperson/caretaker
- 2.5 Cooks/Assistant cooks
- 6 Cleaners/Assistant cleaners

Performance Issues

41. There are key partners that will be affected by the decision. Health Visiting and Midwifery services are both affected. There will be the need for reorganising some health delivery; the impact has been mitigated as

far as is possible by scrutiny of data, a health impact paper and relocation ideas developed.

42. Children's Centres are subject to inspection by Ofsted, and the DfE must be notified of any changes, the current Children's Centre Ofsted inspection approach will continue to work well within the proposed reorganisation, as Hubs with full core offer centres and delivery sites are being retained. There will be an 'at risk' period whilst changes are implemented as managers will need to up skill and learn about the different communities in Harrow that they will be serving. Relocation of staff and relocation of services have disruptive influences and this will require positive and timely attention to reduce any potential impact at inspection time.
43. Data and reach figures and performance measures will have to be adjusted and changes put in place to evidence the continued impact. This will need to be planned for to secure success at inspection times. Children's centre staff and the performance intelligence team have previously successfully made changes through 2 other reorganisations.

Environmental Implications

44. There are no environmental implications

Risk Management Implication

Claw back of capital expenditure

45. One centre, St. Josephs, and 4 delivery sites, Pinner, Rayners Lane, Roxbourne and Earlsmead, that are proposed for closure were originally developed with capital funding from the Department for Children, Schools and Families (now Department for Education). The 2 centres due to merge, Whitefriars and Kenmore Park were developed with capital funding from the department of education. The DfE has a right to clawback funding of an asset that is no longer used for the purpose for which it is given. One of the centres and three of the delivery sites proposed to be closed are within school sites and the Council is not proposing to dispose of the site for a capital sum. The centres will become available for use by the schools and will be considered for school place planning purposes when considering utilisation of school land in order to meet demand for school places.

Risk included on Directorate risk register?

No, as it would have pre-empted the outcome of the consultation, however depending on decision of members it will be included in the future iteration of the risk register.

Separate risk register in place? No

Legal Implications

The Childcare Act 2006 sets out the statutory duties for local authorities in relation to childcare and children's centres. The following sections are particularly relevant:

Section 1 – duty to improve the well-being of young children and reduce inequalities.

Section 3 – duty to make arrangements to secure that early childhood services are provided in an integrated manner to facilitate access and maximise benefits to young children and their parents.

Section 4 – duty on commissioners of local health services and Jobcentre Plus to work together with local authorities in their arrangements for improving the well-being of young children and securing integrated early childhood services.

Section 5A – arrangements to be made to ensure sufficient children's centres to meet local need.

Section 5C – duty to ensure each children's centre is within the remit of an advisory board.

Section 5D – duty to ensure there is consultation before any significant changes are made to children's centre provision in their area.

Statutory guidance in relation to children's centres was published in April 2013. This confirms that there is a presumption against closure of children's centres and when consulting on significant changes, everyone who could be affected should be consulted, including local families, users of the centres, children's centre staff, advisory board members and service providers. Particular attention should be given to ensuring disadvantaged families and minority groups participate in the consultation. Decisions following consultation should be announced publicly and give reasons for the decision.

There is a statutory duty to consult. As a matter of public law consultation must be carried out fairly. In general, a consultation can only be considered as proper consultation if:

- Comments are genuinely invited at the formative stage;
- The consultation documents include sufficient reasons for the proposal to allow those being consulted to be properly informed and to give an informed response;
- There is adequate time given to the consultees to consider the proposals; and
- There is a mechanism for feeding back the comments and those

comments are conscientiously taken into account by the decision maker / decision making body when making a final decision.

When making policy decisions, the Council must take account of all relevant considerations; including importantly the duty to give due regards to the public sector equality duties and in particular any potential differential and/or adverse impact. When consulting on proposed service cuts or closure of services, it will not be unusual for the majority of respondents to be against the proposals. These views must be taken into account, however this is not a simple headcount of those in favour and those against proposals and even in situations where the majority of respondents are opposed to the proposals, the Council may decide to implement this if there are good policy reasons for doing so. The Council must have regard to and weigh up all relevant factors, including financial resources, alternative options, equality impact and consultation responses, which in the context of the function being exercised; it is proper and reasonable for the Council to consider.

The guidance confirms that children's centres should have a named health visitor and access to a named social worker as a minimum. The guidance recommends that children's centres are commissioned as part of local authorities' wider early intervention strategy and strategy for turning around the lives of troubled families.

Children's centres are subject to Ofsted inspection. From April 2013, inspections are organised according to how local authorities deliver their children's centres.

Each Children's Centre must have an advisory board, however centres clustered together can share a board. The board must include representatives from each Children's Centre within its remit, the local authority and parents and prospective parents in the area. Other representatives should be included on the board as set out in the guidance.

Financial Implications

The Draft Revenue Budget 2015-16 and Medium Term Financial Strategy 2015-16 to 2018-19 was approved by Cabinet in December 2014. The Final Revenue Budget 2015-16 and Medium Term Financial Strategy 2015-16 to 2018-19 is due to be considered at Cabinet at the same meeting that this matter is being considered. The budget includes savings proposals totalling £1.189m in respect of Early Intervention and Children's Centres services and management. If Cabinet agree the budget, it will be recommended up to Full Council for approval. The budget is not agreed until it is approved by Full Council. This report is subject to approval of the budget and any decision to agree an option will only be implemented if the reduced budget for children's centres is approved by Full Council. All three options proposed would achieve savings totalling £1.189m.

Equalities implications / Public Sector Equality Duty

The Council is required under the Equality Act 2010, to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; advance equality of opportunity between those with a protected characteristic and those without; promote good relations between those with a protected characteristic and those without. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation. It also covers marriage and civil partnership with regard to eliminating discrimination.

An initial and full equalities impact assessment has been completed and kept under review during the consultation process. The full EqIA can be found at Appendix. The children's centres are more likely to be used by children aged 0-5, parents of those children, particularly women and by pregnant women. Marital status may be relevant as many parents receiving support from the centres are lone parents, although there is currently no data on marital status. The response to consultation shows that the majority of parents responding had children aged 0-5. Any changes to children's centres are therefore more likely to impact on these groups than other groups. In addition specific services for children over 5 years will cease to be provided by Children's Centre staff and an alternative provider will need to be sourced. A number of respondents also raised concern about reducing services to children with SEN or disabilities and the impact issues raised by users related to travel e.g. proximity of centres to their home address or the school where a sibling attends. There is not an intention to reduce services for SEN children under five years. 0.6% of all children accessing centres parents have stated they have a disability. 14 individuals indicating they have a child with disabilities have responded to the consultation which is 6% of all adults/parents that have completed the survey (based on 230 responses). This is a higher proportion than the 0.6% of children with disabilities seen on eStart which indicates they have been fairly represented on the consultation responses so far.

The centres to continue to provide services were chosen to ensure that services continue to be targeted at the most vulnerable families in the borough. This approach ensures that reduced resources are focused on those who most require support. This is an attempt to reduce inequality, by targeting the most vulnerable at an early age, with a key objective to reduce inequality in educational attainment and health and wellbeing. Ensuring support to increase employment opportunities for parents will support a number of protected groups. Improving the targeting of services will have a positive impact on those families most in need, which impacts on the protected characteristics of age, gender, disability and potentially marital status. Whilst reducing the opening hours of some centres and closing some of the existing centres has a potentially negative impact on users of those centres, services will continue to be offered from centres across the Borough, and other centres in the locality will have existing opening hours, which should mitigate any negative impact.

In option 3 the outcome of the EqIA demonstrates that following careful considerations, scrutiny and mitigation the potential protected characteristic that proposals could have a disproportionate adverse impact on is 'age', more

specifically school aged children; over the age of five years. The EqlA action plan shows the approach to reduce the impact. Appendix 3.

The EqlA outcome demonstrates that minor adjustments to remove / mitigate adverse impact or advance equality have been identified and actions have been proposed to take to address this in an Improvement Action Plan.

Full details of the EqlA and the EqlA analysis by the best practice stakeholder group are provided as enclosures.

Council Priorities

The Council's vision:

Working Together to Make a Difference for Harrow

All four of the administration priorities are incorporated, specifically and strongly as the decision has an impact for the vulnerable, families and communities.

- **Making a difference for the vulnerable**
- **Making a difference for communities**
- **Making a difference for local businesses**
- **Making a difference for families**

Section 3 - Statutory Officer Clearance

Name: Jo Frost	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 2 February 2015		
Name: Sarah Wilson	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 1 January 2015		

Ward Councillors notified:	NO, as it impacts on all Wards
EqIA carried out:	YES
EqIA cleared by:	EqIA Equality Assurance Group

Section 4 - Contact Details and Background Papers

Contact: Hilary O'Byrne ccprojectwork@harrow.gov.uk

Background Papers:

Have Your Say full report

http://harrow-consult.limehouse.co.uk/public/cs/childrens_centres/childrens_centres_consultation

Children's Centre consultation paper

<http://www.harrow.gov.uk/www2/mqCalendarMonthView.aspx?GL=1&bcr=1>

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---

This page is intentionally left blank

Appendix 1 Analysis of the Children's Centre Have Your Say consultation question responses

11th November was the start of conversation with parents/carers, staff, partners and other residents in Harrow about the options for proposed changes to Children's Centres' services, linked to Harrow Council's challenge ahead of delivering £83 million of cuts to its budget over the next four years with 1.89 million from Children's Services.

Consultation took place between the dates Tuesday 11th November 2014 through to Sunday 4th January 2015.

10 event dates were set up across the Children's Centre network offering 19 sessions including 9 specific focus groups, 3 each for; staff, parents and key partners.

1,000 plus surveys distributed
1,000 plus booklets distributed

27 in depth conversations
Over 75 face to face conversations
19 'have your say' event sessions

There were many ways used to gain views:

- online survey at www.harrow.gov.uk/CCconsultation
- Fill in a paper copy of the survey, available at all Children's Centres
- Join the conversation on Facebook at www.facebook.com/harrowcc
- Drop in to one of 18 'Have Your Say' engagement events

The standard online platform the council uses for hosting surveys: Have Your Say Objective system was used to record all online and hard copy survey results.

A best practice EqIA stakeholder group was set up met on 3 occasions with positive results in assessing the responses received to the consultation and therefore allowing intervention to support increased representation from underrepresented groups.

- 504 participants took part in the survey and were entered on line

- 371 of these were hard copy and entered by Harrow council staff
- Final report from the objective entry was created on 7.1.2015
- 16 emails
- 7 phone calls
- 13 letters from head teachers, school governors, preschools managers, LSCB chair, Clinical Commissioning Group, North West London Health Trust.
- 2 parent led petitions and 1 school/governor led petition with a total of 1,065 signatures

The response was considered by communications colleagues to be a 'good' response. There were 3 petitions received with a total of 1,065 signatures.

There is a belief that the petitions had an impact on the number of people completing the consultation survey and there was some confusion about the council's Take Part consultation as people said they had completed a survey and it then emerged that it was the Take Part survey they had completed and not the Children's Centres one. This belief follows feedback received by staff at centres and at the planned 'events' held.

The response via the Objective system has offered statistical, graphical and narrative feedback all of which offers outcomes that supports decision making.

Following scrutiny of the responses Option 3 has been recommended to cabinet for approval:-

Retain 2 Full Core Offer Children's Centres at Cedars and Hillview

Operate 8 "delivery sites" that will continue to offer access to some of the early childhood services on behalf of the 2 full core offer children's centres.

Introduction to questions

There were 12 questions and the level of response differed for each question. Feedback was received which indicated that for some of the population of respondents the questions were not completely clear to them as individuals, and some suggested that they did not have access to enough information to make a response or in some cases an informed response.

The paper presenting the consultation was a separate paper to the survey and one could consider from the responses that people were not referring to this when answering the questions e.g. Response; 'it is difficult to comment without knowing the current structure', and yet the current structure was within the paper.

Question responses

Question 1: Which (if any) of Harrow's Children's Centres(s) do you currently use?

Overall the respondents used centres in the following Hubs:

- Cedars Hub 36.66%
- Kenmore Park Hub 32.36%
- Hillview Hub 26.43%

The respondents used the following 6 centres the most.

- Cedars 12.71%
- Kenmore Park 10.79%
- St. Joseph's 9.78%
- Stanmore Park 9.14%
- The Pinner Centre 7.68%
- Whitefriars 7.13%

Calculation of the centres used by the respondents as overall figures per Hub:

- Cedars Hub 36.66%
- Kenmore Park Hub 32.36%
- Hillview Hub 26.43%

Question 2: Are you completing this consultation as:

Parent / Carer of a child under 5 years old

Parent / Carer of a child age 5 -12 years old

Parent / Carer of a child age 13 -17 years old

- 66.87% of respondents were parent /carers of a child under 5 years old
- 8.73% were parents/carers of a child aged 5-12 years
- 1.98% were parents/ carers of a child aged 13-17 years
- 16.87% were 'other' which includes:- staff, partners from health, midwifery, health visiting, PVI sector; preschools and child-minders, therapy services, G.P's, Clinical Commissioning group, London North West Hospital Trust, Schools, Head Teachers, Governors, nurseries, L.A officers, adult learners, traveller liaison officer, residents, grandparents.

Children's Centre eStart data system shows that 86% of all Children's Centre users are:

- Children Aged 0-5, 12%
- Children aged 5-12
- 0.6% are children aged 13 – 18.

(We can assume a large number of staff/other residents have completed the survey too hence the 16.87% stating 'Other')

This age breakdown for Children's Centre usage is in similar proportion to the age breakdown on the survey response demonstrating that this represents accurately users if the centres.

Question 3: To what extent would you agree with savings being made to the Children's Centres' budget in the following ways?

Closing Children's Centres, with some services provided at alternative centres (which may be further away)

- 69.95% of respondents strongly disagree or disagree
- 13.70% of respondents strongly agree or agree
- 5.56% responded as neutral
- 11.12% either offered no response or 'don't know' response.

There were 100 additional comments received to question 3.

The 'no response' or 'don't know' response could be attributed to the number of people that have responded stating that they believed that Children's Centre's should remain open with many respondents echoing the following type of statement:-

'I feel these centres are hugely important to our community- they provide such invaluable help to many families'.

'I think it would be a huge loss to the borough if you closed any of the centres. Concerns such as the impact on accessibility- travel to a centre further away from home especially for families with more than 1 under 5'

'Closing the children's centres would have devastating consequences for families across the borough, leading to greater long-term pressure on other services. If you close the centres, I would expect to see a higher number of mothers with post-natal depression, a greater number of children arriving at school or preschool with lower levels of development, an increase in the number of appointments made with GPs for issues regarding child development, nutrition, dental care, and pnd. These centres are much more than a place for mums to meet up for a chat- they are a lifeline of support for many'.

'Whilst I don't agree with any of the changes, I realise that savings do need to be made and I feel that over fives and mothers of over fives probably need less support than mothers of young babies. Although I think that help should remain for over five's who have additional needs, i.e. learning or development issues, e.g. speech etc. I also know that administration, whilst necessary should not affect the front facing element of the centres'.

This response clearly demonstrates that there is a strong view that this is not a desired outcome.

Reducing services at some centres

- 54.57 strongly disagree or disagree
- 21.83% strongly agree or agree
- 9.72 % were neutral
- 13.89% either offered no response or 'don't know' response

'Mothers rely on these centres so much so that they are always at full capacity. To close any of them would be criminal. They offer educational development and support for both child and mother, a huge asset to the local community'.

'I think some of the centres are quite close to each other, so it makes sense to close some of them'.

'The centres are already running a streamlined reduced service in comparison to four years ago and the variety and availability of sessions for the under 5's is already at a bare minimum. Any further reduction would mean a complete loss of this valuable service to the community and the under 5's'.

This response clearly demonstrates that there is a strong view that this is not a desired outcome. Accumulated figures for 21.83% strongly agree or agree, plus 9.72 % neutral plus 13.89% no response or 'don't know' still does not reach the 54.57%, instead 44.44%.

Reducing or closing services for children over the age of five

- 52.19% strongly disagree or disagree
- 23.02% strongly agree or agree
- 11.51% were neutral
- 13.29% either offered no response or 'don't know' response.

'Whilst I don't agree with any of the changes, I realise that savings do need to be made and I feel that over five's probably need less support than mothers of young babies. Although I think that helps should remain for over five's who have additional needs, i.e.

learning and development issues, e.g. speech etc. I also know that administration, whilst necessary should not affect the front facing element of centres’.

‘Childrens over 5 start school so less should be needed for children of that age group. Children’s centres are much needed, however, are more beneficial for younger children and pregnant women’.

‘All children benefit from Children’s centres NOT just under 5’s’.

‘Children over 5 will be receiving school support’.

This response demonstrates that there is a view that this is not a desired outcome.

There is a possibility that parents of families with under 5’s and over 5’s may have considered that it was the family sessions that would no longer be available; this will not be the case, it is the specific over 5’s services delivered by Children’s Centre staff that will be impacted upon, however mitigation is being considered to reduce the potential impact, before changes are implemented.

‘Children’s centres are essential. Not just to the children, but the parents. 1/2 term/holiday activities are essential. I would look to charge for services before closures/cuts are made’.

Reducing management and administration costs

- 42.66% strongly agree or agree
- 26.39% strongly disagree or disagree
- 16.87% were neutral
- 14.09% either offered no response or ‘don’t know’ response.

‘The admin and staff who run the groups work very hard. Lot of managers are not needed, they are paid far too much money by LB Harrow. Childrens Centres provide brilliant services. I have been attending for seven years now’.

‘My concern with reducing admin is that clinical staff will be further burdened with admin and reducing their clinical role’.

'There has to be some sort of management for the running of CC so they can plan ahead and help families with activities/groups/workshop the families need'.

'The government have spent lots of money in Children's Centres but when you close them you have thrown away the money spent. Therefore you see no future. Reduce core management staff on higher level'.

The admin and staff who run the groups work very hard. Lot of managers are not needed, they are paid far too much money by LB Harrow. Childrens Centres provide brilliant services. I have been attending for seven years now'.

'I agree with reducing some of the management, especially the higher paid ones. The Coordinators are able to run services and manage centres so why do you need a service manager and 2/3 Hub Managers'?

This response demonstrates that people are in favour of this approach; some responses indicated that there was reference to staff outside of the children's centres structure rather than within e.g. 'management staff on a higher level'.

The service manager post is a shared post not a Children's Centre Service Manager instead an Early Intervention Service, Service Manager.

Question 3 generated 100 comments, many of which were long responses e.g.

'My son has a disability and has been attending Hillview since he was 3 years old. The centre has been a great place to gain information about support available for both myself and my son and the support that myself and my son continue to receive is invaluable. When you have a child with a disability you need assistance at the earliest time to ensure that you are able to continue in your caring role. Most of this support is received via the centre including support in accessing appropriate schooling and health care support. It would be a financial mistake to close centres as they are one of the main preventatives in making sure that families are able to remain living as a family and reducing the need and risk of long term placements in the future. You will lose more money by closing the centres'.

Question 4: To what extent do you think that the options proposed will enable Harrow Children's Centres to continue to fulfil their core purpose? (Core purpose was supplied)

Option 1 Retain 3 Full Core Offer Children's Centres and 4 Centre Delivery Points

- 34.13% strongly disagree or disagree
- 24.00% strongly agree or agree
- 27.78% either did not respond or 'don't know'
- 14.09% were neutral

Option 2 Retain 3 Full Core Offer Children's Centres and 6 Centre Delivery Points

- 34.33% strongly agree or agree
- 23.41% strongly disagree or disagree
- 26.24% did not respond or 'don't know'
- 15.48% were neutral

Option 3 Retain 2 Full Core Offer Children's Centres and 8 Centre Delivery Points

- 44.45% strongly agree or agree
- 19.84% strongly disagree or disagree
- 22.42% did not respond or 'don't know'
- 13.29% were neutral

Option 3 had the higher percentage of respondents that believed that centres could fulfil their core purpose.

There were 74 additional comments received to this question some of which were comprehensive and some brief; there were none that favoured fully the preferred option 3 instead there were a number of comments that had the following themed points:-

'I would like to keep all our centres'

'Not sure the agree/ disagree options make sense here but I'm trying to say that option 3 fulfils the best'

'I think closing any of the centres will mean some families in need simply won't be able to access these essential services, but of all the options I believe option 3 to be the best choice for families within the borough'.

'The demands are increasing with increase in younger population, hence it is strongly recommended that Harrow Council thinks proactive approaches on how to increase revenue and improve quality of care rather than thinking of closing down services which would in some way or another put increased pressure on the centres that remain open'

'I don't think you should close any of the centres, they are well used and have helped to make Harrow one of the most child-friendly boroughs in the country(as recognised in the recent baby friendly accreditation UNICEF). I am very disappointed the council are even considering this as an option to save money in the borough'.

'I feel the services provided at the moment only just meet the needs of the community.

'The more CC's retained will help keep some of the services to parents.If anything we need more to open not shut them down'.

A fuller response was as follows:

'Harrow council tax goes up but our services are cut. The services provided are essential to supporting parents and their children. Compared to Hillingdon, we are not provided with full extent of support that they provide their residents such as support courses for new parents but to remove the services that we currently do have would be disastrous. Without these centres I would not have connected to other like parents going through difficult milestones with their children. It takes some mothers courage and confidence to leave the house with their first borns. By reducing centres and making centres further away for some will prevent these mothers from leaving their homes and gaining the confidence and support they need. Also centres like these provide us guidance with caring and educating our children. Plus some centres are often packed to full capacity. Reducing centres will only reduce opportunities for Harrow residents gaining access to these reduced services'.

There was also a strong theme related to option 3described as the 'better' option:-

'Looks like the better option for all. More centres maintained and saved'.

'Not sure how to answer this but Option 3 would have least negative impact I think'.

Question5: To what extent do you think the **options proposed willnegatively** impact on access to early childhood services through Children's Centres?

Option 1: Retain 3 Full Core Offer Children's Centres and 4 Centre Delivery Points

- 48.02% strongly agree or agree
- 13.10% strongly disagree or disagree
- 13.49% were neutral
- 8.73% responded as don't know and 16.67% offered no response

Option 2: Retain 3 Full Core Offer Children's Centres and 6 Centre Delivery Points

- 39.88% strongly agree or agree
- 15.28% strongly disagree or disagree
- 17.26% were neutral
- 8.33% responded as don't know and 19.25% offered no response

Option 3: Retain 2 Full Core Offer Children's Centres and 8 Centre Delivery Points

- 40.87% strongly agree or agree
- 17.06% strongly disagree or disagree
- 15.48% were neutral
- 8.13% responded as don't know and 18.45 % offered no response.

Option 1 emerged as the option that would have the most negative impact, Option 2 and 3 having similar responses and option 2 being the lowest percentage strongly agreeing or agreeing. There were 61 additional comments received to this question. Some comments received indicated that the question was difficult to understand and respond to for some: responses do not equate with other question responses; there is a likely possibility that this response does not reflect accurately people's views. (This issue has been reported on the learning lessons pro-forma)

'The question here and answers do not match. Closing centres and delivery points is not a way forward here'.

'This question is strange... and I don't understand what it is aiming to find out'.

'This question is poorly worded – the answer statements would work with a statement rather than a question'.

'Maintaining the maximum possible will obviously have the least negative impact. Maintaining the current levels would obviously have the best impact'.

'Closing any Children's Centres would negatively impact users of that centre'.
More children's centres the better for their needs!!!'

'Families will have nowhere to go. Your thinking behind this is silly. Families who have issues will not have the access to gain what is needed for them and their children. You do not need management on £240,000 a year'.

'All the closures of our children's centres will create a negative impact'

'I disagree with all the proposals'

'Option 2 and 3 provide a positive impact compared to option 1'.

Question 6: To what extent are the **proposed options effective** to provide Children's Centre services for families across Harrow?

Option 1: Retain 3 Full Core Offer Children's Centres and 4 Centre Delivery Points

- 25.99% strongly agree or agree
- 27.78% strongly disagree or disagree
- 17.06% neutral
- 8.93% responded as don't know and 20.24% offered no response.

Option 2: Retain 3 Full Core Offer Children's Centres and 6 Centre Delivery Points

- 33.14% strongly agree or agree
- 21.63% strongly disagree or disagree
- 14.48% were neutral

- 8.33% responded as don't know and 22.42 % offered no response.

Option 3: Retain 2 Full Core Offer Children's Centres and 8 Centre Delivery Points

- 42.86% strongly agree or agree
- 18.65% strongly disagree or disagree
- 12.90% were neutral
- 8.53% responded as don't know and 17.06% offered no response.

Option 3 was clearly the preferred approach: with the most % strongly agreeing or agreeing and the least % strongly disagreeing or disagreeing, the least % neutral and the least offering no response.

There were 47 additional comments received to this question. The main themes were to either not close any centres or have the maximum number of centres.

'I feel this is not giving us much choice - if you have to close some centres then the more delivery sites the better, clearly'.

'Leave all as they are – open'.

'Option 3 is the best and option 1 the worst in my opinion'.

I think losing any of these centres is going to affect the future of families and their children

'I think I have mentioned this above. Really need to keep all children's centres. They work. Get rid of some management'.

'Again the question cannot be answered by selecting 'strongly agree'. Please correct. Closing these essential services will impact families across Harrow in a negative way'.

'The group thinks that with more children in the neighbourhood smaller number of centres is less likely to be effective'.

'Once they are gone it will be too late to worry about effectiveness. The question is how fewer sites are going to cover all of Harrow when services are already stretched'.

Question 7: To what extent are the **proposed options effective to provide services for families within deprived areas** in Harrow?

Option 1: Retain 3 Full Core Offer Children's Centres and 4 Centre Delivery Points

- 26.39% strongly agree or agree
- 27.78% strongly disagree or disagree
- 12.30% were neutral
- 10.52% responded as don't know and 23.02% offered no response.

Option 2: Retain 3 Full Core Offer Children's Centres and 6 Centre Delivery Points

- 32.34% strongly agree or agree
- 21.63% strongly disagree or disagree
- 12.30% were neutral
- 10.32% responded as don't know and 23.41% offered no response.

Option 3: Retain 2 Full Core Offer Children's Centres and 8 Centre Delivery Points

- 42.46% strongly agree or agree
- 16.27% strongly disagree or disagree
- 12.70% were neutral
- 10.91% responded as don't know and 17.66% offered no response.

Option 3 was clearly the preferred option

There were 44 additional comments received to this question, with strong messages against closures and offering reasons why they should remain open and why more centres are the better option. Examples are:-

‘Just because the proposed options are for CC in deprived areas, this is a draconian statement as just because other centres are in so called affluent areas it doesn’t mean children are in less need or at risk’.

‘Because option 3 will retain more childrens centres in the borough I disagree with all the proposals – all centres should remain open’.

‘By taking centres away families will be limited in what they can access it will potentially stop many families accessing services they need and rely on’.

‘We want to keep as many as we can. Children in Harrow need them’.

‘All families need access. In some ways the middle-class mothers used to going to professional work can be most thrown by the change of being at home with baby and need support/somewhere to go/people to speak with. The more centres open, the better for families’.

‘Children Centres provide support across the whole community and should continue to be developed as a community resource and not just in areas of recognised deprivation’.

‘All three proposed options would involve closure of the Pinner Centre which will negatively impact the provision of childhood services to deprived families in Pinner’.

‘Option 1 will have a significantly negative impact on access to service particularly to children with SLCN i.e. no location / delivery point in the north west of the borough and no site for the pre-school language unit. Little opportunity to increase day care places for under 5. Less delivery sites will reduce access further for needy children and families’

Question 8: To what extent do you think that the use of some existing buildings for community-run projects will help to provide services to families?

- 67.06% strongly agree or agree
- 5.56% strongly disagree or disagree
- 9.33% were neutral

- 8.13% responded as don't know and 0% offered no response.

There were 68 additional comments received to this question. **There was strong support for this approach**, the following responses indicated that careful thought would need to be given to any plan.

Examples are:-

'Providing that the correct safeguarding/ child protection measures are followed. This seems like an effective and sensible use of the space'.

'How will be funded? Will there be a grant for a set time and then again no funding'? Existing buildings could be a venue for community run projects. But who will fund them? Will Harrow make the buildings desirable for organisations to hire. Will Harrow market the new opportunities? Provide funding to get some of the groups set up. Will the community run organisations offer the services for children 0-5?'

'Usually volunteers need the support of the Council to work efficiently'.

'I think this might work in Pinner, not sure how this is going to work in Elm Grove'.

'Lots of services are already run by volunteers, e.g. breastfeeding support, the current system works well – you would struggle to find volunteers to run the centres and they would close anyway, thus meeting your original goals'.

'Some of the centres appear to have capacity for other services to be provided also. Perhaps you should consider multi use buildings that could house a children's service, library, coffee shop, voluntary agency access and GPs or such like in one place, instead of sole children's centre usage. This would increase social contact and be buildings that are well used and could become hubs of the community. That would save a lot of money'.

'Community Groups are not run the same way as Children Centres and do not offer the same support for parents. Depends on location and costs involved'.

Question 9: To what extent do you think Children's Centre services will be effectively provided through the following changes to staffing structures?

A network of Children's Centres led by staff grouped into 3 teams

- 51.59% strongly agree or agree
- 10.72% strongly disagree or disagree
- 13.29% were neutral
- 8.73% responded as don't know and 15.67% offered no response.

A network of Children's Centres led by staff grouped into 2 teams

- 29.17% strongly agree or agree
- 18.65% strongly disagree or disagree
- 20.04% were neutral
- 9.13% responded as don't know and 23.02% offered no response.

Reducing the number of senior roles within Children's Centres

- 34.72% strongly agree or agree
- 22.62% strongly disagree or disagree
- 16.67% were neutral
- 7.94% responded as don't know and 18.06% offered no response.

There was a higher percentage strongly agreeing or agreeing with staff grouped in 3 teams however this response did not correlate with responses to other questions, e.g. question 6, 7:- option 6, 7:- option 3, with 2 main centres, was the preferred option; this would have staff grouped in 2 teams. A higher percentage strongly agreed or agreed with reducing the number of senior roles.

There were 43 additional comments received to this question.

Examples are:-

'Surely this depends on the outcome of the other question on number of hubs - please think things through before asking questions of the public'.

'The children's centres and their staff should be protected in their entirety'.

'A majority % in part 2 of the question 'A network of Children's Centres led by staff grouped into 2 teams' still emerged as a higher percentage that strongly agree or agree compared to strongly disagree or disagree'.

Comments received may explain further individuals thinking and links with a previous comment about using the provided Children's Centres consultation booklet alongside the survey form: '*The paper presenting the consultation was a separate paper to the survey and one could consider from the responses that people were not referring to this when answering the questions*'.

'This is a silly question because how are the public meant to know the answer to this. We don't know what is currently happening at present. Why don't you state this before asking this question then we can compare the differences'?

'It is difficult to comment when I do not know the current structure and the roles of the senior staff'.

'I'm not aware of the current structure to comment accurately on outcomes'

'The information available does not provide an understanding of the overall structure of the department and reporting lines and responsibilities therefore no answer can be given'.

'I don't know the current number of staff employed to run the children centres but I can only see a detriment to the services provided to the harrow residents should staff be cut'.

Other comments include comments related to management and senior posts:-

'Strong leadership at the centres is one of the main reasons they have been so successful in my opinion'.

'Managing staff over a number of locations is not easy and can be very time-consuming, this is even more complex where many staff also work part time, as they do in Ch Cs.'

'I do not feel I have the required knowledge/information to provide constructive feedback!'

'I have always much appreciated the advice given at the centres. Senior roles with experience and knowledge are important for this'

'Because staffing will be more effective when they work direct with families and be aware of transition community's changing need, special like in Harrow. I believe there is no need of a Service Manager when they are spending £40K + on Hub Managers'

'Middle managers seem to be cut back in most areas of business now so if this will save money for the future and provide a better option for centres, I agree!'

'It is important to ensure some leadership within each Children Centre to maintain focus on delivery and expectations of Children Centre. There also needs to be someone with ultimate decision making responsibility at each centre'

'It is important to retain senior roles to ensure sound leadership to support – Delivery of quality services; Service developments, Partnership working, Staff development support and training'

11

Question 10: Which of the options proposed do you think provides the best model for the future of Harrow's Children's Centres for....

You

- Option 3 33.52%
- Option 2 17.05 %
- Option 1 11.88%
- None of the options proposed 11.69%

Your child/children

- Option 3 32.63%
- Option 2 17.945 %
- Option 1 13.93%
- None of the options proposed 9.92%

Your family

- Option 3 30.96%
- Option 2 17.12%
- Option 1 11.35%
- None of the options proposed 10.00%

The Children’s Centrecommunity

- Option332.64%
- Option2 18.55 %
- Option1 12.06%
- None of the options proposed 10.02%

Harrow residents

- Option3 35.00%
- Option2 18.52%
- Option1 9.63%
- None of the options proposed 10.37%

Option 3 was overall overwhelmingly the preferred option, with the higher % preferred option for each of the 5 categories. The main message was that option 3 seemed the best option if changes had to be made.

There were 45 additional comments received to this question.

Examples are:-

‘I think the reductions proposed are all inadequate’.

‘This seems the best as 3 children’s centres are left open with more delivery suites than option 1. Option 3 only has 2 children centre’s leftopen. I’m for the most left open aspossible.at the moment the system is workingyou will only cause more problems forthe future if these valuable centresclose’

‘I don’t drive so ideally things wouldstay as they are. I wouldn’t bother totavel on a bus for a stay and playsession, but in fortunate in that i don’t“need” that session. I worry this disadvantaged parents who need thisservice will be..’(unfinished)

'Out of the 3 option 3 is best but is also a Semtex back from today'.

'I don't think any of the above will be enough. Think this over very carefully'.

'The best model would be prioritising early intervention services instead of cutting them. The options given are likely to result in more money being spent supporting families when their needs have become greater'.

'Leave Children's Centres alone!!! Why are children services being targeted for the councils lack of budgeting. Cuts need to be happening from the top over paid managers and directors'.

Question 11: To what extent do you agree with the **suggested centres to be retained** in each of the proposed options?

Option 1

Children's Centres: Kenmore Park, Cedars and Grange

Delivery Points: Elmgrove, Stanmore Park, Earlsmead and Hillview

- 31.34% strongly agree or agree
- 25.79% strongly disagree or disagree
- 13.89% were neutral

- 28.97% offered no response.

Option 2

Children's Centres: Kenmore Park, Cedars and Hillview

**Delivery Points: Gange, Chandos, Stanmore Park, Whitefriars, Grange and Pinner Wood
Additional buildings: The Pinner Centre and Elmgrove (for community-run projects)**

- 43.85% strongly agree or agree
- 14.29% strongly disagree or disagree
- 12.70% were neutral

- 29.17% offered no response

Option 3:

Children’s Centres: Cedars and Hillview

**Delivery Points: Kenmore Park, Gange, Chandos, Stanmore Park, Whitefriars, Grange, Elmgrove and Pinner Wood
Additional building: The Pinner Centre (for community-run projects)**

- 54.16% strongly agree or agree
- 12.11% strongly disagree or disagree
- 10.52% were neutral
- 23.21% offered no response.

Option 3 is the overall preferred option, option 2 was considered an acceptable option and option 1 was less favourable in meeting needs – it appears that retaining centres was the main view offered through responses, the highest % for each option was strongly agree or agree; the highest % strongly disagree or disagree was for option 1.

Closures of any centres were raised as not being acceptable in these responses. There were views expressed about individual centres being closed and which some would prefer were staying open. It was evident that this question was responded to on a personal level. Views also covered the perceived impact on children, if centres are closed.

There were 74 additional comments received to this question.

Examples are:-

‘Option 2 is the best option out of these but less closures of children’s centres is even better’!!!

‘I use Rayners Lane so would like to see this in there’.

- 'Pinner needs a centre with an already established preschool that has been in situ for over 40 years, has a waiting list & children with additional needs, which is under threat due to these proposals'.
- 'Chandos needs to stay - no other centre in local community is walking distance for Edgware residents'.
- 'Every centre matters!!'
- 'Any closures would have an affect on me, my colleagues, children who attend and families. It would be a great loss if any of the children's centres do close'.
- 'As previously stated, losing Pinner Centre and St Joseph's will be very sad and will be a very big loss to the community this would mean that for my families there would be no site within easy access of our community'.
- 'I drive so I don't really mind which stay open but I think a few should definitely stay open'.
- 'Too many local centres being closed'.
- 'Why St Joseph's? Where is it on this list?'
- 'I want St Joseph's Centre open – near for walking and convenient'.
- 'Cedars and Hillview have the largest impact on our family. The least reduction in centres will have the least impact on the groups and sessions we attend'.
- 'Hillview - only problem is car parking facilities. Needs to be consider this facilities. When we come with kids, we have to park the car very far distance then we have to walk to Hillview'.
- 'Option 3 is the better option'
- 'None of these options secures my centre!'
- 'I chose option 3 because I believe it will keep the Pinner Centre Pre School open'.

'It seems like you have already decided to close or reduce the services at the Pinner Centre which is ridiculous, it is one of the better attended centres and has many groups I have used in the past. It is also a good location accessible by public transport unlike several of the others proposed to stay open. Grange, Chandos and Elm Grove in my experience are used much less than Pinner.

'Save all of them - please close nothing. All are necessary for the future of children and families'.

'Please don't cut back on these facilities. They provide valuable knowledge for our children and children are our future'.

'My 8 year old, is performing really well in school. He is a math genius, all because he uses to fill rice in a muffin tray and counting them, playing Mr Wolf and counting jugs of water to fill a bucket. All activities we used to play at children's centres. As a parent of two, I know children's centres have a range of services to offer, which are crucial for early years. My 3 year old is so confident to staff and activities. She recently started nursery, settled from the first day. She knows a range of phrases/vocabularies, because she is ready to move on to school, all because I was coming to children's centres since she was 5 months old'.

Question 12: Are there any **further comments** you would like to contribute to the consultation?

90 comments were received to this question. There were brief messages and some fuller comments both of which contained strong views; demonstrated frustrations, and in some cases anger at the proposals and the content of the options. There were comments about the survey itself, ideas and views for the use of buildings (the latter will be reported on under a different heading) Comments were also received about the impact on children and individual families who shared their experiences.

Examples are:-

Survey comments...

'I am worried about the efficiency of this somewhat over-complicated and opaque questionnaire and would question such important decisions being made based on its results I think it requires simplification and at least a re-think'.

'This is not a purposeful consultation. Where are the stats and data? No figures'.

'The questions asked are over worded, perhaps less complicate questions to prevent having to read them numerous times to understand them'.

'This is quite a confusing and inaccessible survey which means it will be difficult for people to complete. Which may serve your purpose. As amum of 2 who experienced post natal depression, the Pinner Children's Centre was my lifeline and got me through. It continues to provide myself and my family support through its groups and access to HV via the baby clinic'.

'Some of the questions are a bit confusing and not worded very well'.

Options/proposals comments...

'DON'T CLOSE ANY OF OUR CHILDREN CENTRE'S'

'Very disappointed with therestructure -- appalling'.

'I am furious that you're even proposing to axe our centres – FURIOUS'.

'I would like to see maintained as manysites (centres or delivery points) aspossible, even with reduced services'.

'I find it sad that 5000+ signatures saves the Arts Centre but an essential service to a vulnerable group that has real worth is being cut. Unfortunately the prophylactic effect of this service is difficult to quantify. The parents of toddlers and the unborn in poorer areas are less able to mount a campaign compared to the supporters of an arts centre in the middle of an affluent community'.

'I don't believe any of these options will be positive. However, option 3 seems to be the less bad option. I'm also really concerned about the future of the Pinner Centre Preschool. They do a great job and I believe don't represent a cost to the council. This is a charity that provides great and affordable care. Please do not force them to close'.

'Childcare for under 5 is so costly these days. Children centres give children a good base before they start school'.

'Do not want centres to close – English not first language'.

'Children centres play an important part in the community and are vital for kids. Closing too many down will have detrimental affect'.

'Delivery points like Gange, Elmgrove, Grange are in some of the deprived areas where people need centres to explain and help them about society and their rights'.

'Harrow should be proud of its children's centres. I cannot understand the logic of reducing this service'.

'Some of the centres appear to have capacity for other services to be provided also. Perhaps you should consider multi use buildings that could house a childrens service, library, coffee shop, voluntary agency access and GPs or such like in one place. Instead of sole childrens centre usage. This would increase social contact and be buildings that are well used and could become hubs of the community. That would save alot of money'.

Impact on individual families comments ...

'Families would like to have their local children's centre open as if they have older siblings they can drop them and go straight to children's centre. Also family's who don't drive can also use their local children's centre services'.

'It's very sad at the thought of the centres closing, not only are they great for the children but for parents from all cultures to come together and meet. It's a great socialising time for parents to discuss universal problems, i.e. toileting, feeding etc and a great developmental opportunity for our children'.

'Keeping the children's centres help parents that are young to be a good parent. Plus the centres help the children to develop the right way'.

'I am an NHS employee based in the centres but not employed by the council and I have been working in and from them since they opened in 2009. My midwifery colleagues and I work alongside the council employees, who are in my opinion very professional, compassionate and do a thoroughly excellent job of drawing in families from all sections of the community in such a way that no one feels singled out or that they are being 'targetted'. Most of the services are well attended and some, like our own are running at full capacity all the time, this includes a weekly clinic at the Pinner centre but we need the assistance of the admin staff in all the centres to help us to provide a good service to the families. The centres, in my opinion are extremely effective in helping with the parenting skills which are so essential to allow children to really get the best out of life and prevent costly poor lifestyle choices and antisocial behaviour. We must start early in a child's life if we really want to set them on the right path and cutting back these services is

very short sighted in my opinion. Also, providing services like Midwifery and Health visiting in the centres gives much better messages to the women/families that childbirth and child rearing is a social event and not a medical one (i.e., they are not sick as in a doctor's practice). The centres are doing a great job and have thoroughly dedicated staff, please value that and don't close them'.

'Children Centres have demonstrated their value and worth through analysis of outcomes data. Loss of this provision would have adverse effects on the families and young children of Harrow in a number of ways including fundamentally safeguarding'.

'It makes sense to keep the centres open that have preschools already in place, which can further help the community and assist in early intervention and make it easier for transition into mainstream schools. Without the early intervention it will cost the Borough much more money when the children who have additional needs enter into KS1. Make more use of the centres and fill the rooms that have so much potential to bring in more money to help with the cuts'.

'I would be very disappointed as I use the children centre for personal reasons. The staff and other professionals are very helpful with the issues and queries I have'.

'While understanding the acute financial pressures on councils, we are increasingly concerned about the council's vision and support for vulnerable children, young people and their families - Children's Centres offer early intervention - some of the most cost-effective and lasting forms of interventions - Concerned about the safeguarding implications for young children if these centres are closed'.

'It is absolutely vital that there remains a constant meeting point for new babies and new parents. It would appear that there have already been extensive cuts within the child development area, no monitoring of home welfare, development of children, it would be a travesty to lose any more community based welfare'.

'My son has a diagnosis of ASD. Due to the support of my children's centre through attending groups such as PAFT, we are in the fortunate position to have an early diagnosis/intervention. I have been lucky in my ability to access services. By making these cuts, you are putting more vulnerable families at a higher risk, thus making the need for support to be identified later - which in the long run will cost more to the council if the child is at school before the issue is addressed'.

Other views...

'Not enough info provided about which services are likely to be retained in the consultation paper. Need to understand the use of space in the buildings - maybe over 5s are catered for when buildings aren't in demand by under 5s. Need to understand how far parents can travel to centres. Need to focus on services successfully aimed at those under 5s most in need, not ESOL for parents or yummy mummies getting cheap childcare and free breakfast for their toddlers, but real learning for the under 5s and parenting skills that will benefit them by the time they start school'.

'Reduce the council's perks and wages for the top managers, get rid of the council magazine (pointless waffle) and use this money to fund projects'.

'These buildings could be used more by others in children's services and at weekends. More could be done to make them centres for families rather than children. If funding is the main concern, you can charge some of the services within children's centres'.

'I hope this is the end of children's centre consultations now as this is the second one in 2 years'.

Next steps

Following the decision making by cabinet further work will be undertaken to support a positive and timely implementation of the model to ensure it meets the statutory obligation of the council.

Through analysis of the information received it is clear that there are many misconceptions, myths and misunderstandings about Children's Centres; the statutory definition and its meaning, the development, governance and lines of responsibility and accountability. Work will be undertaken to develop a fuller understanding for all those using and working through centres.

There is also much learning for the staff that work in and through centres, points emerging that support improvements will be highlighted, shared and acted upon.

There were many ideas offered by respondents, most of which have been explored and decisions made about taking these forward or not. There have been some barriers in taking forward ideas and some proposed developments have been rejected by key partners. Further exploration of ideas will be undertaken and reported on.

It is also clear that further understanding by others of the data used by centres is required, especially related to Lower Super Output Area's, deprivation, and reach expectations required for Children's Centres Ofsted inspections.

In the light of these points there is a plan to take the comments and respond to them via a paper which will be available to Children's Centre users, staff, partners and other interested partners.

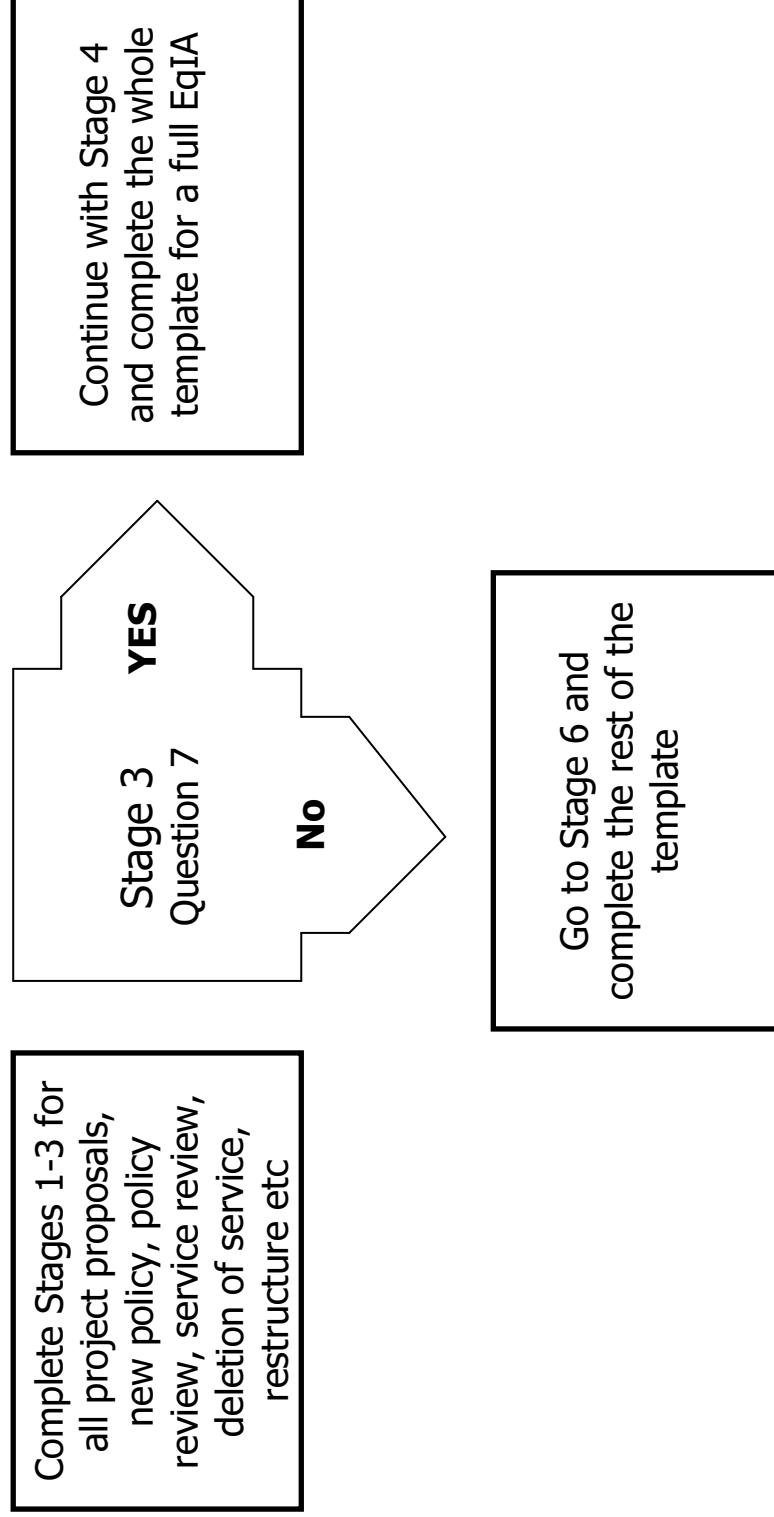
It is intended that this work will be carried out with the support of the Children's Centre Strategic Group.

Hilary O'Byrne
Children's Centre Project Lead

This page is intentionally left blank

Appendix 2 Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment. It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation/consultation	x	Cabinet	x
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other		Other	
Children's Centre Consultation (as part of EIS/CS savings)			
Title of Project:	Proposal to remodel and to close some Children's Centres and Children's Centre delivery sites.		
Directorate / Service responsible:	Children's Services/ Early Intervention		
Name and job title of lead officer:	Hilary O'Byrne Children's Centre Project Lead		
Name & contact details of the other persons involved in the assessment:	Kamini Rambellas – civic 1 ext 6978 / Performance intelligence – Sita Mistry – civic 1 ext 8140/stakeholder group- Joy Collins – civic 1 ext. 8856 / Priya Ganatra – civic 1 ext. 5237/Rachelle O'Byrne – 020 8736 6222 / Gemma Williams – 020 8416 8400		
Date of assessment:	on-going from 24/09/14 – 15 January 2015		

Stage 1: Overview
<p>1. What are you trying to do? (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p> <p>The aim of this proposal is to reduce the amount of children centres as part of the Early Intervention service in the Children and Families Directorate in order to achieve council savings of £16 million over the next 4 years. Children's Centres provide support and assistance to families with children aged under 5, and some for those above, to achieve better outcomes for children and their families. Children's Centres statutory guidance, April 2013</p> <p>The core purpose of children's centres is to improve outcomes for young children and their families, with a particular focus on families in greatest need of support in order to reduce inequalities in:</p> <ul style="list-style-type: none"> Child development and school readiness Parenting aspirations and parenting skills; and Child and family health and life chances <p>Harrow has 16 Children's Centres providing a range of early education, care and support services to young children and their families. The Children's Centres are currently grouped in three Hubs with 5 lead full core offer centres and eleven delivery sites. We are currently consulting on</p>

proposals to reduce the number of Children's Centre (CC) as part of the expected savings within the council and specifically within Children's Service Directorate. There are 3 new CC model options being consulted on - each model means a **reduction** in venues and reach to deliver CC services, and within the reduced models a **reduction** of staffing levels in some roles, and **deletion** of some posts will be required. In one model **an increase** in some grade positions is included. Other service providers will be impacted upon e.g. health provision, commissioned services, preschools provision and school communities.

A greater focus on targeted services and a reduction in the universal offer could lead to a public perception of stigmatisation with a lower voluntary take up of services by families that need them the most and missed opportunities for prevention and early intervention. There is a need to ensure that the Council's Children's Centres continue to provide universal and targeted services to meet the needs of the local communities; have the flexibility to respond to changes to promote a sustainable model; and are able to meet increasing pressures from changing demography.

The three models proposed are:

- Option 1: Retain 3 full core offer Children's Centres and 4 centre delivery points.
- Option 2: Retain 3 full core offer Children's Centres and 6 centre delivery points.
- Option 3: Retain 2 full core offer Children's Centres and 10 centre delivery points.

Option 1:

Children's Centres: Kenmore Park, Cedars and Grange

Delivery points: Elmgrove, Stanmore Park, Earlsmead and Hillview.

This would involve **closing** the following sites:

- Whitefriars
- Chandos
- Pinner Wood
- Gange
- St. Josephs
- Rayners Lane
- The Pinner Centre
- Vaughan
- Roxbourne

Option 2:

This option proposes retaining 3 Children's Centres and 6 `delivery points':

Children's Centres: Kenmore Park, Cedars and Hillview

Delivery points: Gange, Chandos, Stanmore Park, Whitefriars, Grange and Pinner Wood

This would involve **closing** the following sites:

- Rayners Lane
- Vaughan
- Roxbourne
- St Josephs

- Earlsmead
- The Pinner Centre
- Elmgrove

This option also includes expenses for the Pinner Centre and Elmgrove buildings: This allows for the possibility of community-run projects

Option 3:

This option proposes retaining 2 Children's Centres and 8 'delivery points':

Children's Centres: Cedars and Hillview

Delivery points: Kenmore Park, Gange, Chandos, Stanmore Park, Whitefriars, Grange, Elmgrove and Pinner Wood

This would involve **closing** the following sites:

- Rayners Lane
- Earlsmead
- St Josephs
- Vaughan
- Roxbourne
- The Pinner Centre

This option also includes expenses for the Pinner Centre building: This allows for the possibility of community-run projects

Following consultation there is much opposition to making any changes to the Children's Centres sites and services with strong views about the impact on children's learning and development and strong views about the impact from the potential loss of support, advice and guidance for parents. These views, in one way or another, are echoed throughout the responses to the consultation.

In recognition by some of the need to make savings Option 3 emerges as the preferred option to be implemented.

Option 1

34.13% strongly disagree or disagree

24.00% strongly agree or agree

27.78% either did not respond or 'don't know'

14.09% were neutral

Option 2 lift

34.33% strongly agree or agree

23.41% strongly disagree or disagree

26.24% did not respond or 'don't know'

15.48% were neutral

Option 3

44.45% strongly agree or agree
19.84% strongly disagree or disagree
22.42% did not respond or 'don't know'
13.29% were neutral

Recommendation

Following the responses to 12 posed questions, designed with the intention of hearing the views and voice of; users, staff, partners and other interested parties about a future preferred model the recommendation to council is to approve Option 3 as the preferred future model, namely:

Retain 2 Full Core Offer Children's Centres at Cedars and Hillview

Operate 8 "delivery sites" that will continue to offer access to some of the early childhood services on behalf of the 2 children's centres.

Option 3. Option 3 offers the most places to provide Children's Centre services reaching as far as possible albeit through a reduced number of centres. The expectation is that those most in need of support are reached.

It is clear that there will be an overall impact on communities because of reducing the number of centres and hence impacting on the proximity to people's homes. However no one particular community within LSOA's would need to be disproportionately impacted upon.

Full monitoring of centre reach to families will continue to take place. There is opportunity for outreach work within the model and increased partnership working, particularly with schools. Health services have been retained as far as is possible and retaining Pinner building offers the opportunity for reduced impact in the Pinner area. Relocation of services has been planned to reduce any impact on those most in need of support.

Residents / Service Users	*	Partners	*	Stakeholders	*
Staff	*	Age	*	Disability	*
Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	*

2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)

	Race	*	Religion or Belief	Sex	*
	Sexual Orientation		Other		
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment? 	<p>Responsibility is not shared however there are key partners involved in service delivery in centres and therefore a small stakeholder equality group will be formed and will plan to meet on 3 occasions through the process.</p> <p>This stakeholder group, although not attended by some key partners, was a proactive and positive way of ensuring that we gained the views of all communities and partners in Harrow and in particular to reflect the users of the centres.</p>				
<p>Stage 2: Evidence / Data Collation</p> <p>4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics. (Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)</p>					
<p>Age (including carers of young/older people)</p>	<p>The reduction in Children Centres will affect children, their families e.g. parents, stakeholders, partners including partners in statutory services and voluntary sector services and some staff members.</p> <p>It is clear that families with children under 5 and their parents/carers will be affected by these proposals as they are the highest percentage of users access the children's centre services. There are also specific services for children over the age of five that will be affected and the consultation includes information about reviewing services for over five year olds that cannot continue to be met through CC funding which is specifically for under-fives. (small numbers of 5-12 years). The greatest impact would be on the Children's Centres services which are positioned in areas of deprivation using the demographic data from the previous decision making. (CC's were set up to be within a 1.5 mile tram pushing distance of each geographical community). Children's Centres provide services that are universal and targeted to mixed communities and this could affect the range and availability including proximity of access to service delivery for these families.</p> <p>There could be the potential impact on BME children and disabled children because of the nature of services and the vulnerability of the children that need services such as Speech and Language Therapy and support for children who have English as an additional language. However the discarded option of reducing to 1 centre did mitigate this, there will be a number of centres and our priorities will be to meet the needs of those most in need of centres help and support.</p> <p>Harrow generic data and Children's Centre specific data have been used to support decision making in putting forward the options for the future. Decisions have been made to minimise the impact on the users of centres and redesign of CC approach using the LSOA's and SOA's has been reviewed and considered for each option. A specific approach to supporting health provision to continue has been collated to 'reassign' where services that are no longer available in centres that close can be accessed elsewhere across the network; this has been done for each option and it is clear that each option will have a different impact. However each model does have a reassignment approach, and the impact is aligned with the number of centres e.g. the lower the number the greater the impact, the higher the number the lesser impact – an impact on reach to those not in LSOA's will occur for each proposed model.</p> <p>Harrow data: Children's Centres are primarily there to serve families with children in the Early Years age group: that is children aged from pre-birth -5 years.</p> <p>Based on Census 2011 data:</p>				

- In total 6.7 per cent (15,916) of Harrow's residents are children aged four and under in 2011.
- There has been a 32% (+3,900) increase in 0-4 year olds since 2001.
- 6.7 per cent (15,916) of Harrow's residents are children aged four and under, compared to 5.8% (12,019) in 2001
- Harrow is ranked in the top quartile nationally for 0-4 year olds
- 81.6 per cent (12,991) of all children aged 0 to 4 in Harrow are from minority ethnic groups (all groups excluding White British). 44.8 per cent (7,134) of all Harrow's young children are of Asian/Asian British ethnic origin, the largest ethnic grouping.
- There are pockets of high concentration of 0-4 year olds in central and south-west harrow.
- Approximately, 6,100 children (Age 0-5) live in the 30% most deprived areas of Harrow (based on the Index of Deprivation affecting Children)

The intention is to retain and/ or increase preschool places.

Nursery/Pre-Schools based in centres	689 families	84% from BME groups 62% from most deprived areas	A high % of nursery children live in deprived areas
---	--------------	---	---

Key Features of Population / Focus areas around each Childrens Centre (Source: census 2011):

Centre	Characteristics
Cedars Centre (Main Ward: Harrow weald/Hatch end)	Includes 4 of the most deprived Lower super output areas in Harrow. High percentage of lone parent households. High percentage of low income households. Higher proportion of families with more than 3 children Lower level of attainment at age 5 (EYFSP) Social housing
Chandos (Main Ward: Edgware)	Includes 4 of the most deprived Lower super output areas in Harrow. High percentage of White Other families, in particular Romanian High proportion of Black African families High proportion of 0-4 year olds High proportion of families who cannot speak English or cannot speak English well. High percentage of lone parent households
Pinner Wood (Main ward: Pinner)	Includes 1 of the most deprived Lower super output areas in Harrow. High proportion of White British families
Stanmore Park (Main ward: Stanmore Park, Canons)	Includes 4 of the most deprived Lower super output areas in Harrow. High percentage of low income households Lower level of attainment at age 5 (EYFSP) Social Housing
Whitefriars	Includes 5 of the most deprived Lower super output areas in Harrow.

	<p>(Main ward: Wealdstone)</p>	<p>High proportion of 0-4 year olds High proportion of families who cannot speak English or cannot speak English well. High percentage of lone parent households High percentage of low income households High proportion of Asian Arab families High proportion of Black Caribbean families Social Housing</p>
	<p>Kenmore Park (Main ward: Kenton East, Queensbury)</p>	<p>Includes 8 of the most deprived Lower super output areas in Harrow. High proportion of 0-4 year olds High proportion of Asian families High percentage of White Other families High proportion of families who cannot speak English or cannot speak English well. Lower level of attainment at age 5 (EYFSP) High percentage of lone parent households High percentage of low income households Higher proportion of families with more than 3 children</p>
	<p>Gange (Main ward: Marlborough)</p>	<p>Includes 3 of the most deprived Lower super output areas in Harrow. High proportion of 0-4 year olds High percentage of lone parent households. High percentage of White Other families, in particular Polish High percentage of low income households Lower level of attainment at age 5 (EYFSP)</p>
	<p>Elmgrove (Main ward: Greenhill, Kenton West)</p>	<p>Includes 2 of the most deprived Lower super output areas in Harrow. High proportion of Asian families High percentage of White Other families High proportion of families who cannot speak English or cannot speak English well. Lower level of attainment at age 5 (EYFSP)</p>
	<p>St. Josephs (Main ward: Belmont)</p>	<p>Includes 3 of the most deprived Lower super output areas in Harrow. High proportion of Asian families High percentage of low income households</p>
	<p>Hillview (Main ward: Harrow on the Hill)</p>	<p>Includes 3 of the most deprived Lower super output areas in Harrow. High proportion of 0-4 year olds High proportion of Asian Other families High proportion of families who cannot speak English or cannot speak English well. Lower level of attainment at age 5 (EYFSP)</p>
	<p>Pinner Centre (Main ward: Pinner South)</p>	<p>Includes 1 of the most deprived Lower super output areas in Harrow.</p>
	<p>Rayners Lane (Main ward:)</p>	<p>Includes 2 of the most deprived Lower super output areas in Harrow. High proportion of 0-4 year olds</p>

Roxbourne)	High proportion of Asian Other families High proportion of Black African families High percentage of lone parent households High percentage of low income households Social housing Higher proportion of families with more than 3 children
Roxbourne (Main ward: Rayners Lane)	Includes 2 of the most deprived Lower super output areas in Harrow. High proportion of families who cannot speak English or cannot speak English well. High percentage of Asian Other families
Grange (Main ward: West Harrow)	Includes 3 of the most deprived Lower super output areas in Harrow. High percentage of Mixed families
Earlsmead (Main ward: Roxeth)	Includes 2 of the most deprived Lower super output areas in Harrow. High percentage of Asian Other families High proportion of families who cannot speak English or cannot speak English well. Higher proportion of families with more than 3 children
Vaughan Road (Main ward: Headstone South/ West Harrow)	Includes 2 of the most deprived Lower super output areas in Harrow. High percentage of Asian Other families

Birth Rate Data

- The ONS live births for Harrow have substantially increased from 2,581 in 2001, to 3,088 in 2007 and to 3,585 in 2012 which is an increase of 39% since 2001.
- Of the 3,585 live births in 2012 69% were to non-UK born mothers. Of the 69% non-UK born mothers 51% were born in the Middle East & Asia, 29% in the European Union and 15% in Africa. A quarter of the mothers from the European Union were born in the 'New EU', which constitutes the twelve countries which joined the European Union (EU) between 2004 and 2012. Birth rates among British-born mothers have fallen from 1,307 births in 2001 to 1,126 in 2012.

Children's Centre Reach data (taken from eStart database)

As at 1st September 2014:

Harrow Reach data for 2 year period from: From 1st July 2012 up to 30th June 2014:

- 12,915 different families accessed Children's Centre services at least once.
- 15,788 carers/parents accessed Children's Centre services at least once.
- 11,360 Female Carers/Parents accessed Children's Centre services at least once.

- 3,789 Male carers/parents accessed Children's Centre services at least once
- 3,710 Fathers accessed Children's Centre services at least once.
- 665 known Lone Parent families accessed Children's Centre services at least once
- 104 Teenage parents accessed Children's Centre services at least once

Children

- 11,985 children under 5 accessed Children's Centre services at least once.
- 8,619 children seen were from BME (All groups except White British) groups (where Ethnicity was provided by the family – so the BME number is likely to be higher than reported). 37% of these BME children were of Asian Indian origin, 19% are White Other, 18% are Asian Other.
- 245 children seen with known disabilities/special needs

Hub level Reach data for 2 year period from: From 1st July 2012 up to 30th June 2014:

Cedars Hub (Cedars, Chandos, Pinner Wood, Stanmore Park,)

Approximately 85% of children living in the Reach areas around the Centres have accessed Children's Centres.

- 4,551 families accessed centres/services in the Cedars Hub
- 43% of these families live in the most deprived areas of Harrow
- 82% of these families are known to be from Black & Minority Ethnic (BME) Groups (i.e. non White British)
- Of the families from BME groups, the largest groups accessing the Hub are Asian Indian (38% families accessing), White Other (22%), Asian Other (15%), Black African/Other (8%)

Whitefriars

- Approximately 99% of children living in the Reach areas around the Centre have accessed Children's Centres.
- 2,453 families accessed centres/services at Whitefriars
- 57% of these families live in the most deprived areas of Harrow
- 90% of these families are known to be from Black & Minority Ethnic (BME) Groups (i.e. non White British)
- Of the families from BME groups, the largest groups accessing the Hub are Asian Indian (32% families accessing), White Other (21%), Asian Other (18%), Other Ethnic Group (10%)

Kenmore Hub (Kenmore Park, Elmgrove, Gange)

- Approximately 88% of children living in the Reach areas around the Centres have accessed Children's Centres.
- 1,586 families accessed centres/services in the Kenmore Hub
- 46% of these families live in the most deprived areas of Harrow
- 91% of these families are known to be from Black & Minority Ethnic (BME) Groups (i.e. non White British)
- Of the families from BME groups, the largest groups accessing the Hub are Asian Indian (39% families accessing), White Other (25%), Asian Other (16%), Black African/Other (6%)

St. Josephs

- Approximately 95% of children living in the Reach areas around the Centre have accessed Children's Centres.
- 1,586 families accessed centres/services at St Josephs
- 40% of these families live in the most deprived areas of Harrow
- 88% of these families are known to be from Black & Minority Ethnic (BME) Groups (i.e. non White British)
- Of the families from BME groups, the largest groups accessing the Hub are Asian Indian (41% families accessing), White Other (23%), Asian Other (17%), Black African/Other (6%)

Hillview Hub (Hillview, Grange, Pinner Centre, Rayners Lane, Roxbourne, Earlsmead, Vaughan Road NRC)

- Approximately 79% of children living in the Reach areas around the Centres have accessed Children's Centres.
- 5,218 families accessed centres/services in the Hillview Hub
- 33% of these families live in the most deprived areas of Harrow
- 81% of these families are known to be from Black & Minority Ethnic (BME) Groups (i.e. non White British)
- Of the families from BME groups, the largest groups accessing the Hub are Asian Indian (37% families accessing), Asian Other (22%), White Other (19%), Black African/Other (6%)

Number of Families Accessing Children's Centres

<u>Centre</u>	<u>No. of Families Accessing Centres: 1st Jan '13-31st Aug '14 (Please note all centres are different sizes and have different capacity and staffing so it's not possible to make direct comparisons. For example those that offer certain services such as Health visitors & midwives are likely to have a higher no. of families accessing. Also some of the centres are not open during school holidays)</u>
Cedars	2,238
Chandos	326
Pinner Wood	975
Stanmore Park	1,275
Whitefriars	2,118
Kenmore Park	2,113
Gange	1,263
Elmgrove	313
St. Josephs	1,378
Hillview	2,138
Pinner Centre	2,097
Rayners Lane	723
Roxbourne	212
Grange	305
Earlsmead	237
Vaughan Road	160

The proposal of reduction to children centres will affect families that have 0-5 year's children of all ethnic backgrounds

Summary of families Accessing Health Services at named Children's Centres

Pinner Centre.

Health services currently present at the Centre: Health Visitors, Midwives, Breastfeeding Support, Oral Health, 2 Year Checks

- On average, 640 families access Health Visitors at Pinner Centre on a yearly basis. 54% of these families live in the Pinner and Pinner South wards. 20% of these families come from north of the borough from areas such as Hatch End and Headstone North. 19% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- On average, 114 families access midwives at Pinner Centre on a yearly basis. 48% of these families live in the Pinner and Pinner South wards. 24% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 24% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- Options for relocating these plus other health services from the centre include Cedars, Hillview, Grange and Stanmore Park. There are direct bus links from Pinner Centre to Grange and Stanmore Park.

Pinner Wood

Health services currently present at the Centre: Midwives, Speech & Language Therapy, 2 Year Checks

- On average, 164 families access midwives at Pinner Wood on a yearly basis. 52% of these families live in the Pinner and Pinner South wards. 32% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 13% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- On average, 106 families access Speech & Language Therapy services at Pinner Wood on a yearly basis. 39% of these families live in the Pinner and Pinner South wards. 33% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 17% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South. The remainder come from across the borough
- Options for relocating these plus other health services from the centre include Cedars, Hillview, Grange and Stanmore Park. (see appendix 1)

Rayners Lane

Health services currently present at the Centre: Health Visitors, Oral Health

- On average, 282 families access Health Visitors at Rayners Lane on a yearly basis. 79% seen from the south west of

the borough from wards such as Rayners lane, Roxbourne, Roxeth, West Harrow, Pinner South and Harrow on the Hill. 10% of these families come from north of the borough from areas such as Pinner, Hatch End and Headstone North. 9% of these families come from centre of the borough such as Greenhill, Marlborough and Headstone South.

- Options for relocating these plus other health services from the centre include Grange, Earlsmead, Cedars and Stanmore Park. There are direct bus links from Rayners Lane to Grange, Hillview, Earlsmead, Stanmore Park and Elmgrove.

Gange

Health services currently present at the Centre: Health Visitors, Oral Health

- On average, 410 families access Health Visitors at Gange on a yearly basis. 77% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 9% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 9% also come from east of the borough from wards such as Queensbury, Belmont, Kenton East and Kenton West.
- Options for relocating these plus other health services from the centre include Elmgrove and Cedars.

St.Josephs

Health services currently present at the Centre: Health Visitors, Oral Health, 2 Year Checks

- On average, 437 families access Health Visitors at St Josephs on a yearly basis. 65% come from east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 24% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 8% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.
- Options for relocating these plus other health services from the centre include Kenmore Park and Cedars. There are direct bus links from St Josephs to Cedars.

Whitefriars

Health services currently present at the Centre: Midwives, Post natal Clinics, Breastfeeding, 2 Year Checks

- On average, 570 families access Midwives at Whitefriars on a yearly basis. 77% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 15% come from east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 6% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.
- On average, 520 families access Post Natal clinics at Whitefriars on a yearly basis. 78% of these families come from

centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 13% come from the east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 7% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.

- Options for relocating these plus other health services from the centre include Kenmore Park and Cedars. There are direct bus links from Whitefriars to Hillview and Stanmore Park.

Summary of families Accessing Health Services at named Children’s Centres Pinner Centre.

Health services currently present at the Centre: Health Visitors, Midwives, Breastfeeding Support, Oral Health, 2 Year Checks

- On average, 640 families access Health Visitors at Pinner Centre on a yearly basis. 54% of these families live in the Pinner and Pinner South wards. 20% of these families come from north of the borough from areas such as Hatch End and Headstone North. 19% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- On average, 114 families access midwives at Pinner Centre on a yearly basis. 48% of these families live in the Pinner and Pinner South wards. 24% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 24% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- Options for relocating these plus other health services from the centre include Cedars, Hillview, Grange and Stanmore Park. There are direct bus links from Pinner Centre to Grange and Stanmore Park.

Pinner Wood

Health services currently present at the Centre: Midwives, Speech & Language Therapy, 2 Year Checks

- On average, 164 families access midwives at Pinner Wood on a yearly basis. 52% of these families live in the Pinner and Pinner South wards. 32% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 13% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- On average, 106 families access Speech & Language Therapy services at Pinner Wood on a yearly basis. 39% of these families live in the Pinner and Pinner South wards. 33% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 17% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South. The remainder come from across the borough
- Options for relocating these plus other health services from the centre include Cedars, Hillview, Grange and Stanmore Park.

Rayners Lane

Health services currently present at the Centre: Health Visitors, Oral Health

- On average, 282 families access Health Visitors at Rayners Lane on a yearly basis. 79% seen from the south west of the borough from wards such as Rayners lane, Roxbourne, Roxeth, West Harrow, Pinner South and Harrow on the Hill. 10% of these families come from north of the borough from areas such as Pinner, Hatch End and Headstone North. 9% of these families come from centre of the borough such as Greenhill, Marlborough and Headstone South.
- Options for relocating these plus other health services from the centre include Grange, Earlsmead, Cedars and Stanmore Park. There are direct bus links from Rayners Lane to Grange, Hillview, Earlsmead, Stanmore Park and Elmgrove.

Gange Health services currently present at the Centre: Health Visitors, Oral Health

- On average, 410 families access Health Visitors at Gange on a yearly basis. 77% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 9% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 9% also come from east of the borough from wards such as Queensbury, Belmont, Kenton East and Kenton West.
- Options for relocating these plus other health services from the centre include Elmgrove and Cedars.

St. Josephs Health services currently present at the Centre: Health Visitors, Oral Health, 2 Year Checks

- On average, 437 families access Health Visitors at St Josephs on a yearly basis. 65% come from east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 24% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 8% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.
- Options for relocating these plus other health services from the centre include Kenmore Park and Cedars. There are direct bus links from St Josephs to Cedars.

Whitefriars

Health services currently present at the Centre: Midwives, Post natal Clinics, Breastfeeding, 2 Year Checks

- On average, 570 families access Midwives at Whitefriars on a yearly basis. 77% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 15% come from east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 6% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.
- On average, 520 families access Post Natal clinics at Whitefriars on a yearly basis. 78% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 13% come from east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 7% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.

	<ul style="list-style-type: none"> Options for relocating these plus other health services from the centre include Kenmore Park and Cedars. There are direct bus links from Whitefriars to Hillview and Stanmore Park. 																				
<p>Disability (including carers of disabled people)</p>	<p>245 individual children seen with known disabilities and special needs. Targeted speech and language and other services are delivered at designated centres. The intention is to retain these services through any model.</p> <p>Disability</p> <p>Children with disabilities are able to access all CC services and specific services are provided for children with identified SEN e.g. short breaks/play scheme/sensory rooms.</p> <p>Number of Families / Children Accessing January 2013 to September 2014</p> <p>Special Educational Needs/Disability services (includes Sensory Room) 1,069 families seen in the period above - 87% from BME groups 47% from most deprived areas. Quite high % reached from deprived area although these activities are focused on all groups in community, not just deprived.</p> <p>In the same period: Speech & Language Groups (includes TALK groups, SALT) 1,453 families - 89% from BME groups. 47% from most deprived areas. Quite high % reached from deprived although these activities are focused on all groups in community, not just deprived.</p>																				
<p>Gender Reassignment</p>	<p>No data available.</p> <table border="1" data-bbox="790 291 970 1594"> <tr> <td>Children under 5 living in 30% most deprived Lower Super Output Areas</td> <td>3,925</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Teenage Parents</td> <td>58</td> <td>3188</td> <td>3410</td> <td>3197</td> </tr> <tr> <td>Lone Parents</td> <td>375</td> <td>52</td> <td>63</td> <td>53</td> </tr> <tr> <td></td> <td></td> <td>360</td> <td>468</td> <td>351</td> </tr> </table>	Children under 5 living in 30% most deprived Lower Super Output Areas	3,925				Teenage Parents	58	3188	3410	3197	Lone Parents	375	52	63	53			360	468	351
Children under 5 living in 30% most deprived Lower Super Output Areas	3,925																				
Teenage Parents	58	3188	3410	3197																	
Lone Parents	375	52	63	53																	
		360	468	351																	
<p>Pregnancy and Maternity</p>	<p>Children Centres are used by pregnant women and a range of ante natal midwifery, post natal and a range of health checks are delivered through the centres including healthy living and breastfeeding support.</p> <p>The intention is to retain the services, some may need to be relocated to other centres, and this will only be done where essential. Scrutiny of data informs us that women travel to centres currently. The distance would still be less for those that would have previously travelled to hospital services. E.g all maternity services used to be at NWL hospital wherever one lived in the borough. The impact would be greater if option 1 were chosen, however relocation plans have been considered for other options.</p> <p>BME communities are highly represented in usage of the centres.</p> <p>Harrow Reach data for 2 year period from: From 1st July 2012 up to 30th June 2014:</p> <ul style="list-style-type: none"> 11,985 children under 5 accessed Children's Centre services at least once. 8,619 children seen were from BME (All groups except White British) groups (where Ethnicity was provided by the family – so the BME number is likely to be higher than reported). 37% of these BME children were of Asian Indian origin, 19% are White Other, and 18% are Asian Other. 																				
<p>Race</p>	<p>BME communities are highly represented in usage of the centres.</p> <p>Harrow Reach data for 2 year period from: From 1st July 2012 up to 30th June 2014:</p> <ul style="list-style-type: none"> 11,985 children under 5 accessed Children's Centre services at least once. 8,619 children seen were from BME (All groups except White British) groups (where Ethnicity was provided by the family – so the BME number is likely to be higher than reported). 37% of these BME children were of Asian Indian origin, 19% are White Other, and 18% are Asian Other. 																				

	<p>It is not envisaged that there would be a disproportionate impact on BME compared to White groups; targeted services will be available in alternative centres. BME target groups are identified and this intelligence will be used to ensure that targeting to these groups continues and where necessary additional targeting processes will be implemented.</p> <table border="1" data-bbox="207 100 399 1601"> <tr> <td data-bbox="207 1310 399 1601">ESOL classes for speakers of other languages</td> <td data-bbox="207 1086 399 1310">379 families</td> <td data-bbox="207 750 399 1086">52% from most deprived areas 32% from Asian other 28% from White Other 21% from Other Ethnic (includes Afghan)</td> <td data-bbox="207 100 399 750">A high % of ESOL attendees live in deprived areas which are as expected.</td> </tr> </table>	ESOL classes for speakers of other languages	379 families	52% from most deprived areas 32% from Asian other 28% from White Other 21% from Other Ethnic (includes Afghan)	A high % of ESOL attendees live in deprived areas which are as expected.
ESOL classes for speakers of other languages	379 families	52% from most deprived areas 32% from Asian other 28% from White Other 21% from Other Ethnic (includes Afghan)	A high % of ESOL attendees live in deprived areas which are as expected.		
<p>Religion and Belief</p>	<p>The Children's Centres work with families with a range of religious views and beliefs. There is no expected impact on individuals or groups from any religious background or belief.</p> <p>Women are overly represented as users of Children's Centres, which is an expectation as prenatal services are provided, and mothers are registered as main carers. Fathers from working families' access less. Fathers are welcome at all services in centres and specific fathers' services are available on Saturdays.</p> <p>Staff at Centres are by nature of the work and in line with the national early years sector predominantly women and therefore potential redundancy will impact almost entirely on women.</p> <p>From 1st July 2012 up to 30th June 2014: 3,710 Fathers accessed Children's Centre services at least once. The consultation to date 9/12/2014 male/female/non-disclosure responses to the consultation have been as follows: Male Total 6.09% Total of answers 7.07% Number 14 Female 80.00% 92.93% 184 [No Response] 13.91% -- 32 Total 100.00% 100.00% 230. 1 male staff member will be impacted upon whichever model is chosen, this post is a potential redundancy.</p> <p>Fathers</p> <p>At the end of the consultation the following analysis of data was undertaken.</p> <ul style="list-style-type: none"> eStart data shows that 24% of all parents accessing centres are fathers. 14 individuals completing the consultation have indicated that they are a male which is 7% of all parents completing the survey. This is a lower proportion than the 24% of fathers seen on eStart. However, in the majority of cases Hub managers have reported that although father is present while the mother completes the survey, the survey response is generally submitted from the mother which explains the higher proportion of female responses. Also some of the responses would be from female staff members who are predominate in early years and Children's Centres. 				
<p>Sexual Orientation</p>	<p>No data available.</p>				

The proposals will negatively impact in relation to a range of protected characteristics. Mitigation will be put in place through remaining provision but will be increasingly difficult if the most reduced service proposals are accepted. Travel to some centre's will mean longer journeys for parents – consideration will need to be given to length of groups so that the journey is considered 'worthwhile' for parents travelling longer distance. Bus and train routes have been planned for the potential changes. This could cause financial impact if more than 1 bus is used to arrive at a centre. In the main this will be a small percentage of families affected.

January 2013 –September 2014

- 5,148 Families living in Harrow's most deprived areas have accessed Harrow's Children's Centres at least once from 1st January 2013 up to 1st September 2014.
- 4,837 Children living in Harrow's most deprived areas have accessed Harrow's Children's Centres at least once from 1st January 2013 up to 1st September 2014
- 665 known Lone Parent families accessed Children's Centre services at least once
- 104 Teenage parents accessed Children's Centre services at least once

Teenage parents

- eStart data shows that 0.5% of all parents accessing centres are teenage parents. 7 individuals completing the consultation have indicated that they are a teenage parent which is 3% of all parents completing the survey. **This is a higher proportion than the 0.5% of teenage parents seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Socio Economic

140

Lone parents

- eStart data shows that 3.3% of all parents accessing centres are lone parents. 16 individuals completing the consultation have indicated that they are a lone parent which is 6.9% of all parents completing the survey. **This is a higher proportion than the 3.3% of lone parents seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Children from Workless Households:

Number Reached in 2011 - 1,867

Number Reached in 2012 - 1852

Number Reached in 2013 - 1816

Number Reached in 2014 - 1524 (up to 31st October 2014)

2011

2012

2013

2014 (to Oct)

Total of Target Groups Reach

11,409

13,054

13880

12906

5. What consultation have you undertaken on your proposals?

Who was consulted?
What consultation methods were used?

What do the results show about the impact on different groups / Protected Characteristics?

What actions have you taken to address the findings of the consultation?

<p>Parents/carers as users of centres Harrow community Staff in centres Staff in other service areas Schools Child-minders Preschools staff and parents Stakeholders e.g. CAB Health colleagues; Health Visiting Midwifery GP's PVI sector colleagues Commissioning Continued</p>	<p>Consultation paper Questionnaire: hard copy/online/Facebook/events/discussion groups/petition/feedback/letters/complaints/briefings/petitions/ attendance at meetings/EqIA group/dedicated email/dedicated telephone line.</p>	<p>The results show that people's concerns are much more about the impact for all children related to their care and development and their future outcomes. There is concern about travel to centres and this could have an impact on all families that will no longer have a centre as near to them irrespective of their characteristic. The options have taken account of the areas of most need and this mitigates this impact as far as is possible. Results show that retaining 10 places to deliver CC services is the preferred option, option 3, this will reduce the impact on travel and access to the support required and needed. The opportunity for schools to 'buy in' to CC delivery for families attending and due to transition to school. This can be via outreach and this will again mitigate the impact.</p> <p>Information from stakeholder group scrutiny</p> <p>Age • eStart data shows that 86%</p>	<p>(This may include further consultation with the affected groups, revising your proposals).</p> <p>Remodelled original options following concerns re the impact of options put forward. Used demographic intelligence data from various sources and scrutinised the on-going collated data for CC delivery and planning. Used performance intelligence to scrutinise responses to ensure that all groups were represented.</p> <p>Used information to inform decision making about the 3 options being consulted on. Realigned LSOA's to each of the new models to minimise the impact. Commenced report; produced papers to explain the identified impact and offered solutions to arising issues e.g. health paper for CCG. Revised options to include some opportunities to reduce impact and generate income e.g. keeping additional buildings for income generation and social enterprise. Set up a good practice EqIA group.</p>
---	---	--	--

Continued

of all CC users are Children Aged 0-5, 12% are children aged 5-12 and 0.6% are children aged 13 – 18. (We assume a large number of staff/other residents have completed the survey too hence the 16.87% stating 'Other')

- This age breakdown for Childrens centre usage is in similar proportion to the age breakdown on the survey response. There is no specific impact – the centre where most usage by teenagers is in all models.

Parents/Carers with Disabilities

- eStart data shows that 0.5% of all parents accessing centres have stated they have a disability. 27 parents/adults with disabilities have responded to the consultation which is 5.3% of all adults/parents that have completed the survey (based on 504 responses).

This is a higher proportion than the 0.5% of parents with disabilities seen on eStart which indicates they have been fairly represented on the consultation responses so far.

Children with Disabilities

- eStart data shows that 0.6% of all children accessing centres have stated they have a disability. This is a higher proportion than the 0.6% of children with disabilities seen on eStart which indicates they

have been fairly represented on the consultation responses so far. 31 individuals indicating they have a child with disabilities have responded to the consultation which is 6.1% of all adults/parents that have completed the survey (based on 504 responses). There were some impact issues raised by users e.g. proximity of centres to their home address or the school where a sibling attends.

Teenage parents

- eStart data shows that 0.5% of all parents accessing centres are teenage parents. 23 individuals completing the consultation have indicated that they are a teenage parent which is 4.5% of all parents completing the survey. This is a higher proportion than the 0.5% of teenage parents seen on eStart which indicates they have been fairly represented on the consultation responses so far.

Lone parents

- eStart data shows that 3.3% of all parents accessing centres are lone parents. 33 individuals completing the consultation have indicated that they are a lone parent which is 6.5% of all parents completing the survey. This is a higher proportion than the 3.3% of lone parents seen on eStart which indicates they have been fairly represented on the consultation responses so far and will not be specifically impacted upon.

		<p>There will be no specific impact on lone parents.</p> <p>Ethnicity: Asian/Asian British</p> <ul style="list-style-type: none"> eStart data shows that 45% of Centre users are noted as being Asian Indian, Asian other or Asian Pakistani. This is similar to the consultation response of Asian/Asian British proportion of 43.5% Asian Indian and Asian Pakistani are shown to be well represented on consultation response with the proportions being similar to those on eStart In the EqIA December report update, the group under represented was the Asian Other community. The Jan report shows a significant increase in responses from the Sri Lankan/Tamil community which is good. The response from Afghan community is higher also but only 9 responses from Afghan community so this could have been slightly higher – but they may not have ticked the right box for their Ethnicity <p>Ethnicity: Black/Black british</p> <ul style="list-style-type: none"> eStart data shows that 5.6% of Centre users are noted as being Black African, Black Caribbean or Black Other. This is higher than the consultation response of Black/Black British proportion of 1.98% Black Caribbean are shown to be well represented on consultation response with the proportions being similar to those on 	
--	--	--	--

eStart

- eStart data shows 3.5% of all centre users are **Black African** and on the consultation only 0.43% are Black African. In the December report, the group under represented was the Black African community – in particular Somali. The Jan report shows the numbers responding from the Black ethnic groups has increased and is in line with the proportion of our centre users that are Black African. There has been an increase in numbers of responses from Black African & Somali since December which is a good improvement.

Ethnicity: White/White British

- eStart data shows that 33% of Centre users are noted as being White British, White Irish or White Other. This is lower than the consultation response of White/British proportion of 49% indicating a high proportion of this group have responded.
- White British and White Irish are shown to be well represented on consultation response with the proportions being similar or higher to those on eStart
- eStart data shows 19% of all centre users are **White Other (mainly Romanian)** and on the December report consultation only 10.4% are White Other/Polish/Romanian. Polish community. The Jan report shows There has been an increase in

		<p>responses from these groups – however the total proportion of responses from White Other/Polish/Romanian groups is still slightly lower than we'd expect. However they may have ticked 'Other' as their Ethnicity</p> <p>Ethnicity: Mixed</p> <ul style="list-style-type: none"> eStart data shows that 1.95% of Centre users are noted as being of Mixed origin. This is similar to the consultation response of Mixed proportion of 2.17% indicating a fair proportion of this group have responded. <p>There is no specific impact on any ethnic group instead the impact is across all ethnicities and reorganisation accounts for reaching those most in need and the intention is that ways will be identified further to manage this should the performance intelligence data show that we are failing to reach specific groups e.g. via outreach/partnership working.</p>	
<p>6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment? List the Title of reports / documents and websites here.</p>	<p>Core purpose of Children's Centres Children's Centres statutory guidance, April 2013 CS self-assessment strategy Our plan: Children and Families www.harrow.gov.uk/children Our participation Strategy (as above) The Child's Journey http://harrowhub.harrow.gov.uk/download/6082/making_a_difference Healthy Child strategy www.twoyearprogresscheck.org.uk Early years 2 year offer strategy (ESSO)</p>		

	CC data report (PI team) Estart reports (available on request) Schools data (schools performance team).									
--	--	--	--	--	--	--	--	--	--	--

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	Yes	Yes	No	No	Yes	No	No	Yes	No
No									

YES - If there is a risk of disproportionate adverse impact on any ONE of the Protected Characteristics, continue with the rest of the template.

- Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

D - If you have ticked 'No' to all of the above, then go to Stage 6

Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3? (include this evidence, including any data, statistics, titles of documents and website links here)	LSOA data, Postcode data, CC estart data, current usage of each centre, realignment of REACH, potential at other locations, target setting. Realignment of REACH areas REACH figures calculated Health paper (OByrne) EQUIA analysis work with a 2 page summary from Performance intelligence officer
---	---

9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?	Who was consulted?	What consultation methods were	What do the results show about	What actions have you taken to
---	--------------------	--------------------------------	--------------------------------	--------------------------------

	used?	the impact on different groups / Protected Characteristics?	address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
<p>Clinical Commissioning Group Midwifery service</p> <p>Targeted approach to ensure that we heard views from all groups as our scrutiny of the responses highlighted the need to do this. This was successful.</p>	<p>Survey Objective recording system Face to face meeting Receipt of letter Offer to attend a fuller meeting</p> <p>Approached leads of specific communities e.g the faith schools/traveller liaison officer Contacted users of specific services highlighted the specific minority groups that needed to be 'heard'. Face to face approach, telephone contact.</p>	<p>Impact is mitigated through a considered plan to realign families to other available centres and therefore required support e.g maternity services. Option 3 as the preferred option reduces any impact considerably. Children's access to opportunities for care, learning and development emerged still as a main concern, along with support for parents, early intervention and safeguarding. Option 3 emerging as the preferred model will support the most opportunity to reach those that we need to reach. Opportunities for social enterprise will also support to allay issues raised.</p>	<p>Discussion with health colleagues CCG would like future discussions when the decision is made. Considered the health paper prepared will support a future model. Midwifery leads consider that the option 3 will mitigate the impact – no additional need. Relocation of health services to maintain the current reach will be implemented.. The responses confirmed the thinking and planning that has been undertaken for the options to be put forward. Specific issues raised will be collated so that a paper can be written to support increased understanding of the centres and the reasons why decisions are made. Myths and misunderstandings were evident and the CC strategic group will take forward a piece of work to that effect.</p>
EqIA group			
Stage 5: Assessing Impact and Analysis			
<p>10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?</p>			

Protected Characteristic	Adverse ✓	Positive ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)	✓		<p>Children over the age of five years:-</p> <p>The intention is that CC staff will not provide the services for over five year olds, with the exception of multi aged family activity sessions during holiday periods.</p> <p>After school clubs and holiday playschemes will be impacted upon.</p> <p>Private providers may need to be commissioned.</p> <p>Consultation specific to these services may need to follow.</p> <p>This affects 2 after school clubs and 2 holiday play schemes. A total of 221 families used the service in 1 year. Staff also support Hillview Nursery play scheme with 85 families attending in the same period.</p> <p>119 children are aged 0-5 (out of a total of 272 children altogether). As a percentage this is 44% of children age 0-5 So this impacts on 56% of users (at this time)</p> <p>For Hillview support - 57 children are aged 0-5 (out of a total of 98 children altogether). As a percentage this is 58% of children age 0-5. This impacts on 42% of users.</p> <ul style="list-style-type: none"> eStart data shows that 86% of all CC users are Children Aged 0-5, 12% are children aged 5-12 and 0.6% are children aged 13 – 18. This age breakdown is in similar proportion to the age breakdown on the survey response – however the proportion of responses from parents of children age 5-12 could be slightly higher <p>Teenage parents</p> <ul style="list-style-type: none"> eStart data shows that 0.5% of all parents accessing centres are teenage parents. 7 individuals completing the consultation have indicated that they are a teenage parent 	<p>The children that use these services are in the main from the schools attached to the Centre's. These were 'inherited' provision previously run by the youth service.</p> <p>Discussions with the schools are essential.</p> <p>There could be a negative impact on access to some families. The intention is for CC staff to reduce their work with over 5 year olds and alternative ways of providing the services for the older children will need to be considered e.g. schools providing the ASC or holiday scheme provision/private sector provision/social enterprise opportunities.</p> <p>Increased targeting of After School clubs parents and parents accessing play-schemes services to complete consultation questionnaire. This took place and there were very few concerns raised about the reduction of the services for over 5's.</p> <p>Teenage parents do not need to be specifically targeted further for their views.</p>

			which is 3% of all parents completing the survey. This is a higher proportion than the 0.5% of teenage parents seen on eStart which indicates they have been fairly represented on the consultation responses so far.			
Disability (including carers of disabled people)	√	√	<p>Impact for disabled children or disabled parents.</p> <p>237 of 248 responses did not have a child with a disability.</p> <p>Parents/Carers with Disabilities</p> <ul style="list-style-type: none"> eStart data shows that 0.5% of all parents accessing centres have stated they have a disability. 11 parents/adults with disabilities have responded to the consultation which is 4.7% of all adults/parents that have completed the survey (based on 230 responses). This is a higher proportion than the 0.5% of parents with disabilities seen on eStart which indicates they have been fairly represented on the consultation responses so far. <p>Concern is the proximity for those without vehicles; this impacts on all those without vehicles and that have a CC near to them that closes; available services for SEN, the intention is to sustain SEN services however children over age five may be affected as we will reduce services delivered by CC staff to over 5's; access to sensory rooms – it is the intention that these main sensory spaces will be retained.</p>	<p>Scrutinizing the data of responses received indicated that we had a lower than expected response from families with a disabled child, we therefore contacted key partners with the intention of increasing the response from this protected characteristic group.</p> <p>Following EqIA best practice group meeting the PI officer undertook further analyses and the position became clearer.</p> <p>Sensory room access remains in the 3 models</p> <p>Travel to these will not change</p> <p>Generic services provided in closely located spaces to schools will have an impact, if they close, for some families especially where they have a child with SEN and children attending school. Timings of groups will need to be reviewed to ensure that they are available at times that in the main work best for protected characteristics e.g. disabled children.</p> <p>Disabled specialist services will be retained and will be in the same spaces in option 2 and 3.</p>		
Gender Reassignment			No specific impact anticipated		<p>26.06% 26.06%</p> <p>Bisexual 5.99% 5.99% 74</p> <p>Gay Woman / Lesbian 0.35% 0.35% 17</p> <p>Gay Man 0.35% 0.35% 1</p> <p>Heterosexual 63.03% 63.03% 179</p> <p>Other – Please specify 4.23% 4.23% 12</p> <p>Total 100.00% 100.00% 284</p>	
Marriage and Civil Partnership			No specific impact anticipated			

	<p>A health paper has demonstrated how we intend to mitigate this with a reallocation of the LSOA's and the scrutiny of the post codes and the nearest centres to the post codes. It emerged from this work that mothers are not necessarily receiving services from the nearest centre located to them (this will be either choice or agreement with providers)</p>	<p>Ethnicity: Asian/Asian British</p> <ul style="list-style-type: none"> eStart data shows that 45% of Centre users are noted as being Asian Indian, Asian other or Asian Pakistani. This is similar to the consultation response of Asian/Asian British proportion of 43.5% Asian Indian and Asian Pakistani are shown to be well represented on consultation response with the proportions being similar to those on eStart eStart data shows that 13% of Centre users are Asian Other (many of these Tamil Sri Lankan and Afghan) and on the consultation, only 5.5% of respondents have indicated they are Sri Lankan, Afghan or Asian other. This community has now been targeted to achieve further responses so that representation is evident. <p>Ethnicity: Black/Black british</p> <ul style="list-style-type: none"> eStart data shows that 5.6% of Centre users are noted as being Black African, Black Caribbean or Black Other. This is higher than the consultation response of Black/Black British proportion of 1.98% Black Caribbean are shown to be well represented
	<p>The impact for families that receive their maternity services in centres that are proposed to close will be impacted on in as far as having to relocate to a different centre, the service will not stop. There is an intention to strive to retain these services in centres that are closing via other means e.g. increased partnership with health for funding and the PVI (Pinner Centre)</p> <p>High risk pregnant women do not receive their maternity services via the CC's instead via the hospital or specialist midwife.</p> <p>The main impact will be if option 1 is chosen by councilors. Affecting 2 main centres for health services.</p> <p>Option 3 is emerging as the preferred option this retains all midwifery centres if we can retain Pinner building.</p>	<p>No specific impact anticipated however we have worked to ensure that all ethnic groups accessing the centres are encouraged to offer their views to the proposed changes in order to highlight any issues.</p> <p>The impact will be across all races, however performance intelligence data informs where the target groups are and planning accounts for these.</p>
<p>Pregnancy and Maternity</p>	<p>✓</p>	<p>✓</p>
<p>Race</p>		

on consultation response with the proportions being similar to those on eStart

- eStart data shows 3.5% of all centre users are Black African and on the consultation only 0.43% are Black African. We therefore need to target this group of users.

Ethnicity: White/White British

- eStart data shows that 33% of Centre users are noted as being White British, White Irish or White Other. This is lower than the consultation response of White/British proportion of 49% indicating **a high proportion of this group have responded.**

- White British and White Irish are shown to be **well represented** on consultation response with the proportions being similar or higher to those on eStart

- eStart data shows 19% of all centre users are White Other (mainly Romanian) and on the consultation only 10.4% are White Other/Polish/Romanian. So we need to target this group – **in particular the Polish families seem under represented. A targeted approach will take place to increase responses from this ethnic group.**

Ethnicity: Mixed

eStart data shows that 1.95% of Centre users are noted as being of Mixed origin. **This is similar to the consultation response of Mixed proportion of 2.17% indicating a fair proportion of this group have responded.**

EQUIA panel suggested Polish numbers to respond seemed low. 4 Polish responses so far which is 1.7% of all responses.

Census 2011 data shows 5.7% of Harrow's residents are Polish speakers and 6.9% are Romanian speakers

It is possible that Polish families may have ticked the 'Other White' category.

<p>Religion or Belief</p>			<p>No specific impact anticipated</p>	
<p>Sex</p>	<p>✓</p>		<p>Fathers</p> <p>•eStart data shows that 24% of all parents accessing centres are fathers. 14 individuals completing the consultation have indicated that they are a male which is 7% of all parents completing the survey. This is a lower proportion than the 24% of fathers seen on eStart. However, in the majority of cases Hub managers have reported that although father is present while the mother completes the survey, the survey response is generally submitted from the mother which explains the higher proportion of female responses.</p> <p>Also some of the responses would be from a high percentage of female staff members that dominate the provision e.g. early years staff across the country are predominantly female.</p> <p>Women emerge as the main care givers and the highest percentage of users of the centre 76% and therefore impact will be more on women than men.</p>	<p>Ensure that fathers are encouraged to complete a consultation form from their perspective. Target the fathers group.</p> <p>Women are well represented in the responses.</p>
<p>Sexual orientation</p>			<p>No specific impact anticipated</p>	
<p>11. Cumulative Impact – Considering what else is happening within the</p>				<p>yes</p>
				<p>No</p>

<p>Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?</p> <p>If yes, which Protected Characteristics could be affected and what is the potential impact?</p>	<p>Age – children - The proposals could have a cumulative impact with the following: - School expansion due to increase in numbers of children needing to access schools – increase in the number of children needing to access CC's. Increase in target numbers in deprived areas.</p> <p>Library closures and the impact on support to young children however also offers opportunity for use of CC space for libraries services via outreach and hosting books for loan.</p> <p>Potential increase in provision for under 5's by increasing the number of centres offering a space for voluntary sector preschool.</p>																		
<p>11a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?</p>	<table border="1"> <thead> <tr> <th data-bbox="550 840 590 1086">Yes</th> <th data-bbox="550 604 590 840">yes</th> <th data-bbox="550 336 590 604">No</th> </tr> </thead> <tbody> <tr> <td data-bbox="590 840 678 1086"></td> <td data-bbox="590 604 678 840"></td> <td data-bbox="590 336 678 604"></td> </tr> </tbody> </table> <p>Potential health if option 1 is chosen. The impact would be much reduced if the preferred option 3 is approved.</p>	Yes	yes	No															
Yes	yes	No																	
<p>154. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation</p>	<p>Access to midwifery and health visiting service and support for parents and children's wellbeing. As above</p>																		
<p>If you have answered "yes" to any of the above, set out what justification there may be for this in Q13a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)</p> <p>If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.</p>	<table border="1"> <thead> <tr> <th data-bbox="1133 840 1173 1086">Yes</th> <th data-bbox="1133 604 1173 840">Pregnancy and Maternity</th> <th data-bbox="1133 336 1173 604">Race</th> <th data-bbox="1133 89 1173 336">Religion and Belief</th> <th data-bbox="1133 336 1173 392">Sex</th> <th data-bbox="1133 392 1173 1086">Sexual Orientation</th> </tr> </thead> <tbody> <tr> <td data-bbox="1173 840 1212 1086">Yes</td> <td data-bbox="1173 604 1212 840"></td> <td data-bbox="1173 336 1212 604"></td> <td data-bbox="1173 89 1212 336"></td> <td data-bbox="1173 392 1212 604">Yes</td> <td data-bbox="1173 392 1212 1086"></td> </tr> <tr> <td data-bbox="1212 840 1252 1086">No</td> <td data-bbox="1212 604 1252 840"></td> <td data-bbox="1212 336 1252 604"></td> <td data-bbox="1212 89 1252 336"></td> <td data-bbox="1212 392 1252 604"></td> <td data-bbox="1212 392 1252 1086"></td> </tr> </tbody> </table>	Yes	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation	Yes				Yes		No					
Yes	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation														
Yes				Yes															
No																			

- If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. **(select outcome 4)**
- If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. **(select outcome 4)**

Stage 6: Decision

13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.

Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. *List the actions you propose to take to address this in the Improvement Action Plan at Stage 7* ✓

Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. **(Explain this in 13a below)**

Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)

13a. If your EqIA is assessed as **outcome 3 or you have ticked 'yes' in Q12**, explain your justification with full reasoning to continue with your proposals.
 The council's economic situation determines that there is a need to make cuts, other options were considered and there was opportunity to change the centre proposals to ensure that the maximise reach to most vulnerable children were planned for including an improved targeted approach, using data intelligence, to make decisions re the options.

55

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
All ethnic groups	Use of the CC data performance intelligence	Quarterly reports Reorganisation of reach expectations	July 2015 October 2015 December 2015	Hub Managers Rachelle O'Byrne Gemma Williams	
REACH to those most	Data performance scrutiny Planning		ongoing	Hilary O'Byrne	

in need					
Health services	Meetings with key partners – planning-relocations where necessary Action plan for individual areas e.g. Public Health partnership working	As above via data performance	As above April 2015	Hilary O'Byrne	
Age	Identify alternative providers for the services for the older age range of children e.g. over 5 year olds	Providers identified	By July 2015	Hilary O'Byrne	

Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Hub Managers along with Performance intelligence staff reporting to the Children's centre committees and strategic group. Quarterly reports are currently produced these offer access to information to scrutinise. Feedback protocols are in place and will be increased for a period of 6 months with outcomes analysed.
16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Circulation of CC monitoring to a wider 'audience' than the committees. Report to Director of Children's Services. Work with the communications department. Use of the CC facebook and website. No official complaints however comments received in the feedback related strongly to lack of financial information being offered and lack of general information to support a response to questions Compliments about the events face to face which supported fuller understanding in order to respond to questions.
17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	

Stage 9: Public Sector Equality Duty

18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups. (Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)	
Eliminate unlawful discrimination, harassment	Foster good relations between people from
Advance equality of opportunity between	

and victimisation and other conduct prohibited by the Equality Act 2010	people from different groups	different groups
Stage 10 - Organisational sign off (to be completed by Chair of Departmental Equalities Task Group)		
The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.		
19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?		
Signed: (Lead officer completing EqIA)	H O'Byrne	Signed: (Chair of DETG) R Rickman
Date:	6.2.15	Date: 6.2.15
157 State EqIA presented at the EqIA Quality Assurance Group	28.1.15	Signature of ETG Chair pp R Rickman

This page is intentionally left blank

EQUIA Tasks – Response to Survey Results (as at 8/12/2014)

Overview of Analysis

Age

- eStart data shows that 86% of all CC users are Children Aged 0-5, 12% are children aged 5-12 and 0.6% are children aged 13 – 18. **This age breakdown is in similar proportion to the age breakdown on the survey response – however the proportion of responses from parents of children age 5-12 could be slightly higher (HOB is targeting After School clubs for their responses)**

Parents/Carers with Disabilities

- eStart data shows that 0.5% of all parents accessing centres have stated they have a disability. 11 parents/adults with disabilities have responded to the consultation which is 4.7% of all adults/parents that have completed the survey (based on 230 responses). **This is a higher proportion than the 0.5% of parents with disabilities seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Children with Disabilities

- eStart data shows that 0.6% of all children accessing centres have stated they have a disability. 14 individuals indicating they have a child with disabilities have responded to the consultation which is 6% of all adults/parents that have completed the survey (based on 230 responses). **This is a higher proportion than the 0.6% of children with disabilities seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Teenage parents

- eStart data shows that 0.5% of all parents accessing centres are teenage parents. 7 individuals completing the consultation have indicated that they are a teenage parent which is 3% of all parents completing the survey. **This is a higher proportion than the 0.5% of teenage parents seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Lone parents

- eStart data shows that 3.3% of all parents accessing centres are lone parents. 16 individuals completing the consultation have indicated that they are a lone parent which is 6.9% of all parents completing the survey. **This is a higher proportion than the 3.3% of lone parents seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Fathers

- eStart data shows that 24% of all parents accessing centres are fathers. 14 individuals completing the consultation have indicated that they are a male which is 7% of all parents completing the survey. **This is a lower proportion than the 24% of fathers seen on eStart.** However, in the majority of cases Hub managers have reported that although father is present while the mother completes the survey, the survey response is generally submitted from the mother which explains the higher proportion of female responses. Also some of the responses would be from female staff members.

Ethnicity: Asian/Asian British

- eStart data shows that 45% of Centre users are noted as being Asian Indian, Asian other or Asian Pakistani. **This is similar to the consultation response of Asian/Asian British proportion of 43.5%**
- **Asian Indian and Asian Pakistani are shown to be well represented on consultation response with the proportions being similar to those on eStart**
- **eStart data shows that 13% of Centre users are Asian Other (many of these Tamil Sri Lankan and Afghan) and on the consultation, only 5.5% of respondents have indicated they are Sri Lankan, Afghan or Asian other. This community has been targeted to achieve further responses**

Ethnicity: Black/Black British

- eStart data shows that 5.6% of Centre users are noted as being Black African, Black Caribbean or Black Other. **This is higher than the consultation response of Black/Black British proportion of 1.98%**
- **Black Caribbean are shown to be well represented on consultation response with the proportions being similar to those on eStart**
- **eStart data shows 3.5% of all centre users are Black African and on the consultation only 0.43% are Black African. So we need to target this group**

Ethnicity: White/White British

- eStart data shows that 33% of Centre users are noted as being White British, White Irish or White Other. **This is lower than the consultation response of White/British proportion of 49% indicating a high proportion of this group have responded.**
- **White British and White Irish are shown to be well represented on consultation response with the proportions being similar or higher to those on eStart**
- **eStart data shows 19% of all centre users are White Other (mainly Romanian) and on the consultation only 10.4% are White Other/Polish/Romanian. So we need to target this group – in particular the Polish families seem under represented.**

Ethnicity: Mixed

- eStart data shows that 1.95% of Centre users are noted as being of Mixed origin. **This is similar to the consultation response of Mixed proportion of 2.17% indicating a fair proportion of this group have responded.**

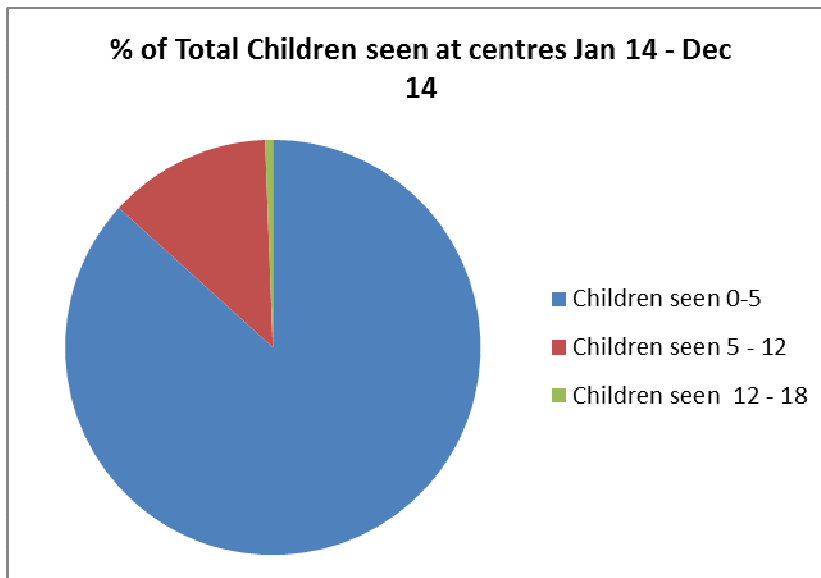
Further detail: EQUIA Tasks – Response to Survey Results

1. Ref: P 9, Question 2

eStart data

	Number seen Jan 14 - Dec 14 (Count)	% of Total Children seen at centres Jan 14 - Dec 14
Children seen 0-5	7444	86.7%
Children seen 5 - 12	1089	12.7%
Children seen 12 - 18	51	0.6%
	8584	

Looks in similar proportion as those who have responded to survey so far



2. Ref: Page 123. Question : what is your age?

eStart doesn't have a standard report on parents age and would take time to get Capita to get this in place – maybe response in No. Xx below would help this question?

3. Ref: page 124. Disability

eStart data

	Number seen Jan 14 - Dec 14 (Count)	% of Total Parents/Carers seen at centres Jan 14 - Dec 14	Notes
Parents with Disabilities	47	0.5%	Majority of this group seen at Hillview Hub
Total Parents/carers seen	9910		

11 parents/adults with disabilities have responded to the consultation which is 4.7% of all adults/parents that have completed the survey (based on 230 responses). This is higher than the 0.5% of parents with disabilities seen on eStart (see table above)

4. Ref: Page 125. Disability of child

	Number seen Jan 14 - Dec 14 (Count)	% of Total Children seen at centres Jan 14 - Dec 14
Children Seen age 0 -18 that have a disability	51	0.6%
Children Seen age 0 -18	8584	

5. Ref: Page 128. Groups

	Number seen Jan 14 - Dec 14 (Count)	% of Total Parents/Carers seen at centres Jan 14 - Dec 14	Notes
Parents with Disabilities	47	0.5%	Majority of this group seen at Hillview Hub
Teenage Parents	54	0.5%	majority of this group seen at Cedars Hub
Fathers	2396	24.2%	

Lone Parents	330	3.3%	Majority of this group seen at Cedars & Kenmore Hub
Grandparents	211	2.1%	
Total Parents/carers seen	9910		

Based on above, the proportion of Lone Parents & teenage parents responding to survey is in line (or better) than what we would expect.

However, looking at the numbers, 330 known lone parents have accessed the centre in the last 12 months so it would be beneficial for slightly more than 16 to respond

6. Ref: P.132 – p.141. Ethnic Origin of Parent

Table showing Ethnicities of Parents at all Centres Jan 14 – Dec 14

Ethnicity	Number seen Jan 14 - Dec 14 (Count)	% of Total Ethnicities of Parents seen at centres Jan 14 - Dec 14
Asian Bangladeshi	74	0.72%
Asian Indian	2934	28.64%
Asian Other	1329	12.97%
Asian Pakistani	408	3.98%
Black African	354	3.46%
Black Caribbean	197	1.92%
Black Other	29	0.28%
Chinese	93	0.91%
Mixed Other	103	1.01%
Mixed white & Asian	34	0.33%
Mixed White & Black African	17	0.17%
		0.45%
Mixed White & Black Caribbean	46	
Other Ethnic Group	450	4.39%
White British	1187	11.59%
White Irish Traveller	13	0.13%
		1.35%
White Irish	138	

7. Ref: page 141. White Other Ethnicity

EQUIA panel suggested Polish numbers to respond seemed low. 4 Polish responses so far which is 1.7% of all responses.

Census 2011 data shows 5.7% of Harrow's residents are Polish speakers and 6.9% are Romanian speakers

It is possible that Polish families may have ticked the 'Other White' category

EQUIA Tasks – Response to Survey Results (as at 8/1/2015)

Overview of Analysis

Age

- eStart data shows that 86% of all CC users are Children Aged 0-5, 12% are children aged 5-12 and 0.6% are children aged 13 – 18. (We assume a large number of staff/other residents have completed the survey too hence the 16.87% stating 'Other')
- **This age breakdown for Childrens centre usage is in similar proportion to the age breakdown on the survey response**

Parents/Carers with Disabilities

- eStart data shows that 0.5% of all parents accessing centres have stated they have a disability. 27 parents/adults with disabilities have responded to the consultation which is 5.3% of all adults/parents that have completed the survey (based on 504 responses). **This is a higher proportion than the 0.5% of parents with disabilities seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Children with Disabilities

- eStart data shows that 0.6% of all children accessing centres have stated they have a disability. 31 individuals indicating they have a child with disabilities have responded to the consultation which is 6.1% of all adults/parents that have completed the survey (based on 504 responses). **This is a higher proportion than the 0.6% of children with disabilities seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Teenage parents

- eStart data shows that 0.5% of all parents accessing centres are teenage parents. 23 individuals completing the consultation have indicated that they are a teenage parent which is 4.5% of all parents completing the survey. **This is a higher proportion than the 0.5% of teenage parents seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Lone parents

- eStart data shows that 3.3% of all parents accessing centres are lone parents. 33 individuals completing the consultation have indicated that they are a lone parent which is 6.5% of all parents completing the survey. **This is a higher proportion than the 3.3% of lone parents seen on eStart which indicates they have been fairly represented on the consultation responses so far.**

Fathers

- eStart data shows that 24% of all parents accessing centres are fathers. 14 individuals completing the consultation have indicated that they are a male which is 7% of all parents completing the survey. **This is a lower proportion than the 24% of fathers seen on eStart.** However, in the majority of cases Hub managers have reported that although father is present while the mother completes the survey, the survey response is generally submitted from the mother which explains the higher proportion of female responses. Also some of the responses would be from female staff members.

Ethnicity: Asian/Asian British

- eStart data shows that 45% of Centre users are noted as being Asian Indian, Asian other or Asian Pakistani. **This is similar to the consultation response of Asian/Asian British proportion of 43.5%**
- **Asian Indian and Asian Pakistani are shown to be well represented on consultation response with the proportions being similar to those on eStart**
- In the December report update, the group under represented was the Asian Other community. The Jan report shows a significant increase in responses from the Sri Lankan/Tamil community which is good. The response from Afghan community is higher also but only 9 responses from Afghan community so this could have been slightly higher – but they may not have ticked the right box for their Ethnicity

Ethnicity: Black/Black british

- eStart data shows that 5.6% of Centre users are noted as being Black African, Black Caribbean or Black Other. **This is higher than the consultation response of Black/Black British proportion of 1.98%**
- **Black Caribbean are shown to be well represented on consultation response with the proportions being similar to those on eStart**
- **eStart data shows 3.5% of all centre users are Black African and on the consultation only 0.43% are Black African.** In the December report, the group under represented was the Black African community – in particular Somali. The Jan report shows the numbers responding from the Black ethnic groups has increased and is in line with the proportion of our centre users that are Black African. There has been an increase in numbers of responses from Black African & Somali since December which is a good improvement.

Ethnicity: White/White British

- eStart data shows that 33% of Centre users are noted as being White British, White Irish or White Other. **This is lower than the consultation response of White/British proportion of 49% indicating a high proportion of this group have responded.**
- **White British and White Irish are shown to be well represented on consultation response with the proportions being similar or higher to those on eStart**

- **eStart data shows 19% of all centre users are White Other (mainly Romanian) and on the December report consultation only 10.4% are White Other/Polish/Romanian.** Polish community. The Jan report shows There has been an increase in responses from these groups – however the total proportion of responses from White Other/Polish/Romanian groups is still slightly lower than we'd expect. However they may have ticked 'Other' as their Ethnicity

Ethnicity: Mixed

- eStart data shows that 1.95% of Centre users are noted as being of Mixed origin. **This is similar to the consultation response of Mixed proportion of 2.17% indicating a fair proportion of this group have responded.**

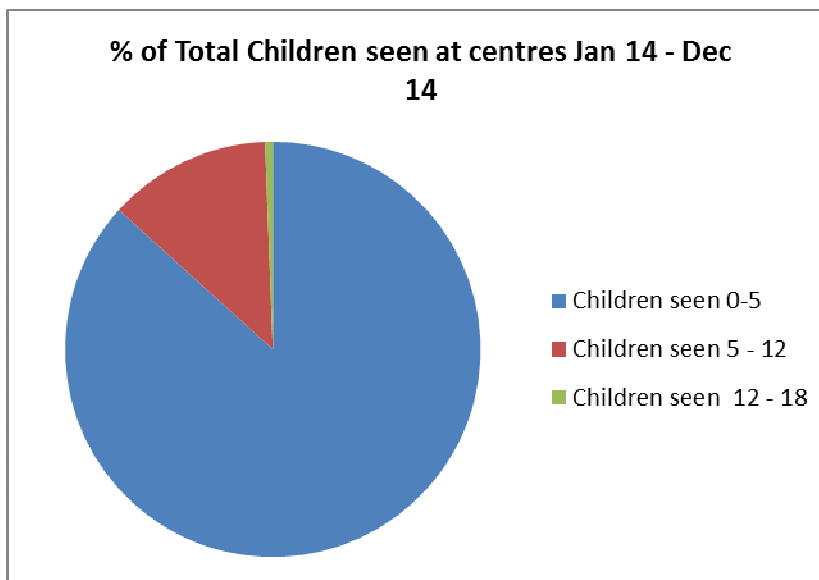
Further detail: EQUIA Tasks – Response to Survey Results

1. Ref: P 9, Question 2

eStart data

	Number seen Jan 14 - Dec 14 (Count)	% of Total Children seen at centres Jan 14 - Dec 14
Children seen 0-5	7444	86.7%
Children seen 5 - 12	1089	12.7%
Children seen 12 - 18	51	0.6%
	8584	

Looks in similar proportion as those who have responded to survey so far



2. Ref: Page 123. Question : what is your age?

eStart doesn't have a standard report on parents age and would take time to get Capita to get this in place – maybe response in No. Xx below would help this question?

3. Ref: page 124. Disability

eStart data

	Number seen Jan 14 - Dec 14 (Count)	% of Total Parents/Carers seen at centres Jan 14 - Dec 14	Notes
Parents with Disabilities	47	0.5%	Majority of this group seen at Hillview Hub
Total Parents/carers seen	9910		

11 parents/adults with disabilities have responded to the consultation which is 4.7% of all adults/parents that have completed the survey (based on 230 responses). This is higher than the 0.5% of parents with disabilities seen on eStart (see table above)

4. Ref: Page 125. Disability of child

	Number seen Jan 14 - Dec 14 (Count)	% of Total Children seen at centres Jan 14 - Dec 14
Children Seen age 0 -18 that have a disability	51	0.6%
Children Seen age 0 -18	8584	

5. Ref: Page 128. Groups

	Number seen Jan 14 - Dec 14 (Count)	% of Total Parents/Carers seen at centres Jan 14 - Dec 14	Notes
Parents with Disabilities	47	0.5%	Majority of this group seen at Hillview Hub
Teenage Parents	54	0.5%	majority of this group seen at Cedars Hub
Fathers	2396	24.2%	

Lone Parents	330	3.3%	Majority of this group seen at Cedars & Kenmore Hub
Grandparents	211	2.1%	
Total Parents/carers seen	9910		

Based on above, the proportion of Lone Parents & teenage parents responding to survey is in line (or better) than what we would expect.

However, looking at the numbers, 330 known lone parents have accessed the centre in the last 12 months so it would be beneficial for slightly more than 16 to respond

6. Ref: P.132 – p.141. Ethnic Origin of Parent

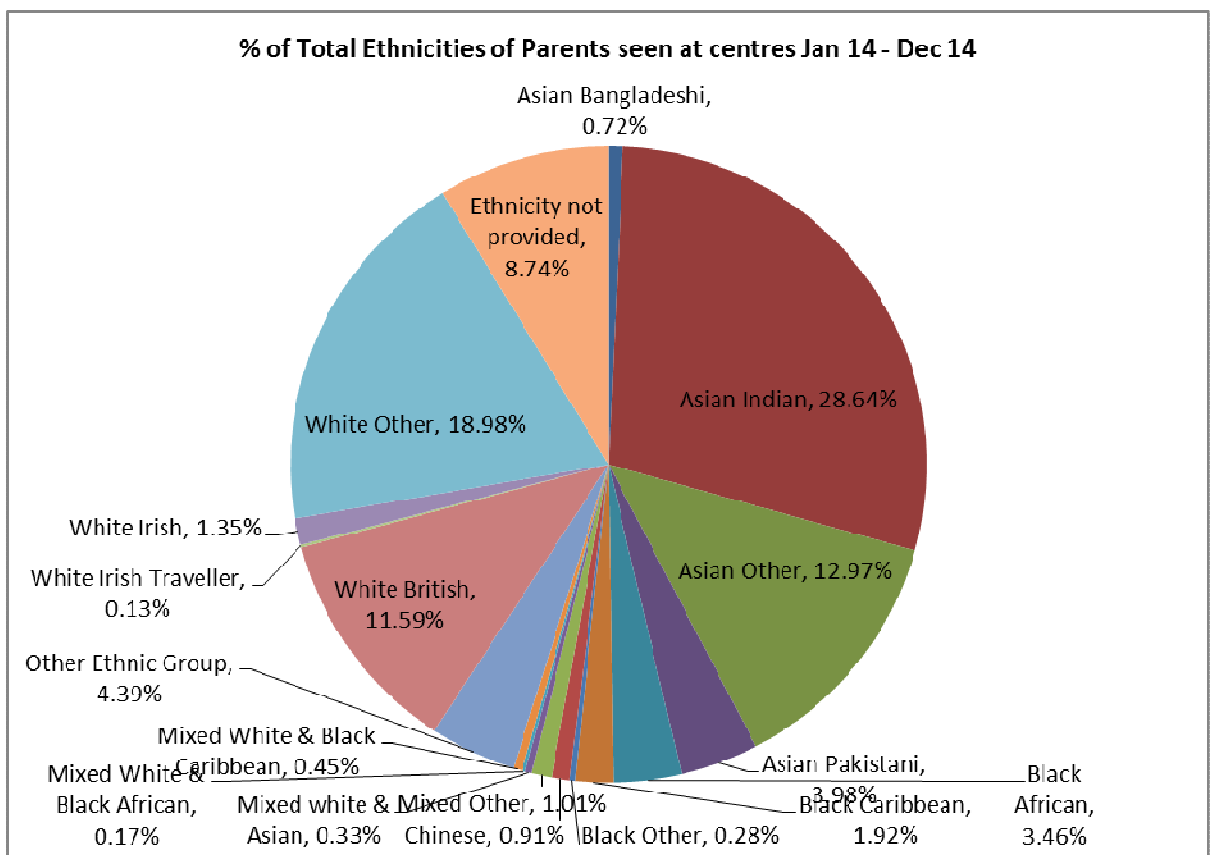
Table showing Ethnicities of Parents at all Centres Jan 14 – Dec 14

Ethnicity	Number seen Jan 14 - Dec 14 (Count)	% of Total Ethnicities of Parents seen at centres Jan 14 - Dec 14
Asian Bangladeshi	74	0.72%
Asian Indian	2934	28.64%
Asian Other	1329	12.97%
Asian Pakistani	408	3.98%
Black African	354	3.46%
Black Caribbean	197	1.92%
Black Other	29	0.28%
Chinese	93	0.91%
Mixed Other	103	1.01%
Mixed white & Asian	34	0.33%
Mixed White & Black African	17	0.17%
		0.45%
Mixed White & Black Caribbean	46	
Other Ethnic Group	450	4.39%
White British	1187	11.59%
White Irish Traveller	13	0.13%
		1.35%
White Irish	138	

White Other	1945	18.98%
Ethnicity not provided	895	8.74%
Total	10246	

- **Based on data on ethnicities above, we would expect a similar percentage to respond to survey – so need to increase response from Asian Other community and Black African community**

Graph showing Ethnicities of Parents reached at all Centres Jan 14 – Dec 14



7. Ref: page 141. White Other Ethnicity

EQUIA panel suggested Polish numbers to respond seemed low. 4 Polish responses so far which is 1.7% of all responses.

Census 2011 data shows 5.7% of Harrow's residents are Polish speakers and 6.9% are Romanian speakers

It is possible that Polish families may have ticked the 'Other White' category



Councillor David Perry
The Leader of the Council
Harrow Council
Harrow

5th November 2014

Dear Councillor Perry

I am writing on behalf of [REDACTED] to respond to the Harrow Council "Take Part" public consultation.

The [REDACTED] has been in an interim period between the Chairmanships of [REDACTED] and [REDACTED] and so the Board agreed that I would write on its behalf to outline our concerns about some aspects of the proposed cuts in service. The new Chair has had sight of this letter and has agreed to its contents.

As you will be aware, Harrow LSCB is a statutory body and one of its roles is to act to highlight issues that impact on the safeguarding of children and young people in Harrow. We appreciate that the Council has some very difficult choices to make and that no reduction in service is an easy choice. However, the Board is very concerned about the impact that some of the suggestions will have on potentially vulnerable children and young people.

We wish to highlight the proposals of:

- Close or reduce some of the Council's Early Support services to families, including Children's Centres
- Reduce the short respite breaks to children and carers

The impact of possible closures of some Children's Centres would, we feel, be detrimental to the future outcomes for children. Early intervention activities, as are provided at Children's Centres, are strongly evidence based as being effective interventions for children. Children's Centres have been a place of provision of multi-agency services in the borough for many years and have provided support for vulnerable families from pre-birth to early years. These centres are, we believe, essential in the work that partners undertake to fulfil one of the

Health and Wellbeing's priorities; namely supporting parents and the community to protect children and maximise their life chances.

The Board is also concerned that it will be increasingly difficult for Children's Services to provide their statutory functions without the Children's Centre settings. Service provision is likely to be stigmatising and isolating for these families. We strongly feel that it would be counter-productive to minimise these early support services and we urge the Council to reconsider these proposals.

The provision of short respite breaks to children and their carers can often be a fundamental element in the support of these vulnerable families. Professionals know that these breaks can often encourage families to maintain a home environment for children with challenging circumstances. Without a good provision of respite the Board is concerned that this may result in more costly and less desirable provisions such as looked after placements.

Harrow LSCB feels that the current Council proposals unfairly impact on children and young people and would urge the Council to work with the Board to consider how the difficult decisions that are to be made could be made with the children of borough at the centre.

Yours sincerely


Named GP and Harrow LSCB Member

Cc Harrow LSCB Executive Board



Councillor David Perry
The Leader of the Council
Harrow Council
Harrow

5th November 2014

Dear Councillor Perry

I am writing on behalf of [redacted] to respond to the Harrow Council "Take Part" public consultation.

The [redacted] has been in an interim period between the Chairmanships of [redacted] and [redacted] and so the Board agreed that I would write on its behalf to outline our concerns about some aspects of the proposed cuts in service. The new Chair has had sight of this letter and has agreed to its contents.

As you will be aware, Harrow LSCB is a statutory body and one of its roles is to act to highlight issues that impact on the safeguarding of children and young people in Harrow. We appreciate that the Council has some very difficult choices to make and that no reduction in service is an easy choice. However, the Board is very concerned about the impact that some of the suggestions will have on potentially vulnerable children and young people.

We wish to highlight the proposals of:

- Close or reduce some of the Council's Early Support services to families, including Children's Centres
- Reduce the short respite breaks to children and carers

The impact of possible closures of some Children's Centres would, we feel, be detrimental to the future outcomes for children. Early intervention activities, as are provided at Children's Centres, are strongly evidence based as being effective interventions for children. Children's Centres have been a place of provision of multi-agency services in the borough for many years and have provided support for vulnerable families from pre-birth to early years. These centres are, we believe, essential in the work that partners undertake to fulfil one of the

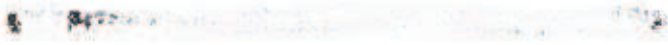
Health and Wellbeing's priorities; namely supporting parents and the community to protect children and maximise their life chances.

The Board is also concerned that it will be increasingly difficult for Children's Services to provide their statutory functions without the Children's Centre settings. Service provision is likely to be stigmatising and isolating for these families. We strongly feel that it would be counter-productive to minimise these early support services and we urge the Council to reconsider these proposals.

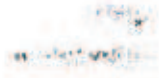
The provision of short respite breaks to children and their carers can often be a fundamental element in the support of these vulnerable families. Professionals know that these breaks can often encourage families to maintain a home environment for children with challenging circumstances. Without a good provision of respite the Board is concerned that this may result in more costly and less desirable provisions such as looked after placements.

Harrow LSCB feels that the current Council proposals unfairly impact on children and young people and would urge the Council to work with the Board to consider how the difficult decisions that are to be made could be made with the children of borough at the centre.

Yours sincerely



Named GP and Harrow LSCB Member



Cc Harrow LSCB Executive Board

Response
Sent on
17/10/14.



19th September 2014

Dear Mr Spencer

I am writing to you in regards to your recent meeting with the Early Years Sector, which was to brief council staff on what could happen in the near future to Children Centres.

As a paying service provider based [redacted] I am writing to find out if any information should/could be given to paying service providers, as closure to the children centre will effect not only the pre-school [redacted] but those at the Pinner Centre, Stanmore Park and Gange.

Please can you answer the following questions:-

Will service providers have a consultation regarding these closures?

When will we as charity run service providers know when children centres are closing?

How much notice will service providers be given, if closure is agreed?

What will happen to our vulnerable families who access our services?

Will service providers be offered/moved to alternative accommodation?

What impact will this have on our rent?

Will children be allocated alternative places?

I thank you in advance for answering our questions and we look forward to your response.

Regards

[redacted]
[redacted]

This page is intentionally left blank

[REDACTED]
Head of Paid Services and Corporate Director
of Community Health & Wellbeing
Harrow Council
Station Road
HARROW
HA1 2XY

Friday, 31 October 2014

Dear Paul

Re: Harrow Council Proposed Budget Cuts

On behalf of the Safeguarding Children/Adult service in CNWL, I write to express grave concerns regarding four of the Harrow budget cut proposals:

1. Close or reduce some of the Council's Early Support services to families, including Children's Centres

Reducing funding for early support will result in greater spending in future years for the Council. Instead of addressing family problems early, these will become intransigent and it will result in more children being taken into care, and other poor outcomes like increased criminal behaviour, and reduced educational attainment, impacting on Harrow communities.

Children Centres are a vital part of the early help offer providing non-stigmatising family-friendly centres where families can see staff for a variety of interventions. These centres are often staffed sessionally by health staff who work closely in partnership with CSC staff (early help staff to prevent family problems or deal with them at the earliest point.) Closing these will have the ramifications as described above.

2. Reduce the short respite breaks to children and carers

Reducing respite breaks for children and carers will also result in increased breakdown of families in supporting children with disabilities/challenging behaviours. This will again impact in a greater amount of funding required to deal with the children/adults concerned. Carers provide a huge support to both health and social care budgets by looking after children/adults at home. Reducing the respite breaks is both cruel, inhumane and counter-intuitive.

3. Cut some support to older and disabled people in harrow under the Supporting People Programme

The Supporting People Programme aims to provide vulnerable adults with relevant support for them to maintain independent living in the community including maintaining their tenancies. These people already are dealing with significant problems in their lives. To reduce support will impact directly on their health and wellbeing and again is inhumane.

Contd/...

Page 2

31 October 2014

4. Cut funding provided to the Voluntary Sector

Voluntary Sector agencies provide excellent support to services across a huge range of issues including vulnerable children and adults. They often provide value for money, and so cutting them at this time would again appear to be counter-intuitive.

Yours sincerely

A large black rectangular redaction box covering the signature area.

c.c.  Service Manager, Policy and Partnerships, Harrow



Harrow
Clinical Commissioning Group

Executive Office
The Heights
59-65 Lowlands Road
Harrow on the Hill
Middlesex HA1 3AW
Tel: 020 8422 6644
Fax: 020 8426 8646

www.harrowccg.nhs.uk

7 November 2014

Councillor David Perry
Leader of the Council
Harrow Civic Centre
Harrow

Dear Councillor Perry

Re: Harrow Council Take Part Consultation

Harrow CCG recognises the need to support Harrow Council in this difficult process and would like to understand how we can assist with this exercise further regarding the recent Take Part consultation. Harrow CCG recognises the challenging position our local economy faces. However to date, Harrow CCG continues to be un-assured on both the details and the impact of the proposed changes contained within this consultation exercise.

Alongside reviewing the information which is available on the Council's website, there have also been two discussions held at our CCG Seminars in October 2014. The first discussion covered the overarching consultation with limited details on the impact/scale of proposals by service line, followed by a second discussion with regard to specific impacts on Children's Services.

The CCG would like you to note that the outcome of the 7th October 2014 discussion was that the CCG was not in a position to support the proposals in the consultation due to the very limited information made available to the group in order to have an informed understanding as to the impact of the proposals to residents/service users and to the CCG. A list of discussion points was

As a consequence, on the 9th October 2014 the CCG emailed the consultation project manager Alex Dewsnap with a list of discussion points, information to which would enable the CCG to give consideration to and thereby make an informed response to the consultation. This list as emailed on the 9th October 2014 highlighted the following areas for further information:

- Harrow CCG seeks assurance on how the proposed cuts will impact services and the impact it will have on residents.
- Details on the impact of £56m cut from adult social services.
- The affected populations where these reduced services will impact are likely to affect residents with ill health. The CCG requests additional detailed information to understand the impact and the potential cost pressures for the CCG.

Chair: [REDACTED]
Chief Officer: [REDACTED]
COO: [REDACTED]

BHH Brent
Harrow
Hillingdon
Clinical Commissioning Groups

Clinical Commissioning Group

- What provision is there to safeguard vulnerable groups once funding has been cut?
- The CCG has requested the following information to support this consultation:
 - The total 14/15 budget for each element of the £25m targeted savings as part of the Take Part information issued.
 - The number of service users receiving each of these services targeted in the consultation on an annual basis.
 - The financial value and percentage of the proposed budget reduction for each of the targeted services.
 - The completed EQIAs for each of the services identified for proposed changes.
 - Details on what the intended changes are for each service area i.e. 'what does reducing services targeted older adults' mean and what cohort will be affected.
 - A rationale for how the reduction of respite support for carers aligns to the proposals within the Better Care Fund.
 - What assurances can the Council make that service users will not suffer and the changes will not result in contributing to or causing future safeguarding risks.
- In our Commissioning Intentions, the consistent question from the Council is that "How can you ensure that these commissioning intentions, or a consequence of these, directly or indirectly, doesn't mean a cost shunt back to the Council". As a CCG we now ask Harrow Council how you could give us the assurance that a consequence of these, intended or unintended, doesn't mean a cost shunt to the CCG?
- What modeling has the Council completed to inform the impact of the cuts on the vulnerable and needy groups, including outcomes?
- As part of the consultation, the CCG would like to understand the impact on Health Visiting services with effect from April 2015, given this is a mandatory spend.
- What is the existing budget allocated to staffing costs within this financial year for the pre and post consultation period? In addition, what is the total cost of administrative services for each of these services i.e. Children's Centres?
- Please provide details for the wider £50m savings plan which has not been included in the consultation information.
- On discussion with our commissioned providers, maternity services were not aware of the intended plans to close a high percentage of Harrow's Children's Centres until last week. Harrow CCG would like to have assurance of who has been consulted as there may be a range of key partner organisations that have not been engaged to date.
- The CCG is aware that detailed modeling has been completed by Harrow Council to inform these high level proposals and financials within the published consultation. When will the detailed modeling be released to the CCG for discussion? As a key partner organisation and given that the Council would need our support, the CCG would need further detailed information in order to make an informed response to these proposals.
- The CCG are keen to understand how the Council will evidence that you have changed your views based on these comments from the CCG and wider stakeholders.

It is important to bring to your attention that despite the above points being made both face to face and in writing, Harrow CCG has yet to receive a response to these comments. However we did have a useful discussion with Chris Spencer in relation to Children's Services, where a level of greater

Chair: [REDACTED]
Chief Officer: [REDACTED]
COO: [REDACTED]



Harrow

Clinical Commissioning Group

detail was made available. The plans to significantly reduce the number of Children's Centres will have a detrimental impact of primary care services. This is due to a range of services that have been taken out of GP Services over a number of years, and have been placed in Children's Centres. If these are being closed, the GP Practices may not have the capacity to deal with the increased demand. Given that NHS England has responsibility for the commissioning of primary care services, the CCG would like assurance of NHS England's engagement in this process. This is due to the potential impact on all of Harrow's 35 practices should Children's Centres be closed without adequate alternative resources being made available for the provision of the existing range and volume of services offered to Harrow residents.

The CCG would like to reiterate that it recognises the need to support Harrow Council in this difficult process and would like to understand how we can assist. However to date, Harrow CCG continues to be un-assured on both the details and the impact of the proposed changes contained within this consultation exercise.

In conclusion and based on the above, Harrow CCG urges Harrow Council to strongly consider the impact that any decisions within this consultation may have relation to the health and wellbeing of our local residents of harrow and your partner organisations. We look forward to receiving a response.

Yours sincerely,

Chair of Harrow CCG

Chief Officer, Brent, Harrow and Hillingdon CCGs

CC:

- Harrow Council
- Harrow CCG
- Harrow CCG
- Harrow CCG
- CCG
- CCG
- Harrow CCG
- row CCG
- Harrow CCG
- Harrow CCG
- Harrow CCG
- CCG
- Harrow CCG
- England, London Region

Chair:
Chief Officer:
COO:

BHH Brent
Harrow
Hillingdon
Clinical Commissioning Groups

This page is intentionally left blank



Tuesday 9th December 2014

Dear Mr Spencer,

Re: Consultation on the Future of Harrow's Children's Centres.

As a Primary Head in Harrow I fully understand that difficult decisions will need to be made in order to deliver £75 million of cuts and efficiencies. However we also value the work our Children's Centres carry out to support vulnerable families in child development, parenting skills and health. They also help support the Local Authority to meet its wider duty to improve the well – being of young children.

We hear continually about the need for early intervention and the previous vision of putting Harrow Children's Centres at the heart of the local authority's early intervention and preventative strategies and yet here we are faced with potentially risking many families 'falling through the cracks'.

Having considered all three options I personally feel that Option 2 would impact less on the offer to our families as the three hubs are placed in different parts of the Local Authority. The six delivery points also cover a significant area. I do not support Option 3 as 2 hubs would lengthen travel times and many vulnerable families rely on Public Transport which is not efficient across the borough.

However I am concerned that the timescale for this Consultation is very tight especially if it leads to some closures with the Council deciding in February on the 2015 -2016 Budget. As there are no costs in the Consultation we do not know whether Option 2 would produce the desired efficiencies.

It is unclear from the Consultation whether the Local Authority has a clear vision for supporting vulnerable families especially as other Early Intervention services are at risk. This is an area of real concern to schools as we feel it may affect the efficient safeguarding of some of our more vulnerable families. I know that the Chair of Governors at Alexandra School, Sue Stalley, has already written to you explaining how important the Early Intervention services are to our school community. I hope that you will do everything you can to protect these vital services from being affected by the cuts.

Yours sincerely,



Head of school



This page is intentionally left blank

Count of Name	
Appendix 5	Total
Abbots Langley	1
Abingdon	1
Andover	1
Ashford	1
Berks	1
Bilston	1
Bridport	1
Buckhurst Hill	1
Bucks	1
Bushey	1
Chacombe	1
Co. Limerick	1
Edgware	7
Edinburgh	1
eynsham witney	1
Grays	1
Harefield	1
Harrow	121
Harrow on the hill	1
Harrow weald	1
Harrow, Middx	1
Hertford	1
Hertfordshire	1
Ickenham	1
kenton	1
Kettering	1
Kings Langley	2
London	54
Luton	1
Manchester	1
Middlesex	5
Middx	1
North harrow	4
Northolt	2
NORTHWOOD	3
Oxford	2
Pinner	71
Rickmansworth	2
Ruislip	11
Shepton Mallet	1
solihull	1
South Harrow	2
St Albans	1
staines	1
Stanmore	12
sudbury hill	1

Twickenham	1
Uxbridge	2
Watford	3
welwyn garden city	1
Wembley	2
Whaley bridge	1
Witney	2
Woodford	1
WORTHING	1
Yarnton	1
York	1
(blank)	6
Grand Total	352

Appendix 5

Petition 1

136 signatories responded to this petition, names and addresses were supplied :-

We the undersigned, petition Harrow Borough Council to maintain the current levels of service provided by the Children's Centres. These are key to supporting children's development across the borough. Failing to maintain this service will have a long term impact on individual children and their families. The loss of this service will also have long term financial implications for Harrow Council. We think that this should be prioritised at the expense of other areas of the council's budget, outside of Children's Services.

Copy of original petition available.

This page is intentionally left blank

Appendix 5

Petition 3

This petition was headed 'Save Our Children's Centres'

118 individuals signed this petition.

Full details available

Count of Name	
City	Total
Berks	1
edgware	3
Estepona	1
eynsham	
witney	1
Grays	1
Harrow	33
Hertford	1
herts	1
Ickenham	1
kenton	1
Kings Langley	1
Lightwater	1
London	25
Luton	1
Middlesex	4
Oxford	1
Pinner	29
radley	1
Ruislip	4
Shepton	
Mallet	1
solihull	1
Stanmore	3
WATFORD	1
(blank)	1
Grand Total	118

This page is intentionally left blank

Appendix 6

Summary of families Accessing Health Services at named Children's Centres

Pinner Centre.

Health services currently present at the Centre: Health Visitors, Midwives, Breastfeeding Support, Oral Health, 2 Year Checks

- On average, 640 families access Health Visitors at Pinner Centre on a yearly basis. 54% of these families live in the Pinner and Pinner South wards. 20% of these families come from north of the borough from areas such as Hatch End and Headstone North. 19% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- On average, 114 families access midwives at Pinner Centre on a yearly basis. 48% of these families live in the Pinner and Pinner South wards. 24% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 24% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- Options for relocating these plus other health services from the centre include Cedars, Hillview, Grange and Stanmore Park. There are direct bus links from Pinner Centre to Grange and Stanmore Park.

Pinner Wood

Health services currently present at the Centre: Midwives, Speech & Language Therapy, 2 Year Checks

- On average, 164 families access midwives at Pinner Wood on a yearly basis. 52% of these families live in the Pinner and Pinner South wards. 32% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 13% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South.
- On average, 106 families access Speech & Language Therapy services at Pinner Wood on a yearly basis. 39% of these families live in the Pinner and Pinner South wards. 33% of these families come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 17% of families come from the south west of the borough from wards such as Rayners lane, West Harrow and Headstone South. The remainder come from across the borough
- Options for relocating these plus other health services from the centre include Cedars, Hillview, Grange and Stanmore Park.

Rayners Lane

Health services currently present at the Centre: Health Visitors, Oral Health

- On average, 282 families access Health Visitors at Rayners Lane on a yearly basis. 79% seen from the south west of the borough from wards such as Rayners lane, Roxbourne, Roxeth, West Harrow, Pinner South and Harrow on the Hill. 10% of these families come from north of the borough from areas such as Pinner, Hatch End and Headstone North. 9% of

these families come from centre of the borough such as Greenhill, Marlborough and Headstone South.

- Options for relocating these plus other health services from the centre include Grange, Earlsmead, Cedars and Stanmore Park. There are direct bus links from Rayners Lane to Grange, Hillview, Earlsmead, Stanmore Park and Elmgrove.

Gange

Health services currently present at the Centre: Health Visitors, Oral Health

- On average, 410 families access Health Visitors at Gange on a yearly basis. 77% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 9% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North. 9% also come from east of the borough from wards such as Queensbury, Belmont, Kenton East and Kenton West.
- Options for relocating these plus other health services from the centre include Elmgrove and Cedars.

St.Josephs

Health services currently present at the Centre: Health Visitors, Oral Health, 2 Year Checks

- On average, 437 families access Health Visitors at St Josephs on a yearly basis. 65% come from east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 24% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 8% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.
- Options for relocating these plus other health services from the centre include Kenmore Park and Cedars. There are direct bus links from St Josephs to Cedars.

Whitefriars

Health services currently present at the Centre: Midwives, Post natal Clinics, Breastfeeding, 2 Year Checks

- On average, 570 families access Midwives at Whitefriars on a yearly basis. 77% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 15% come from come from east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 6% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.
- On average, 520 families access Post Natal clinics at Whitefriars on a yearly basis. 78% of these families come from centre of the borough such as Greenhill, Marlborough, Wealdstone and Headstone South. 13% come from come from east of the borough from wards such as Queensbury, Belmont, Kenton East, Kenton West, Edgware, Stanmore Park and Canons. 7% come from north of the borough from areas such as Hatch End, Harrow Weald and Headstone North.
- Options for relocating these plus other health services from the centre include Kenmore Park and Cedars. There are direct bus links from Whitefriars to Hillview and Stanmore Park.

Articulate on a centre by centre basis the impact on **health services** with indications about where the services would be located if certain centres were to close.

Midwifery – MW Health Visiting – HV Speech and Language Therapy - S< Breastfeeding – BF

Option 1

Centre	Service	Figure	Potential Relocation opportunities
<p><u>Pinner Centre</u></p> <p><u>Buses close to Pinner Centre</u></p> <p>H11, H12, H13</p> <p>H12 also goes to Stanmore Park CC, Rayners Lane CC and Grange CC</p> <p>H11 goes to Grange CC</p> <p>H10 goes to Pinner Wood CC</p>	PC MW	114 families reached Sep 13 – Sep 14	<p>Cedars/Stanmore Park: 75 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald.</p> <p>Hillview/Grange: 29 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>(Remainder 9 families live outside of Harrow)</p>
	PC HV	641 families reached Sep 13 – Sep 14	<p>Cedars/Stanmore Park: 457 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Marlborough</p> <p>Hillview/Grange: 130 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>Stanmore Park: 13 families seen from Stanmore Park, Kenton east, Kenton West, Queensbury, Edgware, Belmont</p> <p>(Remainder 41 families live outside of Harrow)</p>
	PC BF	68 families reached Sep 13 – Sep 14	<p>Cedars/Stanmore Park: 39 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Marlborough</p> <p>Hillview/Grange: 23 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>Stanmore Park: 2 families seen from Stanmore Park, Kenton east, Kenton</p>

			West, Queensbury, Edgware, Belmont (Remainder 4 families live outside of Harrow)
	PC Oral health	64 families reached Sep 13 – Sep 14	Cedars: 52 families seen from Pinner, Pinner South, Headstone North, Hatch End, Marlborough Hillview/Grange: 7 families seen from Greenhill, Rayners Lane, Roxbourne, Headstone South, Roxeth, Stanmore Park: 4 families seen from Kenton east, Queensbury and Edgware. (Remainder 1 family live outside of Harrow)
	PC 2 Year Check	8 families reached Sep 13 – Sep 14	Cedars/Stanmore Park: 4 families seen from Pinner, Pinner South, Headstone North, Hatch End, Marlborough Hillview/Grange: 3 families seen from Greenhill, Rayners Lane, Roxbourne, Headstone South, Roxeth, (Remainder 1 family live outside of Harrow)
<u>Pinner Wood</u> <u>Buses close to Pinner Wood</u> H13	PW MW	164 families reached Sep 13 – Sep 14	Cedars: 123 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Wealdstone Hillview/Grange: 20 families seen from Greenhill, Rayners Lane, Roxbourne, Headstone South, Roxeth, Harrow on the Hill, West Harrow Stanmore Park: 2 families seen from Stanmore Park and Belmont (Remainder 19 families live outside of Harrow)
	PW S&LT	106 families reached Sep 13 – Sep 14	Cedars: 75 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Wealdstone, Marlborough Hillview/Grange: 21 families seen from

			Greenhill, Rayners Lane, Roxbourne, Headstone South, Harrow on the Hill, West Harrow Stanmore Park: 6 families seen from Stanmore Park, Edgware, Canons, Queensbury, Kenton West (Remainder 4 families live outside of Harrow)
	PW 2 Year Check	12 families reached Sep 13 – Sep 14	Cedars: 10 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Wealdstone, Marlborough (Remainder 2 families live outside of Harrow)
<u>Rayners Lane</u> <u>Buses close to Rayners Lane</u> H10, H12, 398 H10 goes to Hillview CC, Earlsmead CC, Roxbourne CC and Elmgrove CC. H12 goes to Stanmore Park CC, Grange CC and Pinner Centre 398 goes to Earlsmead CC	RL HV	282 families reached Sep 13 – Sep 14	Grange: 94 families seen from West harrow, Headstone North, Headstone South, Greenhill, Harrow on the Hill and Marlborough Earlsmead: 164 families seen from Rayners lane, Roxbourne, Roxeth, Harrow on the Hill, Pinner South, Pinner Stanmore Park/Cedars?: 18 families seen from Belmont, Canons, Edgware, Harrow Weald, Hatch End, Wealdstone, Kenton West, Queensbury (Remainder 6 families live outside of Harrow)
	RL Oral health	41 families reached Sep 13 – Sep 14	Grange: 10 families seen from West harrow, Headstone North and Harrow on the Hill Earlsmead: 30 families seen from Rayners lane, Roxbourne, Roxeth, Pinner South, Pinner (Remainder 1 family live outside of Harrow)

<p><u>Gange</u></p> <p><u>Buses close to Gange</u></p> <p>186</p> <p>186 goes to St Josephs CC, Chandos CC</p>	<p>Gange HV</p>	<p>410 families reached Sep 13 – Sep 14</p>	<p>Elmgrove: 280 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, West Harrow, Headstone South</p> <p>Cedars?: 112 families seen from Harrow Weald, Wealdstone, Pinner, Pinner South, Headstone North, Hatch End, Stanmore Park</p> <p>(Remainder 15 families live outside of Harrow)</p>
	<p>Gange Oral health</p>	<p>50 families reached Sep 13 – Sep 14</p>	<p>Elmgrove: 39 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury</p> <p>Cedars?: 11 families seen from Harrow Weald, Wealdstone, Pinner,</p>
<p><u>St.Josephs</u></p> <p><u>Buses close to St Josephs</u></p> <p>186, H18</p> <p>186 goes to Chandos CC, Gange CC</p> <p>H18 goes to Cedars CC</p>	<p>SJ HV</p>	<p>437 families reached Sep 13 – Sep 14</p>	<p>Kenmore Park: 299 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons</p> <p>Cedars?: 89 Families seen from Harrow Weald, Wealdstone, Headstone North, Pinner</p> <p>(Remainder 26 families live outside of Harrow)</p>
	<p>SJ Oral health</p>	<p>106 families reached Sep 13 – Sep 14</p>	<p>Kenmore Park: 73 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons</p> <p>Cedars?: 31 Families seen from Harrow Weald, Wealdstone, Headstone North, Pinner</p> <p>(Remainder 1 family live outside of</p>

			Harrow)
	SJ 2 Year Check	146 families reached Sep 13 – Sep 14	Kenmore Park: 108 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons Cedars?: 31 Families seen from Harrow Weald, Wealdstone, Headstone North, Pinner (Remainder 4 families live outside of Harrow)
	SJ Weigh & Go	9 families reached Sep 13 – Sep 14	Kenmore Park: 9 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons
<u>Whitefriars</u> <u>Buses close to Whitefriars</u> 182, 258, 340 258 goes to Hillview CC 340 goes to Stanmore Park CC	WF MW	570 families reached Sep 13 – Sep 14	Cedars: 239 families seen from Harrow Weald, Wealdstone, Pinner, Pinner South, Headstone North, Hatch End, Marlborough Kenmore Park/Stanmore Park: 312 families seen from Greenhill, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons (Remainder 13 families live outside of Harrow)
	WF Post natal clinics (for babies 1-3 wks old run by midwives)	521 families reached Sep 13 – Sep 14	Cedars: 227 families seen from Harrow Weald, Wealdstone, Pinner, Pinner South, Headstone North, Hatch End, Marlborough Kenmore Park/Stanmore Park: 284 families seen from Greenhill, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore

			<p>Park, Canons</p> <p>(Remainder 10 families live outside of Harrow)</p>
	WF BF	<p>41 families reached Sep 13 – Sep 14</p>	<p>Cedars: 19 families seen from Harrow Weald, Wealdstone, Pinner, Pinner South, Headstone North, Hatch End, Marlborough</p> <p>Kenmore Park/Stanmore Park: 19 families seen from Greenhill, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons</p> <p>(Remainder 3 families live outside of Harrow)</p>
	WF Oral health	<p>19 families reached Sep 13 – Sep 14</p>	<p>Cedars: 17 families seen from Harrow Weald, Wealdstone, Pinner, Pinner South, Headstone North, Hatch End, Marlborough</p> <p>Kenmore Park/ Stanmore Park: 2 families seen from Greenhill, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons</p>
	WF 2 Year Check	<p>4 families reached Sep 13 – Sep 14</p>	<p>Cedars: 4 families seen from Harrow Weald, Wealdstone, Pinner, Pinner South, Headstone North, Hatch End, Marlborough</p>
	WF Weigh & Go	<p>102 families reached Sep 13 – Sep 14</p>	<p>Cedars: 85 families seen from Harrow Weald, Wealdstone, Pinner, Pinner South, Headstone North, Hatch End, Marlborough</p> <p>Kenmore Park/ Stanmore Park: 26 families seen from Greenhill, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons</p>

Option 2

Centre	Service	Figure	Potential relocation opportunities
<p><u>Pinner Centre</u></p> <p><u>Buses close to Pinner Centre</u></p> <p>H11, H12, H13</p> <p>H12 also goes to Stanmore Park CC, Rayners Lane CC and Grange CC</p> <p>H11 goes to Grange CC</p> <p>H10 goes to Pinner Wood CC</p>	PC MW	114 families reached Sep 13 – Sep 14	<p>Cedars/Stanmore Park: 75 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald.</p> <p>Hillview: 29 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>(Remainder 9 families live outside of Harrow)</p>
	PC HV	641 families reached Sep 13 – Sep 14	<p>Cedars/Stanmore Park: 457 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Marlborough</p> <p>Hillview: 130 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>Stanmore Park: 13 families seen from Stanmore Park, Kenton east, Kenton West, Queensbury, Edgware, Belmont</p> <p>(Remainder 41 families live outside of Harrow)</p>
	PC BF	68 families reached Sep 13 – Sep 14	<p>Cedars/Stanmore Park: 39 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Marlborough</p> <p>Hillview: 23 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>Stanmore Park: 2 families seen from Stanmore Park, Kenton east, Kenton West, Queensbury, Edgware, Belmont</p>

			(Remainder 4 families live outside of Harrow)
	PC Oral health	64 families reached Sep 13 – Sep 14	<p>Cedars/Stanmore Park: 52 families seen from Pinner, Pinner South, Headstone North, Hatch End, Marlborough</p> <p>Hillview: 7 families seen from Greenhill, Rayners Lane, Roxbourne, Headstone South, Roxeth,</p> <p>Stanmore Park: 4 families seen from Kenton east, Queensbury and Edgware.</p> <p>(Remainder 1 family live outside of Harrow)</p>
	PC 2 Year Check	8 families reached Sep 13 – Sep 14	<p>Cedars: 4 families seen from Pinner, Pinner South, Headstone North, Hatch End, Marlborough</p> <p>Hillview: 3 families seen from Greenhill, Rayners Lane, Roxbourne, Headstone South, Roxeth,</p> <p>(Remainder 1 family live outside of Harrow)</p>
<p><u>St. Josephs</u></p> <p><u>Buses close to St Josephs</u></p> <p>186, H18</p> <p>186 goes to Chandos CC, Gange CC</p> <p>H18 goes to Cedars CC</p>	SJ HV	437 families reached Sep 13 – Sep 14	<p>Kenmore Park: 251 families seen from Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Edgware, Stanmore Park, Canons</p> <p>Gange: 102 families seen from Greenhill, Marlborough, Headstone South, Wealdstone</p> <p>Cedars?: 35 Families seen from Harrow Weald, Wealdstone, Headstone North, Pinner</p> <p>(Remainder 26 families live outside of Harrow)</p>
	SJ Oral health	106 families reached Sep 13 – Sep 14	Kenmore Park: 52 families seen from Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill,

			<p>Edgware, Stanmore Park, Canons</p> <p>Gange: 43 families seen from Greenhill, Marlborough, Headstone South, Wealdstone</p> <p>Cedars?: 11 Families seen from Harrow Weald, Headstone North, Pinner</p> <p>(Remainder 1 family live outside of Harrow)</p>
	SJ 2 Year Check	146 families reached Sep 13 – Sep 14	<p>Kenmore Park: 83 families seen from Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Edgware, Stanmore Park, Canons</p> <p>Gange: 48 families seen from Greenhill, Marlborough, Headstone South, Wealdstone</p> <p>Cedars?: 11 Families seen from Harrow Weald, Headstone North, Pinner</p> <p>(Remainder 3 families live outside of Harrow)</p>
	SJ Weigh & Go	9 families reached Sep 13 – Sep 14	<p>Kenmore Park: 9 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons</p>
<p><u>Rayners Lane</u></p> <p><u>Buses close to Rayners Lane</u></p> <p>H10, H12, 398</p> <p>H10 goes to Hillview CC, Earlsmead CC, Roxbourne CC and Elmgrove</p>	RL HV	282 families reached Sep 13 – Sep 14	<p>Grange: 258 families seen from West harrow, Headstone North, Headstone South, Greenhill, Harrow on the Hill and Marlborough, Rayners lane, Roxbourne, Roxeth, Harrow on the Hill, Pinner South, Pinner</p> <p>Stanmore Park/Cedars?: 18 families seen from Belmont, Canons, Edgware, Harrow Weald, Hatch End, Wealdstone, Kenton West, Queensbury</p> <p>(Remainder 6 families live outside of</p>

CC.			Harrow)
H12 goes to Stanmore Park CC, Grange CC and Pinner Centre 398 goes to Earlsmead CC	RL Oral health	41 families reached Sep 13 – Sep 14	Grange: 40 families seen from West harrow, Headstone North and Harrow on the Hill , Rayners lane, Roxbourne, Roxeth, Pinner South, Pinner (Remainder 1 family live outside of Harrow)

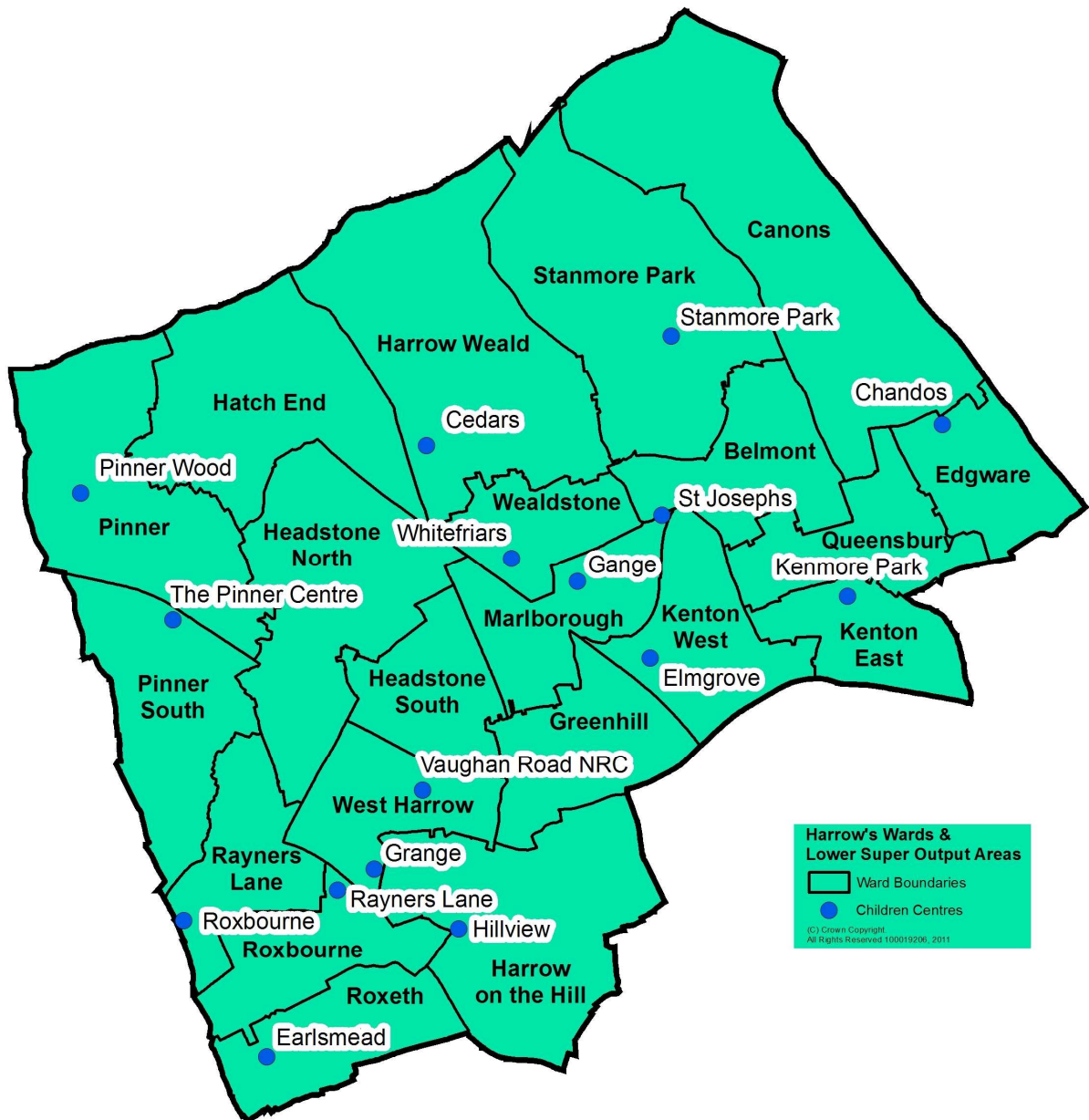
Option 3

Centre	Service	Figure	Potential relocation opportunities
<p><u>Pinner Centre</u></p> <p><u>Buses close to Pinner Centre</u></p> <p>H11, H12, H13</p> <p>H12 also goes to Stanmore Park CC, Rayners Lane CC and Grange CC</p>	PC MW	114 families reached Sep 13 – Sep 14	<p>Pinner Wood: 75 families seen from Pinner, Pinner South, Headstone North, Hatch End,</p> <p>Hillview: 29 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>(Remainder 9 families live outside of Harrow)</p>
	PC HV	641 families reached Sep 13 – Sep 14	<p>Pinner Wood: 457 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Marlborough</p> <p>Hillview: 130 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>Stanmore Park: 13 families seen from Stanmore Park, Kenton east, Kenton West, Queensbury, Edgware, Belmont</p> <p>(Remainder 41 families live outside of Harrow)</p>
<p>H11 goes to Grange CC</p> <p>H10 goes to Pinner Wood CC</p>	PC BF	68 families reached Sep 13 – Sep 14	<p>Pinner Wood: 39 families seen from Pinner, Pinner South, Headstone North, Hatch End, Harrow Weald, Marlborough</p> <p>Hillview: 23 families seen from Rayners Lane, Roxbourne, Headstone South, Roxeth, West Harrow, Harrow on the Hill</p> <p>Stanmore Park: 2 families seen from Stanmore Park, Kenton east, Kenton West, Queensbury, Edgware, Belmont</p> <p>(Remainder 4 families live outside of</p>

			Harrow)
	PC Oral health	64 families reached Sep 13 – Sep 14	<p>Pinner Wood: 52 families seen from Pinner, Pinner South, Headstone North, Hatch End, Marlborough</p> <p>Hillview: 7 families seen from Greenhill, Rayners Lane, Roxbourne, Headstone South, Roxeth,</p> <p>Stanmore Park: 4 families seen from Kenton east, Queensbury and Edgware.</p> <p>(Remainder 1 family live outside of Harrow)</p>
	PC 2 Year Check	8 families reached Sep 13 – Sep 14	<p>Pinner Wood: 4 families seen from Pinner, Pinner South, Headstone North, Hatch End, Marlborough</p> <p>Hillview: 3 families seen from Greenhill, Rayners Lane, Roxbourne, Headstone South, Roxeth,</p> <p>(Remainder 1 family live outside of Harrow)</p>
<p><u>St. Josephs</u></p> <p><u>Buses close to St Josephs</u></p> <p>186, H18</p> <p>186 goes to Chandos CC, Gange CC</p> <p>H18 goes to Cedars CC</p>	SJ HV	437 families reached Sep 13 – Sep 14	<p>Elmgrove: 299 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons</p> <p>Cedars?: 89 Families seen from Harrow Weald, Wealdstone, Headstone North, Pinner</p> <p>(Remainder 26 families live outside of Harrow)</p>
	SJ Oral health	106 families reached Sep 13 – Sep 14	<p>Elmgrove: 73 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons</p> <p>Cedars?: 31 Families seen from Harrow Weald, Wealdstone, Headstone</p>

			North, Pinner (Remainder 1 family live outside of Harrow)
	SJ 2 Year Check	146 families reached Sep 13 – Sep 14	Elmgrove: 108 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons Cedars?: 31 Families seen from Harrow Weald, Wealdstone, Headstone North, Pinner (Remainder 4 families live outside of Harrow)
	SJ Weigh & Go	9 families reached Sep 13 – Sep 14	Elmgrove: 9 families seen from Greenhill, Marlborough, Kenton West, Kenton East, Belmont, Queensbury, Harrow on the Hill, Headstone South, Edgware, Stanmore Park, Canons
<u>Rayners Lane</u> <u>Buses close to Rayners Lane</u> H10, H12, 398 H10 goes to Hillview CC, Earlsmead CC, Roxbourne CC and Elmgrove CC. H12 goes to Stanmore Park CC, Grange CC and Pinner Centre 398 goes to Earlsmead CC	RL HV	282 families reached Sep 13 – Sep 14	Grange: 258 families seen from West harrow, Headstone North, Headstone South, Greenhill, Harrow on the Hill and Marlborough, Rayners lane, Roxbourne, Roxeth, Harrow on the Hill, Pinner South, Pinner Stanmore Park/Cedars?: 18 families seen from Belmont, Canons, Edgware, Harrow Weald, Hatch End, Wealdstone, Kenton West, Queensbury (Remainder 6 families live outside of Harrow)
	RL Oral health	41 families reached Sep 13 – Sep 14	Grange: 40 families seen from West harrow, Headstone North and Harrow on the Hill , Rayners lane, Roxbourne, Roxeth, Pinner South, Pinner (Remainder 1 family live outside of Harrow)

Map of Harrow's Children's Centres



REPORT FOR: CABINET

Date of Meeting:	19 February 2015
Subject:	Environment and Enterprise Medium Term Financial Strategy Implementation Plan
Key Decision:	Yes
Responsible Officer:	Caroline Bruce, Corporate Director Environment and Enterprise
Portfolio Holder:	Councillor Varsha Parmar, Portfolio Holder for Environment, Crime & Community Safety
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendices 1-5 Equality Impact Assessments: <ul style="list-style-type: none">• Environmental Health Out of Hours Noise nuisance response service• Shopping areas street cleaning• Reduce Parks service to statutory minimum• Highways Verge Grass Cutting• Organic Garden Waste Appendix 6: Proposed Parks Maintenance Schedule Appendix 7: Existing parks locking schedule

Section 1 – Summary and Recommendations

This report sets out the results of public consultation as well as high level implementation plans for the key Environment and Enterprise Medium Term Financial Strategy proposals.

Recommendations:

Cabinet is requested to read this report in conjunction with the main budget report and:

1. note the outcome of public consultation on the Environment and Enterprise proposals; and,
2. subject to approval of the related budgetary proposals by full Council, to approve the Environment & Enterprise proposals summarised at paragraph 7 and further detailed in the report, and authorise the Corporate Director for Environment & Enterprise to take all necessary steps to implement the proposals.

Reason: (For recommendations)

To provide additional information regarding the key proposals within the Environment and Enterprise Medium Term Financial Strategy which are required in order to help meet the budgetary pressures facing the Council.

Section 2 – Report

Introductory paragraph

1. The Environment and Enterprise (E&E) Medium Term Financial Strategy (MTFS) contains a series of savings proposals, a number of which have been consulted on due to the potential impact on residents following a Cabinet decision on 11 December 2014 to carry out a public consultation.
2. This report should be read in conjunction with main budget Cabinet report as it supplements it with further information on how the key E&E MTFS proposals will be delivered if approval is given by Cabinet for implementation and the results of the consultation.

Options considered

3. As an alternative to agreeing the proposals, the Council also has the option to maintaining the current level of services; however this will impact on the proposed budget. If savings are not made from the Environment & Enterprise budget, the Council will have to consider what alternatives are available to meet its anticipated budgetary shortfall. Alternatives could

include cutting services elsewhere, use of reserves and increasing Council tax. Information on these options are included in the budget report, which is being considered at the same Cabinet meeting as this report for recommendation up to full Council.

4. Should the proposals be agreed, E&E have considered two methods of implementation – to deliver with Council staff or to contract a third party organisation. The latter option was discounted as it did not meet requirements because it would not make full use of the skills and experience of officers within the directorate.

Background

5. The Environment and Enterprise (E&E) Medium Term Financial Strategy (MTFS) includes a range of proposals that continue the directorate programme of internal efficiencies through further process and structure efficiencies, and through generating additional income. The main focus of the E&E MTFS was on reducing the cost of doing business as much as possible without affecting services.
6. However given the scale of savings required, proposals that will reduce service standards or cease services that will impact residents have been unavoidable.
7. This report presents implementation plans for the five key proposals that have been subject to public consultation as part of the Take Part campaign. The proposals are:
 - 7.1. Deleting the Environmental Health out of hours noise nuisance response service;
 - 7.2. Removing dedicated 'beat sweeper' street cleaners from secondary shopping areas and removing weekend and late afternoon street cleansing from those areas;
 - 7.3. Changing the grass cutting, management and locking regimes in Council parks;
 - 7.4. Reducing the frequency of grass cutting of highway verges; and,
 - 7.5. Introducing changes to household waste collection to provide residents with a dedicated food waste collection and a separate, optional chargeable garden waste collection.
8. For each proposal, the following information is presented below:
 - 8.1. A summary of each proposal;
 - 8.2. A delivery plan setting out key actions and timeframes;
 - 8.3. Analysis from public consultation; and,
 - 8.4. An equality impact update.

Consultation and implementation overview

9. High level plans, with indicative dates, are presented below that identify the actions that will be taken to implement the proposals if they are agreed by Cabinet.

10. Detailed plans are being drafted and will be included in the Project Initiation Documents for the proposals together with the organisational arrangements for delivery.
11. All proposals implemented will have a stabilisation review period designed to monitor implementation, ensure any technical issues are identified and rectified, and customer and staff impacts are monitored.
12. Members of staff were advised of the proposals that had staff impacts prior to the commencement of the Take Part campaign and Cabinet reports proposing savings, and also took part in the Take Part Employee consultation. In addition, Trade Union colleagues have been given briefings prior to each Cabinet meeting agenda publication.
13. The Council consulted on its overall budget proposals, including E&E services, as part of the Take Part consultation. The results of this consultation was fed back to Cabinet in December 2014 and can be viewed at <http://www.harrow.gov.uk/www2/documents/s118033/Appendix%206%20-%20Take%20Part%20feedback%20presentation.pdf>
14. Following the initial Take Part consultation, further consultation on the specific E&E proposals was conducted by way of online surveys undertaken between 16 December 2014 and 29 January 2015. The survey was publicised through the Community Champion network, as well as posting it on the Harrow website, and through community groups, community events and libraries.
15. Printed copies of the survey were available at libraries and also posted to the Harrow Federation of Tenants, Residents and Leaseholders (HFTRL). This was also supplemented by formal and informal presentations with Park User Groups. All surveys completed via printed copy were then collated together with all online feedback.
16. The survey was designed to be easy to complete and had a mixture of questions for a choice of answers to select and open questions for customers to provide more detailed feedback, where appropriate. There were a total of 801 surveys completed and returned.
17. Alongside the surveys, further comments and correspondence have been received and have been incorporated into the overall assessment of consultation feedback and Equality Impact Assessments. Correspondence has been acknowledged and residents with general enquiries were encouraged to complete the survey.
18. As a result of the consultation, E&E have reassessed the proposals based on the impact for residents. In general, the consultation reflects that customers are understanding of the proposals. There are changes, detailed below, that have been made to the proposals as a result of the feedback and the results underline the need for a comprehensive communications campaign.

19. The consultation also demonstrates the drive from E&E to increase community involvement in the planning and delivery of services. E&E will continue to work with community groups to create conditions that allow local people to make a difference to improve their area through increased involvement and decision making. The Community Champion scheme is also being developed to increase champions influencing and involvement in services.

E&E_23 Environmental Health Out of Hours Noise nuisance response service

20. The Environmental Health Out of Hours noise nuisance responsive service is the means in which residents can refer a wide range of noise complaints witnessed out of working hours to the Council. Typical enquiries include noise from anti-social behaviour, barking dogs, domestic and car security alarms, noise from pubs, clubs and other entertainment venues. Typically, 600 complaints are received a year.

21. The current service operates on Friday and Saturday. Officers investigate complaints raised and also carry out proactive visits to licensed premises.

22. This proposal is to stop delivering the out of hours noise service. The team will, however, continue to investigate complaints and carry out planned proactive visits during working hours. If the proposal is adopted, the remaining services provision will continue to meet the statutory obligations that the Council is required to meet.

Delivery plan

23. Key activities for the implementation of this proposal are updating service standards and informing customers thereof, and a service review after six months.

TABLE 1: Out of Hours Implementation Plan

Action title	Action detail	Timeframe
Design and presentation	Creation of proposal Presentation Cabinet	June 2014 to December 2014
Public Consultation	Carry out public consultation via online surveys, Harrow Federation of Tenants, Residents and Leaseholds and community groups Assess customer feedback and update proposals	16 December 2014 to 29 January 2015
Staff consultation	Inform staff of changes to service Inform Trade Unions of changes and impacts to service	March 2015
Inform customers and partner agencies	Publish service change through means such as Harrow Council website, Community Champions and community groups Advise police and other agencies of service changes	March 2015
Go live	Cease the service provision to customers	April 2015
Post implementation review	Review the impact of the deletion of service through analysis of customer service request, complaints and feedback through engagement exercises	October 2015

Public consultation analysis

24. 79% of respondents had not used the out of hours noise service while 23% thought that the deletion of the service would have a detrimental affect on their quality of life. Over 60% of respondents confirmed that they were aware of how to raise a noise complaint to the Council.
25. As a result of the feedback, communications to residents will also now include messages about how to raise noise complaints to the Council after the deletion of the service. This will reinforce the message to those that are already aware how to and inform those who are not. This will ensure that customers can still raise issues for the Council to address during working hours.
26. The communications will also provide the contact details for the Civic Centre out of hours security service to allow residents to still log issues out of hours if they wish.

Equality impact update

27. The Equalities Impact Assessment (EqIA) produced for the proposal indicated that while the out of hours service has been in place, there has been no evidence that indicates that a particular section of the community uses the services more than another and that no particular type event is complained about compared to another.
28. The EqIA has been reviewed and updated following the results of public consultation and no further customer impacts have been identified.

E&E_25 Shopping areas street cleaning (beat sweepers)

29. The street cleansing service covers both residential roads and shopping areas. The Council deploys staff to the Harrow Town Centre and the secondary shopping areas to have a permanent presence and carry out cleaning activities throughout the day.
30. This proposal removes dedicated “beat sweeper” street cleaners who are located in the borough’s secondary shopping areas and also removes weekend and late afternoon street cleansing of the areas with effect from 01 April 2015. Harrow Town Centre will, however, remain unaffected by the proposal.
31. There are nine secondary shopping areas outside of the Town Centre that will be affected – Burnt Oak, Harrow Weald, Hatch End, North Harrow, Pinner, Rayners Lane, Stanmore, South Harrow and Wealdstone. There will, however, be mobile cleansing teams that visit the areas each day to empty litter bins and carry out street cleaning activities but to a lower frequency than is currently in place.
32. The national street cleaning standards as set out the in the Code of Practice on Litter and Refuse will continue to be followed in the new schedules. The new street cleansing frequency will continue to keep

secondary shopping areas clear of litter and refuse as far as is considered reasonable.

Delivery plan

33. Key activities for the implementation of this proposal are amendments to work schedules used by operational teams, updating staff structures, updating services standards and informing customers thereof, and a stabilisation review period.

TABLE 2: Beat Sweepers Implementation Plan

Action title	Action detail	Timeframe
Design, consultation and presentation	Creation of proposal Presentation to Cabinet Consultation and engagement with Trade Unions and staff	June 2014 to December 2014
Public Consultation	Carry out public consultation via online surveys, Harrow Federation of Tenants, Residents and Leaseholds and community groups Assess customer feedback and update proposals	16 December 2014 to 29 January 2015
Staff consultation	Inform staff of changes and impacts to service Inform Trade Unions of changes and impacts to service Update SAP organisational structures with changes	March 2015
Work schedules	Update Collective system to reflect new work schedules	March 2015
Service standards	Inform public of the change in service standards Update website with service standard changes	March 2015 to April 2015
Go live and stabilisation	Commence new maintenance regime and carry out weekly checks and identify and resolve any issues arising	April 2015
Trader engagement	Work with traders associations and business improvement districts to prompt businesses self service	May 2015 to October 2015
Service review	Six month review to assess service changes	October 2015

Public consultation analysis

34. Just under half (49%) of respondents rated current cleaning standards as excellent or good, with 15% rating it poor. Of those who rated it poor, the majority cited the presence of general littering and flytipping as the main reasons for their views.

35. When asked whether high frequency cleaning in our shopping areas is key to the economic vitality of Harrow, while three quarters of respondents answered yes, nine out of ten believed that shopkeepers should take more responsibility for cleaning areas outside their shops.

36. In light of the customer feedback in relation to shopkeepers taking more responsibility for cleaning outside their shops, greater emphasis will be placed on working with traders associations and the Business Improvement Districts to raise awareness and engage with businesses to carry out cleaning outside their shop fronts. This has been added to the implementation plan for action.

Equality impact update

37. The initial EqIA produced to accompany the proposal indicated that the reduced cleansing frequency in shopping areas may affect wheelchairs users and/or people with mobility and visual impairments due to increased litter. This impact is mitigated by mobile teams carrying out daily cleaning and responding to service requests regarding excessive littering within 24 hours.
38. The EqIA has been reviewed and updated following the results of public consultation and there has been no further adverse impact identified for customers. Customer satisfaction and service issues will be monitored through the use of the Collective management system used by the department.
39. There will be a reduction in posts currently filled by agency workers so there will be no redundancy of directly employed staff. The amount of work being done will be reduced proportionately so there should be no impact on remaining staff. Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs.
40. There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme. E&E will work with the corporate Organisational Development team in mitigating this impact.

E&E_26 Reduce Parks services that the Council are responsible for to statutory minimum

41. The parks maintenance service carried out to the parks that the Council is responsible for provides grass cutting for parks and open spaces and a range of horticultural services, including sports pitch maintenance, planting and bedding maintenance, weed control and a locking and unlocking service for key parks.
42. This proposal seeks to convert some of the parks into wildlife open spaces. This involves reducing grass cutting to only that which is needed for health and safety reasons, reducing pruning and removing some shrub, rose and flower beds. The proposal also removes the parks locking service for the 30% of parks that are currently locked, and also a reduction in management.
43. As set out in the Parks and Opens Spaces Act, while Local Authorities do not have a statutory obligation to provide public parks and open spaces, where they do provide them they are required under statute to hold and administer the open space in trust with a view to public enjoyment and maintain and keep the open space in a good and decent state. The changes contained within this proposal bring the service in line with what is considered to be the minimum standard to meet our statutory obligation.

Delivery plan

44. Key activities for the implementation of this proposal are amendments to work schedules used by operational teams, updating staff structures, updating services standards and informing customers thereof, and a stabilisation review period. The stabilisation review period will include an assessment of levels of litter in bins to ensure that they are not overflowing following a reduction in emptying frequencies.

TABLE 3: Parks Maintenance Implementation Plan

Action title	Action detail	Timeframe
Design, consultation and presentation	Creation of proposal Presentation to Cabinet Consultation and engagement with Trade Unions and staff	June 2014 to December 2014
Public Consultation	Carry out public consultation via online surveys, Harrow Federation of Tenants, Residents and Leaseholds and community groups Assess customer feedback and update proposals	16 December 2014 to 29 January 2015
Staff consultation	Inform staff of changes and impacts to service Inform Trade Unions of changes and impacts to service Notify staff of cessation of secondment places Update SAP organisational structures with changes	March 2015
Work schedules	Update Collective system to reflect new work schedules	March 2015
Service standards	Inform public of the change in service standards Update website with service standard changes	March 2015 to April 2015
Go live and stabilisation	Commence new maintenance regime and carry out weekly checks and identify and resolve any issues arising	April 2015 to May 2015
Service review	Six month review to assess service changes	October 2015

Public consultation analysis

45. Almost three quarters (71%) of respondents indicated that they visited parks at least once a month, which reflects the popularity of parks and open spaces across the borough. The most popular reasons for using parks were for the green area, walking and relaxing. Pinner Memorial Park had the most mentions in the survey.

46. Encouragingly, almost half of respondents (41%) said they would volunteer to help support their local park and around 1 in 6 said they would join a Friends /Park user group. This bodes well for the pledge to create a User Group for each park.

47. This will be approached by E&E in a phased approach by identifying those parks where there is already significant interest in creating user groups and working with them to find the best model that meets their needs.

48. E&E have developed a series of template documents that acknowledge the sliding scale of responsibilities that user groups can have. This ranges from working with officers, carrying out some amenity services or full management of parks.

49. When asked to rate current standards within our parks, 65% of respondents said they were good or very good. Just fewer than 80% of respondents thought it was important that Harrow has parks with Green Flag status. The results indicate that standards, in particular Green Flag status, are important to residents. Applications for Green Flag status need to be made every year and the Council has already submitted applications to be assessed for the 2015 award in the existing five parks with the accreditation (Kenton Recreation Ground, Canons Park, Roxeth Recreation Ground, Harrow Recreation Ground and Pinner Memorial Park). The assessments are anticipated to take place May 2015.
50. In terms of park locking, 69% said that they would not be directly affected if the nominated parks were not locked, with the remaining population stating that they would be affected. Illegal activity, fear of crime and disturbance were the main issues raised by those who replied that they would be affected by stopping the service. These issues will continue to be discussed with the Police and other key partners in order to mitigate concerns raised.
51. As a result of the public consultation, the proposal for parks maintenance has been amended to incorporate aspirations to achieve Green Flag status in key parks. While the existing parks will no longer have a dedicated member of staff based permanently on site (which helps to achieve some of the criteria required for the award), the mobile operational teams will undertake maintenance of parks that aspire to Green Flag status. Although we are looking to increase volunteer involvement within our portfolio of parks and open spaces, the revised maintenance regimes, however, may mean that the assessment criteria are not met even with the assistance of volunteer groups.
52. The list of proposed standards for parks can be found as an Appendix to this report. Canons Park will continue to receive Lottery funding to achieve standards.

Equality impact update

53. The EqIA produced for the proposal indicated that the reduced cleansing frequency and changes in the grass cutting regime may affect older people and those with mobility or visibility impairments. Long grass can hide litter and obstructions that could contribute to slip/trip hazards and make walking away from the main paths more hazardous for the elderly.
54. The EqIA has been reviewed and updated following the results of public consultation and the impacts identified can be further mitigated by the potential attainment of Green Flag status in some parks.
55. There will be a reduction in posts currently filled by agency workers so there will be no redundancy of directly employed staff. The amount of work being done will be reduced proportionately so there should be no impact on remaining staff. Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs.

56. There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme. E&E will work with the corporate Organisational Development team in mitigating this impact.

E&E_27 Highways Verge Grass Cutting

57. The Council currently cuts highway grass verges on a three week cycle from March to November, with grass clippings being left distributed evenly over the verge to compost down back into the soil.

58. This proposal will reduce the cutting frequency from three weeks to a six week cycle to all verges across the borough, with all grass clippings remaining to be left upon the verge to compost.

Delivery plan

59. Key activities for the implementation of this proposal are amendments to work schedules used by operational teams, updating staff structures, updating services standards and informing customers thereof, and a stabilisation review period.

TABLE 4: Highway Verge Implementation Plan

Action title	Action detail	Timeframe
Design, consultation and presentation	Creation of proposal Presentation to Cabinet Consultation and engagement with Trade Unions and staff	June 2014 to December 2014
Public Consultation	Carry out public consultation via online surveys, Harrow Federation of Tenants, Residents and Leaseholds and community groups Assess customer feedback and update proposals	16 December 2014 to 29 January 2015
Staff consultation	Inform staff of changes and impacts to service Inform Trade Unions of changes and impacts to service Update SAP organisational structures with changes	March 2015
Work schedules	Update Collective system to reflect new work schedules	March 2015
Service standards	Inform public of the change in service standards Update website with service standard changes	March 2015 – April 2015
Go live and stabilisation	Commence new maintenance regime and carry out weekly checks and identify and resolve any issues arising	April 2015
Communications	Communications campaign to promote residents maintaining grass verges outside their properties	May to October 2015
Service review	Six month review to assess service changes	October 2015

Public consultation analysis

60. Of the customers that responded to the consultation, 43% had a grass verge outside their house and just under half indicated that they would be prepared to cut the verge. When asked about impact on quality of life from this proposal, 42% said it would not impact their quality of life, compared to 39% saying it would.

61. Respondents were asked their views on the introduction of different cutting cycles for different locations across the borough. Half of respondents believed that the Council should introduce differential cutting regimes with respondents believing highway safety and areas of high footfall should be given priority. It is not, however, considered appropriate to implement this suggestion as it would lead to differential treatment across the borough. As such, the proposal to maintain a standard cutting regime will be retained as proposed. The reduction in frequency will be mitigated by supporting of residents in maintaining the verges at the front of their properties.

Equality impact update

62. The EqIA produced for the proposal indicated that this proposal should not disproportionately affect one or more group.

63. The EqIA has been reviewed and updated following the public consultation and no additional equalities impact has been identified. If different cutting regimes were introduced across the borough, then a consequential impact will be introduced that may have a disproportionate affect on customers.

64. There will be a reduction in posts currently filled by agency workers so there will be no redundancy of directly employed staff. The amount of work being done will be reduced proportionately so there should be no impact on remaining staff. Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs.

65. There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme. E&E will work with the Council Organisational Development team in mitigating this impact.

E&E_34 Garden Waste

66. The Council currently provides three wheeled bin household waste collections to Harrow Residents that covers landfill, recycling, mixed organic and clinical waste types. The mixed organic waste service is in place for residents to dispose of garden and food waste in a single bin and collected on a weekly basis.

67. This proposal replaces the mixed waste collection scheme with separate collections for food waste and garden waste.

68. Under the proposal, residents will be provided with a small food waste bin along with a smaller caddy to use to transfer waste to the outside bin. This service will be collected on a weekly basis and part of the statutory service and will not result in charges for residents.

69. Alongside the new food waste service, a new opt in, chargeable garden waste scheme will be introduced for residents who wish to continue to dispose of garden waste through household collections from the Council.

Residents who sign up for the scheme will retain their current brown bin and have it collected once every two weeks. Residents who do not wish to sign up for the scheme will be able to take their garden waste to the Waste, Reuse and Recycle Centre at Forward Drive, Wealdstone or via home composting.

70. Whilst the Council Tax bill includes a charge for the collection and disposal of domestic waste, Councils are not obliged to cover the cost of collecting garden waste. Some Councils may not have the necessary resources to cover this cost, which is why charges are made for the service.

71. When setting the proposed charges, a benchmarking assessment of other Council charges, in particular across London, was undertaken. The table below sets out the standard charges for schemes offered across London:

TABLE 5: London Borough annual garden waste charges

London Borough	Annual chargeable fee:
Brent	£40
Bromley	£60
Ealing	£40
Havering	£35
Kingston Council	£75
Lambeth	£35
Merton	£65
Richmond Upon Thames	£60

72. The proposed charge is a fee of £75 per year, with a means tested concessionary scheme under consideration. The Council proposes to give an introductory fee of £75 to cover 18 months between October 2015 and 31 March 2017.

Delivery plan

73. If the proposal is approved by Cabinet, it will be delivered via a project with five workstreams:

73.1. **Work scheduling.** New work schedules will be created for the weekly food waste collection and the fortnightly garden waste collections;

73.2. **Technology.** This includes activities around invoice generation, systems integrations between customer contact, financial and waste management systems. This will also include customer account management and methods for customers to raise services requests about the food and garden waste services;

- 73.3. **Equipment.** This will focus on the vehicle and bin requirements for both food and garden waste services, and the disposal arrangements for both waste types;
- 73.4. **Business Process Reengineering.** This will include terms and conditions and payment mechanisms for the garden waste service, enforcement and compliance processes and performance management arrangements; and,
- 73.5. **Communications.** This will include communications on project objectives and progress to all concerned stakeholders, together with a Behaviour Change Campaign that is aimed at delivering longer term changes in support of the organic waste changes. Examples of communication methods that will be considered are:

TABLE 6: Communication methods

Internal communications (Staff and Councillors)	External Communications (Residents, Community Groups and Suppliers)
Intranet Team brief Members' briefings Newsletters Training programmes & information drops Vehicles – Agripa panels Committee papers and reports Noticeboards Reception areas	Website Electronic media, texts, emails, Twitter, FaceBook Local media, including press, radio and advertising Letter and leaflet drops Roadshows Community events Presentations and attendance at meetings Residents' associations & Community Groups Vehicles – Agripa panels Permanent or temporary displays, e.g. in public buildings Waste, Reuse and Recycle Centre West London Waste Authority sites Community Champions Public Noticeboards Council Tax mailing Focus groups

74. The governance of the project will follow a Prince2 project management framework. A Project Board will be created with responsibility for the overall direction and management of the project and will meet at least once a month to monitor progress prior and provide authorisation to proceed throughout the stages of the project.
75. The Project Board is responsible for ensuring that the project remains on course to deliver the desired outcomes to the required quality. The roles and responsibilities of members of the Project Board will be defined in the Project Initiation Document (PID) and the roles will be carried out by officers from across the departments affected by the changes.
76. A detailed project plan will also be included in the PID but the initial high level plan is as follows:

TABLE 7: Garden Waste Implementation Plan

Action title	Timeframe
Design, consultation and presentation	June 2014 to December 2014
Public Consultation	16 December 2014 to 29 January 2015

Action title	Timeframe
Staff consultation	March 2015 to October 2015
Work scheduling	March 2015 – August 2015
Technology	March 2015 – May 2015
Equipment	March 2015 – April 2015
Business process reengineering	March 2015 – August 2015
Communications	January 2015 – December 2015

77. The table below shows the charges set by the West London Waste Authority for 2015 – 2016. These are the charges made to the constituent boroughs per tonne of waste they deposit. These are known as Pay as you throw charges and act to incentivise boroughs to minimise the amount of waste collected. Food waste and garden waste processed separately, rather than mixed or included in the residual waste, attract a lower processing cost as illustrated in the table.

TABLE 8: 2015 – 2016 waste charges

Item	2015/16 charge per tonne
Residual Waste (delivered)	£120.18
Food	£25.95
Green	£32.41
Mixed food and green	£56.34

Public consultation analysis

78. Just over 80% of respondents use the organic bin to dispose of their food and garden waste. When asked for the most common items that they put in the bin, food waste, weeds and grass were the most popular answers.

79. When asked if difficulties would be experienced if the mixed food and garden waste collection was stopped, 67% responded yes and 20% said no with the remaining 11% saying that they did not know.

80. Residents were also asked if they would take up the new chargeable service, over half (53%) said no, 31% were undecided and 14% replied yes. When asked why they would not subscribe to the garden waste service, the cost and not generating enough garden waste for a separate bin were the most frequent responses. Concerns were also raised about waste being left uncollected in the street and fly tipping if the scheme was adopted.

81. When asked which groups should be eligible for concessionary rates, residents on pension credit and income support were identified as those groups respondents felt should be eligible. This feedback supports consideration of a concessionary scheme.

82. The results of the consultation underline the need for a comprehensive communications campaign relating to the service, careful consideration of a concessionary charging scheme and scalability of service provision to

meet an uncertain level of demand. All of these factors will be considered during the development and implementation of the scheme.

Equality impact update

83. The EqlA produced for the proposal indicated that there was a potential disproportionate impact on elderly residents and residents with disabilities as those groups may have difficulty in accessing the Council Waste, Reuse and Recycle Centre to dispose garden waste as an alternative to the scheme.
84. The EqlA has been reviewed following the results of public consultation with the original impacts restated and a potential impact on residents within the pregnancy and maternity group. The introduction of a concessionary scheme is the predominant mitigation for the affected groups.
85. There will be a reduction in posts currently filled by agency workers so there will be no redundancy of directly employed staff. The amount of work being done will be reduced proportionately so there should be no impact on remaining staff. Socio-economic and health impacts will be monitored using the Action Plans in the EqlAs.
86. There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme. E&E will work with the corporate Organisational Development team in mitigating this impact.

Performance and Risk Management

87. The monitoring of implementation of the MTFs will form part of the directorate performance management process, which will measure the progress in delivering the proposals and the impact of the changes.
88. The proposals detailed in this report will impact negatively on the environmental appearance of the borough as we minimise standards. Whilst mitigations will be in place as far as is possible (such as fixed penalty notices and engagement with traders to reduce waste from retail centres), it is inevitable that a reduction in standards will be seen.
89. The proposals contained with the MTFs and the methods of implementation have both been designed to minimise the environmental impact of Council operations upon the local environment
90. Risk registers have been created for each proposal, which will be expanded in the Project Initiation Documents if Cabinet gives approval to proceed.
91. The risk registers document the risks for each proposal, assign owners and the current and future actions in place to control the risks. The Council corporate risk management procedure will be used to rate risks.

Legal Implications

92. Where not otherwise prescribed in legislation, local authorities have discretion as to how they perform their statutory duties and the proposals are consistent with performance of the council's legal obligations in respect of the affected services. In particular, The Controlled Waste (England and Wales) Regulations 2012 provide that local authorities can levy a reasonable charge for the collection of green waste.
93. When making policy decisions, the Council must take account of all relevant considerations. These include the duty to give due regard to the public sector equality duties, as set out in the Equalities section below, and in particular any potential differential and/or adverse impact. When consulting on proposed service cuts or closure of services, it will not be unusual for the majority of respondents to be against the proposals. These views must be taken into account, however, this is not a matter of a simple headcount of those in favour and those against proposals. Even in situations where the majority of respondents are opposed to the proposals, the Council may decide to implement this if there are good reasons for doing so. The Council must have regard to and weigh up all relevant factors, including financial resources, alternative options, equality impact and consultation responses, which in the context of the function being exercised, it is proper and reasonable for the Council to consider.

Financial Implications

94. The five saving proposals detailed in this report, if approved, would realise a total saving of £3.29M which could be used to contribute towards the Council's 15/16 MTFS. The financial details of these proposals have been included in the main 15/16 Budget Report which is being presented to cabinet with this report.
95. Any additional financial requirements to implement proposals beyond existing E&E budgets have been included in the cost models for each proposal. If no additional implementation costs are stated, then E&E will use existing budgets to deliver the proposals.

Equalities implications / Public Sector Equality Duty

96. Section 149 of the Equality Act 2010 requires that public bodies, in exercising their functions, have due regard to the need to (1) eliminate discrimination, harassment, victimisation and other unlawful conduct under the Act, (2) advance equality of opportunity and (3) foster good relations between persons who share a protected characteristic and persons who do not share it.

97. Equalities Impact Assessments have been carried out and have identified impacts as referenced above. The EqIAs are attached with this report.

Council Priorities

98. The Council's vision:

98.1. **Working Together to Make a Difference for Harrow**

99. The Council Priorities are as follows:

- Making a difference for the vulnerable;
- Making a difference for communities;
- Making a difference for local businesses; and,
- Making a difference for families.

100. The setting of the E&E MTFs was priority lead so that resources within the directorate are aligned with Council priorities and statutory responsibilities.

Section 3 - Statutory Officer Clearance

Name: Jessie Man	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 09 February 2015		
Name: Matthew Adams	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 23 January 2015		

Ward Councillors notified:	NO.
EqIA carried out:	YES
EqIA cleared by:	Equality Impact Assessment Quality Assurance Group

Section 4 - Contact Details and Background Papers

Contact: Andrew Smith, Strategic Commissioner, 02084247698,
andrew.smith@harrow.gov.uk

Background Papers:

Appendices 1-5 Equality Impact Assessments:

- Environmental Health Out of Hours Noise nuisance response service
- Shopping areas street cleaning
- Reduce Parks service to statutory minimum
- Highways Verge Grass Cutting
- Organic Garden Waste

Appendix 6: Proposed Parks Maintenance Schedule

Appendix 7: Existing parks locking schedule

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---

This page is intentionally left blank

Appendix 1: Environmental Health Out of Hours Noise nuisance response service EqIA

Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other		Other	
Title of Project:			
Environmental Health out of hours noise nuisance response service.			
Directorate / Service responsible:			
E&E / Environmental Health (Domestic)			
Name and job title of lead officer:			
Alex Hauck			
Name & contact details of the other persons involved in the assessment:			
David Corby			
Date of assessment:			
12/01/2015			

Stage 1: Overview

1. What are you trying to do?
(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)

The proposal is to remove the out of hours noise team service. The team will continue to carry out planned proactive visits for the day time teams, such as licensing visits and planning checks

Deletion of the Environmental Health Out of Hours Noise service, to be implemented from 1st October 2014. Saving £50k.

2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Residents / Service Users	X	Partners		Stakeholders
	Staff	X	Age		Disability

	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
	Sexual Orientation	Other	
3. Is the responsibility shared with another directorate, authority or organisation? No.			
Stage 2: Evidence / Data Collation			
4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics. (Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)			
Age (including carers of young/older people)	No data collected.	Unlike to have an adverse disproportionate effect.	
Disability (including carers of disabled people)	No data collected.	Unlike to have an adverse disproportionate effect.	
Gender Reassignment	No data collected.	Unlike to have an adverse disproportionate effect.	
Marriage / Civil Partnership	No data collected.	Unlike to have an adverse disproportionate effect.	
Pregnancy and Maternity	No data collected.	Unlike to have an adverse disproportionate effect.	
Race	No data collected.	Unlike to have an adverse disproportionate effect.	
Religion and Belief	No data collected.	Unlike to have an adverse disproportionate effect.	
Sex / Gender	No data collected.	Unlike to have an adverse disproportionate effect.	
Sexual Orientation	No data collected.	Unlike to have an adverse disproportionate effect.	

Socio Economic	No data collected. Unlike to have an adverse disproportionate effect.		
5. What consultation have you undertaken on your proposals?			
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
Community Champions Housing Tenants See Appendix 1	An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.	25% of respondents thought that the proposals will have a detrimental effect on their quality of life. Cross tab analysis on age – disability and ethnicity indicated an even distribution across all three protected characteristics. Reasons of effect primarily relate to generalised environmental noise with minimal direct impact.	Data indicates that no protected groups are disproportionately effected. Therefore no further action is programmed

6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?

None N/A

List the Title of reports / documents and websites here.

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	X	X	X	X	X	X	X	X	X

YES - If there is a risk of disproportionate adverse impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

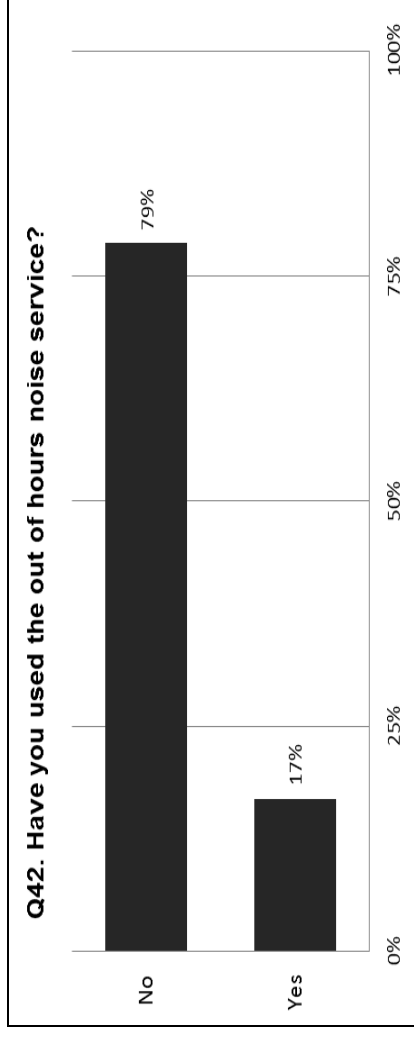
Best Practice: You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

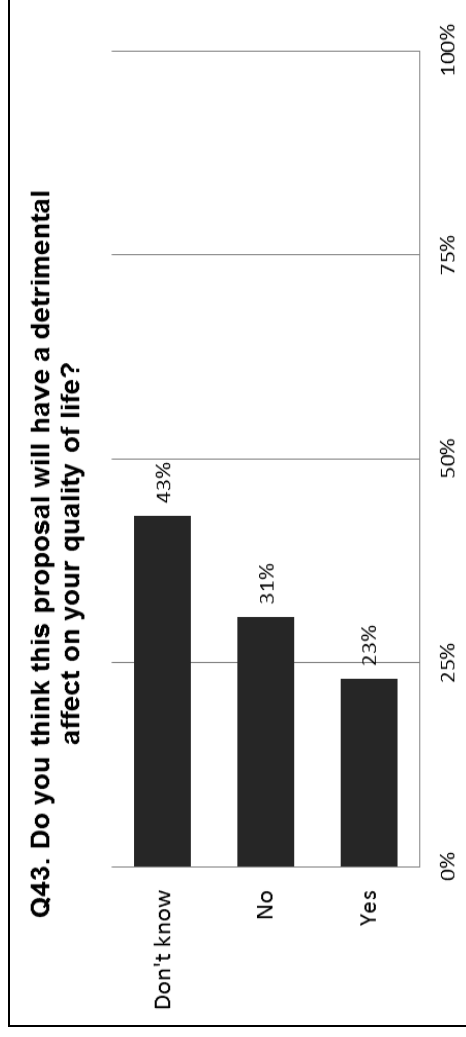
Just under 1 out of 5 respondents (17%) had used the out of hours noise service.



8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

23 Include this evidence, including any data, statistics, titles of documents and website links here)

Just under a quarter of respondents (23%) thought this proposal would have a detrimental affect on their quality of life. 43% said they did not know, and just under a third (31%) said it would not have a detrimental affect.



9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).

Stage 5: Assessing Impact and Analysis

<p>10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?</p>			
Protected Characteristic	Adverse ✓	Positive ✓	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)			
Disability (including carers of disabled people)			
Gender Reassignment			
Marriage and Civil Partnership			
Pregnancy and Maternity			
Race			
Religion or Belief			
Sex			
Sexual orientation			
11. Cumulative Impact – Considering what else is happening within the Council and		Yes	No
			X

Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?							
If yes, which Protected Characteristics could be affected and what is the potential impact?		Yes		No		X	
<p>11a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?</p> <p>If yes, what is the potential impact and how likely is to happen?</p> <p>12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation</p>							
		Yes		No		X	
		Age (including carers)		Disability (including carers)		Gender Reassignment	
		X		X		X	
		Marriage and Civil Partnership		Pregnancy and Maternity		Race	
		X		X		X	
		Religion and Belief		Sex		Sexual Orientation	
		X		X		X	
<p>237 you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)</p> <p>If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.</p> <ul style="list-style-type: none"> ▪ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4) ▪ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4) 							

Stage 6: Decision

13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	X
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals.	

238

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
N/A					

Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? *(Also Include in Improvement*

<i>Action Plan at Stage 7</i>	
16. How will the results of any monitoring be analysed, reported and publicised? (A/so Include in Improvement Action Plan at Stage 7)	
17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	

Stage 9: Public Sector Equality Duty		
18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups. (Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)		
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups

Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)
Be completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?		
Signed: (Lead officer completing EqIA)	Alex Hauck	Signed: (Chair of DETG)
Date:	16/01/2015	Date:
Date EqIA presented at the EqIA Quality Assurance Group	28/01/2015	Signature of ETG Chair
		PP Hanif Islam
		Hanif Islam

Appendix 1

Consultees

Afghan Association of London (Harrow)	Jaago Punjabi Women's Group	Pinner Albion FC
Association of Senior Muslim Citizens	Pinner Association	St Josephs Youth FC
Gujarati Arya Association	Wealdstone Active Community	Stanmore Manor FC
Harrow Bengalee Association	ADHD and Autism Support Harrow	Three Wishes Exiles
Harrow Iranian Community Association (HICA)	Mind in Harrow	Venceremos FC
Harrow Tamil Association	National Osteoporosis Society Middlesex Group	APB FC
Indian Association of Harrow	Rethink: Harrow Support Group	Lankians CC
Nepalese British Community UK	Friends of Bentley Priory Nature Reserve	Pinner Challengers CC
Pakistan Society of Harrow	Friends of Canons Park	Pinner Cricket Club
Russian Immigrants Association	Friends of West Harrow Park	South Harrow CC
The Harrow African Caribbean Association (HACAS)	Harrow Youth Parliament	Tamil Union CC
UK Asian Women's Conference (North London)	Capable Communities Ltd.	West Harrow CC
Harrow in Business (HiB)	The Wish Centre	Yarl CC
Canons Community Association	The Stanmore Society	Youth Wing CC
Harrow Association of Disabled People	Bessborough Cricket Club	Culver Bowls Club
Harrow in Leaf	Harrow Rugby Football Club	Harrow Weald Bowls Club
Middlesex Association for the Blind	Harrow St. Mary's Youth Football Club	Pinner Bowls Club
Harrow Heritage Trust	Pinner Cricket Club	Stanmore Bowls Club
North West London Lesbian & Gay Group (NWLLG)	Pinnstars Football Club	Pinner & Grammarians Rugby Football Club
Harrow Civic Residents' Association (HCRA)	Harrow Mencap	
Hatch End Association	Harrow Over 50 club	
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Harrow Community Transport	
Harrow Association of Voluntary Service	Harrow Centre for Volunteering	
Voluntary Action Harrow	Harrow Volunteer Centre	
Angolan Civic Communities Alliance (ACCA)	Harrow Women's Centre	
Harrow	Headstone Manor Youth Football Club	
British Afghan Women's Society	Parkfield Youth Football Club	
Harrow Association of Somali Voluntary Organisations (HASVO)	Pinner Albion Football Club	
Harrow Bengalee Association	Pinner Jewish Football Club	
Harrow Equalities Centre	Stanmore Football Club	
Harrow Somali Cultural & Educational Association	Age Concern Harrow	
	Harrow Mencap	
	CAPRA Canons Park Residents Association	
	Harrow Nature Conservation Forum	
	Harrow St Mary's	
	Kenton Town FC	
	Parkfield Football Club	
	Parkfield Youth FC	

This page is intentionally left blank

Appendix 2: Shopping areas street cleaning EqIA

Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other	✓	Other	
Title of Project:			
Removal of static sweepers from secondary shopping centres			
Directorate / Service responsible:			
E&E			
Name and job title of lead officer:			
Mick Wynne			
Name & contact details of the other persons involved in the assessment:			
David Corby, Andrew Smith, Sajni Durve			
Date of assessment:			
13/01/2015 Review 16/01/15			

Stage 1: Overview

1. What are you trying to do?

(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)

Harrow Pride currently provides street cleansing services to all Harrow managed highways, with shopping areas covered on a daily basis by a combination of mobile crews covering multiple sites and dedicated beat sweepers who are assigned to a particular shopping area.

We are considering a new system to remove dedicated beat sweepers from secondary shopping areas and to remove late evening street cleansing from 1st April 2015. The new system means that a mobile team will undertake one daily single cleansing operation only, still ensuring that the area is cleaned Mon- Fri. There will be a reduced team working during weekends to undertake a cleansing operation and respond to reported cases around the borough.

Additional cleaning will be available between these cycles - for example if a sudden build-up of litter occurs. We will ensure that a reactive workforce is in place to

respond to customer referrals. The council's fly tip removal service will still be able to respond to requests from residents in the case of excessive fly tipping.

The proposals would realise a saving of £150K through the removal of 7 posts from the current staffing establishment.

Residents / Service Users	Partners	Stakeholders
Staff	Age	Disability
Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
Race	Religion or Belief	Sex
Sexual Orientation	Other	

No. The responsibility for service lies with Enterprise & Environment, Harrow Pride.

- 2.** Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)
- 3.** Is the responsibility shared with another directorate, authority or organisation? If so:
- Who are the partners?
 - Who has the overall responsibility?
 - How have they been involved in the assessment?

Stage 2: Evidence / Data Collation

What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Borough wide 2011 census data (see data below) shows that Harrow has a fairly significant elderly population with 14.1% over the age of 65. The removal of beat sweepers could cause the streets to become more littered as no mitigation measures have been provided therefore the quality of the area could go down. Elderly / vulnerable residents may be more affected by the perception of crime if streets are dirtier and more littered. Elderly / vulnerable residents may also feel relatively unsafe and uncomfortable in areas that are dirtier and more littered when compared to younger residents.

Borough – wide age structure statistics from 2011 census

Harrow	2011 Data	2011 %	2011 Rank - National
All usual residents	239,056		
0 - 4	15,916	6.7	76
5 - 7	9,007	3.8	40
8 - 9	5,414	2.3	87
10 - 14	14,590	6.1	96
15	3,131	1.3	83
16 - 17	6,604	2.8	34
18 - 19	5,369	2.2	192
20 - 24	16,066	6.7	89
25 - 29	19,345	8.1	47
30 - 44	53,358	22.3	45
45 - 59	44,579	18.6	277
60 - 64	12,010	5	301
65 - 74	17,420	7.3	287
75 - 84	11,659	4.9	283
85 - 89	2,982	1.2	288
90 & over	1,606	0.7	252
Average Age (Mean)	37.6		287
Median Age	36		284

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

If large litter items are not swiftly removed from footways, this could affect access mobility and significantly affect people with mobility and visual impairments.

Age (including carers of young/older people)

245

Disability (including carers of disabled people)

Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or Disability for all Households

Harrow	2011	2011	2011	2011	2011
	Data	%	Rank – National	Rank - London	
All households	84,268				
Households with:					
No adults in employment with dependent children	3,675	4	116	24	24
No adults in employment with no dependent children	18,788	22	324	15	15
Dependent children of all ages	30,670	36	6	5	5
Dependent children aged 0 - 4	12,435	15	24	13	13
One person in household with a long-term health problem or disability: With dependent children	5,038	6	20	6	6
One person in household with a long-term health problem or disability: No dependent children	15,285	18	293	10	10
One or more person with a limiting long-term illness	N/A	N/A	N/A	N/A	N/A

246

Gender Reassignment
No data collected. Unlikely to have an adverse disproportionate effect.

Marriage / Civil Partnership
No data collected. Unlikely to have an adverse disproportionate effect.

Pregnancy and Maternity
No data collected. Unlikely to have an adverse disproportionate effect.

Race
Data available but not presented here as unlikely to have an adverse disproportionate effect.

Religion and Belief
Data available but not presented here as unlikely to have an adverse disproportionate effect.

Sex / Gender
Users
Borough- wide census data available, but not presented here as unlikely to have an adverse disproportionate effect.
Staff

			7% of staff in the Harrow Pride team are female. However, impact on staff is a reduction in numbers in equal measure and does not disproportionately affect this protected characteristic.
Sexual Orientation		No data collected. Unlike to have an adverse disproportionate effect.	
Socio Economic		If streets and roads are left untidy, this could devalue surrounding properties. Untidy roads could also lead to shops closing down resulting in fewer turnovers for businesses. However, no particular roads or streets have been specifically targeted therefore a particular shopping street/parade is unlikely to be adversely disproportionately affected.	

5. What consultation have you undertaken on your proposals?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
The consultation was carried out over the period 11 th September 2014 to 8 th November, 2014. The consultation has given all the residents the opportunity to respond.	The consultation has been promoted widely through posters, articles in the press and the web. The consultation has had the most engagement in recent years and a variety of mechanisms to engage residents were taken forward: 100,000 Take part	A presentation giving a summary of all of the consultation feedback is attached to this EqlA at Appendix A . Survey Responses Specifically in relation to impacts of the proposed changes in the survey residents were specifically asked which impacts would affect them most as an individual/family and a further question asking which proposals would impact the community as a whole. The following were fed back in order as having the most impact: E&E sections include <i>Impact on you and your family:</i> 1. Introducing a separate weekly food waste collection and charge	Based on the findings from this consultation elected members will be making a decision on the proposals that are to be taken forward for individual consultation. All proposals that are being taken forward to consultation will have their own individual detailed EqlA. Councillors have confirmed that they will be taking forward a campaign for a fairer grant for Harrow.

247

	<p>Booklets developed with survey distributed widely to stakeholder distribution list and through Harrow People</p> <p>6000 booklets distributed as part of events</p> <p>Specific web pages relating to the consultation and online web survey</p> <p>7 Roadshows and 10 Drop in sessions held across Harrow and attendance at 50 Community Group meetings across Harrow resulting in 361 face to face in depth conversations</p> <p>Translated documents on the web and in hard copy</p> <p>Easy read of the consultation booklet and survey</p> <p>Information on Facebook, Twitter and 4 responses received by video</p>	<p>for fortnightly collections of garden waste</p> <p>2. Switch off some streetlights, or reduce the hours that they are on for</p> <p><i>Impact on the community as a whole</i></p> <ol style="list-style-type: none"> 1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste 2. Changes to parks maintenance 3. Relocation of beat sweepers from secondary shopping centres 4. Reduction in grass verge cutting <p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration. However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:</p> <ul style="list-style-type: none"> - Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and - Close or reduce some of the Council's early support services to families, including Children's Centres. <p>Formal Letters</p> <p>23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals</p> <p>Petitions</p> <p>15 Petitions were received however none related to this proposal.</p> <p>Harrow Youth Parliament</p>	
--	--	---	--

		<p>The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.</p>	
--	--	--	--

		<p>6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment? N/A</p> <p>List the Title of reports / documents and websites here.</p>	
--	--	--	--

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	X	X	X	X	X	X	X	X	X
No									

YES - If there is a risk of disproportionate adverse impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

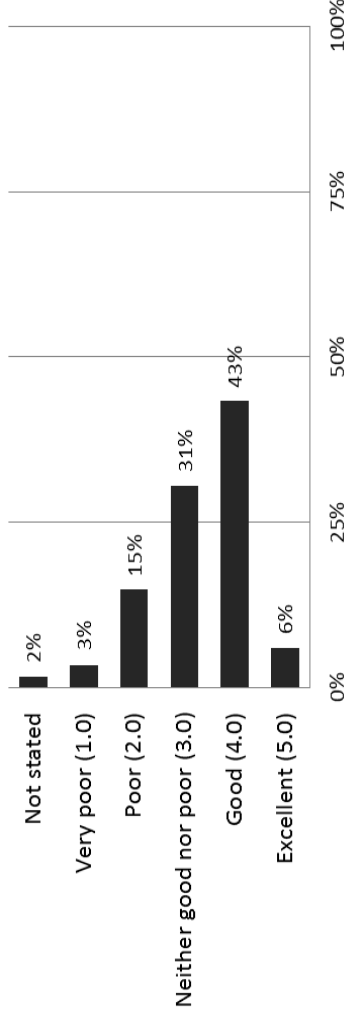
NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

These graphs below are from the consultation questions:

Around half of respondents (49%) rated current cleaning standards as good or excellent, with only 15% saying they were poor or and 3% very poor. This gave a mean score of 3.3 out of 5 for this rating question.

Q22. How do you rate the current cleaning standards within shopping areas? (mean score = 3.3)

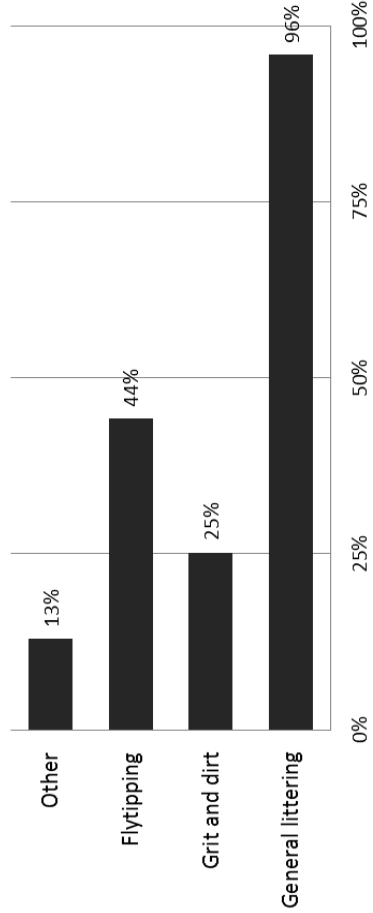


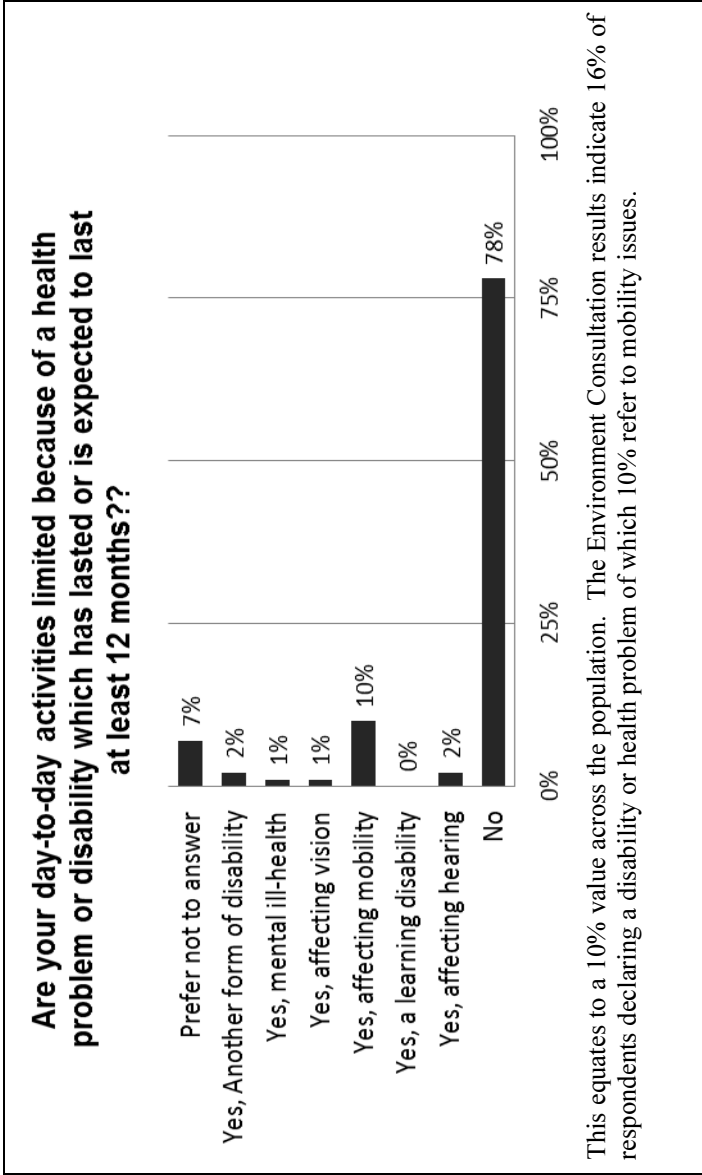
8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

250
 include this evidence, including any data, statistics, titles of documents and website links here)

Of those who rated it poor or very poor, the majority cited general littering (96%) followed by flytipping (44%) as the main reason for that rating.

Q23. If you are not happy with the current cleaning is it due to...?





What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
Community Champions Housing Tenants Key Community groups	An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date	Over 50% of respondents consider the current service to be good or better. Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main	Consultation feedback has identified key priorities for any targeted cleaning the use of the rapid response teams to mitigate impacts.

<p>Staff</p>	<p>The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.</p> <p>Members of staff were advised of the proposals that had staff impacts prior to the commencement of the Take Part and Cabinet reports proposing savings and took part in the Take Part Employee consultation. In addition, Trade Union colleagues have been given briefings prior to each Cabinet meeting agenda publication.</p>	<p>reason for that rating.</p> <p>There will be a staff impact through the deletion of seven posts from the establishment. These posts are currently filled by agency workers so there will be no reduction in the number of permanent staff or redundancy but the reduction in posts may have an impact on remaining staff.</p> <p>There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme.</p>	<p>Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs.</p> <p>E&E will work with the corporate Organisational Development team in mitigating this impact.</p>
--------------	---	---	--

Stage 5: Assessing Impact and Analysis

10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Adverse	Positive	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)	✓	✓	<p>The streets are likely to be more littered as dedicated beat sweepers are being removed and therefore the quality of the area may go down. Elderly / vulnerable residents may be more affected by the perception of crime if streets are dirtier and more littered. Elderly / vulnerable residents may also feel unsafe and uncomfortable in areas that are dirtier and more littered.</p> <p>The prime implication is likely to be an increase in general littering throughout the day.</p>	<p>Of the 20% who rated standards poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating. Of these 34% (6.8% of total sample) were ages 65+</p> <p>More efficient use of mobile teams to deal with excessive accumulation</p> <p>There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues.</p> <p>If monitoring indicates continuing issues the roads affecting can be reviewed under the Zonal cleansing approach.</p>
Disability (including carers of disabled people)	✓		<p>If large litter items are left on the road, this could affect access mobility and significantly affect people with mobility and visual impairments.</p>	<p>Of the 20% who rated standards poor or very poor, all respondents who declared a disability cited general littering</p> <p>There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues.</p>

Gender				Unlikely to have an adverse disproportionate effect.	
Reassignment				Unlikely to have an adverse disproportionate effect.	
Marriage and Civil Partnership				Unlikely to have an adverse disproportionate effect.	
Pregnancy and Maternity				Unlikely to have an adverse disproportionate effect.	
Race				Unlikely to have an adverse disproportionate effect.	
Religion or Belief				Unlikely to have an adverse disproportionate effect.	
Sex				Unlikely to have an adverse disproportionate effect.	
Sexual orientation				Unlikely to have an adverse disproportionate effect.	
Socio Economic				Potential redundancy impact on employed staff	Staff reduction will be met by existing vacancies or discontinuation of Agency staff. There will be no redundancies affecting permanently employed staff

	Yes	✓	No
<p>11. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?</p> <p>If yes, which Protected Characteristics could be affected and what is the potential impact?</p>			
<p>The newly introduced Zonal cleaning system – is that likely to have a cumulative impact on non-shops roads. However the adaptive nature of the zonal scheme will allow flexibility to respond to local 'hotspots'</p> <p>The potential negative impacts can be justified when the proposed mitigating steps are considered.</p> <p>Harrow's current street cleansing service provides for: the removal of all litter and debris from streets and paths and other areas adjoining the public highway and the collection of leaf fall.</p> <p>The requirement to make financial economies is likely to impact the frequency at which some aspects of street cleansing are provided. Although the cleansing approach will look to utilise resources more effectively through a targeted approach to cleansing frequencies, the reduction in static cleaners to secondary shopping centres could potentially result in a greater accumulation of litter, debris, flytips, and other obstructions on the public highway which may detrimentally and disproportionately impact upon older people, people with mobility impairments and/or people with impaired vision. An increase in litter and debris may also increase the likelihood of slips, trips and falls in the borough.</p> <p>As mitigating steps against these potential impacts, there will remain rapid response teams who will be able to address fly tips and unacceptably excessive levels of litter and other debris in between any scheduled cleansing operation. In addition, the Council will be introducing enforcement measures to tackle anti social behaviour such as littering, which should minimise obstructions, improve the street scene and enhance local environmental.</p>			

	Yes	✓	No
<p>11a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?</p> <p>If yes, what is the potential impact and how likely is to happen?</p>			<p>If streets and roads are left untidy, this could devalue surrounding properties. Untidy roads could also lead to shops closing down resulting in fewer turnovers for businesses. However, no particular roads or streets have been targeted therefore this group is unlikely to be adversely disproportionately affected.</p>
<p>12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation</p>			
<p>Yes</p> <p>No</p>	<p>Age (including carers)</p> <p>Disability (including carers)</p> <p>Gender Reassignment</p> <p>Marriage and Civil Partnership</p> <p>Pregnancy and Maternity</p> <p>Race</p> <p>Religion and Belief</p> <p>Sex</p> <p>Sexual Orientation</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p>
<p>256 you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)</p> <p>If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.</p> <ul style="list-style-type: none"> ▪ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4) ▪ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4) 			

Stage 6: Decision

13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	X
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	

13a. If your EqIA is assessed as **outcome 3 or you have ticked 'yes' in Q12**, explain your justification with full reasoning to continue with your proposals.

257

Stage 7: Improvement Action Plan

List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
Disability & Age Possibility that the reduced cleansing frequency in some areas may affect people in wheelchairs and/or people with other mobility impairments and/or those with visual impairments	Retention of Rapid Response teams to be able to respond to service requests relating to excessive littering, debris or fly tipping to allow for removal within the current SLA of 24 hours Monitor deployment of mobile and amend work schedules to meet variable demand	The Collective system captures all service requests and is used to monitor the response time to rectify. The retention of Rapid Response teams will allow the service to maintain its current performance	Sept 2015	Michael Wynne	

Stage 8 - Monitoring

<p>15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>As well as in house monitoring through the creation of random inspections via the Collective system, further monitoring of street cleansing performance is undertaken by an independent external body on 3 occasions per year.</p> <p>A full breakdown of performance, causes of litter, land class performance is provided as part of the external monitoring and assessment of cleansing performance. The classification of areas into zones is not rigid and, if data suggests that the classification of an area into a particular zone disproportionately affects one of the protected groups, this will be reviewed and appropriate adjustments made.</p> <p>Full consultation analysis to be completed.</p>	
<p>16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>		
<p>17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>		
<p>Stage 9: Public Sector Equality Duty</p>		
<p>18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.</p> <p>(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)</p> <p>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010</p>		
<p>258</p>	<p>Advance equality of opportunity between people from different groups</p>	<p>Foster good relations between people from different groups</p>
<p>N/a</p>	<p>N/a</p>	<p>N/a</p>
<p>Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)</p>		
<p>The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.</p>		
<p>19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p>		
<p>Signed: (Lead officer completing EqIA)</p>	<p>Mick Wynne</p>	<p>Signed: (Chair of DETG)</p> <p>Hanif Islam</p>
<p>Date:</p>	<p>16/01/2015</p>	<p>Date:</p>

Date EqIA presented at the EqIA Quality Assurance Group	28/01/2015	Signature of ETG Chair	PP Hanif Islam
---	------------	------------------------	----------------

Appendix 1

Consultees

Afghan Association of London (Harrow)	Harrow Somali Cultural & Educational Association	Harrow Nature Conservation Forum
Association of Senior Muslim Citizens	Jaago Punjabi Women's Group	Harrow St Mary's
Gujarati Arya Association	Pinner Association	Kenton Town FC
Harrow Bengalee Association	Wealdstone Active Community	Parkfield Football Club
Harrow Iranian Community Association (HICA)	ADHD and Autism Support Harrow	Parkfield Youth FC
Harrow Tamil Association	Mind in Harrow	Pinner Albion FC
Indian Association of Harrow	National Osteoporosis Society Middlesex Group	St Josephs Youth FC
Nepalese British Community UK	Rethink: Harrow Support Group	Stanmore Manor FC
Pakistan Society of Harrow	Friends of Bentley Priory Nature Reserve	Three Wishes Exiles
Russian Immigrants Association	Friends of Canons Park	Venceremos FC
The Harrow African Caribbean Association (HACAS)	Friends of West Harrow Park	APB FC
UK Asian Women's Conference (North London)	Harrow Youth Parliament	Lankians CC
Harrow in Business (HiB)	Capable Communities Ltd.	Pinner Challengers CC
Canons Community Association	The Wish Centre	Pinner Cricket Club
Harrow Association of Disabled People	The Stanmore Society	South Harrow CC
Harrow in Leaf	Bessborough Cricket Club	Tamil Union CC
Middlesex Association for the Blind	Harrow Rugby Football Club	West Harrow CC
Harrow Heritage Trust	Harrow St. Mary's Youth Football Club	Yarl CC
North West London Lesbian & Gay Group (NWLLG)	Pinner Cricket Club	Youth Wing CC
Harrow Civic Residents' Association (HCRA)	Pinnstars Football Club	Culver Bowls Club
Hatch End Association	Harrow Mencap	Harrow Weald Bowls Club
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Harrow Over 50 club	Pinner Bowls Club
Harrow Association of Voluntary Service	Harrow Community Transport	Stanmore Bowls Club
Voluntary Action Harrow	Harrow Centre for Volunteering	Pinner & Grammarians Rugby Football Club
Angolan Civic Communities Alliance (ACCA)	Harrow Volunteer Centre	
Harrow	Harrow Women's Centre	
British Afghan Women's Society	Headstone Manor Youth Football Club	
Harrow Association of Somali Voluntary Organisations (HASVO)	Parkfield Youth Football Club	
Harrow Bengalee Association	Pinner Albion Football Club	
Harrow Equalities Centre	Pinner Jewish Football Club	
	Stanmore Football Club	
	Age Concern Harrow	
	Harrow Mencap	
	CAPRA Canons Park Residents Association	

Appendix 3: Reduce Parks service to statutory minimum

Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment. It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other	✓	Other	
Title of Project:			
Reduce Parks service to statutory minimum and reduce parks management cost			
Directorate / Service responsible:			
E&E			
Name and job title of lead officer:			
Mick Wynne			
Name & contact details of the other persons involved in the assessment:			
David Corby, Andrew Smith, Sajni Durve			
Date of assessment:			
14/01/2015			
Stage 1: Overview			
1. What are you trying to do? (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)		<p>Harrow Pride currently provides a full maintenance service to all parks & open spaces within the Borough, with the aim of providing leisure, recreational and play facilities for the community whilst maintaining the environmental assets of the Boroughs Parks & Open Spaces.</p> <p>The main proposal is to convert some of the parks into wildlife open spaces. This is a complex proposal involving: reducing grass cutting to only that which is needed for Health and Safety reasons, reducing pruning, and removing some shrub, rose and flower beds. The Local Authority has a duty to ensure that open spaces and parks are safe for public enjoyment and that people using the areas, so far as is practical, can enjoy the areas without exposure to risks to their health and safety.</p> <p>The proposals would see parks maintenance reduced to a statutory minimum with</p>	

the exception of sports provision, where an income is received from clubs to provide a suitable playing surface in line with the relevant requirements. The move to a statutory minimum would see the following changes to the current maintenance regime: A table of changes is also included in Table1

- Parks would cease to be locked overnight
- Grass areas would be left naturalised (with the exception of sports pitches) and be subject to an annual conservation cut only
- Pruning of shrubs and hedges would reduce from up to 3 times per year to once a year
- Litter picking and emptying of bins would reduce from twice weekly to once a week

No parks would be submitted for the Green Flag award (currently 5 parks have attained this national recognition). The proposals would realise savings through the removal of 11 posts from the current staffing establishment and associated vehicles.

The reduction in management posts within the parks structure is linked to a proposed reduction in parks maintenance to a statutory minimum level, with the exception of sports provision, where an income is received from clubs to provide a suitable playing surface.

If the reduction in parks maintenance is agreed, this proposal would also see the removal of 1 Team Leader post and 2 Charge hand posts from the current staffing establishment, which would realise savings.

These changes combined will produce a saving of £327k

	Data	%	Rank - National
All usual residents	239,056		
0 - 4	15,916	6.7	76
5 - 7	9,007	3.8	40
8 - 9	5,414	2.3	87
10 - 14	14,590	6.1	96
15	3,131	1.3	83
16 - 17	6,604	2.8	34
18 - 19	5,369	2.2	192
20 - 24	16,066	6.7	89
25 - 29	19,345	8.1	47
30 - 44	53,358	22.3	45
45 - 59	44,579	18.6	277
60 - 64	12,010	5	301
65 - 74	17,420	7.3	287
75 - 84	11,659	4.9	283
85 - 89	2,982	1.2	288
90 & over	1,606	0.7	252
Average Age (Mean)	37.6		287
Median Age	36		284

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

There is a possibility that the reduced cleansing frequency and changes in the grass cutting regime may affect people in wheelchairs and/or people with other mobility impairments and/or those with visual impairments. Long grass can hide litter and obstructions which could contribute to slip/trip hazards and make movement off the main paths more hazardous for those in wheelchairs and/or people with other mobility impairments and/or those with visual impairments.

Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or Disability for all Households

Harrow	2011	2011	2011	2011	2011
	Data	%	Rank - National	Rank - London	
All households	84,268				
Households with:					
No adults in employment with dependent children	3,675	4	116	24	
No adults in employment with no dependent children	18,788	22	324	15	
Dependent children of all ages	30,670	36	6	5	
Dependent children aged 0 - 4	12,435	15	24	13	
One person in household with a long-term health problem or disability: With dependent children	5,038	6	20	6	
One person in household with a long-term health problem or disability: No dependent children	15,285	18	293	10	
One or more person with a limiting long-term illness	N/A	N/A	N/A	N/A	N/A

No data collected. Unlikely to have an adverse disproportionate effect.

Gender Reassignment

No data collected. Unlikely to have an adverse disproportionate effect.

Marriage / Civil Partnership

No data collected. Unlikely to have an adverse disproportionate effect.

Pregnancy and Maternity

No data collected. Unlikely to have an adverse disproportionate effect.

Race

Religion and Belief	Data available but not presented here as unlikely to have an adverse disproportionate effect.	
Sex / Gender	<p><u>Users</u></p> <p>Borough- wide census data available, but not presented here as unlikely to have an adverse disproportionate effect.</p>	<p><u>Staff</u></p> <p>7% of staff in the parks team are female. However, impact on staff is a reduction in numbers in equal measure and does not disproportionately affect this protected characteristic.</p>
Sexual Orientation	No data collected. Unlikely to have an adverse disproportionate effect.	
Economic	No data collected. Unlikely to have an adverse disproportionate effect.	
266 What consultation have you undertaken on your proposals?		
Who was consulted?	What consultation methods were used?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
The consultation was carried out over the period 11 th September 2014 to 8 th November, 2014.	<p>The consultation has been promoted widely through posters, articles in the press and the web.</p> <p>The consultation has</p>	<p>Based on the findings from this consultation elected members will be making a decision on the proposals that are to be taken forward for individual consultation. All proposals that are being taken forward to consultation will have</p>
	<p>What do the results show about the impact on different groups / Protected Characteristics?</p>	<p>A presentation giving an summary of all of the consultation feedback is attached to this EqIA at Appendix A. Survey Responses</p> <p>Specifically in relation to impacts of the proposed changes in the survey residents were specifically asked which</p>

<p>The consultation has given all residents the opportunity to respond.</p>	<p>had the most engagement in recent years and a variety of mechanisms to engage residents were taken forward: 100,000 Take part Booklets developed with survey distributed widely to stakeholder distribution list and through Harrow People 6000 booklets distributed as part of events Specific web pages relating to the consultation and online web survey</p>	<p>impacts would affect them most as an individual/family and a further question asking which proposals would impact the community as a whole. The following were fed back in order as having the most impact: E&E sections include <i>Impact on you and your family:</i></p> <ol style="list-style-type: none"> 1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste 2. Switch off some streetlights, or reduce the hours that they are on for <p><i>Impact on the community as a whole</i></p> <ol style="list-style-type: none"> 1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste 2. Changes to parks maintenance 3. Relocation of beat sweepers from secondary shopping centres 4. Reduction in grass verge cutting <p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration. However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:</p> <ul style="list-style-type: none"> - Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and - Close or reduce some of the Council's early support services to families, including Children's Centres. 	<p>their own individual detailed EqIA. Councillors have confirmed that they will be taking forward a campaign for a fairer grant for Harrow.</p>
<p>7 Roadshows and 10 Drop in sessions held across Harrow and attendance at 50 Community Group meetings across Harrow resulting in 361 face to face in depth conversations Translated documents on the web and in hard copy Easy read of the</p>			

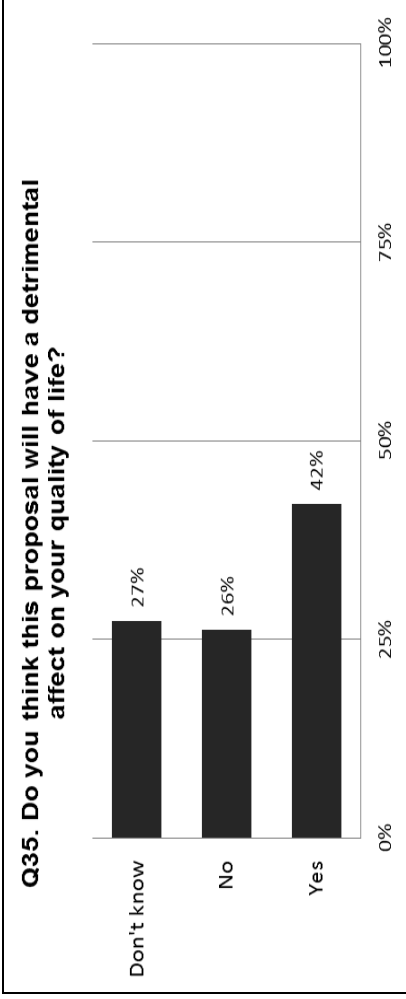
	<p>consultation booklet and survey</p> <p>Information on Facebook, Twitter and 4 responses received by video</p>	<p>Formal Letters</p> <p>23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals</p> <p>Petitions</p> <p>15 Petitions were received and these the following was received in relation to Environmental services:</p> <ul style="list-style-type: none"> - 1 petition about locking of park gates with 108 signatures <p>Harrow Youth Parliament</p> <p>The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.</p>
<p>6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</p> <p>List the Title of reports / documents and websites here.</p>	<p>None</p>	
<p>Stage 3: Assessing Potential Disproportionate Impact</p>		
<p>7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?</p>		

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	X	X							
No			X	X	X	X	X	X	X
<p>YES - If there is a risk of disproportionate adverse Impact on any ONE of the Protected Characteristics, continue with the rest of the template.</p> <ul style="list-style-type: none"> Best Practice: You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated. <p>NO - If you have ticked 'No' to all of the above, then go to Stage 6</p> <ul style="list-style-type: none"> Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7 									

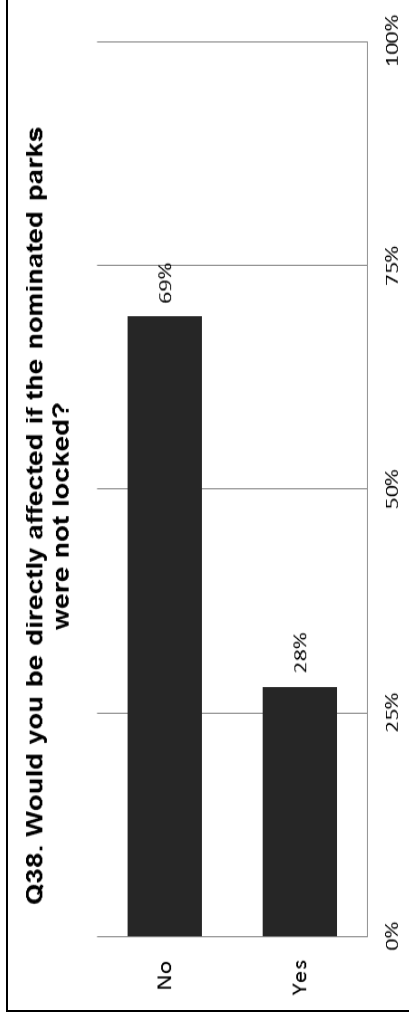
8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

270
 include this evidence, including any data, statistics, titles of documents and website links (here)

Just over 4 out of 10 respondents (42%) said that the proposal would have a detrimental affect on their quality of life, with around a quarter (26%) saying it wouldn't.

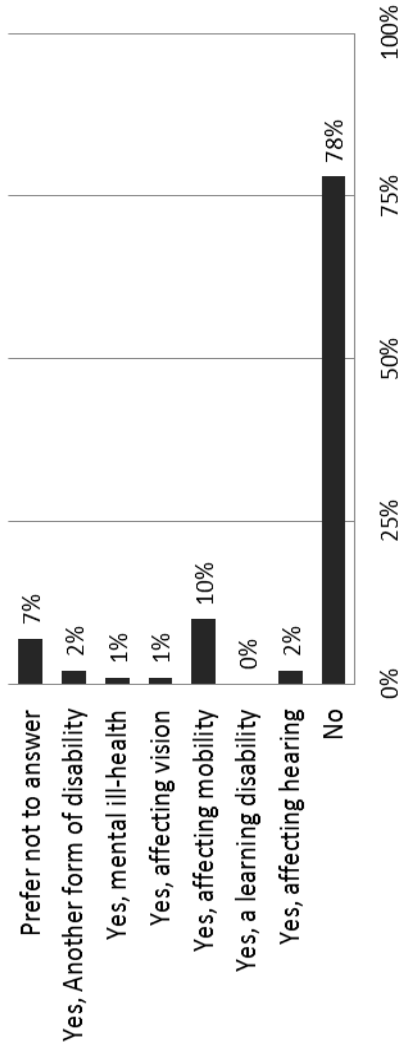


In terms of park locking, Just under 7 out of 10 respondents (69%) said that they would not be directly affected if the nominated parks were not locked. Around 3 out of 10 respondents (28%) said they would be affected.



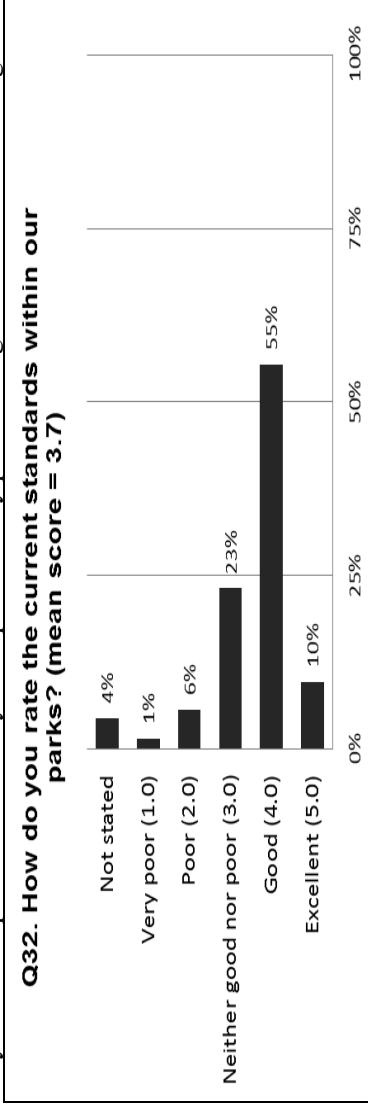
Of those who said they would be affected, 'illegal activity' followed by 'fear of crime' and 'disturbance' were the main concerns.

Are your day-to-day activities limited because of a health problem or disability which has lasted or is expected to last at least 12 months??



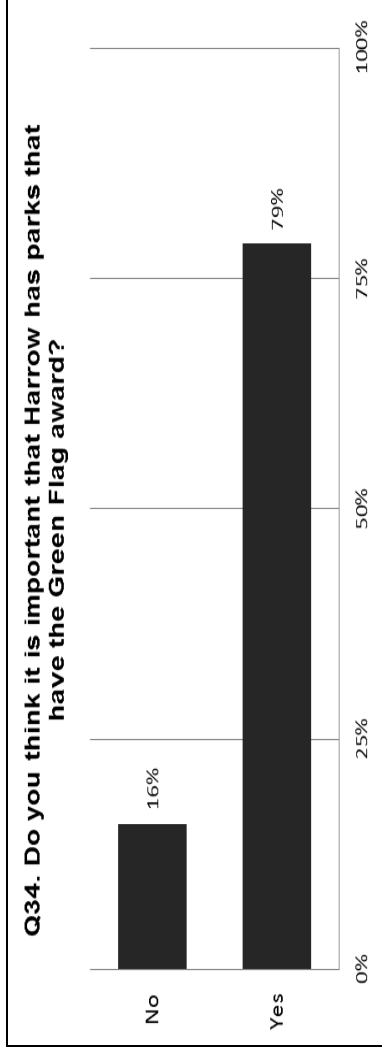
This equates to a 10% value across the population. The Environment Consultation results indicate 16% of respondents declaring a disability or health problem of which 10% refer to mobility issues.

When asked to rate current standards within our parks, 65% of respondents said they were good or excellent. Only 7% of respondents said they were poor or very poor. This gave a mean score rating of 3.7 out of 5.



Those who rated poor or very poor were asked for their reasons, and 'general standards of maintenance' followed by 'general littering' were the two largest responses, albeit from a very small base who rated them as poor.

Almost 8 out of 10 respondents (79%) thought it was important that Harrow has parks with Green Flag status.



9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
<p>Community Champions Housing Tenants Key Community groups</p>	<p>An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.</p>	<p>Over 50% of respondents consider the current service to be good or better. Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating</p>	<p>Consultation feedback has identified key priorities for any targeted cleaning have directed mitigations</p>

<p>Staff</p>	<p>Members of staff were advised of the proposals that had staff impacts prior to the commencement of the Take Part and Cabinet reports proposing savings and took part in the Take Part Employee consultation. In addition, Trade Union colleagues have been given briefings prior to each Cabinet meeting agenda publication.</p>	<p>There will be a staff impact through the deletion of fourteen posts from the establishment. These posts are currently filled by agency workers so there will be no reduction in the number of permanent staff or redundancy but the reduction in posts may have an impact on remaining staff.</p> <p>There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme.</p>	<p>Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs</p> <p>E&E will work with the corporate Organisational Development team in mitigating this impact</p>
--------------	---	---	--

Stage 5: Assessing Impact and Analysis

10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Adverse ✓	Positive ✓	<p>Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.</p> <p>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</p> <p>Possibility that the reduced cleansing frequency and changes in the grass cutting regime may affect older people and those with mobility impairments and/or impaired vision. Long grass can hide litter and obstructions which could contribute to slip/trip hazards and make movement off the main paths more hazardous for those that are old and infirm. Perception of increase in crime if gates left opened and appearance of unmanaged and unmaintained facility.</p>	<p>What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)</p> <p>Just under 4 out of 10 respondents (38%) said that the proposal would have a detrimental affect on their quality of life, with around 3 out of 10 (31%) saying it wouldn't.</p> <p>Path borders and accessible fencelines will be cut and/or pruned at current standards to ensure safe passage from vegetation and possibly hidden litter and natural surveillance in terms of reducing fear of crime.</p> <p>More efficient use of mobile teams to deal with excessive accumulation</p> <p>There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues</p> <p>If monitoring indicates continuing issues in key parks, they can be reviewed under the Zonal cleansing approach</p>
Age (including carers of young/older people)	✓			
Disability (including carers of disabled people)	✓		<p>Possibility that the reduced cleansing frequency and changes in the grass cutting regime may affect people in wheelchairs and/or people with other mobility impairments and/or those with visual impairments. Long grass can hide litter and obstructions which could contribute to slip/trip hazards and make movement off the main paths more hazardous for those that are old and infirm.</p>	<p>Just under 4 out of 10 respondents (38%) said that the proposal would have a detrimental affect on their quality of life, with around 3 out of 10 (31%) saying it wouldn't.</p> <p>Path borders and accessible fencelines will be cut and/or pruned at current standards to ensure safe passage from vegetation and possibly hidden litter and natural surveillance in terms of reducing fear of crime.</p>

				<p>More efficient use of mobile teams to deal with excessive accumulation</p> <p>There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues</p> <p>If monitoring indicates continuing issues in key parks, they can be reviewed under the Zonal cleansing approach</p>
Gender Reassignment			No disproportionate adverse effect.	
Marriage and Civil Partnership			No disproportionate adverse effect.	
Pregnancy and Maternity			No disproportionate adverse effect.	
Race			No disproportionate adverse effect.	
Religion or Belief			No disproportionate adverse effect.	
Sex			No disproportionate adverse effect.	
Sexual			No disproportionate adverse effect.	

275

No		X	X	X	X	X	X	X
	If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)							
	If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.							
	<ul style="list-style-type: none"> If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4) If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4) 							
	Stage 6: Decision							
	13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)							
	Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.							
	Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>							X
	Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below)							
	Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)							
	13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals.	The roads / pavements through the parks will not be affected. The proposals are needed to achieve the savings.						

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team / Plan
Disability & Age	Retention of Rapid Response teams to be able to respond to service requests relating to excessive littering, debris or fly tipping to allow for removal within the current SLA of 24 hours Monitor deployment of mobile and amend work schedules to meet variable demand	The Collective system captures all service requests and is used to monitor the response time to rectify. The retention of Rapid Response teams and flexible staff deployment	December 2015	Michael Wynne	
Socio Economic	Whilst the resource model to key parks will change there is still the capability to aspire to retaining Green Flag status at most of the current Green Flag Parks. Maintaining key major parks at disparate geographic locations will mitigate some perception and fitness implications. Existing booked sports facilities in parks will be maintained to existing standards 28% of responders have expressed concern over not locking park gates with a significant bias towards fear of crime	Monitor Green Flag success Parks will be monitored for increases in crime, especially in terms of car parks where there is a greater likelihood of nuisance occurring	July 2015	Michael Wynne	

278

Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? *(Also Include in Improvement Action Plan at Stage 7)*

As well as in house monitoring through the creation of random inspections via the Collective system, further monitoring of parks standards is undertaken by an independent external body annually.
The Collective system captures all service requests and is used to monitor the response time to rectify.

<p>16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>A full breakdown of performance, causes of litter, and class performance is provided as part of the external monitoring and assessment of cleansing performance. The classification of areas into zones is not rigid and, if data suggests that the classification of an area into a particular zone disproportionately affects one of the protected groups, this will be reviewed and appropriate adjustments made.</p>
<p>17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>Full consultation analysis to be completed</p>

Stage 9: Public Sector Equality Duty

<p>18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups. (Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)</p>		
<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010</p>	<p>Advance equality of opportunity between people from different groups</p>	<p>Foster good relations between people from different groups</p>
<p>27 a</p>	<p>N/a</p>	<p>N/a</p>

**Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)
The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<p>19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p>		
<p>Signed: (Lead officer completing EqIA)</p>	<p>Mick Wynne</p>	<p>Signed: (Chair of DETG)</p> <p>Hanif Islam</p>
<p>Date:</p>	<p>14/01/2015</p>	<p>Date:</p>
<p>Date EqIA presented at the EqIA Quality Assurance Group</p>	<p>28/01/2015</p>	<p>Signature of ETG Chair</p> <p>PP Hanif Islam</p>

Table 1: Parks Service Standards per designation type

Parkland	Open Spaces
Hedge and shrub pruning up to twice a year	Hedge and shrub pruning up to twice a year
CURRENTLY UP TO 3 TIMES	CURRENTLY UP TO 3 TIMES
Leaf clearance once a year	Leaf clearance once a year
Empty litter bins once a week	Empty litter bins once a week
CURRENTLY EMPTIED TWICE WEEKLY ALONG WITH LITTER PICKING OF THE PARK, WHICH WILL ALSO REDUCE TO ONCE PER WEEK. THIS WILL ALSO APPLY TO DOG BINS IF EMPTYING OF DOG BINS COMES BACK IN HOUSE	CURRENTLY EMPTIED TWICE WEEKLY ALONG WITH LITTER PICKING OF THE PARK, WHICH WILL ALSO REDUCE TO ONCE PER WEEK. THIS WILL ALSO APPLY TO DOG BINS IF EMPTYING OF DOG BINS COMES BACK IN HOUSE
General inspection of playgrounds and infrastructure once every 3 months	General inspection of playgrounds and infrastructure once every 3 months
CURRENTLY INSPECTED MONTHLY	CURRENTLY INSPECTED MONTHLY
Strimming of high visibility boundary areas every 3 weeks during growing season (March to October depending on seasonal changes)	Strimming of high visibility path boundaries every 3 weeks during growing season (March to October depending on seasonal changes).
CURRENTLY CUT EVERY 3 WEEKS	CURRENTLY CUT EVERY 3 WEEKS
Grass cutting every 6 weeks	Grass cut once a year forage cut
CURRENTLY CUT EVERY 3 WEEKS	CURRENTLY CUT EVERY 3 WEEKS
Rake Play bark areas once a week	Rake Play bark areas once a week
Grass cutting every 6 weeks during growing season (March to October depending on seasonal changes)	Cut grass on park path and boundary every 3 weeks during growing season (March to October depending on seasonal changes)
CURRENTLY DONE ON A 3 WEEKLY CYCLE	CURRENTLY DONE ON A 3 WEEKLY CYCLE
Pond clearance once a month	Pond clearance every 3 months
Shrub and flower beds are mulched once a year	No mulching of beds
Mechanical sweeping once a month	

Table 2: Parks by designation type

Parkland	Open Spaces	Country Parks, Nature Reserves & Woodland
Alexandra Park	Brockhurst Corner	Bentley Priory
Bernays Gardens	Brockley Hill	Belmont Rattler
Byron Recreation Ground	Church Fields	Brewery Reservoir Open Space
Cedars O.S.	Chrutchurch Avenue Open Space	Church Farm
Centenary Park	Cuckoo Hill Open Space	Glenthorne
Chandos Recreation Ground	Croft	Grimsdyke Open Space
Harrow Recreation Ground	Elms Road Open Space	Harrow Weald Common
Harrow Weald Recreation Ground	Greenway	Pinner Park Farm
Hatch End Playing Fields	Grove Fields	Roxbourne Rough
Headstone Manor	Harrow Garden Village	Stanmore Common
Hooking Green	Kenton Recreation Ground	Stanmore Country Park
John Rummey	Lake Grove	
Lowlands Recreation Ground	Little Common Pinner	
Melbourne Ave	Little Common Stanmore	
Montesoles P.F.	Lynwood Close Open Space	
Pinner Memorial Park	Montrose Walk	
Priestmead Recreation Ground	Newton Ecology Park	
Queensbury Recreation Ground	Newton Park West	
Rayners Mead	Pinner Recreation Ground	
Roxbourne Park	Pinner Village Gardens	
Roxeth Recreation Ground	Ridgeway Playing Fields	
Saddlers Mead	River Pinn Open Space	
Shaftesbury P.F.	Streamside	

Parkland	Open Spaces	Country Parks, Nature Reserves & Woodland
Stanmore Marsh	Sylvia Avenue Open Space	
Stanmore Recreation Ground	Thackery Close Open Space	
Weald Village	Tookes Green	
West Harrow Recreation Ground	Whitchurch Playing Fields	
	Whitefriars Open Space	
	Woodlands	
	Yeading Walk	

Nb: Due to funding criteria, Canons Park will retain the current maintenance regimes.
 Countryside Parks, Nature Reserves and Woodland already have separate maintenance regimes that are not affected by these proposals

Appendix 1

Consultees

Afghan Association of London (Harrow)	Harrow Bengalee Association	Pinner Jewish Football Club
Association of Senior Muslim Citizens	Harrow Equalities Centre	Stanmore Football Club
Gujarati Arya Association	Harrow Somali Cultural & Educational Association	Age Concern Harrow
Harrow Bengalee Association	Jaago Punjabi Women's Group	Harrow Mencap
Harrow Iranian Community Association (HICA)	Pinner Association	CAPRA Canons Park Residents Association
Harrow Tamil Association	Wealdstone Active Community	Harrow Nature Conservation Forum
Indian Association of Harrow	ADHD and Autism Support Harrow	Harrow St Mary's
Nepalese British Community UK	Mind in Harrow	Kenton Town FC
Pakistan Society of Harrow	National Osteoporosis Society Middlesex Group	Parkfield Football Club
Russian Immigrants Association	Rethink: Harrow Support Group	Parkfield Youth FC
The Harrow African Caribbean Association (HACAS)	Friends of Bentley Priory Nature Reserve	Pinner Albion FC
UK Asian Women's Conference (North London)	Friends of Canons Park	St Josephs Youth FC
Harrow in Business (HiB)	Friends of West Harrow Park	Stanmore Manor FC
Canons Community Association	Harrow Youth Parliament	Three Wishes Exiles
Harrow Association of Disabled People	Capable Communities Ltd.	Venceremos FC
Harrow in Leaf	The Wish Centre	APB FC
Middlesex Association for the Blind	The Stanmore Society	Lankians CC
Harrow Heritage Trust	Bessborough Cricket Club	Pinner Challengers CC
North West London Lesbian & Gay Group (NWLLG)	Harrow Rugby Football Club	Pinner Cricket Club
Harrow Civic Residents' Association (HCRA)	Harrow St. Mary's Youth Football Club	South Harrow CC
Hatch End Association	Pinner Cricket Club	Tamil Union CC
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Pinnstars Football Club	West Harrow CC
Harrow Association of Voluntary Service	Harrow Mencap	Yarl CC
Voluntary Action Harrow	Harrow Over 50 club	Youth Wing CC
Angolan Civic Communities Alliance (ACCA)	Harrow Community Transport	Cuiver Bowls Club
Harrow	Harrow Centre for Volunteering	Harrow Weald Bowls Club
British Afghan Women's Society	Harrow Volunteer Centre	Pinner Bowls Club
Harrow Association of Somali Voluntary Organisations (HASVO)	Harrow Women's Centre	Stanmore Bowls Club
	Headstone Manor Youth Football Club	Pinner & Grammarians Rugby Football Club
	Parkfield Youth Football Club	
	Pinner Albion Football Club	

This page is intentionally left blank

Appendix 4: Highways Verge Grass Cutting

Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment. It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other	✓	Other	
Title of Project:			
Highways verge grass cutting, moving from a three weekly to a six weekly cycle.			
Directorate / Service responsible:			
E&E			
Name and job title of lead officer:			
Mick Wynne			
Name & contact details of the other persons involved in the assessment:			
David Corby, Andrew Smith, Sajni Durve			
Date of assessment:			
13/01/2015			
Stage 1: Overview			
<p>1. What are you trying to do? (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p> <p>Harrow Pride currently undertakes cutting of grass verges to all Harrow managed highways on a 3 weekly cycle.</p> <p>The council currently delivers this service on a three week cycle from March to November although this can be affected by weather conditions. Clippings are left distributed evenly over the verge to compost down back into the soil. The objective is to extend of the cutting frequency to a 6 weekly cycle which will apply to all verges across the borough is anticipated to achieve financial savings within the current residential street services budget of £82,000.</p> <p>The reduction in cutting frequency will realise these savings through the removal of</p>			

3 posts from the current staffing establishment and associated vehicles.																									
Residents / Service Users	Partners	Stakeholders																							
Staff	✓	Disability	✓		✓																				
Gender Reassignment	✓	Pregnancy and Maternity																							
Race		Sex																							
Sexual Orientation																									
<p>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</p>																									
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 																									
<p>4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.</p> <p>(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)</p>																									
<p>It is unlikely that this proposal will have a significant on this characteristic as this is more an aesthetic matter. However, in the rare event that pedestrians need to cross and there isn't hard surfacing or a crossing nearby, elderly / vulnerable residents may find it difficult if they are faced with the option of longer grass verge for a significant distance to get to the nearest crossing. Borough wide 2011 census data (see data below) shows that Harrow has a fairly significant elderly population with 14.1% over the age of 65.</p>																									
<p>Borough – wide age structure statistics from 2011 census</p>																									
<table border="1"> <thead> <tr> <th></th> <th colspan="3">Age Structure</th> </tr> <tr> <th></th> <th>2011</th> <th>2011</th> <th>2011</th> </tr> </thead> <tbody> <tr> <td>Harrow</td> <td>2011</td> <td>2011</td> <td>2011</td> </tr> <tr> <td></td> <td>Data</td> <td>%</td> <td>Rank - National</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Rank - London</td> </tr> </tbody> </table>							Age Structure				2011	2011	2011	Harrow	2011	2011	2011		Data	%	Rank - National				Rank - London
	Age Structure																								
	2011	2011	2011																						
Harrow	2011	2011	2011																						
	Data	%	Rank - National																						
			Rank - London																						
<p>Age (including carers of young/older people)</p>																									

All usual residents	239,056				
0 - 4	15,916	6.7	76	24	
5 - 7	9,007	3.8	40	14	
8 - 9	5,414	2.3	87	16	
10 - 14	14,590	6.1	96	9	
15	3,131	1.3	83	8	
16 - 17	6,604	2.8	34	3	
18 - 19	5,369	2.2	192	20	
20 - 24	16,066	6.7	89	25	
25 - 29	19,345	8.1	47	23	
30 - 44	53,358	22.3	45	30	
45 - 59	44,579	18.6	277	8	
60 - 64	12,010	5	301	8	
65 - 74	17,420	7.3	287	5	
75 - 84	11,659	4.9	283	5	
85 - 89	2,982	1.2	288	7	
90 & over	1,606	0.7	252	8	
Average Age (Mean)	37.6		287	8	
Median Age	36		284	8	

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

It is unlikely that this proposal will have a significant on this characteristic as this is more an aesthetic matter. However, in the rare event that pedestrians need to cross and there isn't hard surfacing or a crossing nearby, residents with visual and/or mobility impairments may find it difficult if they are faced with the option of longer grass verge for a significant distance to get to the nearest crossing.

Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or

Disability (including carers of disabled people)

Disability for all Households

Harrow	2011	2011	2011	2011	2011
All households : 84,268	Data		%	Rank - National	Rank - London
Households with:					
No adults in employment with dependent children	3,675	4		116	24
No adults in employment with no dependent children	18,788	22		324	15
Dependent children of all ages	30,670	36		6	5
Dependent children aged 0 - 4	12,435	15		24	13
One person in household with a long-term health problem or disability: With dependent children	5,038	6		20	6
One person in household with a long-term health problem or disability: No dependent children	15,285	18		293	10
One or more person with a limiting long-term illness	N/A	N/A		N/A	N/A

No data collected. Unlikely to have an adverse disproportionate effect.

Gender Reassignment

2008

Marriage / Civil Partnership

No data collected. Unlikely to have an adverse disproportionate effect.

Pregnancy and Maternity

No data collected. Unlikely to have an adverse disproportionate effect.

Race

No data collected. Unlikely to have an adverse disproportionate effect.

Religion and Belief

No data collected. Unlikely to have an adverse disproportionate effect.

Sex / Gender

No data collected. Unlikely to have an adverse disproportionate effect.

Sexual Orientation

No data collected. Unlikely to have an adverse disproportionate effect.

Socio Economic

No data collected. Unlikely to have an adverse disproportionate effect.

5. What consultation have you undertaken on your proposals?

Who was consulted?

What consultation methods were used?

What do the results show about the impact on different groups / Protected Characteristics?

What actions have you taken to address the findings of the

<p>The consultation was carried out over the period 11th September 2014 to 8th November, 2014.</p> <p>The consultation has given all residents the opportunity to respond.</p>	<p>The consultation has been promoted widely through posters, articles in the press and the web.</p> <p>The consultation has had the most engagement in recent years and a variety of mechanisms to engage residents were taken forward:</p> <p>100,000 Take part Booklets developed with survey distributed widely to stakeholder distribution list and through Harrow People</p> <p>6000 booklets distributed as part of events</p> <p>Specific web pages relating to the consultation and online web survey</p> <p>7 Roadshows and 10 Drop in sessions held across Harrow and attendance at 50 Community Group meetings across Harrow</p>	<p>Survey Responses</p> <p>Specifically in relation to impacts of the proposed changes in the survey residents were specifically asked which impacts would affect them most as an individual/family and a further question asking which proposals would impact the community as a whole. The following were fed back in order as having the most impact:</p> <p>E&E sections include</p> <p><i>Impact on you and your family:</i></p> <ol style="list-style-type: none"> 1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste 2. Switch off some streetlights, or reduce the hours that they are on for <p><i>Impact on the community as a whole</i></p> <ol style="list-style-type: none"> 1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste 2. Changes to parks maintenance 3. Relocation of beat sweepers from secondary shopping centres 4. Reduction in grass verge cutting <p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration.</p>	<p>consultation? (This may include further consultation with the affected groups, revising your proposals).</p>
<p>Based on the findings from this consultation elected members will be making a decision on the proposals that are to be taken forward for individual consultation. All proposals that are being taken forward to consultation will have their own individual detailed EqIA.</p> <p>Councillors have confirmed that they will be taking forward a campaign for a fairer grant for Harrow.</p>			

resulting in 361 face to face in depth conversations

Translated documents on the web and in hard copy

Easy read of the consultation booklet and survey

Information on Facebook, Twitter and 4 responses received by video

However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:

- Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and
- Close or reduce some of the Council's early support services to families, including Children's Centres.

Formal Letters

23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals

Petitions

15 Petitions were received and this included the following in relation to Environmental services:

- 1 petition about locking of park gates with 108 signatures

Harrow Youth Parliament

The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.

6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?

List the Title of reports / documents and websites here.

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	X	X							
No			X	X	X	X	X	X	X

YES - If there is a risk of disproportionate adverse impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

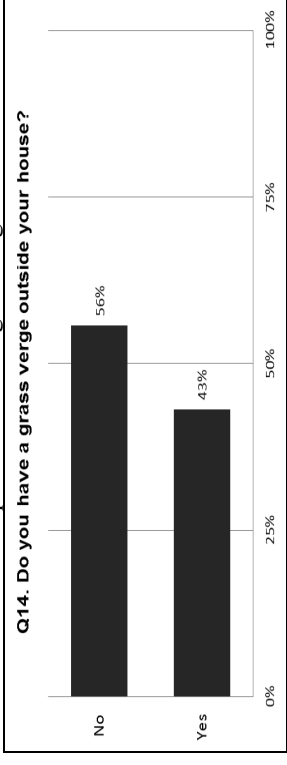
NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

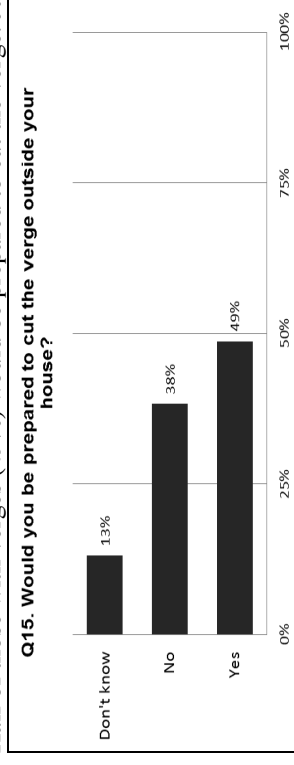
8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 2, include this evidence, including any data, statistics, titles of documents and website links here)

292

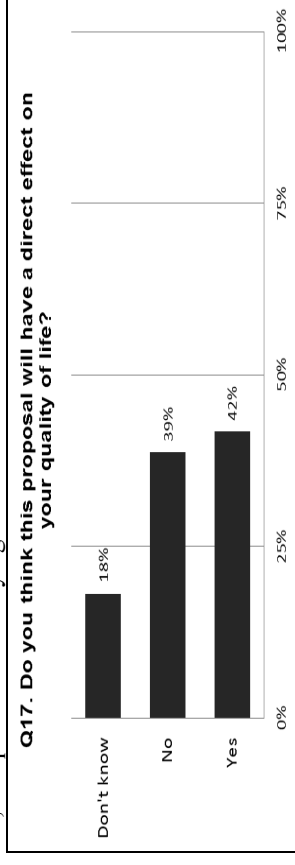
Around 4 out of 10 respondents have a grass verge outside their house (43%).



Half of those with verges (49%) would be prepared to cut the verge. Just over a third (38%) said no.

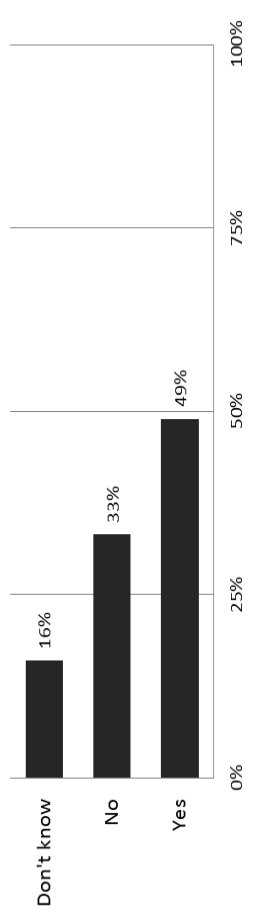


When asked about impact on quality of life from this proposal, 42% said it would impact their quality of life, compared to 39% saying it would.



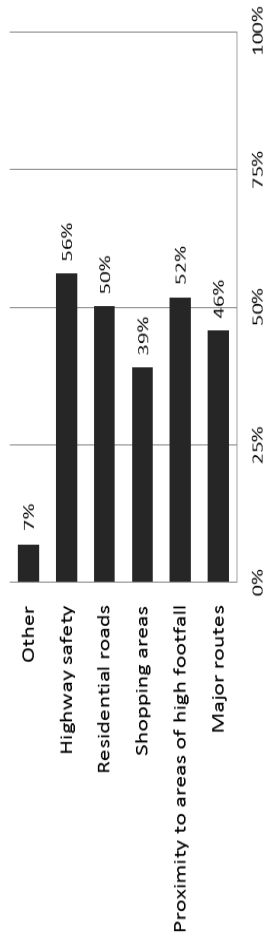
Respondents were asked their views on the introduction of different cutting cycles for different verges. Half of respondents (49%) agreed with this suggestion.

Q19. Rather than cutting all verges at the same frequency, do you think we should introduce different cutting cycles for different verges (e.g. cut those on major routes more often than those on rural roads)?



When considering this prioritisation, highway safety was the most frequent response (56%), followed by proximity to areas of high footfall (52%).

Q20. What factors do you think needs to be a determining factor in prioritising verges for cutting?



9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

<p>Who was consulted?</p>	<p>What consultation methods were used?</p>	<p>What do the results show about the impact on different groups / Protected Characteristics?</p>	<p>What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).</p>
---------------------------	---	---	--

Community Champions
Housing Tenants
Key Community groups

An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date

The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.

Members of staff were advised of the proposals that had staff impacts prior to the commencement of the Take Part and Cabinet reports proposing savings and took part in the Take Part Employee consultation. In addition, Trade Union colleagues have been given briefings prior to each Cabinet meeting agenda publication.

Over 50% of respondents consider the current service to be good or better.

Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating

There will be a staff impact through the deletion of seven posts from the establishment. These posts are currently filled by agency workers so there will be no reduction in the number of permanent staff or redundancy but the reduction in posts may have an impact on remaining staff.

There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme.

Consultation feedback has identified potential priorities for any targeted zonal cutting regimes if required

Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs

E&E will work with the corporate Organisational Development team in mitigating this impact

Stage 5: Assessing Impact and Analysis

10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Adverse	Positive	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)	✓	✓	Longer grass could potentially cause a nuisance for residents, also may be hidden objects in longer grass. Impact on staff is a reduction in numbers – but does not disproportionately affect one or more protected characteristic.	Due to the fact that pedestrians are not expected to be walking on verges there is no direct implications The potential negative impacts are limited to aesthetics. Monitor Service Requests through the Council's 'Collective' computer system which is used to monitor the queries and response time to rectify.
Disability (including carers of disabled people)	✓		Longer grass could potentially affect mobility for people with mobility and visual impairments. Impact on staff is a reduction in numbers – but does not disproportionately affect one or more protected characteristic.	Due to the fact that pedestrians are not expected to be walking on verges there is no direct implications The potential negative impacts are limited to aesthetics. Monitor Service Requests through the Council's 'Collective' computer system which is used to monitor the queries and response time to rectify.
Gender			No disproportionate adverse effect.	
Reassignment			No disproportionate adverse effect.	
Marriage and Civil Partnership			No disproportionate adverse effect.	
Pregnancy and Maternity			No disproportionate adverse effect.	
Race			No disproportionate adverse effect.	
Religion or Belief			No disproportionate adverse effect.	
Sex			No disproportionate adverse effect.	
Sexual orientation			No disproportionate adverse effect.	

11. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?		Yes	No	X
If yes, which Protected Characteristics could be affected and what is the potential impact?				
11a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?		Yes	No	X
If verges are left untidy, this could devalue surrounding properties.				
If yes, what is the potential impact and how likely is to happen?				
12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation				
	Age (including carers)			
Yes				
No	X	X	X	X
13. you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)				
If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.				
<ul style="list-style-type: none"> If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4) If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4) 				
Stage 6: Decision				
13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)				
Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.				X
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List</i>				

<i>the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals.	

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
Ability & Age Possibility that the increased verge cutting frequency may affect appearance of streets and people with other mobility impairments and/or those with visual impairments	Monitor deployment of mobile and amend work schedules to meet variable demand. Monitor Service Requests through the Council's 'Collective' computer system which is used to monitor the queries and response time to rectify.	The Collective system captures all service requests and is used to monitor the response time to rectify.		Michael Wynne	

Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? *(Also Include in Improvement Action Plan at Stage 7)*

As well as in house monitoring through the creation of random inspections via the Collective system, further monitoring of street cleansing performance is undertaken by an independent external body on 3 occasions per year.

<p>16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>A full breakdown of performance, causes of litter, and class performance is provided as part of the external monitoring and assessment of cleansing performance. This will be reviewed and appropriate adjustments made.</p>	
<p>17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>Full consultation analysis to be completed</p>	
<p>Stage 9: Public Sector Equality Duty</p>		
<p>18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.</p>		
<p>(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)</p>		
<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010</p>	<p>Advance equality of opportunity between people from different groups</p>	<p>Foster good relations between people from different groups</p>
<p>N/a</p>	<p>N/a</p>	<p>N/a</p>

Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)
are completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

<p>19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p>	<p>Mick Wynne</p>	
<p>Signed: (Lead officer completing EqIA)</p>	<p>Signed: (Chair of DETG)</p>	<p>Hanif Islam</p>
<p>Date:</p>	<p>Date:</p>	<p></p>
<p>Date EqIA presented at the EqIA Quality Assurance Group</p>	<p>Signature of ETG Chair</p>	<p>PP Hanif Islam</p>
<p>28/01/2015</p>	<p>13/01/2015</p>	<p></p>

Appendix 1

Consultees

Afghan Association of London (Harrow)	Jaago Punjabi Women's Group	Parkfield Football Club
Association of Senior Muslim Citizens	Pinner Association	Parkfield Youth FC
Gujarati Arya Association	Wealdstone Active Community	Pinner Albion FC
Harrow Bengalee Association	ADHD and Autism Support Harrow	St Josephs Youth FC
Harrow Iranian Community Association (HICA)	Mind in Harrow	Stanmore Manor FC
Harrow Tamil Association	National Osteoporosis Society Middlesex Group	Three Wishes Exiles
Indian Association of Harrow	Rethink: Harrow Support Group	Venceremos FC
Nepalese British Community UK	Friends of Bentley Priory Nature Reserve	APB FC
Pakistan Society of Harrow	Friends of Canons Park	Lankians CC
Russian Immigrants Association	Friends of West Harrow Park	Pinner Challengers CC
The Harrow African Caribbean Association (HACAS)	Harrow Youth Parliament	Pinner Cricket Club
UK Asian Women's Conference (North London)	Capable Communities Ltd.	South Harrow CC
Harrow in Business (HiB)	The Wish Centre	Tamil Union CC
Canons Community Association	The Stanmore Society	West Harrow CC
Harrow Association of Disabled People	Bessborough Cricket Club	Yarl CC
Harrow in Leaf	Harrow Rugby Football Club	Youth Wing CC
Middlesex Association for the Blind	Harrow St. Mary's Youth Football Club	Culver Bowls Club
Harrow Heritage Trust	Pinner Cricket Club	Harrow Weald Bowls Club
North West London Lesbian & Gay Group (NWLLG)	Pinnstars Football Club	Pinner Bowls Club
Harrow Civic Residents' Association (HCRA)	Harrow Mencap	Stanmore Bowls Club
Hatch End Association	Harrow Over 50 club	Pinner & Grammarians Rugby Football Club
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Harrow Community Transport	
Harrow Association of Voluntary Service	Harrow Centre for Volunteering	
Voluntary Action Harrow	Harrow Volunteer Centre	
Angolan Civic Communities Alliance (ACCA)	Harrow Women's Centre	
Harrow	Headstone Manor Youth Football Club	
British Afghan Women's Society	Parkfield Youth Football Club	
Harrow Association of Somali Voluntary Organisations (HASVO)	Pinner Albion Football Club	
Harrow Bengalee Association	Pinner Jewish Football Club	
Harrow Equalities Centre	Stanmore Football Club	
Harrow Somali Cultural & Educational Association	Age Concern Harrow	
	Harrow Mencap	
	CAPRA Canons Park Residents Association	
	Harrow Nature Conservation Forum	
	Harrow St Mary's	
	Kenton Town FC	

This page is intentionally left blank

Appendix 5: Garden Waste

Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other	✓	Other	
<p>Title of Project: Change mixed organic waste collection system with separate collection of food waste and introduce charges for garden waste from 1st October 2015.</p>			
<p>30 rectorate / Service responsible: E&E</p>			
<p>31 Name and job title of lead officer: Alan Whiting</p>			
<p>Name & contact details of the other persons involved in the assessment: David Corby, Sajni Durve</p>			
<p>Date of assessment: 14/01/2015</p>			
Stage 1: Overview			
<p>1. What are you trying to do? (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>		<p>The proposal is to alter the current garden waste recycling collection to a chargeable service. The introduction of charges for garden waste collections will enable protecting of key front line services such as social care. A number of Boroughs currently charge for this service and it is expected that more will follow in the near future etc. The new proposal will change the brown (organic waste) bin system to a separate free collection of food waste and a charged collection for garden waste. Provision of a weekly food collection only to the 74,000 households the container will collect food waste separately for disposal to an AD facility. Before introduction all users will receive a letter detailing the changes. Any language barriers will be mitigated by a well-designed and flexible communications</p>	

strategy and action plans put in place.

Residents / Service Users	Partners	Stakeholders
Staff	Age	Disability
Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
Race	Religion or Belief	Sex
Sexual Orientation	Other	

2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)

3. Is the responsibility shared with another directorate, authority or organisation? If so:

- Who are the partners?
- Who has the overall responsibility?
- How have they been involved in the assessment?

Stage 2: Evidence / Data Collation

4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the action below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Borough wide 2011 census data (see data below) shows that Harrow has a fairly significant elderly population with 14.1% over the age of 65. Pensioners on low income may have difficulty financing the new paid-for service. There may be difficulty for older people with mobility impairments and/or impaired vision to travel to the CA site.

Borough – wide age structure statistics from 2011 census

Harrow	2011 Data	2011 %	2011 Rank - National
All usual residents	239,056		
0 - 4	15,916	6.7	76
5 - 7	9,007	3.8	40
8 - 9	5,414	2.3	87
10 - 14	14,590	6.1	96
15	3,131	1.3	83
16 - 17	6,604	2.8	34
18 - 19	5,369	2.2	192
20 - 24	16,066	6.7	89
25 - 29	19,345	8.1	47
30 - 44	53,358	22.3	45
45 - 59	44,579	18.6	277
60 - 64	12,010	5	301
65 - 74	17,420	7.3	287
75 - 84	11,659	4.9	283
85 - 89	2,982	1.2	288
90 & over	1,606	0.7	252
Average Age (Mean)	37.6		287
Median Age	36		284

Age (including carers of young/older people)

303

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

Disability (including carers of disabled people)

If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents with mobility and visual impairments.

Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or Disability for all Households

Harrow	2011	2011	2011	2011	2011
	Data	%	Rank - National	Rank - London	
All households	84,268				
Households with:					
No adults in employment with dependent children	3,675	4	116	24	
No adults in employment with no dependent children	18,788	22	324	15	
Dependent children of all ages	30,670	36	6	5	
Dependent children aged 0 - 4	12,435	15	24	13	
One person in household with a long-term health problem or disability: With dependent children	5,038	6	20	6	
One person in household with a long-term health problem or disability: No dependent children	15,285	18	293	10	
One or more person with a limiting long-term illness	N/A	N/A	N/A	N/A	N/A

No data collected. Unlikely to have an adverse disproportionate effect.

No data collected. Unlikely to have an adverse disproportionate effect.

No full data held however a recent survey indicates that 2% of responders have been pregnant and / or on maternity leave during the past 2 years. There may be difficulty traveling to the CA site.

If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents affected by pregnancy and maternity.

Data collected. Unlikely to have an adverse disproportionate effect.

Gender Reassignment	No data collected. Unlikely to have an adverse disproportionate effect.
Marriage / Civil Partnership	No data collected. Unlikely to have an adverse disproportionate effect.
Pregnancy and Maternity	No full data held however a recent survey indicates that 2% of responders have been pregnant and / or on maternity leave during the past 2 years. There may be difficulty traveling to the CA site.
Race	If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents affected by pregnancy and maternity. Data collected. Unlikely to have an adverse disproportionate effect.

Religion and Belief	Data collected. Unlikely to have an adverse disproportionate effect.
Sex / Gender	Data collected. Unlikely to have an adverse disproportionate effect.
Sexual Orientation	No data collected. Unlikely to have an adverse disproportionate effect.
Socio Economic	Some residents may not be able to afford the new proposed fees and therefore may need to travel to the CA site to dispose of garden waste. This may prove difficult for those who cannot afford the cost of travelling to the CA site. Furthermore, this may lead to an increased disposal of waste on streets which could lead to fly tipping, increased crime perception, infestations, blocking access and devaluing areas.

	<p>and online web survey</p> <p>7 Roadshows and 10 Drop in sessions held across Harrow and attendance at 50 Community Group meetings across Harrow resulting in 361 face to face in depth conversations</p> <p>Translated documents on the web and in hard copy</p> <p>Easy read of the consultation booklet and survey</p> <p>Information on Facebook, Twitter and 4 responses received by video</p>	<p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration. However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:</p> <ul style="list-style-type: none"> - Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and - Close or reduce some of the Council's early support services to families, including Children's Centres. <p>Formal Letters</p> <p>23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals</p> <p>Petitions</p> <p>No petitions were received in respects of this proposal.</p> <p>Harrow Youth Parliament</p> <p>The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.</p>	
--	---	--	--

--	--	--	--	--

6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?

None

List the Title of reports / documents and websites here.

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	X	X							
No			X	X	X	X	X	X	X

YES - If there is a risk of disproportionate adverse impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

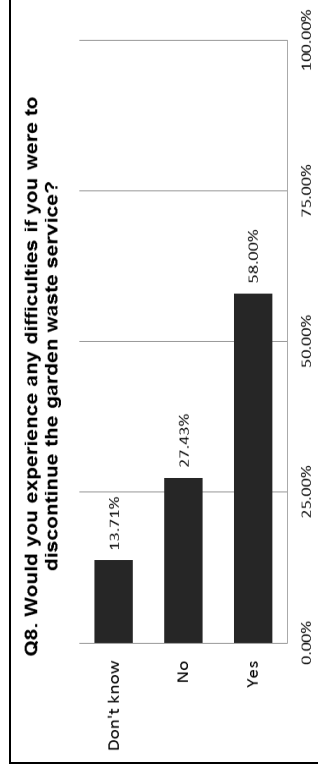
Best Practice: You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA. It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

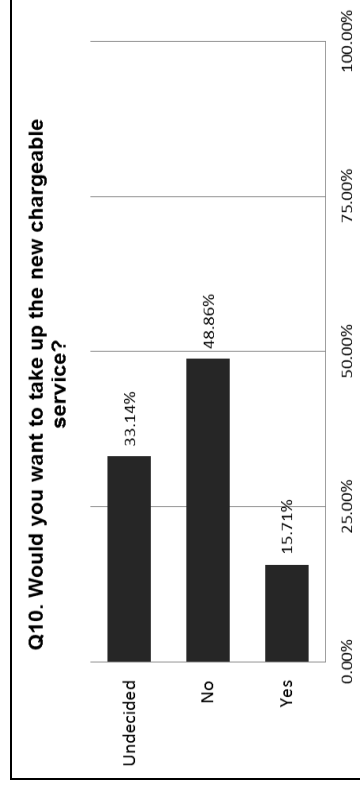
Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

When asked if difficulties would be experienced if we were to discontinue the garden waste service, just over half (58%), said yes. (There is a high proportion of over 65s in this group)



When asked if they would take up the new chargeable service, almost half of the respondents (49%) said no, with a third undecided, and 16% saying yes. (There is a high proportion of under 45s white and asian in the NO group)

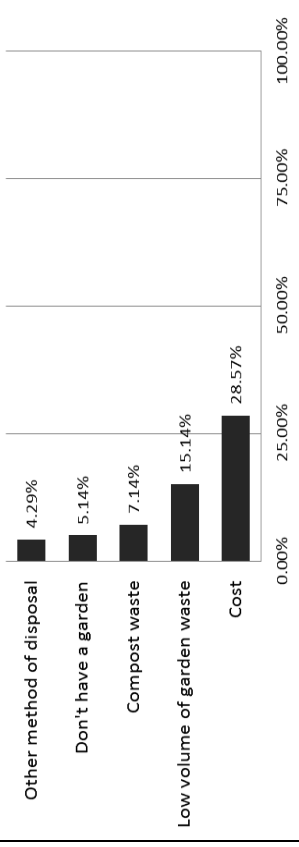


When asked why they wouldnt subscribe to this service, cost was the most requent response, made by 29% of the sample. (High proportion of under 45s)

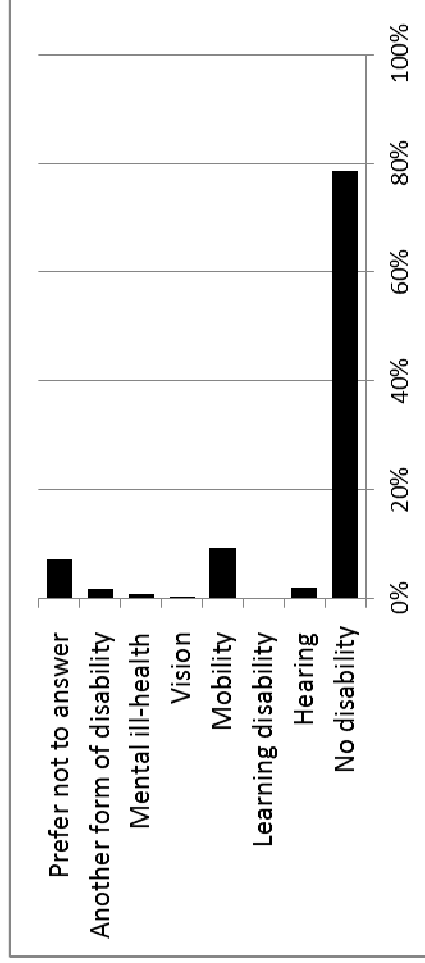
8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage

310 include this evidence, including any data, statistics, titles of documents and website links here)

Q11. Why wouldn't you subscribe to the service?



Are your day-to-day activities limited because of a health problem or disability which has lasted or is expected to last at least 12 months?



This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation)

Community Champions Housing Tenants Key Community groups	An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.	Over 50% of respondents consider the current service to be good or better. Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating The results of the consultation underline the need for a comprehensive communications campaign relating to the service, careful consideration of a concessionary charging scheme and scaleability of service provision to meet an uncertain level of demand. All of these factors will be considered during the development and implementation of the scheme	with the affected groups, revising your proposals).
Stage 5: Assessing Impact and Analysis			
10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?			

Protected Characteristic	Adverse ✓	Positive ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)	✓		Pensioners on low income may have difficulty financing the new paid-for service. The only other option would be to drop waste at CA site. This may prove difficult for elderly / vulnerable residents.	Implement concessionary rates for low income retirees. Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA
Disability (including carers of disabled people)	✓		If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents with mobility and visual impairments.	Implement concessionary rates for low income residents with impairments. Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA
Gender Reassignment			No disproportionate adverse impact.	
Marriage and Civil Partnership			No disproportionate adverse impact.	
Pregnancy and Maternity	✓		If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for pregnant residents.	This is a low volume group. Monitor impact

Race			No disproportionate adverse impact.				
Religion or Belief			No disproportionate adverse impact.				
Sex			No disproportionate adverse impact.				
Sexual orientation			No disproportionate adverse impact.				
Socio Economic			There may be a general impact regarding the ability to afford the service. Although age and disability are identified there may be other groups disadvantaged				Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA
			Change in working practice may have implications to staff working practice				Undertake Health and Safety and method of work assessment prior to go-live Ensure correct training is delivered to staff
11. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?				Yes	No		X
<i>If yes, which Protected Characteristics could be affected and what is the potential impact?</i>							
11a. Any Other Impact – Considering what else is happening within the Council and				Yes	No		X

Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?

If yes, what is the potential impact and how likely is to happen?

12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? *(Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation*

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	X	X			X				
No			X	X		X	X	X	X

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

315

the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

- If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. **(select outcome 4)**
- If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. **(select outcome 4)**

Stage 6: Decision

13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.

Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. *List the actions you propose to take to address this in the Improvement Action Plan at Stage 7*

Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. **(Explain this in 13a below)**

X

Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals.	The results of the consultation underline the need for a comprehensive communications campaign relating to the service, careful consideration of a concessionary charging scheme and scalability of service provision to meet an uncertain level of demand. All of these factors will be considered during the development and implementation of the scheme

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
Disability Age	Introduction of concessionary pricing	Service take-up	October 2015	Alan Whiting	
Pregnancy and Maternity	Monitor impact to this group	Monitor through the 'Waste Collector' computer system	October 2015	Alan Whiting	
Socio Economic	Review EQIA to clarify policy of introduction of concessionary pricing for the service	Delivery of revised EQIA	April 2015	Dave Corby	

316

Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	In house monitoring through Service requests from the 'Waste Collector' computer system and Council complaints.
16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Internal monitoring
17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	Full consultation analysis to be completed

Stage 9: Public Sector Equality Duty

18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups. (Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)	Foster good relations between people from different groups	
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups
31	N/a	N/a

Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?		
Signed: (Lead officer completing EqIA)	Alan Whiting	Signed: (Chair of DETG)
Date:	14/01/2015	Date:
Date EqIA presented at the EqIA Quality Assurance Group	28/01/2015	Signature of ETG Chair
		Hanif Islam
		PP Hanif Islam

Appendix 1

Consultees

Afghan Association of London (Harrow)	Wealdstone Active Community	Stanmore Manor FC
Association of Senior Muslim Citizens	ADHD and Autism Support Harrow	Three Wishes Exiles
Gujarati Arya Association	Mind in Harrow	Venceremos FC
Harrow Bengalee Association	National Osteoporosis Society Middlesex Group	APB FC
Harrow Iranian Community Association (HICA)	Rethink: Harrow Support Group	Lankians CC
Harrow Tamil Association	Friends of Bentley Priory Nature Reserve	Pinner Challengers CC
Indian Association of Harrow	Friends of Canons Park	Pinner Cricket Club
Nepalese British Community UK	Friends of West Harrow Park	South Harrow CC
Pakistan Society of Harrow	Harrow Youth Parliament	Tamil Union CC
Russian Immigrants Association	Capable Communities Ltd.	West Harrow CC
The Harrow African Caribbean Association (HACAS)	The Wish Centre	Yarl CC
UK Asian Women's Conference (North London)	The Stanmore Society	Youth Wing CC
Harrow in Business (HiB)	Bessborough Cricket Club	Cuiver Bowls Club
Canons Community Association	Harrow Rugby Football Club	Harrow Weald Bowls Club
Harrow Association of Disabled People	Harrow St. Mary's Youth Football Club	Pinner Bowls Club
Harrow in Leaf	Pinner Cricket Club	Stanmore Bowls Club
Middlesex Association for the Blind	Pinnstars Football Club	Pinner & Grammarians Rugby Football Club
Harrow Heritage Trust	Harrow Mencap	
North West London Lesbian & Gay Group (NWLLG)	Harrow Over 50 club	
Harrow Civic Residents' Association (HCRA)	Harrow Community Transport	
Hatch End Association	Harrow Centre for Volunteering	
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Harrow Volunteer Centre	
Harrow Association of Voluntary Service	Harrow Women's Centre	
Voluntary Action Harrow	Headstone Manor Youth Football Club	
Angolan Civic Communities Alliance (ACCA)	Parkfield Youth Football Club	
Harrow	Pinner Albion Football Club	
British Afghan Women's Society	Pinner Jewish Football Club	
Harrow Association of Somali Voluntary Organisations (HASVO)	Stanmore Football Club	
Harrow Bengalee Association	Age Concern Harrow	
Harrow Equalities Centre	Harrow Mencap	
Harrow Somali Cultural & Educational Association	CAPRA Canons Park Residents Association	
Jaago Punjabi Women's Group	Harrow Nature Conservation Forum	
Pinner Association	Harrow St Mary's	
	Kenton Town FC	
	Parkfield Football Club	
	Parkfield Youth FC	
	Pinner Albion FC	
	St Josephs Youth FC	

This page is intentionally left blank

APPENDIX 6 – PROPOSED PARKS MAINTENANCE SCHEDULE

ENVIRONMENT AND ENVIRONMENT PROPOSED PARKS MAINTENANCE SCHEDULE

Table 1: Parks Service Standards per designation type

Parkland	Open Spaces
Hedge and shrub pruning up to twice a year CURRENTLY UP TO 3 TIMES	Hedge and shrub pruning up to twice a year CURRENTLY UP TO 3 TIMES
Leaf clearance once a year	Leaf clearance once a year
Empty litter bins once a week CURRENTLY EMPTIED TWICE WEEKLY ALONG WITH LITTER PICKING OF THE PARK, WHICH WILL ALSO REDUCE TO ONCE PER WEEK. THIS WILL ALSO APPLY TO DOG BINS IF EMPTYING OF DOG BINS COMES BACK IN HOUSE	Empty litter bins once a week CURRENTLY EMPTIED TWICE WEEKLY ALONG WITH LITTER PICKING OF THE PARK, WHICH WILL ALSO REDUCE TO ONCE PER WEEK. THIS WILL ALSO APPLY TO DOG BINS IF EMPTYING OF DOG BINS COMES BACK IN HOUSE
General inspection of playgrounds and infrastructure once every 3 months CURRENTLY INSPECTED MONTHLY	General inspection of playgrounds and infrastructure once every 3 months CURRENTLY INSPECTED MONTHLY
Strimming of high visibility boundary areas every 3 weeks during growing season (March to October depending on seasonal changes) CURRENTLY CUT EVERY 3 WEEKS	Strimming of high visibility path boundaries every 3 weeks during growing season (March to October depending on seasonal changes). CURRENTLY CUT EVERY 3 WEEKS
Grass cutting every 6 weeks CURRENTLY CUT EVERY 3 WEEKS	Grass cut once a year forage cut CURRENTLY CUT EVERY 3 WEEKS
Rake Play bark areas once a week	Rake Play bark areas once a week
Grass cutting every 6 weeks during growing season (March to October depending on seasonal changes) CURRENTLY DONE ON A 3 WEEKLY CYCLE	Cut grass on park path and boundary every 3 weeks during growing season (March to October depending on seasonal changes) CURRENTLY DONE ON A 3 WEEKLY CYCLE
Pond clearance once a month	Pond clearance every 3 months
Shrub and flower beds are mulched once a year	No mulching of beds
Mechanical sweeping once a month	

Note: Due to funding criteria, Canons Park will retain the current maintenance regimes. Countryside Parks, Nature Reserves and Woodland already have separate maintenance regimes that are not affected by these proposals

Table 2: Parks by designation type

Parkland	Open Spaces	Country Parks, Nature Reserves & Woodland
Alexandra Park	Brockhurst Corner	Bentley Priory
Bernays Gardens	Brockley Hill	Belmont Rattler
Byron Recreation Ground	Church Fields	Brewery Reservoir Open Space
Cedars O.S.	Chrutchurch Avenue Open Space	Church Farm
Centenary Park	Cuckoo Hill Open Space	Glenthorne
Chandos Recreation Ground	Croft	Grimsdyke Open Space
Harrow Recreation Ground	Elms Road Open Space	Harrow Weald Common
Harrow Weald Recreation Ground	Greenway	Pinner Park Farm
Hatch End Playing Fields	Grove Fields	Roxbourne Rough
Headstone Manor	Harrow Garden Village	Stanmore Common
Hooking Green	Kenton Recreation Ground	Stanmore Country Park
John Rumney	Lake Grove	
Lowlands Recreation Ground	Little Common Pinner	
Melbourne Ave	Little Common Stanmore	
Montesoles P.F.	Lynwood Close Open Space	
Pinner Memorial Park	Montrose Walk	
Priestmead Recreation Ground	Newton Ecology Park	
Queensbury Recreation Ground	Newton Park West	
Rayners Mead	Pinner Recreation Ground	
Roxbourne Park	Pinner Village Gardens	
Roxeth Recreation Ground	Ridgeway Playing Fields	
Saddlers Mead	River Pinn Open Space	
Shaftesbury P.F.	Streamside	
Stanmore Marsh	Sylvia Avenue Open Space	
Stanmore Recreation Ground	Thackery Close Open Space	
Weald Village	Tookes Green	
West Harrow Recreation Ground	Whitchurch Playing Fields	
	Whitefriars Open Space	
	Woodlands	
	Yeading Walk	

Note: Due to funding criteria, Canons Park will retain the current maintenance regimes. Countryside Parks, Nature Reserves and Woodland already have separate maintenance regimes that are not affected by these proposals

APPENDIX 7 - CURRENT PARKS LOCKING SCHEDULE

ENVIRONMENT AND ENTERPRISE

Parks & Open Spaces

List of Parks Locking Schedule

Park Name	Address
Alexandra Park	Alexandra Avenue, South Harrow
Beacon Centre ***	Rayners Lane
Bernays Gardens	Church Lane, Stanmore
Byron Recreation Ground	Peel Road, Wealdstone
Canons Park**	Donnerfield Avenue, Edgware
Carpenders Park Cemetery ***	Oxhey Lane
Cedars	Uxbridge Road, Harrow Weald
Centenary Park	Culver Grove, Stanmore
Chandos Recreation Ground	Camrose Avenue, Edgware
Eastcote Cemetery	Eastcote Lane, South Harrow
Harrow Cemetery	Pinner Road
Harrow Recreation Ground	Hindes Road, Harrow
Harrow Weald Cemetery	Clamp Hill, Stanmore
Harrow Weald Recreation Ground	High Road, Harrow Weald
Headstone Manor*	Pinner View
Kenton Recreation Ground*	Carlton Avenue, Kenton
Lake Grove	Dalkeith Grove, Edgware
Little Common	Elms Park Road, Pinner
Montesoles Playing Fields	Uxbridge Road, Pinner
Paines Lane Cemetery	Paines Lane, Pinner
Pinner Memorial Park	West End Lane, Pinner
Pinner New Cemetery	Pinner Road, Harrow HA5 5RH
Pinner Village Gardens	Marsh Road, Pinner
Priestmead Recreation Ground	Hartford Avenue, Kenton
Queensbury Park	Clifton Road, Kenton
Rayners Mead	Imperial Drive, Pinner
Roxbourne Park	Cannon Lane, Pinner
Roxeth Recreation Ground	Kingsley Road, South Harrow
Saddlers Mead	Clonard Way, Hatch End
Shaftsbury Playing Fields	Grimsdyke Road, Hatch End
Stanmore Recreation Ground	Stanmore Hill, Stanmore
The Croft	Cannonbury Avenue, Pinner
Wealdstone Cemetery	Byron Road, Wealdstone, HA7 3JR
West Harrow Recreation Ground*	Butler Road, West Harrow
Whitefriars	Whitefriars Avenue, Harrow Weald

* car park only locked; park is still accessible

** walled garden only locked; park is still accessible

*** locked under local arrangement

This page is intentionally left blank

APPENDIX 7 - CURRENT PARKS LOCKING SCHEDULE

ENVIRONMENT AND ENTERPRISE

Parks & Open Spaces

List of Parks & Open Spaces within Harrow

Park Name	Address	Locked
Alexandra Park	Alexandra Avenue, South Harrow	Yes
Belmont Rattler	Christchurch Avenue, Kenton	
Bentley Priory	Old Lodge Way, Stanmore	
Brockley Hill OpenSpace	Brockley Hill	
Bernays Gardens	Church Lane, Stanmore	Yes
Boulevard Gardens	Pinner Road	
Brewery Reservoir Open Space	The Common, Stanmore	
Bridge Street Gardens	Bridge Street, Pinner	
Brockhurst Corner	Clamp Hill, Stanmore	
Byron Recreation Ground	Peel Road, Wealdstone	Yes, but park still accessible from open boundary with Leisure Centre car park
Canons Park	Donnerfield Avenue, Edgware	Yes, walled garden only. Park still accessible
Cedars	Uxbridge Road, Harrow Weald	Yes
Centenary Park	Culver Grove, Stanmore	Yes
Chandos Recreation Ground	Camrose Avenue, Edgware	Yes
Christchurch Avenue Open Space	Christchurch Avenue	
Church Farm		
Church Fields	Bessborough Road, Harrow on the Hill	
Cuckoo Hill Open Space	Cuckoo Hill	
Eastcote Cemetery	Eastcote Lane, South Harrow	Yes
Elms Road Open Space	Elms Road, Harrow Weald	
Glenthorne	Common Road, Stanmore	
Greenway Open Space	Greenway, Pinner	
Grimsdyke Open Space	Old Redding, Harrow Weald	
Grove Fields	Lowlands Road	
Harrow Cemetery	Pinner Road	Yes
Harrow Garden Village	Rayners Lane	
Harrow Recreation Ground	Hindes Road, Harrow	
Harrow Weald Cemetery	Clamp Hill, Stanmore	Yes
Harrow Weald Cemetery Extension	Clamp Hill, Stanmore	Yes
Harrow Weald Cemetery Woods	Clamp Hill, Stanmore	
Harrow Weald Common	Old Redding	
Harrow Weald Recreation Ground	High Road, Harrow Weald	Yes
Headstone Manor	Pinner View	Yes, car park only. Park still accessible
Hooking Green Open Space	Hooking Green	
Kenmore Park	Kenmore Avenue, Kenton	
Kenton Recreation Ground	Carlton Avenue, Kenton	Yes, car park only. Park still accessible
Lake Grove	Dalkeith Grove, Edgware	Yes
Little Common	Elms Park Road, Pinner	
Little Common	Wood Lane, Stanmore	
Lowlands	Lowlands Road	
Lynwood Close Open Space	Lynwood Close	
Melbourne Avenue Open Space	Melbourne Avenue	
Montesoles Playing Fields	Uxbridge Road, Pinner	Yes
Montrose Walk	Gordon Avenue, Stanmore	
Newton Ecology Park	Alexandra Avenue	
Newton Park West	Alexandra Avenue	
Paines Lane Cemetery	Paines Lane, Pinner	Yes
Pinner Memorial Park	West End Lane, Pinner	Yes
Pinner New Cemetery	Pinner Road, Harrow HA5 5RH	Yes
Pinner Park Farm	George V Avenue	
Pinner Village Gardens	Marsh Road, Pinner	Yes
Priestmead Recreation Ground	Hartford Avenue, Kenton	Yes
Queensbury Park	Clifton Road, Kenton	Yes
Rayners Mead	Imperial Drive, Pinner	Yes
Ridgeway Playing Fields	Ridgeway	
River Pinn Open Space	West End Lane, Pinner	
Roxbourne Park	Cannon Lane, Pinner	Yes

Park Name	Address	Locked
Roxbourne Rough	Cannon Lane, Pinner	
Roxeth Burial Ground	Roxeth Hill	
Roxeth Recreation Ground	Kingsley Road, South Harrow	
Saddlers Mead	Clonard Way, Hatch End	Yes
Shaftsbury Playing Fields	Grimsdike Road, Hatch End	Yes
Stanmore Common	Warren Lane, Stanmore	
Stanmore Country Park	Dennis Lane, Stanmore	
Stanmore Marsh	Marsh Lane, Stanmore	
Stanmore Recreation Ground	Stanmore Hill, Stanmore	
Streamside	Village Way, Rayners Lane	
Streamside Reservation	Village Way, Rayners Lane	
Sylvia Avenue Open Space	Sylvia Avenue, Hatch End	
Thackery Close Open Space	Thackery Close	
The Croft	Cannonbury Avenue, Pinner	Yes
The View Point	Old Redding	
Weald Village	The Middle Way, Harrow Weald	
Tookes Green	Tookes Green	
Wealdstone Cemetery	Byron Road, Wealdstone, HA7 3JR	Yes
West Harrow Recreation Ground	Butler Road, West Harrow	Yes, car park only. Park still accessible
Whitchurch Playing Fields	Wemborough Road, Stanmore	
Whitefriars	Whitefriars Avenue, Harrow Weald	Yes
Woodlands Open Space	Woodlands, North Harrow	
Yeading Walk	Suffolk Road, Rayners Lane	

REPORT FOR: **CABINET**

Date of Meeting:	19 February 2015
Subject:	Housing Revenue Account Budget 2015-16 and Medium Term Financial Strategy 2016-17 to 2018-19
Key Decision:	Yes
Responsible Officer:	Simon George, Director of Finance and Assurance Paul Najsarek, Corporate Director of Community, Health and Wellbeing
Portfolio Holder:	Councillor Glen Hearnden, Portfolio Holder for Housing Councillor Sachin Shah, Portfolio Holder for Finance and Major Contracts
Exempt:	No
Decision subject to Call-in:	Yes, except for the Recommendations to Council
Wards affected:	All
Enclosures:	Appendix 1 – HRA Budget 2015-16 Appendix 2 – Average Rents & Service Charges (Tenants) Appendix 3 – Garage & Parking Space Charges Appendix 4 – Facility Charges Appendix 5 – Water charges Appendix 6 – Community Centre Charges Appendix 7 – Capital Programme Appendix 8 – HRA Growth Fund Bid

Section 1 – Summary and Recommendations

This report sets out the Housing Revenue Account (“HRA”) Budget for 2015-16 and Medium Term Financial Strategy (“MTFS”) for 2016-17 to 2018-19.

Recommendations:

- 1) That Cabinet approves:
 - a. the Medium Term Financial Strategy for the HRA as attached in Appendix 1;
 - b. the proposed increase of 2.2% to housing rent charges for 2015-16, resulting in an average rent of £114.97 per week for 2015-16;
 - c. a service charge increase of 2.2% (an average of £0.06) resulting in an average tenant service charge of £2.91 per week;
 - d. that garage and car parking rents be frozen for a further year pending development of a usage and differential charging policy (Appendix 3);
 - e. an increase in energy [heating] charges of 5% from 1 April 2014 as detailed in Appendix 4;
 - f. an increase in annual water charges of 4% as detailed in Appendix 5;
 - g. increases in Community Centre charges of 4% as set out in Appendix 6;
 - h. The four year capital programme set out in Appendix 7
- 2) That Cabinet recommends Council approve:
 - a. The HRA Budget for 2015-16;
 - b. The HRA capital programme (as detailed in appendix 7)

Reason: (For recommendation)

To publish the final HRA budget and set Council rents and other charges for 2015-16

Section 2 – Report

Introductory paragraph

The Council has a statutory obligation to agree and publish the HRA budget for 2015-16. This report sets out the budget proposals along with the MTFs to 2018-19, which sets out the indicative income and expenditure for the HRA for this period and shows how the income collected will be spent in the management and maintenance of the Council's stock and in meeting its landlord obligations. The MTFs indicate a sustainable position in the medium term, consistent with the updated 30 year HRA business plan approved by Cabinet in July 2014.

Options considered

Alternative rent options were considered during the preparation of this report and were consulted on at a meeting of the Tenants, Leaseholders and Residents' Consultative Forum on 7th October 2014. The view expressed was not to change from the current rent-setting policy.

Background

1. Cabinet received a report in July 2014 that set out the updated 30-year business plan for the HRA. This report updated the HRA element of the Housing business plan approved in June 2013, and set out a 30-year forecast of the income and expenditure anticipated to occur within the HRA, based on an agreed set of assumptions.
2. The starting point for the updated business plan was the HRA budget and MTFs approved by Cabinet in February 2014, and the first four years of the plan mirrored the MTFs. Thereafter, a set of fairly prudent assumptions were used to project income and expenditure for the remainder of the 30-year period. The cash flows resulting from the projections indicated that the HRA remained in a very sound position and was forecast to generate significant balances over the life of the business plan.
3. Further work has been undertaken regarding the options available to the Council to deliver new affordable housing, and to deliver estate regeneration within the HRA. This has resulted in approval being granted to commence work on developing a comprehensive set of proposals to regenerate the Grange Farm estate, as well as further proposals for a modest Purchase and Repair programme and phase 2 of the HRA development programme being developed. Phase 1 of the HRA development programme is anticipated to be on site towards the end of 2014-15.
4. The business plan is intended to form a framework within which future budgets are set, and the budget and MTFs information

contained within this report are largely in line with the forecasts contained within the business plan approved in July. Some minor variations have resulted from changes in inflation used to calculate rent increases, changes to the assumed levels of Right-to-Buy sales, and from pressures within some of the budgets. This is to be expected, as the business plan should be a guide to future budgets, and must retain the ability to flex to meet changing requirements.

5. A further change that has impacted on the HRA is the changes to national rent-setting policy proposed last year and subsequently confirmed in 2014. These changes mean that the rent convergence process that has been going on since 2001 has now ceased following the 2014-15 increase, and that the basis for rent increases from 2015-16 onwards is now the Consumer Prices Index (CPI) plus 1% each year, rather than the Retail Prices Index (RPI) plus 0.5% plus £2 each year until convergence was reached. As previously the inflation figure is as at September of the previous year.

The inflation figures we had used in constructing the MTFs and Business Plan had already assumed that the government would seek to implement some form of reduction in the long-term inflation uplift, and so the HRA was not badly affected by this change, and remains in a sound position. For the purposes of this budget, we are assuming increases based on CPI + 1%, but have considered and modelled several alternative rent scenarios based on varying rates of CPI, as well as whether rent policy is likely to change further following the end of the government's 10-year "guarantee" period.

6. The HRA budget and MTFs detailed in Appendix 1, is based on these principles, and is consistent with the approved 30 year business plan for the HRA approved by Cabinet in July 2014. The HRA budget proposed reflects the costs of delivering services at current levels and takes account of areas of identified pressures and savings.
7. The key assumptions that continue to underpin the financial strategy are set out in the following sections.

Consultation

8. Under s.105 of the Housing Act 1985, the Council is required to maintain arrangements as it considers appropriate to enable secure tenants to be informed and consulted about housing management matters which substantially affect them. However, rent and other charges for facilities are specifically excluded from the definition of housing management; therefore there is no statutory requirement to consult secure tenants on proposed rent changes. The Council has however, always consulted through the Tenants' Leaseholders' and Residents' Consultative Forum (TLRCF).

9. The TLRCF has the remit to consider and submit observations to Cabinet on the annual HRA budget and in particular on the consequent rent implications. At the TLRCF meeting held on 7th October 2014, a report was presented outlining several rent options that the Council could potentially adopt for 2015-16, and seeking guidance from the meeting as to whether there was any wish to consider an option other than compliance with national policy (the Council's existing strategy). There was no evidence at the meeting of any desire to change the current policy, so this has been assumed to continue for the purposes of this report.

Balances

10. HRA Balances are currently forecast to be £4.4m at the end of March 2015. The budget estimates that balances in the region of £5.0m will remain at the end of March 2016. Increased depreciation charges in the last two years have already had the effect of moving resources out of the revenue account and into the Major Repair Reserve for capital funding purposes, meaning less contributions from revenue are now required.
11. Over the period of the MTFs, balances are estimated to increase to around £7.5m, or around 21% of gross annual income. Decisions regarding future levels of balances need to be taken in conjunction with considerations around future levels of capital investment, availability of Right-to-Buy receipts for use in the HRA, the Council's plans for new affordable housing as these become more developed, and the potential impact of welfare reform as the proposals are phased in. It is felt that a prudent minimum level of balances would be in the region of 4.5-6% of gross income, approximately £1.5 - £2.0m in today's prices, though this will depend on the level of risk at any given point and will need to be reviewed periodically.

Income

Dwelling rents

12. As indicated above, TLRCF considered several options for setting rents in 2015-16 at its meeting in October 2014, but there was no suggestion that there should be any change from current rent policy for setting rents, i.e. in line with the national social rent policy increase of CPI + 1%. We have therefore assumed that this approach would be followed. The CPI figure to be used for rent setting is the September figure, which was 1.2%. This then results in an average rent increase of 2.2% in 2015-16, meaning an average rent of £114.97 per week (the 2014-15 current average is £112.45). Average rents and service charges under the existing strategy are detailed in Appendix 2.

Alternative Rent Options

13. The HRA business plan approved by Cabinet on 19th July 2014 was formulated on the basis of prudent long term inflation figures for both income and expenditure, with rents being forecast to increase by CPI + 1% throughout. Our working assumption was that the long term CPI figure would be 1.5%, which is below the government's long term assumption of 2.0%.
14. For the purposes of the four-year MTFS projections, the proposal is to continue with this assumption for rent increases. Over the longer term, however, it is appropriate to consider both alternative long-term CPI figures and also whether the government may decide to make further changes to national policy following the end of the 10-year "guarantee period", and these could significantly impact on the level of resources generated by the HRA over the long- term.
15. Whilst these alternatives do not affect the MTFS position, they are an important factor in determining the long-term health of the HRA, and so the resources likely to be available for future investment in new affordable housing. We will therefore model a range of scenarios for the next version of the HRA Business Plan based on the approved budget and MTFS to illustrate the sensitivity of the Plan to changes in future levels of rent increase and to assist in decision-making around further new build/acquisition.

Right-to-Buy sales

16. There have been thirty-one sales under Right-to-Buy so far in 2014-15 as a result of the increased discounts and a further four sales are anticipated by the year end. A stock level of 4,880 at the start of April 2015 is therefore assumed. It is envisaged the HRA will continue to be viable if Right-to-Buy sales continue at these levels. There is potentially a risk issue if we experience a sustained increase in sales and this is referenced in the risk section.
17. To assist with managing this risk, and to provide immediate assistance to ease homelessness pressures, a policy has been developed to enable the buy-back of ex Local Authority properties.
18. During the consultation on the feasibility for regeneration and/or redevelopment of a number of council estates between January and March 2014, a number of leaseholders expressed concern that the sale of their properties may have been blighted by potential proposals to develop some of our estates. There is no evidence to justify these concerns and all of the council's communications made clear we were only considering options and no firm decisions had been made. However, a number of

leaseholders have expressed interest in selling their property back to the council.

19. In July 2014, Cabinet made the decision to proceed with the regeneration of the Grange Farm estate and approved the early buy backs of leasehold properties on the estate which would then be used as either temporary accommodation for homeless households or for decants during the Grange Farm regeneration before demolition.
20. There is a continuing demand for both permanent and temporary affordable housing within Harrow. We continue to see an increase in demand from homeless households. Whilst the vast majority are offered a private sector housing solution either in Harrow or beyond, the number of families housed in expensive temporary Bed and Breakfast accommodation has increased significantly.
21. A bid was therefore submitted for additional HRA borrowing to the HRA Growth Fund which included proposals to purchase 20 properties which would then be refurbished and let as permanent accommodation. Purchasing existing homes provides a quicker solution to increasing the supply of affordable housing than new build and offers an interim solution pending the completion of our infill new build programme. Unfortunately this element of the bid was unsuccessful, but there are sufficient resources available elsewhere to enable this programme to proceed without additional borrowing. The buy-back of ex-Harrow property could be included within this programme.
22. The Capital provision to enable buy backs is currently included in the Purchase & Repair element of the Growth fund bid, and is included in the Capital Programme. Further provision may need to be made from within HRA resources should the scheme prove successful, and a bid would be made in that event in accordance with Financial Regulations.

Service charges: Tenants & Leaseholders

23. Tenants who benefit from specific estate based services will pay a charge to the Council on a weekly basis in addition to their weekly rent charge. This service charge will increase by 2.2% on average resulting in an average weekly charge of £2.91 (2014-15 current service charge £2.85), an increase of £0.06 on the current weekly charge.
24. Leaseholders are no longer charged an estimated service charge but are invoiced annually by the end of September for the previous financial year, based on actual recovery of costs (resulting in the leasehold financial year spanning the 1st September to 31st August rather than the financial year of 1st April to 31st March) Leaseholders are required to settle these

invoices within 30 days, but in practice the challenge process and the payment options available to leaseholders results in some leaseholders not settling their accounts until well into the following financial year. The total income expected to be recovered from leaseholders in 2015-16 (excluding s20 income in relation to capital schemes) is £566k and reflects the recovery of costs associated with estate based costs, communal lighting, repairs, ground maintenance, insurance premiums and administration charges.

Other income

25. Historically other rental income from garages, car parking, and facilities charges are recommended to increase by an annual percentage, consistent with fees & charges across the Council. The charge for garage rents has been held since 2011-12 pending finalisation of the Garage Strategy Review. Progress on the review has been slow as there are some complex issues to address, garages are no longer in demand and individual consultation with residents locally is necessary on the future of each site. A pilot storage project is also being considered that could make good use of existing garage sites, whilst still generating an income to the HRA. Given the work that is in progress, and evidence from a recent marketing exercise for some refurbished garages that letting garages at existing rent levels is now proving problematic, let alone at higher rents, we are proposing to continue this policy by freezing rents for HRA garages and car parking for a further year. We anticipate that once it is clear how many garages will be retained there may be a proposal for including alternative pricing strategies for garages and car parking, and that a further report will be presented following completion of this work.
26. Details of the proposed rents for garages and parking, facility charges and charges for community centres are set out in appendices 3, 4, 5 and 6 respectively.

Expenditure

Employee Costs

27. The HRA budgets are based on the staffing establishment, and assume a pay & superannuation increase of 3.07% reflecting the overall increase expected for 2014-15 and 2015-16, then 2% thereafter.
28. Salary allocations between the HRA and the General Fund have been reviewed and a small amount of additional salaries (in the region of £40,000) in respect of more recent staff members currently charged to the General Fund were found to be attributable to HRA. These have therefore been adjusted.

29. Given the increasing focus on the delivery of new housing going forward, it has been necessary to develop proposals to restructure the way that services are delivered for Housing as a whole in order to ensure that we have the capacity in the appropriate areas to ensure we can meet the ever-increasing demand. The proposed new structure is anticipated to be in place for 2015-16 financial year, and will include additional support for delivering the new build and regeneration proposals, the majority the cost of which will be chargeable to the capital schemes being supported.

Utility Costs

30. These budgets have been uplifted by 5% in 2015-16 and subsequent years, as this is the corporate assumption on the general level of increases for utilities costs.

Support Service Charges

31. The costs of Support Service Charges (SSCs) have been assumed to increase by 2.6%, comprising an inflationary uplift of 1.3% and a reallocation of expenditure from recharges to SSCs although this reallocation has a neutral effect in the HRA overall as recharges are reduced by the same amount.

Repairs

32. Increased provision for response and void repairs to reflect enhanced standards and works required for temporary accommodation partially offset by reduction in the external decorations programme as this is now delivered largely through the capital programme. Additional costs arising from use of HRA property as temporary accommodation are anticipated to be recovered via enhanced service charges.

Charges for Capital

33. Capital charges to the HRA are assumed to continue to be charged at the rate of 4.2978% of the HRA borrowing from the General Fund. This figure is £149.6m at the start of 2015-16, but during the year it is anticipated that additional borrowing of £1.736m will be made following the successful bid to the Local Growth Fund for additional HRA borrowing capacity to help fund the development of new affordable housing. A further bid for additional borrowing capacity of £5.6m to help fund property purchases and additional new build was made in October 2014, of which £3.6m was successful and assumed to apply in 2016-17. This amount has therefore been assumed within the HRA capital charges assumptions. Any additional borrowing is assumed to be at the same rate of interest as that charged for the original HRA debt.

34. As part of the ongoing business planning activity, consideration will be given to the ability to repay debt, and to reduce capital charges to the HRA. Interest rate risk is one of the key risks associated with the longer term planning of the HRA finances, and whilst the risk is relatively small as the loans pool is predominantly comprised of long-term fixed rate loans, the main risk will be as a result of the rates available as existing loans are re-financed on maturity.
35. Interest on HRA balances, including the Major Repairs Reserve are expected to be earned at a rate of 0.5% for 2015-16. Interest is also earned at this rate on the s106 Affordable Housing reserve.

Capital Investment

36. In February 2014 Cabinet agreed the first 4 year Capital Programme for Housing, and since then officers have been working on improving the delivery of the capital programme from 2015-16 onwards in two ways:
- Developing a broader “Better Homes Standard” that will enable us to include in future programmes some works we were not able to do under the government imposed Decent Homes standard. The new standard will include more works to the exterior of properties, communal areas and the environment surrounding homes as well as doing more inside homes when we upgrade kitchens and bathrooms to “future proof” these works
 - Developing the detailed four year programme that will enable contractors to be procured over a longer term, reducing the lead in time to starting the programme of works each year
37. Due to a combination of the progress already made in respect of internal improvement works to properties, and because we continue to be proactive in achieving value for money through procurement, annual programmes are projected to be smaller than they have been over recent years. The result of this is that it will be possible to deliver this enhanced standard of investment from within existing levels of budget.
38. The details of the new standard have been consulted on, both informally with a group of residents who have been assisting us in identifying priorities for the future and formally at the Tenants’, Leaseholders’ and Residents’ Consultative Forum meeting on 10th December 2014. The HRA capital programmes for 2015-16 to 2018-19 are in line with those previously approved in the business plan, with the addition of further budgets for the purchase of properties and phase 2 of the HRA new build programme as set out in the Homes for Harrow section below. These additional budgets represent the

maximum cost of the proposals. The four-year capital programme is attached as Appendix 7.

39. The programme as it is currently constructed is anticipated to deliver in the region of:

- 500 kitchens and/or bathrooms
- 200 heating systems
- 90 electrical re-wires

As indicated above, these numbers have fallen from those in previous years as the significant investment we have been able to deliver in those years means that we have caught up with backlog repairs and are now able to invest more in a broader range of areas from within the same level of resources. To this end we are targeting investment towards improving the environment in which our residents live by undertaking:

- Enveloping works
- Replacing door entry systems
- Environmental works
- Works to communal areas

40. In line with the approach taken last year, Housing Services propose to use the scheme of delegation to implement variations to the HRA Capital programme within agreed limits and following appropriate consultation, to meet the requirements of the Housing Asset Management Strategy and ensure delivery against programme can be maximised. As is currently the case, the HRA Capital programme would continue to be funded from HRA revenue resources, and therefore any such variations would not affect the Council's borrowing position or General Fund resources.

Homes for Harrow

41. As a result of the additional resources retained within the HRA following the introduction of self-financing in April 2012, it has been possible to commence planning for a programme to deliver new housing within the HRA for the first time in decades, initially largely on infill plots or vacant/underused garage sites. The first sites in phase 1 are currently being worked up for the purposes of gaining planning permission, and are likely to commence on site at the end of 2014/15 with the remaining sites coming on stream in 2015 and completions from 2016 onwards. This will deliver a minimum of new 50 homes, of which 10 are anticipated to be shared ownership, and the remainder let at affordable rents. The capital budgets for the development of these homes have already been approved, and additional borrowing capacity of £1.74m was secured from the Local Growth Fund earlier this year to assist in funding the new homes.

42. Following the outcome of the bidding process used to allocate the additional borrowing (above), it was apparent that there was still a significant proportion of additional borrowing capacity that remained unallocated, and so the deadline for bids was extended. Following discussions with the Greater London Authority, it was determined that a further bid should be submitted, and that the amounts bid for per unit should be increased from those assumed in the first round. A bid was therefore submitted comprising two strands. The first was in respect of a 20-property purchase and repair programme, whereby properties would be purchased on the open market and which could include buy back of ex LA council properties, repaired to Harrow's letting standards and then let at affordable rents. This was intended to supplement the phase 1 new build programme and assist in relieving pressure on homelessness budgets within the General Fund. Unfortunately this element of the bid was unsuccessful. The second strand of the round 2 bid was a phase 2 new build programme, with the additional borrowing enabling previously-identified sites to be brought forward quicker than had previously been anticipated. This element of the bid was successful, with £3.6m having been allocated to the Council. Outline scheme costs and indicative funding sources are set out in Appendix 8, and are summarised below:

Additional Growth bid					
	Total Costs	HRA Borrowing	Other Affordable Housing Resources	Total Funding	No Of Units
Purchase & Repair	6,232,000		6,232,000	6,232,000	20
Phase 2 new build	6,901,000	3,600,000	3,301,000	6,901,000	30
	13,133,000	3,600,000	9,533,000	13,133,000	50

43. In addition to starting to build new homes within the HRA, proposals are currently being developed to completely regenerate Grange Farm, one of the worst condition estates within the Borough. This is likely to involve some land assembly to maximise the development opportunities, and a design-led proposal to significantly increase density and make best use of the available land to generate cross subsidy from market sales necessary to enable the scheme to proceed. It is envisaged that there will be no net loss of affordable housing, and that the replacement affordable homes will be retained and managed within the HRA. Housing has previously been given approval to engage architects to develop a viable proposal for Grange Farm based on the previous study by PRP, and in addition has approval to commence the buying back of properties on the estate as they become available. This has the two-fold effect of reducing the requirement to use compulsory purchase to

facilitate the regeneration, and providing additional properties for use as temporary accommodation in the meantime, which helps to reduce the cost of homelessness in the General Fund. Further reports will be made in respect of this scheme as proposals are developed.

44. Within the Grange Farm Estate a number of tenants have already indicated that a permanent move off the estate would be their preference rather than potentially moving twice before becoming settled in a new property. Where we are able to facilitate an early move of this nature, it would be desirable to progress it now and in the process make the necessary Home Loss disturbance payments. Currently Home Loss payments are set nationally at £4,900, and disturbance costs cover the associated costs of removal. These costs can initially be met from within the existing budgets approved to progress the Grange Farm proposals.
45. The final strand of the Homes for Harrow current proposals is firmly linked to the Council's wider regeneration proposals, and will follow on from a wholesale review of HRA and non-HRA assets and land not currently included in any other programme, with a view to assessing whether there is any potential for future use/development for housing purposes, either within or outside the HRA. This is currently referred to as phase 3 of the Homes for Harrow programme, but in reality will be the start of several more phases of work to maximise the ability for the Council to develop properties for rent, and to ensure that resources are identified and allocated appropriately to maximise numbers of homes delivered, whether this be within or outside of the HRA. As yet this strand is unquantifiable, but resources are anticipated to be available within the HRA to progress further development opportunities in years to come.
46. The Phase 1 and Phase 2 new build programmes, along with the Purchase & Repair scheme will require a significant investment from Housing resources to complement the additional borrowing. This will use the majority of the capital resources available of the period, although some is currently being held in reserve to cover risks around build-cost inflation, as well as to provide resources to help deliver the Grange Farm regeneration project, should this not achieve a break-even position.

Impairment Allowance

47. Current tenant arrears continue to remain under control, and action has been taken to write off a significant amount of former tenant arrears where all options for recovery of the debts have been exhausted. Whilst a number of payment arrangements are in place in respect of the remaining former tenant arrears, prudence dictates that provision should be made for the non-recovery of the majority of these arrears via an impairment allowance. The ongoing impact of welfare benefit changes are

likely to continue to have an impact on arrears, although it is difficult to quantify at this stage. The annual provision has reduced from the £400k allowed for in 2014-15 and is budgeted at £300k for 2015-16 per annum and subsequent years. The Council is, however, setting aside further funding to mitigate the impacts of welfare reforms by the establishment of a hardship fund.

Hardship Fund

48. £100k will be set aside in 2015-16 and subsequent years to mitigate the worst impacts of benefit changes arising from the continuing welfare reforms.

General Contingency

49. In addition to the HRA balances, an annual amount of £200k is set aside to cover unforeseen expenditure that may arise in the management and maintenance of the housing stock.

Variation to MTF5 2015-16

50. The MTF5 approved by Cabinet and Council in March 2014 estimated an in year surplus of £1.565m for 2015-16. The proposed budget changes result in a surplus of £0.567m. The decrease in surplus of £0.998m is explained below :

- +£0.348m – Depreciation & capital charges, a transfer of resources from revenue to capital reserves to fund future capital expenditure therefore no overall impact on financial resources
- +£0.178m – Repairs, increase in budget for responsive and void repairs, reflecting new standards and works on properties used for temporary accommodation to alleviate General Fund pressures; partially offset by reduction in external decorations delivered largely through capital programme
- +£0.128m – Affordable Housing, mainly revenue costs relating to Grange Farm redevelopment approved by Cabinet in 17 July 2014
- +£0.100m – Hardship Fund, resources set aside to mitigate impact of ongoing Welfare Reforms on tenants in line with Corporate priorities
- +£0.085m – Revisions in dwelling and non-dwelling income estimates
- +£0.074m – Supplies & Services, mainly tenant expenses associated with removals and decants resulting from the impact of Welfare Reforms

- +£0.171m – Employee costs, reallocation of staff time reflecting a shift in work to the Council's landlord function
- -£0.086m – Central service & other charges, central charges, pending a comprehensive review, are expected to reduce by £0.038m and other costs by £0.048m

Summary

51. The HRA Budget and MTFs detailed in Appendix 1 continues to reflect the significantly improved position reported in last year's budget as a result of HRA reform. The 30-year HRA business plan approved by Cabinet in July 2014 has been used as the framework within which this budget has been developed, and the outcome of the budget process will be used to re-state the business plan. Current forecasts suggest that significant balances are still likely to be generated within the HRA over the period of the business plan, depending on expenditure and income decisions made in the future, with current levels of projected investment expenditure being fully funded over this period. This remains an extremely positive position for the Council to be able to report and will enable the Council to meet both the challenges faced by the service from the Government changes and the increasing expectations of its tenants and Members.

Performance Issues

During Q2 of 2014/15 we have successfully sustained, and in many areas improved performance despite the continued impacts of welfare reform. We continue to proactively work with those most affected by the welfare reform changes to mitigate where possible, the impact and to manage budgetary demands arising from the reforms as well as customer needs and expectations. A snapshot of the Q2 performance data for HRA and affordable housing-related services is shown below.

Housing Scorecard No	Reporting frequency	Measure (cumulative for the year unless stated otherwise)	Corporate scorecard	Corporate priority	Corporate Equalities Objective	Polarity - good to be high / low	Q1 actual 2014/15	RAG	Q1 target 2014/15	Q2 actual 2014/15	RAG	direction of travel since Q1 applic	Q2 Target 2013/14	Q4 / year end target	Current Assessment	Measure owner																						
1	qtrly	Tenant satisfaction with responsive repairs service (telephone survey carried out by Access Harrow)	yes	E&E		high	82%	HR	95%	98.96	LG	↑	95%	96%	This is the first time, following a resident led audit of contractors KPIs that we have relied on data produced by the contractors for this figure, rather than a much smaller sample from surveys undertaken by Access Harrow. As it is a much larger sample it is a more robust assessment of the true figure for customer satisfaction.	MChalloner																						
2	qtrly	Council adaptations: average time from assessment to completion of work (weeks) quarterly performance	yes	V		low	22	HG	30	20	HG	↑	30	30	Performance continues within target	MChalloner																						
4	annual	To support the local economy Responsive Repairs contractors to employ 5 apprentices by March 2015		-	yes	high	-	-	-	-	-		-	5		MChalloner																						
5	annual	Number of Council homes retrieved by anti-fraud action (annual)	yes	F, V & C		high	0	-	-	2	-		-	10	2 properties recovered this quarter to provide homes for families in need of 2 bedroomed properties.	T Burke																						
6	qtrly	100 most vulnerable tenants have bespoke action plans in place with named housing officer to co-ordinate in each case by March 2016. (Yr 1 - 45, Yr 2 - 55)		-	yes	high	-	-	0	25	HG	↑	10	45	Extremely good achievement by this new housing post. On track to exceed annual target	T Burke																						
7	annual	Assist a minimum of 15 tenants move to more affordable accommodation by March 2015		-	yes	high	-	-	-	-			-	15		T Burke																						
8	qtrly	90% of Housing anti social behaviour cases resolved per quarter.		-	yes	high	93%	LG	90%	100%	HG	↑	90%	90%	Good performance but on limited number of cases	T Burke																						
9	qtrly	Number of cases where positive action is taken to prevent homelessness		-	yes	high	383	HG	300	678	HG	↑	625	1300	Still being very successful in preventing homelessness	J Dalton																						
10	qtrly	Total no of households to whom we have accepted a full homeless housing duty (eligible and priority need)	yes	F		low	46	HG	55	145	HR	↓	105	220	We anticipated a significant increase in acceptances due to the housing market and welfare reform	J Dalton																						
14	qtrly	Number of affordable homes delivered (gross)	yes	F	yes	high	13	HG	0	25	LG	↑	25	140	Currently projecting to exceed 140 Q4 target with 157 units. Slippage into next year is a risk which is being monitored.	APegg																						
15	qtrly	No of affordable family sized rented homes completed	yes	F	yes	high	3	HG	0	15	A	↑	18	18	3 more family sized units projected to complete by Q4 to meet 18 target. Slippage risk as above.	APegg																						
17	qtrly	Total no of social housing homes freed up - grants2move (including all downsizing)	yes	F & LB		high	16	HG	14	28	LG	↑	28	56	In Q2 GTM, 3 to Home ownership and 2 to private rented sector. 7 Under occupiers moved. Currently on target.	J Fernley																						
<table border="1"> <thead> <tr> <th colspan="2">Corporate Priorities</th> </tr> </thead> <tbody> <tr> <td>Making a difference for the Vulnerable</td> <td>V</td> </tr> <tr> <td>Making a difference for Communities</td> <td>C</td> </tr> <tr> <td>Making a difference for Local Businesses</td> <td>LB</td> </tr> <tr> <td>Making a difference for families</td> <td>F</td> </tr> <tr> <td>Efficient & effective organisation</td> <td>E&E</td> </tr> </tbody> </table>			Corporate Priorities		Making a difference for the Vulnerable	V	Making a difference for Communities	C	Making a difference for Local Businesses	LB	Making a difference for families	F	Efficient & effective organisation	E&E	<table border="1"> <thead> <tr> <th colspan="2">RAG (Red, Amber, Green)</th> </tr> </thead> <tbody> <tr> <td>High Green - excellent</td> <td>HG</td> </tr> <tr> <td>Low Green - good</td> <td>LG</td> </tr> <tr> <td>Amber - adequate</td> <td>A</td> </tr> <tr> <td>Low Red - poor</td> <td>LR</td> </tr> <tr> <td>High Red - needs prompt attention</td> <td>HR</td> </tr> </tbody> </table>												RAG (Red, Amber, Green)		High Green - excellent	HG	Low Green - good	LG	Amber - adequate	A	Low Red - poor	LR	High Red - needs prompt attention	HR
Corporate Priorities																																						
Making a difference for the Vulnerable	V																																					
Making a difference for Communities	C																																					
Making a difference for Local Businesses	LB																																					
Making a difference for families	F																																					
Efficient & effective organisation	E&E																																					
RAG (Red, Amber, Green)																																						
High Green - excellent	HG																																					
Low Green - good	LG																																					
Amber - adequate	A																																					
Low Red - poor	LR																																					
High Red - needs prompt attention	HR																																					

Environmental Implications

The HRA Budget 2015-16 includes investment in a number of areas such as new heating systems, enveloping and cladding of thermally inefficient properties that will improve the energy efficiency of the Council's housing stock and thus make a contribution towards delivering the Council's Climate Change Strategy. The Asset Management Strategy action plan addresses elements of the "Delivering Warmer Homes" (HECA) strategy which was reported to the Department for Energy and Climate Change (DECC) in March 2013. We were successful in obtaining a grant from DECC to help reduce fuel poverty in the privately-owned stock within the Borough, and have contractors in place to deliver this important work. Resources are available within the HRA to supplement this investment in the private sector with similar works to the Council's own stock, subject to progress on delivery of the grant-funded scheme.

Risk Management Implications

The key risks which should be highlighted, and which are referenced in the main body of the report, are those associated with the changes in the RTB arrangements and, for the longer-term HRA business plan, interest rate risk. Whilst these are real risks to the HRA these are not considered to be significant in the short term.

Current regulations require impairments of non-dwelling assets in excess of balances held on the revaluation reserves to be charged to revenue. These regulations are due to be extended to cover dwelling assets from April 2017 when transitional measures for self-financing are due to come to an end. This could result in significant charges to HRA revenue reserves which run counter to the Government's stated objectives of encouraging new build. This issue would have an impact on all Councils with housing stock and the Council has already requested the Department of Communities & Local Government to address this anomaly as a matter of urgency.

These risks are detailed on the Housing risk register.

Legal Implications

Under section 103 of the Housing Act 1985 (as amended) the terms of a secure tenancy which is a periodic tenancy may be varied by the landlord by a notice of variation served on the tenant. The landlord authority is required to serve a preliminary notice on the secure tenant giving them advance notification of any change proposed to be made to the terms of their tenancy and inviting their comments. However, rent and other charges for facilities are specifically excluded from this requirement.

Section 105 of the Housing Act 1985 requires a landlord authority to maintain such arrangements as it considers appropriate to enable those secure tenants who are likely to be substantially affected by matters of housing management, to be informed and consulted about them, and before deciding on the matter, the landlord authority has to consider any representations made. However, rent and other charges for facilities are specifically excluded from the definition of housing management.

Therefore there is no statutory requirement to consult secure tenants on proposed rent changes. However, as noted earlier in this report, the Council has historically consulted the Tenants Leaseholders and Residents Consultative Forum (TLRCF) and intends to do so again.

Financial Implications

Financial matters are integral to this report.

Equalities implications / Public Sector Equality Duty

Pursuant to the Equality Act 2010 (“the Act”), the council, in the exercise of its functions, has to have ‘due regard’ to (i) eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (ii) advancing equality of opportunity between those with a relevant protected characteristic and those without; and (iii) fostering good relations between those with a relevant protected characteristic and those without. The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation. The duty also covers marriage and civil partnership, but to a limited extent.

When making decisions, the Council must take account of the equality duty and in particular any potential impact on protected groups. There are no new equality impacts of the recommended rent increase option as this represents a continuation of existing rent policy, having consulted with our tenant, leaseholder and resident representative groups on the proposal. Overall there is no proposed change to the current rent policy.

Council Priorities

The Council’s vision:

Working Together to Make a Difference for Harrow

52. This report incorporates the following council priorities:

Making a difference for the vulnerable – through providing support in finding appropriate affordable housing solutions to meet need, and developing new housing to meet future assessed need.

Making a difference for communities – through engaging residents in decisions around regeneration of estates and the wider communities, and delivering housing that people want to live in, in areas they are proud to call home.

Making a difference for local businesses – through supporting the council-wide regeneration agenda, and maximising the contribution that new housing can make towards delivering the regeneration vision and objectives.

Making a difference for families – through providing good quality housing and safe neighbourhoods, and targeting our resources as best we can so that families can feel the full benefits of economic growth. Our priority for every family is to ensure that they can live in a neighbourhood which has a real sense of community, in a house they can be proud to call their home.

Section 3 - Statutory Officer Clearance

Name: Simon George	<input checked="" type="checkbox"/>	Chief Financial Officer
Date: 3 February 2015		
Name: Ian Goldsmith	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 3 February 2015		

Ward Councillors notified:	NO, as it impacts on all Wards
EqIA carried out:	NO There are no new equality impacts of the recommended rent increase option as this represents a continuation of existing rent policy, having consulted with our tenant, leaseholder and resident representative groups on the proposal.

Section 4 - Contact Details and Background Papers

Contact:

Dave Roberts, Finance Business Partner – Housing Services
Tel: 0208 420 9678 (Ext 5678)

Background Papers:

- [HRA Business Plan Update Report Cabinet July 2014](#)

**Call-In Waived by the
Chairman of Overview
and Scrutiny
Committee**

NOT APPLICABLE

*[Call-in applies, except for the
Recommendations to Council]*

HRA Budget 2015-16 and MTFS 2016-17 to 2018-19 – Expenditure

All figures in £s	Budget 2015-16	Budget 2016-17	Budget 2017-18	Budget 2018-19
Operating Expenditure:				
Employee Costs	2,573,100	2,623,920	2,626,970	2,630,050
Supplies & Services	918,380	927,200	936,290	945,520
Utility cost	668,490	677,180	685,980	694,900
Estate & Sheltered Services	2,887,360	2,901,400	2,915,320	2,929,420
Central Recharges	3,528,270	3,574,440	3,620,330	3,666,820
Operating Expenditure	10,575,600	10,704,140	10,784,890	10,866,710
Repairs Expenditure:				
Repairs - Voids	1,076,000	1,089,990	1,104,160	1,118,510
Repairs - Responsive	3,645,500	3,692,890	3,740,890	3,789,520
Repairs – Other	2,026,760	2,034,590	2,042,370	2,050,260
Repairs Expenditure	6,748,260	6,817,470	6,887,420	6,958,290
Other Expenditure:				
Contingency - General	200,000	200,000	200,000	200,000
Investment in Services	200,000	200,000	200,000	200,000
Impairment allowance	300,000	300,000	300,000	300,000
RCCO	0	0	824,860	2,308,040
Affordable Housing	127,970	102,960	104,300	105,660
Grants to Move	162,870	164,580	166,320	168,080
Charges for Capital	6,361,150	6,383,980	6,640,000	6,664,480
Depreciation	6,906,360	6,896,780	6,878,980	6,831,080
Hardship fund	100,000	100,000	100,000	100,000
Other Expenditure	14,358,350	14,348,300	15,414,460	16,877,340
Total Expenditure	31,682,210	31,869,910	33,086,770	34,702,340

Appendix 1 (continued)
HRA Budget 2015-16 and MTFs 2016-17 to 2018-19 – Income

All figures in £s	Budget 2015-16	Budget 2016-17	Budget 2017-18	Budget 2018-19
Income				
Rent Income – Dwellings	(28,985,570)	(29,896,430)	(30,694,520)	(31,410,300)
Rent Income – Non Dwellings	(648,330)	(659,400)	(670,910)	(682,880)
Service Charges - Tenants	(1,173,960)	(1,194,760)	(1,213,150)	(1,234,730)
Service Charges – Leaseholders	(566,020)	(567,820)	(569,650)	(571,490)
Facility Charges	(603,000)	(633,150)	(664,810)	(698,050)
Interest	(3,600)	(3,600)	(3,600)	(3,600)
Other Income	(105,560)	(105,560)	(105,560)	(105,560)
Recharge to General Fund	(163,000)	(163,000)	(163,000)	(163,000)
Total Income	(32,249,040)	(33,223,720)	(34,085,200)	(34,869,610)
In Year Deficit / (Surplus)	(566,830)	(1,353,810)	(998,430)	(167,270)
BALANCE brought forward	(4,395,120)	(4,961,950)	(6,315,760)	(7,314,190)
BALANCE carried forward	(4,961,950)	(6,315,760)	(7,314,190)	(7,481,460)

Average Rent & Service Charges

Appendix 2

Description	No. units	2014-15 Total Weekly Charge	2015-16 Rent	2015-16 Service Charge	2015-16 Total	Increase £
Bedsit bungalow	20	£103.40	£103.05	£2.63	£105.67	£2.27
1 Bed bungalow	116	£114.16	£114.46	£2.22	£116.68	£2.51
2 Bed bungalow	25	£129.82	£129.21	£3.46	£132.67	£2.86
Bedsit flat	84	£89.59	£87.61	£3.95	£91.56	£1.97
1 bed flat	1,213	£99.49	£98.20	£3.48	£101.68	£2.19
2 bed flat	819	£113.16	£111.66	£3.99	£115.65	£2.49
3 bed flat	43	£124.64	£122.63	£4.75	£127.38	£2.74
1 bed Maisonette	6	£92.79	£94.43	£0.40	£94.83	£2.04
2 bed Maisonette	51	£112.51	£111.38	£3.61	£114.98	£2.47
3 bed Maisonette	46	£124.91	£123.49	£4.17	£127.66	£2.75
4 bed Maisonette	1	£132.41	£135.32	£0.00	£135.32	£2.91
2 bed Parlour House	34	£124.84	£126.38	£1.21	£127.59	£2.75
3 bed Parlour House	541	£138.10	£139.44	£1.69	£141.14	£3.04
4 bed Parlour House	57	£149.61	£150.54	£2.36	£152.90	£3.29
5 & 6 bed Parlour House	10	£158.72	£161.05	£1.16	£162.21	£3.49
2 bed Non Parlour House	516	£121.67	£122.36	£1.98	£124.35	£2.68
3 bed Non Parlour House	740	£133.34	£134.16	£2.12	£136.28	£2.93
4 bed Non Parlour House	31	£147.32	£147.57	£2.99	£150.56	£3.24
5,6 & 7 bed Parlour House	6	£159.85	£162.23	£1.14	£163.37	£3.52
Sheltered bedsit	55	£90.00	£89.36	£2.62	£91.97	£1.98
Sheltered – other units	501	£97.24	£96.23	£3.15	£99.38	£2.14
Total	4,915	£115.30	£114.97	£2.91	£117.88	£2.58

The average charge during 2014-15 was £115.30 per week comprising £112.45 rent and £2.85 service charge compared to the budgeted £112.43 and £2.85 per week respectively.

The rent increase for 2015-16 is based on the latest Government Guidance which requires rents to increase by the Consumer Prices Index (CPI) plus 1%. This yields an average rent of £114.97 and an average service charge of £2.91 per week, representing an average increase of 2.2%.

Average rents for the additional 50 Phase 1 properties expected to be constructed 2015-16 to 2016-17 (not included in the above table) are expected to be £180.64 per week for the 40 at affordable rent, and £36.06 per week for the 10 shared ownership properties. Average rents for Phase 2 and Purchase & Repair are expected to be £169.89 & £159.43 respectively.

Garages & parking space charges**Appendix 3**

	Current Weekly Rental	Proposed Weekly Rental
	2014-15	2015-16
	£	£
Garages	14.05	14.05
Car Spaces	9.16	9.16

Facility Charges

Appendix 4

Sheltered Block	No. of properties	Current average weekly facility charge (Heating) 2014-15	Proposed average weekly facility charge (Heating) 2015-16 5% increase
Alma Court	30	13.29	13.95
Belmont Lodge	30	13.26	13.92
Boothman House	30	13.26	13.92
Cornell House	30	13.31	13.98
Durrant Court	27	13.26	13.92
Edwin Ware Court	30	11.17	11.73
Goddard Court	30	13.31	13.98
Grahame White House	30	13.31	13.98
Grange Court	30	11.11	11.67
Harkett Court	30	13.26	13.92
Harrow Weald Park 0 Bed	12	9.02	9.47
Harrow Weald Park 1 Bed	19	12.10	12.71
John Lamb Court	32	13.97	14.67
Meadfield	30	13.31	13.98
Sinclair House	27	13.31	13.98
Tapley Court	26	13.26	13.92
Thomas Hewlett House	30	13.31	13.98
Watkins House	43	13.94	14.64
William Allen House	29	12.05	12.65
Resident Warden Accommodation	11	17.99	18.89
Other Non-Sheltered	95	11.72	12.31

Water Charges

Appendix 5

Sheltered Block	No.of flats	Current Range Water Charge 2014-2015		Proposed Range Charge at 4% increase for 2015-2016		Amount of increase	Average Charge 2015-2016	% Increase	Income per Week per Block 2015-2016
		Lower	Higher	Lower	Higher				
Alma Court	30	£4.41	£4.41	£4.59	£4.59	£0.18	£4.59	4.00%	£137.59
Belmont Lodge	30	£4.53	£4.53	£4.71	£4.71	£0.18	£4.71	4.00%	£141.34
Boothman House	30	£4.68	£4.68	£4.87	£4.87	£0.19	£4.87	4.00%	£146.02
Cornell House	30	£4.62	£4.82	£4.80	£5.01	£0.19	£4.91	4.00%	£147.26
Durrant Court	27	£4.41	£4.88	£4.59	£5.08	£0.19	£4.83	4.00%	£130.43
Edwin Ware Court	30	£3.92	£4.88	£4.08	£5.08	£0.18	£4.58	4.00%	£137.28
Goddard Court	30	£4.53	£4.53	£4.71	£4.71	£0.18	£4.71	4.00%	£141.34
Grahame White House	30	£4.68	£4.68	£4.87	£4.87	£0.19	£4.87	4.00%	£146.02
Grange Court	30	£3.72	£4.68	£3.87	£4.87	£0.17	£4.37	4.00%	£131.04
Harkett Court	30	£4.68	£4.68	£4.87	£4.87	£0.19	£4.87	4.00%	£146.02
Harrow Weald Park	31	£3.72	£5.00	£3.87	£5.20	£0.17	£4.53	4.00%	£140.57
John Lamb Court	32	£4.68	£4.68	£4.87	£4.87	£0.19	£4.87	4.00%	£155.75
Meadfield	30	£4.62	£4.82	£4.80	£5.01	£0.19	£4.91	4.00%	£147.26
Sinclair House	27	£4.41	£4.41	£4.59	£4.59	£0.18	£4.59	4.00%	£123.83
Tapley Court	26	£4.41	£4.68	£4.59	£4.87	£0.18	£4.73	4.00%	£122.90
Thomas Hewlett House	30	£4.62	£4.62	£4.80	£4.80	£0.18	£4.80	4.00%	£144.14
Watkins House	43	£3.92	£3.92	£4.08	£4.08	£0.16	£4.08	4.00%	£175.30
William Allen House	29	£3.72	£4.68	£3.87	£4.87	£0.17	£4.37	4.00%	£126.67
Total No.of Sheltered Flats	545								£2,540.76
Resident Warden Accommodation	11	£6.45	£6.45	£6.71	£6.71	£0.26	£6.71	4.00%	£73.79
Total Sheltered Flats incl Warden	556								£2,614.54
Other Non-Sheltered	95	£4.62	£4.62	£4.80	£4.80	£0.18	£4.80	4.00%	£456.46

Community Hall and Capacity	Current 2014-15			Proposed 2015-16		
	Charges per first 3 hours block booking then subsequent hourly rate			Charges per hour letting 4% Price Increase		
	Evening Rate	Daytime Rate	Weekend Rate	Evening Rate	Daytime Rate	Weekend Rate
	£	£	£	£	£	£
Augustine Road [max 30]	21.63	10.82	32.45	22.50	11.25	33.75
Marsh Road Hall [max 30]	21.63	10.82	32.45	22.50	11.25	33.75
Brookside Hall [max 30]	21.63	10.82	32.45	22.50	11.25	33.75
Woodlands Hall [max 60]	32.45	16.22	44.30	33.75	16.87	46.07
Churchill Place [max 100]	43.26	19.45	54.08	44.99	20.23	56.24
Kenmore Park [max 100]	43.26	19.45	54.08	44.99	20.23	56.24
Pinner Hill Hall [max 100]	43.26	19.45	54.08	44.99	20.23	56.24
Northolt Road [max 100]	43.26	19.45	54.08	44.99	20.23	56.24

Terms & Conditions associated with Hall lets:

- Lets to Tenants and Residents Associations are free, providing 4 weeks notice is provided.
- Charges shown are exclusive of VAT at 20% and Insurance Premium at 7%
- Day time rates are from 9.00am to 3.30pm
- Commercial lets will be charged at above hourly rates plus 20%.
- Registered Charities will receive a discount of 50% (9.00am to 3.30pm only).
- Block Bookings of 6 months minimum will receive a 25% discount.
- A refundable deposit of £100 against loss or damage will be required by all other users.

Of the 11 community centres, there are a number of premises that are fully let and supported by lease agreements and therefore charges not levied in accordance with the above schedule. These are:

- Methuen Road community centre is fully let to Flash Musicals Youth Theatre group on a lease agreement of £25,000 rent per annum.
- Stone Gardens hall is fully let as a nursery on a lease agreement of £10,000 rent per annum.
- Northolt Road hall is partly let as a nursery on a lease agreement of £5,200 rent per annum.
- Churchill Place hall is partly let as a nursery on a lease agreement of £10,000 rent per annum.

Budget Description	2015/16	2016/17	2017/18	2018/19
	£	£	£	£
Internal Works	3,928,120	4,428,120	4,228,120	4,228,120
External Works	3,396,970	1,671,490	2,300,000	2,300,000
M & E	920,000	920,000	920,000	920,000
Garages	61,500	61,500	61,500	61,500
Aids and Adaptations	615,000	615,000	615,000	615,000
Capitalisation Responsive Repairs	142,500	142,500	142,500	142,500
Capitalised Salaries	317,000	317,000	317,000	317,000
Develop Wider Housing Initiatives Pot	256,240	256,240	555,000	555,000
HRA Capital Investment	9,637,330	8,411,850	9,139,120	9,139,120
Grange Farm	1,545,000	-	-	-
Affordable Housing Phase 1	4,242,000	3,000,000	1,000,000	-
Purchase & Repair	6,232,000	-	-	-
Affordable Housing Phase 2	-	1,725,320	5,175,960	-
Total Homes for Harrow	12,019,000	4,725,320	6,175,960	-
Total HRA Capital Programme	21,656,330	13,137,170	15,315,080	9,139,120

The 2015-16 budget includes £1,810,000 re-phasing relating to the main programme and £1,287,000 for the Affordable housing programme.

LB Harrow decided to submit a further bid for additional borrowing under the HRA Growth Fund following the success of our first bid. We bid for borrowing to support the acquisition and development of a further 50 affordable homes as follows:

1. 20 unit Purchase and Repair programme – we submitted this bid because we want to increase the supply of affordable housing quickly to meet urgent homelessness needs.
2. 30 unit Phase 2 Infill Development Programme – this was similar to our successful bid but looking to bring forward the second phase. We have already completed Stage A designs on some sites and are in the process of commissioning others. Given the stage we are at ideally we would have preferred to bid for these as indicative but have decided to submit a firm bid on the assumption we may need to substitute sites as they are progressed within the cost parameters set out in the bid.

The amount of borrowing we bid for per unit was significantly higher than for our first bid. In our first bid we approached it as if we were bidding for grant, whereas the second bid was for the amount of borrowing that we felt we could reasonably support from the rental income stream. This was intended to enable us to stretch our other resources further to deliver more homes. The Phase 2 Infill Development Programme included free land. Both bids were still supported by other HRA resource as well as S106 commuted payments.

In all other respects this bid met the other criteria set out in the bid documents e.g. the homes will be let at Affordable Rents in accordance with our local policy.

As noted in the body of the report, the bid was only partially successful, and we did not receive the £2m additional borrowing approval for the P & R scheme. There are, however, sufficient resources available to enable this scheme to go ahead without the additional borrowing, and the proposed capital budget assumes this to be the case.

The table below sets out the estimated costs and funding for Phase 2 following notification of the outcome of the bidding process:

HRA Growth Fund Phase 2							
Units	Type	Acq	Works	Fees	Interest	Total Costs	Per unit
12	1,2,3, bed flats		£ 2,305,575	£ 373,716	£ 34,709	£ 2,714,000	£ 226,167
12	1,2,3, bed flats		£ 2,305,575	£ 373,716	£ 34,709	£ 2,714,000	£ 226,167
3	Houses		£ 597,000	£ 128,745	£ 10,893	£ 736,638	£ 245,546
3	Houses		£ 597,000	£ 128,745	£ 10,893	£ 736,638	£ 245,546
30	New Build		£ 5,805,150	£ 1,004,922	£ 91,204	£ 6,901,276	
20	P & R	£ 5,600,000	£ 400,000	£ 201,000	£ 31,000	£ 6,232,000	£ 311,600
50	Total round 2					£13,133,276	
Funding	New Build					£ 3,600,000	£ 120,000
	Total additional borrowing					£ 3,600,000	
	Other affordable housing resources					£ 9,533,276	
	Total funding					£13,133,276	

REPORT FOR: CABINET

Date of Meeting:	19 February 2015
Subject:	Treasury Management Strategy Statement including Prudential Indicators, Minimum Revenue Provision Policy Statement and Annual Investment Strategy for 2015/16
Key Decision	Yes
Responsible Officer:	Simon George, Director of Finance and Assurance
Portfolio Holder:	Councillor Sachin Shah, Portfolio Holder for Finance and Major Contracts
Exempt:	No
Decision subject to Call-in:	No, as the decision is reserved to Council
Wards affected:	All
Enclosures:	Appendix 1 - Legislation and Regulations Impacting on Treasury Management Appendix 2 - Treasury Management Delegations and Responsibilities Appendix 3 - Interest Rate Forecasts Appendix 4 - Economic Background

Section 1 – Summary and Recommendations

This report sets out the Council's Treasury Management Strategy Statement including Prudential Indicators, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2015/16.

Recommendation:

Cabinet is asked to recommend to Council that they approve the Treasury Management Strategy Statement for 2015/16 including:

- the Prudential Indicators for 2015/16;
- Minimum Revenue Provision Policy Statement for 2015/16;
- Annual Investment Strategy for 2015/16;
- The upper limit for borrowing of under 12 months be increased to 30%;
- The lower limit for borrowing of 5 to under 10 years be reduced to 0%;
- The deletion of the "Viability" criteria for Specified and Non-specified investments.

Reason

To promote effective financial management and comply with the Local Authorities (Capital Finance and Accounting) Regulations 2003 and other relevant guidance.

Section 2 – Report

1. INTRODUCTION

1.1 Background

1. The Chartered Institute of Public Finance and Accountancy (CIPFA) defines treasury management as:

"The management of the local authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

The Council has adopted this definition.

2. The Council operates a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments

commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.

3. The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning to ensure that the Council can meet its capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses. On occasion, any debt previously drawn may be restructured to meet Council risk or cost objectives.
4. The Local Government Act 2003 and supporting regulations require the Council to 'have regard to' the CIPFA Prudential Code and Treasury Management Code of Practice, to set Treasury and Prudential Indicators for the next three years and to ensure that the Council's capital investment plans are affordable, prudent and sustainable.
5. The Act, the Codes and subsequent Investment Guidance (2010) requires the Council to set out its Treasury Strategy for Borrowing and to prepare an Annual Investment Strategy that establishes the Council's policies for managing its investments and for giving priority to the security and liquidity of those investments. In 2011 CIPFA updated both their Code of Practice and Prudential Code and, in 2013 issued revised guidance notes. All the changes are fully reflected in this strategy statement. At the request of the former Governance, Audit and Risk Management Committee a summary of the relevant legislation, regulations and guidance is included as Appendix 1.
6. The budget for each financial year includes the revenue costs that flow from capital financing decisions. Under the Code of Practice, increases in capital expenditure should be limited to a level whereby increases in charges to revenue from:
 - increases in interest charges caused by increased borrowing to finance additional capital expenditure, and
 - any increases in running costs from new capital projectsare affordable within the projected income of the Council for the foreseeable future.
7. The Council regards compliance with the relevant legislation, regulations, codes and prudential indicators as the prime criterion by which the effectiveness of its treasury management activities will be measured. The effective management and control of risk, recognising the primacy of security and liquidity over yield, is a key component in this compliance.
8. The Council recognises that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management, and to employing suitable comprehensive performance measurement techniques, within the context of effective risk management.

1.2 CIPFA Requirements

9. The Council has formally adopted CIPFA's Code of Practice on Treasury Management (revised November 2011). The primary requirements of the Code are as follows:
- Creation and maintenance of a Treasury Management Policy Statement which sets out the policies and objectives of the Council's treasury management activities.
 - Creation and maintenance of Treasury Management Practices ("TMPs") that set out the manner in which the Council will seek to achieve those policies and objectives.
 - Receipt by the full Council of an annual Treasury Management Strategy Statement - including the Annual Investment Strategy and Minimum Revenue Provision Policy - for the year ahead, a Half-year Review Report and an Annual Report (stewardship report) covering activities during the previous year.
 - Delegation by the Council of responsibilities for implementing and monitoring treasury management policies and practices and for the execution and administration of treasury management decisions.
 - Delegation by the Council of the role of scrutiny of treasury management strategy and policies to a specific named body.

1.3 Reporting Requirements

10. As introduced above, the Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals.

Prudential and treasury indicators and treasury strategy (this report) - The first, and most important report covers:

- the capital plans (including prudential indicators);
- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

A mid year treasury management report – This will update members with the progress of the capital position, amending prudential indicators as necessary, and identifying whether the treasury strategy is meeting the objectives or whether any policies require revision.

An annual treasury report – This provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

Scrutiny - The above reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the Cabinet and the Governance, Audit, Risk Management and Standards Committee (GARMSC).

11. The Council has delegated responsibility for the implementation and regular monitoring of its treasury management policies and treasury management practices to the Section 151 officer. The Section 151 Officer chairs the Treasury Management Group (TMG), which consists of the Head of Technical Finance and Accountancy and the Treasury and Pension Fund Manager, to monitor the treasury management activity and market conditions.
12. Further details of responsibilities are given in Appendix 2.

1.4 Training

13. The CIPFA Code requires the responsible officer to ensure that Members with responsibility for treasury management receive adequate training in treasury management. This especially applies to Members responsible for scrutiny.
14. The Council's Treasury Management consultants will be asked to provide a training session for all Members of GARMSC and other interested Members and other training opportunities will be offered as appropriate.
15. The training needs of treasury management officers are periodically reviewed as part of the Learning and Development programme. The officers attend various seminars and conferences throughout the year.

1.5 Treasury management consultants

16. The Council has engaged Capita Asset Services, Treasury Solutions as its external treasury management adviser.
17. The Council recognises that responsibility for treasury management decisions remains with itself at all times and will ensure that undue reliance is not placed upon external service providers.
18. It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value is assessed are properly agreed and documented, and subjected to regular review.

1.6 Treasury Management Strategy for 2015/16

19. The Strategy covers:-

Capital issues

- the capital plans and the prudential indicators;
- the MRP policy.

Treasury management issues

- policy on use of external service providers;
- the current treasury position;
- the borrowing strategy;

- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy.

20. These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, the Department for Communities and Local Government (DCLG) Minimum Revenue Provision Guidance, the CIPFA Treasury Management Code and DCLG Investment Guidance.

21. It is not considered necessary to produce a separate treasury strategy for the Housing Revenue Account (HRA) in light of the co-mingling of debt and investments between HRA and the General Fund. Where appropriate, details of allocations of balances and interest to HRA are contained in this report.

1.7 Options considered

22. No options were considered beyond those discussed in the report due to the statutory and risk management constraints inherent in treasury management.

2. CAPITAL PRUDENTIAL INDICATORS 2015/16 – 2017/18

23. The Council's capital expenditure plans are the key drivers of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist Members' overview and confirm capital expenditure plans. The values shown in the tables for 2013-14 and 2014-15 are actual and forecast outturn respectively and not the strategy for those years.

2.1 Capital expenditure

24. This prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously and those forming part of this budget cycle. Amendments may be necessary in the light of decisions taken during the budget cycle.

Table 1 Capital Expenditure and Funding

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
	£'000	£'000	£'000	£'000	£'000
Expenditure					
Non - HRA	29,069	68,156	57,061	48,102	38,672
HRA	6,261	6,771	21,656	13,137	15,315
TOTAL	35,330	74,927	78,717	61,239	53,987
Funding:-					
Grants	9,404	37,853	29,142	19,457	12,967
Capital receipts	4,434	2,417	9,359	1,125	3,913
Revenue financing	6,748	6,058	9,638	8,302	9,046

Section 106 / Section 20 contributions	76	499	923	110	2,356
TOTAL	20,662	46,827	49,062	28,994	28,282
Net financing need for the year	14,668	28,100	29,655	32,245	25,705

2.2 The Council's borrowing need (Capital Financing Requirement)

25. The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is the total outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's underlying borrowing need. Any new capital expenditure, which has not immediately been paid for, will increase the CFR.
26. The CFR does not increase indefinitely, as the Minimum Revenue Provision (MRP) is a statutory annual revenue charge which broadly reduces the borrowing need in line with each asset's life.
27. The CFR includes any other long term liabilities (e.g. PFI schemes, finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a funding facility and so the Council is not required to borrow separately for these schemes. The Council currently has £22m of such schemes within the CFR.

Table 2 Capital Financing Requirement

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
	£'000	£'000	£'000	£'000	£'000
Capital Financing Requirement as at 31 March					
Non – HRA	244,215	256,168	270,118	282,616	290,380
HRA	149,538	149,508	151,214	154,784	154,754
TOTAL	393,753	405,676	421,332	437,400	445,134
Annual change in CFR					
Non – HRA	26	11,953	13,950	12,498	7,764
HRA	-36	-30	1,706	3,570	-30
TOTAL	-10	11,923	15,656	16,068	7,734

Table 3 Capital Financing Requirement – reasons for annual change

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
	£'000	£'000	£'000	£'000	£'000
Net financing need	14,114	27,600	29,155	31,745	25,205
Lease liability	554	500	500	500	500
Less MRP for PFI and Leases	-2,040	-2,035	-2,034	-2,035	-2,035
Less MRP	-12,638	-14,142	-11,965	-14,142	-15,936
TOTAL	-10	11,923	15,656	16,068	7,734

a) General Fund CFR increases over the five years from £244m to £290m reflecting the schools re-building and improvements programme and environmental improvements. Through a special determination the debt limit for the HRA has been increased to £154.8m and work will be carried out in line with this increase.

b) It is anticipated over this period that the increase in CFR requirements and the additional HRA expenditure can be met from existing cash balances.

2.3. Minimum Revenue Provision

28. Capital expenditure is generally defined as expenditure on assets that have a life expectancy of more than one year e.g. buildings, vehicles, machinery etc. The accounting approach is to spread the cost over the period during which such assets are used to provide services to the local community. The mechanism for spreading these costs is through an annual MRP. The MRP is the means by which capital expenditure which is financed by borrowing or credit arrangements is funded by Council Tax and housing rents.

29. The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2008 (the Regulations) require the Council to approve a Minimum Revenue Provision (MRP) Statement setting out what provision is to be made in the General Fund for the repayment of debt, and how the provision is to be calculated. The purpose of the Statement is to ensure the provision is prudent, allowing the debt to be repaid over a period reasonably commensurate with that over which the capital expenditure benefits. The Council is recommended to approve the following MRP Statement:

- For capital expenditure incurred before 1 April 2008 or which in the future will be Supported Capital Expenditure, the MRP policy will be the 'Regulatory Method' (option 1) outlined in CLG guidance on MRP. This option provides for an approximate 4% reduction in the borrowing need (CFR) each year.
- For all capital expenditure financed from unsupported (prudential) borrowing (including PFI and finance leases), MRP will be based upon an asset life method in accordance with Option 3 of the guidance.
- In some cases where a scheme is financed by prudential borrowing it may be appropriate to vary the profile of the MRP charge to reflect the future income streams associated with the asset, whilst retaining the principle that the full amount of borrowing will be charged as MRP over the asset's estimated useful life.
- A voluntary MRP may be made from either revenue or voluntarily set aside capital receipts.
- Estimated life periods and amortisation methodologies will be determined under delegated powers. To the extent that expenditure is not on the creation of an asset and is of a type that is subject to estimated life periods that are referred to in the guidance, these periods will generally be adopted by the Council. However, the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.
- Freehold land cannot properly have a life attributed to it, so for the purposes of Asset Life method it will be treated as equal to a maximum of 50 years. But if there is a structure on the land which the authority considers to have a life longer than 50 years, that same life estimate will be used for the land.

- As some types of capital expenditure incurred by the Council are not capable of being related to an individual asset, asset lives will be assessed on a basis which most reasonably reflects the anticipated period of benefit that arises from the expenditure. Also, whatever type of expenditure is involved, it will be grouped together in a manner which reflects the nature of the main component of expenditure and will only be divided up in cases where there are two or more major components with substantially different useful economic lives.
- Repayments included in annual PFI or finance leases are applied as MRP.
- Where borrowing is undertaken for the construction of new assets, MRP will only become chargeable once such assets are completed and operational.
- Under Treasury management best practice the Council may decide to defer borrowing up to the capital financing requirement (CFR) and use internal resources instead. Where internal borrowing has been used, the amount chargeable as MRP may be adjusted to reflect the deferral of actual borrowing.

2.4 Affordability Prudential Indicators

30. The previous sections cover the overall capital expenditure and financing requirements but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances.

2.5 Ratio of Financing Costs to Revenue Stream

31. This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream. The estimates of financing costs include current commitments and the proposals in the budget report.

Table 5 Ratio of Financing Costs to Revenue Stream

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
	%	%	%	%	%
Non - HRA	13	14	13	15	17
HRA	45	45	41	40	39

2.6 Incremental Impact of Capital Investment Decisions on Council Tax and Housing Rents

32. This indicator identifies the revenue costs associated with proposed capital programme and the impact on Council Tax and Housing Rents.

Table 6 Incremental Impact of Capital Investment Decisions

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
	£	£	£	£	£
Incremental impact of capital investment decisions					
Increase in Council Tax (band D) per annum	21.71	42.04	42.49	44.59	33.35
Increase in average housing rent per week	2.65	-2.92	1.34	-0.04	-0.07

2.7 Local HRA indicators

33. The latest CIPFA guidance suggests that the Council be aware of the following ratios when making its treasury management decisions.

Table 7 HRA Ratios

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
Debt (CFR) (£m)	149.5	149.5	151.2	154.8	154.8
Gross Revenue Stream (£m)	31.1	31.9	32.2	33.2	34.1
Ratio of Gross Revenue Stream to Debt (%)	21	21	21	21	22
Average Number of Dwellings	4,933	4,898	4,877	4,867	4,843
Debt outstanding per dwelling (£)	30,306	30,560	31,000	31,806	31,964

The ratio of gross revenue stream to debt is stable. As the number of dwellings reduces over the period, the debt outstanding per dwelling is estimated to increase. However, the annual increases are only marginal and the ratio compared to the average value of each dwelling is low enough for the measure to raise no concern.

2.8 Housing Revenue Account (HRA) Major Repairs Allowance (MRA)

34. The National Subsidy system was replaced by Self Financing on 01 April 2012 as part of the Government's reform of the HRA. As a result, the Council will make a charge for depreciation in respect of its dwellings calculated on a componentised basis, which will be counted as a genuine charge against the HRA. Under the National Subsidy system, the Council made a charge equal to the Major Repairs Allowance receivable from Central Government thereby ensuring a nil overall effect for depreciation.

35. As the value of housing stock is expected to increase HRA debt as a proportion of the value of housing stock will decline.

3. BORROWING

36. The capital expenditure plans set out in Section 2 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity. This involves both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing

facilities. The strategy covers the relevant treasury indicators, the current and projected debt positions and the annual investment strategy.

3.1 Current portfolio position

37. The latest position on actual borrowings and investments is as shown below:

Table 8 Treasury Position as at 31 December 2014

		Principal		Ave. rate
		£m	£m	%
Fixed rate funding	PWLB	218.5		4.25
	Market	115.8	334.3	
Variable rate funding			0	
Other long term liabilities (PFI & leases)			21.8	
Total Debt			356.1	
Total Investments			132.5	1.06

38. The Council has borrowed £83.8 million under Lender Option, Borrower Option (LOBO) structures with maturities between 2050 and 2078. In exchange for an interest rate that was below that offered on long term debt by the PWLB, the lender has the option at the end of five years (and half yearly thereafter) to reset the interest rate. If the rate of interest changes, the Council is permitted to repay the loan at no additional cost.

39. The Council's treasury portfolio position with forward projections is summarised below. The table shows the actual external debt, against the underlying capital borrowing need, highlighting any over or under borrowing.

Table 9 Changes to Gross Borrowing

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
	£'000	£'000	£'000	£'000	£'000
Debt 1st April	350,358	340,293	334,293	334,293	334,293
Expected change in debt	-10,065	-6,000	0	0	-10,000
Other long term liabilities (OLTL) 1st April	23,923	21,841	20,306	18,772	17,237
Expected change in OLTL	-2,082	-1,535	-1,534	-1,535	-1,535
Actual gross debt at 31st March	362,134	354,599	353,065	351,530	339,995
Capital Financing Requirement 31st March	393,753	405,676	421,332	437,400	445,134
Under / (over) borrowing	31,619	51,077	68,267	85,870	105,139

40. Debt outstanding should not normally exceed CFR.

41. Within the prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of

the CFR in the preceding year plus the estimates of any additional CFR for 2015/16 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue purposes.

42. The Director of Finance and Assurance reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in the budget report.
43. The table below shows the net borrowing after investment balances are taken into account. Net debt is forecast to increase as the capital programme continues to be financed from existing cash resources.

Table 10 Net Borrowing

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
	£'000	£'000	£'000	£'000	£'000
brought forward 1 April	273,284	230,942	269,107	282,736	297,695
carried forward 31 March	230,942	269,107	282,736	297,695	306,031
Change in net borrowing	-42,342	38,165	13,629	14,959	8,336

3.2 Treasury Indicators: limits to borrowing activity

The Operational Boundary

44. This is the limit which external debt is not normally expected to exceed.
45. The boundary is based on current debt plus anticipated net financing need for future years.

The Authorised Limit for External Debt.

46. This is a further key prudential indicator which represents a control on the maximum level of borrowing. It represents a limit beyond which external debt is prohibited. It reflects the level of external debt which, while not desired, could be afforded in the short term, but may not be sustainable in the longer term. It relates to the financing of capital plans by both external borrowing and other forms of liability, such as credit arrangements.
47. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.

Table 11 Operational boundary and authorised limit

	2013/14	2014/15	2015/16	2016/17	2017/18
	£m	£m	£m	£m	£m
Authorised Limit for external debt					
Borrowing and finance leases	394	406	421	437	445
Operational Boundary for external debt					
Borrowing	340	334	334	349	347
Other long term liabilities	22	21	19	17	16
Total	362	355	353	366	363
Upper limit for fixed interest rate exposure					
Net principal re fixed rate borrowing	340	406	421	437	445
Upper limit for variable rate exposure					
Net principal re variable rate borrowing	0	0	0	0	0
Upper limit for principal sums invested over 364 days*	25	40.5	40.5	40.5	40.5

* From 2014/15 includes a potential loan facility of £0.5m for HB Public Law Ltd.

HRA Debt Limit

48. Separately, the Council is also limited to a maximum HRA CFR (Debt limit) through the HRA self-financing regime. This limit is shown in the table below.

Table 12 HRA Debt Limit

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Forecast Outturn	Estimate	Estimate	Estimate
	£'000	£'000	£'000	£'000	£'000
HRA Debt Limit	149,648	149,648	151,384	154,984	154,984
HRA CFR	149,537	149,525	151,231	154,801	154,771
Headroom	111	123	153	183	213

3.3 Prospects for Interest Rates

49. The treasury management adviser has provided the commentary in the remainder of this section 3.3 and a more detailed economic commentary is included as Appendices 3 and 4.

The commentary was produced on 7 January 2015.

The Council has appointed Capita Asset Services as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. The following table gives Capita's view.

Annual Average %	Bank Rate %	PWLB Borrowing Rates % (including certainty rate adjustment)		
		5 year	25 year	50 year
Mar 2015	0.50	2.20	3.40	3.40
Jun 2015	0.50	2.20	3.50	3.50
Sep 2015	0.50	2.30	3.70	3.70
Dec 2015	0.75	2.50	3.80	3.80
Mar 2016	0.75	2.60	4.00	4.00
Jun 2016	1.00	2.80	4.20	4.20
Sep 2016	1.00	2.90	4.30	4.30
Dec 2016	1.25	3.00	4.40	4.40
Mar 2017	1.25	3.20	4.50	4.50
Jun 2017	1.50	3.30	4.60	4.60
Sep 2017	1.75	3.40	4.70	4.70
Dec 2017	1.75	3.50	4.70	4.70
Mar 2018	2.00	3.60	4.80	4.80

UK GDP growth surged during 2013 and the first half of 2014. Since then it appears to have subsided somewhat but still remains strong by UK standards and is expected to continue likewise into 2015 and 2016. There needs to be a significant rebalancing of the economy away from consumer spending to manufacturing, business investment and exporting in order for this recovery to become more firmly established. One drag on the economy has been that wage inflation has only recently started to exceed CPI inflation, so enabling disposable income and living standards to start improving. The plunge in the price of oil brought CPI inflation down to a low of 1.0% in November, the lowest rate since September 2002. Inflation is expected to stay around or below 1.0% for the best part of a year; this will help improve consumer disposable income and so underpin economic growth during 2015. However, labour productivity needs to improve substantially to enable wage rates to increase and further support consumer disposable income and economic growth. In addition, the encouraging rate at which unemployment has been falling must eventually feed through into pressure for wage increases, though current views on the amount of hidden slack in the labour market probably means that this is unlikely to happen early in 2015.

The US, the biggest world economy, has generated stunning growth rates of 4.6% (annualised) in Q2 2014 and 5.0% in Q3. This is hugely promising for the outlook for strong growth going forwards and it very much looks as if the US is now firmly on the path of full recovery from the financial crisis of 2008. Consequently, it is now confidently expected that the US will be the first major western economy to start on central rate increases by mid 2015.

The current economic outlook and structure of market interest rates and government debt yields have several key treasury management implications:

- Greece: the general election on 25 January 2015 is likely to bring a political party to power which is anti EU and anti austerity. However, if this eventually results in Greece leaving the Euro, it is unlikely that this will directly destabilise the Eurozone as the EU has put in place adequate firewalls to contain the immediate fallout to just Greece. However, the indirect effects of the likely strengthening of anti EU and anti austerity political parties throughout the EU is much more difficult to quantify;

- *As for the Eurozone in general, concerns in respect of a major crisis subsided considerably in 2013. However, the downturn in growth and inflation during the second half of 2014, and worries over the Ukraine situation, Middle East and Ebola, have led to a resurgence of those concerns as risks increase that it could be heading into deflation and prolonged very weak growth. Sovereign debt difficulties have not gone away and major concerns could return in respect of individual countries that do not dynamically address fundamental issues of low growth, international uncompetitiveness and the need for overdue reforms of the economy (as Ireland has done). It is, therefore, possible over the next few years that levels of government debt to GDP ratios could continue to rise to levels that could result in a loss of investor confidence in the financial viability of such countries. Counterparty risks therefore remain elevated. This continues to suggest the use of higher quality counterparties for shorter time periods;*
- *Investment returns are likely to remain relatively low during 2015/16 and beyond;*
- *Borrowing interest rates have been volatile during 2014 as alternating bouts of good and bad news have promoted optimism, and then pessimism, in financial markets. The closing weeks of 2014 saw gilt yields dip to historically remarkably low levels after inflation plunged, a flight to quality from equities (especially in the oil sector), and from the debt and equities of oil producing emerging market countries, and an increase in the likelihood that the ECB will commence quantitative easing (purchase of EZ government debt) in early 2015. The policy of avoiding new borrowing by running down spare cash balances has served well over the last few years. However, this needs to be carefully reviewed to avoid incurring higher borrowing costs in later times, when authorities will not be able to avoid new borrowing to finance new capital expenditure and/or to refinance maturing debt;*
- *There will remain a cost of carry to any new borrowing which causes an increase in investments as this will incur a revenue loss between borrowing costs and investment returns.*

3.4 Borrowing Strategy

50. As shown in Table 9 above, currently the Council has a debt portfolio of £334m, mainly long term, with an average maturity of 37 years. Cash balances have remained high and at 31 December 2014 were £132.5m. With the investment portfolio yielding around 1% and the average cost of debt 4.2%, there is a substantial short term cost to carrying excessive debt. The same picture is true if investment rates are compared with new borrowing rates.
51. As shown in Table 9 above the Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (CFR), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent with investment returns low and counterparty risk relatively high.
52. For the next three years the capital programme will continue to be funded to a large extent from grants and revenue resources and there is not likely to be a need for further borrowing. The only foreseen circumstances in which new long term borrowing in the next three years might be required therefore, are either if part of the LOBO portfolio had to be refinanced early, or if made available to fund new affordable

housing development on the basis that there was no revenue impact on the General Fund. Even then, the preference would be to reduce investment balances unless the gap between investment and borrowing rates has narrowed.

53. It may be necessary to resort to temporary borrowing from the money markets or other local authorities to cover mismatches in timing between capital grants and payments. However with several Government grants now paid early in the financial year this is not very likely.
54. Against this background and the risks within the economic forecast, caution will be adopted with the 2015/16 treasury management operations. The Director of Finance and Assurance will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances.
55. The Council has adopted a single pooled approach for debt. Allocations to HRA are based on its CFR, with interest charged to HRA at the average rate on all external borrowing. Longer term, the HRA's ability to repay borrowing will depend on future revenues and capital expenditure plans.

3.5 Treasury Management Limits on Activity

56. There are three debt related treasury activity limits. The purpose of these are to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs and improve performance.

Upper limit on variable interest rate exposure

57. This identifies a maximum limit for variable interest rates based upon the debt position net of investments. As shown in Table 11 above the Council does not expect to undertake any borrowing on this basis.

Upper limit on fixed interest rate exposure

58. This identifies a maximum limit for fixed interest rates based upon the debt position net of investments. The Council's limits are shown in Table 11 above

Maturity Structure of Borrowing

59. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.
60. The Council has no variable rate borrowing and the comments below relate only to its fixed rate portfolio.
61. In the table below, the maturity structure for the LOBO debt, in accordance with CIPFA Guidance, is shown as the first date that the interest rate can be increased.

Table 13 Maturity Structure of Fixed Rate Borrowing

	As at 31.12.2014 %	Upper limit %	Lower limit %
Under 12 months	25.1	20	0
12 months to 23 months	0.0	20	0
24 months to under 5 years	9.6	30	0
5 years to under 10 years	1.5	40	5
10 years and over	63.8	90	30

62. The current limits do not fully reflect the maturity structure of the LOBOs all of which could theoretically be repayable within a year. Additionally, adjusting the borrowing profile at this stage is not considered to be either economic or desirable hence the opportunity to comply with some of the limits is very constrained.

63. Cabinet is therefore asked to recommend to Council to agree:

- The upper limit for borrowing of under 12 months be increased to 30%
- The lower limit for borrowing of 5 to under 10 years be reduced to 0%

3.6 Policy on Borrowing in Advance of Need

64. The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved CFR estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.

65. Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

3.7 Debt rescheduling

66. The reasons for any rescheduling to be considered will include:

- the generation of cash savings and / or discounted cash flow savings;
- helping to fulfil the treasury strategy;
- enhancing the balance of the portfolio (amend the maturity profile and/or the balance of volatility).

67. Opportunities to reduce the cost of debt by premature repayment or to improve the maturity profile are kept under review in discussion with the Council's treasury management adviser. Early repayment of market loans is by negotiation. For PWLB loans, there are daily published prices for early repayment that allows analysis of the opportunities for restructuring. There is currently a spread which has generally made restructuring uneconomic. With capital expenditure plans being constrained, the level of required debt will be monitored and if deemed excessive, early redemption will be considered.

68. Should any of the LOBO loans with interest rate reset dates in 2015-16 (£83.8 m) require refinancing, the most likely source will be a combination of internal cash and external borrowing to protect the budget. The ratio will depend on the relative cost of the existing and replacement debt.
69. All rescheduling will be reported to Cabinet at the earliest meeting following the exercise.

4 ANNUAL INVESTMENT STRATEGY

4.1 Investment policy

70. The Council's investment policy has regard to the DCLG's Guidance on Local Government Investments ("the Guidance") and the revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA TM Code"). The Council's investment priorities will be security first, liquidity second, then return.
71. In accordance with the above guidance and in order to minimise the risk to investments, the Council below clearly stipulates the minimum acceptable credit quality of counterparties for inclusion on the lending list. The creditworthiness methodology used to create the counterparty list fully accounts for the ratings, watches and outlooks published by all three ratings agencies. The treasury management adviser monitors counterparty ratings on a real time basis with knowledge of any changes advised electronically as the agencies notify modifications.
72. Further, the Council's officers recognise that ratings should not be the sole determinant of the quality of an institution and that it is important to assess continually and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To this end the Council will engage with its adviser to maintain a monitor on market pricing such as "credit default swaps" and overlay that information on top of the credit ratings.
73. The aim of the strategy is to generate a list of highly creditworthy counterparties which will provide security of investments, enable divestification and minimise risk.
74. Investment instruments identified for current use are listed in paragraphs 83 and 84 under the 'specified' and 'non-specified' investments categories. Counterparty limits will be as set through the Council's treasury management practices.

4.2 Creditworthiness policy

75. The primary principle governing the Council's investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the Council will ensure that:
- It maintains a policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate security, and monitoring their security. This is set out in the specified and non-specified investment sections below; and

- It has sufficient liquidity in its investments. For this purpose it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's prudential indicators covering the maximum principal sums invested.

76. The Director of Finance and Assurance will maintain a counterparty list in compliance with the following criteria and will revise the criteria and submit them to Council for approval as necessary. These criteria are separate to those which determine which types of investment instrument are either specified or non-specified as they provide an overall pool of counterparties considered high quality which the Council may use, rather than defining what types of investment instruments are to be used.

77. The minimum rating criteria uses the lowest common denominator method of selecting counterparties and applying limits. This means that the application of the Council's minimum criteria will apply to the lowest available rating for any institution. For instance, if an institution is rated by two agencies, one meets the Council's criteria, the other does not, the institution will fall outside the lending criteria.

78. Credit rating information is supplied by the treasury management adviser on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating watches (notification of a likely change), rating outlooks (notification of a possible longer term change) are provided to officers almost immediately after they occur and this information is considered before dealing. For instance, a negative rating watch applying to a counterparty at the minimum Council criteria will be suspended from use, with all others being reviewed in light of market conditions.

79. *Recently the Council's treasury management adviser has provided advice affecting some of the Council's most significant counterparties as follows:*

The main rating agencies (Fitch, Moody's and Standard & Poor's) have, through much of the financial crisis, provided some institutions with a ratings "uplift" due to implied levels of sovereign support. More recently, in response to the evolving regulatory regime, the agencies have indicated they may remove these "uplifts". This process may commence during 2014/15 and / or 2015/16. The actual timing of the changes is still subject to discussion, but this does mean immediate changes to the credit methodology are required.

It is important to stress that the rating agency changes do not reflect any changes in the underlying status of the institution or credit environment, merely the implied level of sovereign support that has been built into ratings through the financial crisis. The eventual removal of implied sovereign support will only take place when the regulatory and economic environments have ensured that financial institutions are much stronger and less prone to failure in a financial crisis.

Both Fitch and Moody's provide "standalone" credit ratings for financial institutions. For Fitch, it is the Viability Rating, while Moody's has the Financial Strength Rating. Due to the future removal of sovereign support from institution assessments, both agencies have suggested going forward that these will be in line with their respective Long Term ratings. As such, there is no point monitoring both Long Term and these "standalone" ratings.

Furthermore, Fitch has already begun assessing its Support ratings, with a clear expectation that these will be lowered to 5, which is defined as "A bank for which there is a possibility of external support, but it cannot be relied upon." With all institutions likely to drop to these levels, there is little to no differentiation to be had by assessing Support ratings.

As a result of these rating agency changes, the credit element of our future methodology will focus solely on the Short and Long Term ratings of an institution. Rating Watch and Outlook information will continue to be assessed where it relates to these categories. This is the same process for Standard & Poor's that we have always taken, but a change to the use of Fitch and Moody's ratings. Furthermore, we will continue to utilise CDS prices as an overlay to ratings in our new methodology

80. The Council's criteria for an institution to become a counterparty are:

Specified Investments

81. These are sterling investments of a maturity period of not more than 364 days, or those which could be for a longer period but where the lender has the right to be repaid within 364 days if it wishes. These are low risk assets where the possibility of loss of principal or investment income is negligible. The instruments and credit criteria to be used are set out in the table below.

Instrument	Minimum Credit Criteria	Use
Debt Management Agency Deposit Facility	Government backed	In-house
Term deposits – other LAs	Local Authority issue	In-house
Term deposits – banks and building societies	AA- Long Term F1+Short-term 2 Support AA- Viability UK or AAA Sovereign	In-house
Money Market Funds	AAA	In-house

Non-Specified Investments

82. Non-specified investments are any other type of investment (i.e. not defined as Specified above). They normally offer the prospect of higher returns but carry a higher risk. The identification and rationale supporting the selection of these other investments are set out in the table below.

	Minimum Credit Criteria	Use	Max % of total investments	Max. maturity period
Term deposits – banks and building societies	A Long Term F1 Short-term 1 Support A Viability UK or AAA Sovereign	In-house	50%	3 months
Callable Deposits	A Long Term F1 Short term 1 Support	In-house	20%	3 months
UK nationalised Banks [Lloyds / HBOS]	F1 Short-term 1 Support	In-house	50%	36 months
UK nationalised Banks [RBS]	F2 Short-term 1 Support	In-house	50%	36 months
Enhanced Cash Funds	AAA	In-house	25% (maximum £10m per fund)	Minimum monthly redemption
HB Public Law Ltd		In house	£0.5m	36 months

Unless specified above, individual bank & building society counterparty limits that are consistent with the above limits are approved by the Section 151 Officer in accordance with the Council's Treasury Management Practices.

83. In view of the advice given by the treasury management adviser and quoted in paragraph 79 Cabinet is recommended to agree to the deletion of the "Viability" criteria included in the tables in paragraphs 81 and 82.

4.3 Country limits

84. The Council has determined that it will only use approved counterparties from the UK or from countries with a minimum sovereign credit rating of AAA. Currently the only countries meeting this criterion are Australia, Canada, Denmark, Germany, Luxembourg, Norway, Singapore, Sweden and Switzerland. The current UK rating is the second level of AA+. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.

4.4 Investment strategy

85. **In-house funds.** The Council's funds are mainly cash flow derived primarily the General Fund and HRA. Balances are also held to support capital expenditure. From 1st April 2011, pension fund cash balances have been held separately from those of the Council. However, a separate investment strategy has not been developed for the pension fund and all its cash is held on overnight call account with RBS. Investments are made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months).

86. **Investment returns expectations.** Bank Rate has remained unchanged at 0.50% since March 2009 and is not forecast to rise until quarter 4 of 2015. Bank Rate forecasts for financial year ends are:

- 2014/15 0.50%
- 2015/16 0.75%
- 2016/17 1.25%
- 2017/18 2.00%

87. As regards returns and potential returns key points made by Capita in Section 3.3 above and of prime significance in the Council's investment strategy are:

- *Counterparty risks therefore remain elevated. This continues to suggest the use of higher quality counterparties for shorter time periods; and*
- *Investment returns are likely to remain relatively low during 2015/16 and beyond.*

88. The only amendment proposed to the counterparty policy is explained in paragraph 85 above though close attention will be paid to Government intentions to sell off its stake in Lloyds and RBS. This will gradually remove the additional security offered by Government ownership which is a key element in sustaining the Council's current investment strategy.

89. **Investment treasury indicator and limit** - total principal funds invested for greater than 364 days. These limits are set with regard to the Council's liquidity requirements and to reduce the need for early sale of an investment. The Council's limit for investments of over 364 days is £40.5m.
90. Throughout 2014-15 to date interest rates for periods of up to a year have remained stable with the Council receiving about 1% for 364 days' investments with Lloyds and 0.25% for the RBS Special Interest Bearing Account. Yields available for periods of 1-3 years have fallen during the year to date.
91. As a consequence of these rates and the maturity of several higher yielding investments the Council's return for the whole year is likely to be close to 1%. Whilst this compares well with the LIBOR benchmark and peer authorities it represents a substantial reduction from the 1.5% earned in 2013-14 and 1.8% earned in 2012-13.
92. As a result of the Council's strategy and the interest rates available the only counterparties actively in use during 2014-15 have been Lloyds and Royal Bank of Scotland Group, Enhanced Money Market Funds and Svenska Handelsbanken. The investment portfolio has inevitably remained concentrated with RBS and Lloyds with 83% of the total portfolio invested with them on 31st December 2014. When opportunities arise consistent with the Council's policies diversification will be sought but it is not anticipated that there will be any significant change during 2015-16.
93. Due to the low interest rates environment and uncertainties around Government funding for banks, setting expected income levels for 2015-16 and beyond is imprecise. Investment income (net of allocations and excluding interest from West London Waste Authority) has been budgeted at £699,000 for 2015/16 (2014/15 £1,052,000).

Implications of the recommendations

94. The recommendations primarily relate to the requirements for the Council to comply with statutory duties. However, the content of the report, covering borrowing and investment strategy, has implications for the Council's ability to fund its capital projects and revenue activities.
95. The recommendations do not directly affect the Council' staffing/workforce.

Performance issues

96. The Council meets the requirements of the CIPFA Code of Practice for Treasury Management and, therefore, is able to demonstrate best practices for the Treasury Management function.
97. As part of the Code the Council must agree a series of prudential indicators and measure its performance against them. Success is measured by compliance with the indicators and the accuracy of future estimates so far as they are within the control of the Treasury Management function.

Environmental Implications

98. There are no direct environmental implications.

Risk Management Implications

99. The identification, monitoring and control of risk are central to the achievement of treasury management objectives and to this report. Potential risks are identified, mitigated and monitored in accordance with Treasury Management Practice Notes approved by the Treasury Management Group.

100. Risks are included in the Directorate Risk Register.

Legal Implications

101. The relevant legal provisions are contained within the body of the report.

Financial Implications

102. Financial matters are integral to the report.

Equalities Implications / Public Sector Equality Duty

103. Officers have considered possible equalities impact and consider that there is no adverse equalities impact as there is no direct impact on individuals

Council Priorities

104. This report deals with the Treasury Management Strategy which is a key to delivering the Council's corporate priorities

Section 3 - Statutory Officer Clearance

Name: Simon George	<input checked="" type="checkbox"/>	Chief Financial Officer
Date: 26 January 2015		
Name: Caroline Eccles	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 22 January 2015		

Ward Councillors notified:	NO, as it impacts on all Wards
EqIA carried out:	NO
EqIA cleared by:	N/A

Section 6 - Contact Details and Background Papers

Contact: Ian Talbot (Treasury and Pension Fund Manager)
Tel: 020-8424-1450 / Email: ian.talbot@harrow.gov.uk

Background Papers: N/A

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in does not apply as the decision is reserved to Council]</i>
--	---

LEGISLATION AND REGULATION IMPACTING ON TREASURY MANAGEMENT

The following items numbered 1 - 4 show the sequence of legislation and regulation impacting on the treasury management function. The sequence begins with primary legislation, moves through Government guidance and Chartered Institute of Public Finance and Accountancy (CIPFA) codes of practice and finishes with implementation through the Council's own Treasury Management Practices.

1. Local Government Act 2003

Link below

[Local Government Act 2003](#)

Below is a summary of the provisions in the Act dealing with treasury management.

In addition the Secretary of State is empowered to define the provisions through further regulations and guidance which he has subsequently done through statutory instruments, Department of Communities and Local Government Guidance and CIPFA codes of practice.

Power to borrow

The Council has the power to borrow for purposes relevant to its functions and for normal treasury management purposes – for example, to refinance existing debt.

Control of borrowing

The main borrowing control is the duty not to breach the prudential and national limits as described below.

The Council is free to seek loans from any source but is prohibited from borrowing in foreign currencies without the consent of Treasury, since adverse exchange rate movements could leave it owing more than it had borrowed.

All of the Council's revenues serve as security for its borrowing. The mortgaging of property is prohibited.

It is unlawful for the Council to 'securitise', that is, to sell future revenue streams such as housing rents for immediate lump-sums.

Affordable borrowing limit

The legislation imposes a broad duty for the Council to determine and keep under review the amount it can afford to borrow. The Secretary of State has subsequently defined this duty in more detail through the Prudential Code produced by CIPFA, which lays down the practical rules for deciding whether borrowing is affordable.

It is for the Council (at a meeting of the full Council) to set its own 'prudential' limit in accordance with these rules, subject only to the scrutiny of its external auditor. The Council is then free to borrow up to that limit without Government consent. The Council is free to vary the limit during the year, if there is good reason.

Requirements in other legislation for the Council to balance its revenue budget prevents the long-term financing of revenue expenditure by borrowing.

However the legislation does confer limited capacity to borrow short-term for revenue needs in the interests of cash-flow management and foreseeable requirements for temporary revenue borrowing are allowed for when borrowing limits are set by the Council.

The Council is allowed extra flexibility in the event of unforeseen needs, by being allowed to increase borrowing limits by the amounts of any payments which are due in the year but have not yet been received.

Imposition of borrowing limits

The Government has retained reserve power to impose 'longstop' limits for national economic reasons on all local authorities' borrowing and these would override authorities' self-determined prudential limits. Since this power has not yet been used the potential impact on the Council is not known.

Credit arrangements

Credit arrangements (eg property leasing, PFI and hire purchase) are treated like borrowing and the affordability assessment must take account not only of borrowing but also of credit arrangements. In addition, any national limit imposed under the reserve powers would apply to both borrowing and credit.

Power to invest

The Council has the power to invest, not only for any purpose relevant to its functions but also for the purpose of the prudential management of its financial affairs.

2. Department for Communities and Local Government Investment Guidance (March 2010)

The Local Government Act 2003 requires a local authority “.....to have regard (a) to such guidance as the Secretary of State may issue.....” and the current guidance became operative on 1 April 2010.

The Guidance recommends that for each financial year the Council should prepare at least one investment Strategy to be approved before the start of the year. The Strategy must cover:

- **Investment security –**
Investments should be managed prudently with security and liquidity being considered ahead of yield
Potential counterparties should be recognised as “specified” and “non-specified” with investment limits being defined to reflect the status of each counterparty

- **Investment risk**
Procedures should be established for monitoring, assessing and mitigating the risk of loss of invested sums and for ensuring that such sums are readily accessible for expenditure whenever needed.
The use of credit ratings and other risk assessment processes should be explained
The use of external advisers should be monitored
The training requirements for treasury management staff should be reviewed and addressed
Specific policies should be stated as regards borrowing money in advance of need

- **Investment Liquidity**
The Strategy should set out procedures for determining the maximum periods for which funds may prudently be committed

The Strategy should be approved by the full Council and made available to the public free of charge. Subject to full Council approval, or approved delegations, the Strategy can be revised during the year.

3. Treasury Management in the Public Services: Code of Practice and Cross Sectoral Guidance Notes (CIPFA 2011)

The primary requirements of the Code are:

- Creation and maintenance of a Treasury Management Policy Statement which sets out the policies and objectives of the Council's treasury management activities.
- Creation and maintenance of Treasury Management Practices ("TMPs") that set out the manner in which the Council will seek to achieve those policies and objectives.
- Receipt by the full Council of an annual Treasury Management Strategy Statement - including the Annual Investment Strategy and Minimum Revenue Provision Policy - for the year ahead, a Half-year Review Report and an Annual Report (stewardship report) covering activities during the previous year.
- Delegation by the Council of responsibilities for implementing and monitoring treasury management policies and practices and for the execution and administration of treasury management decisions.
- Delegation by the Council of the role of scrutiny of treasury management strategy and policies to a specific named body.

4. The Prudential Code for Capital Finance in Local Authorities (CIPFA 2011)

Compliance with the objectives of the Code by the Council should ensure that:

- Capital expenditure plans are affordable in terms of their implications on Council Tax and housing rents
- External borrowing and other long term liabilities are within prudent and sustainable levels
- Treasury management decisions are taken in accordance with good professional practice

As part of the two codes of practice above the Council is required to:

- agree a series of prudential indicators against which performance is measured
- produce Treasury Management Practice Notes for officers which set out how treasury management policies and objectives are to be achieved and activities controlled.

Treasury Management Delegations and Responsibilities

The respective roles of the Cabinet, GARMCS, the Section 151 officer, the Treasury Management Group and the Treasury Team are summarised below. Further details are set out in the Treasury Management Practices.

The main responsibilities and delegations in respect of treasury activities are:

Council

Council will approve the annual treasury strategy, including borrowing and investment strategies. In doing so Council will establish and communicate their appetite for risk within treasury management having regard to the Prudential Code

Cabinet

Cabinet will recommend to Council the annual treasury strategy, including borrowing and investment strategies and receive a half-year report and annual out-turn report on treasury activities.

Cabinet also approves revenue budgets, including those for treasury activities.

Governance, Audit, Risk Management and Standards Committee

GARMSC is responsible for ensuring effective scrutiny of the Treasury strategy and policies.

Section 151 Officer

Council has delegated responsibility for the implementation and monitoring of treasury management decisions to the Section 151 Officer to act in accordance with approved policy and practices. In particular, the Sector 151 Officer:

- Approves all new borrowing, investment counterparties and limits and changes to the bank mandate,
- Chairs the Treasury Management Group (“TMG”), and
- Approves the selection of treasury advisor and agrees terms of appointment.

Treasury Management Group

Monitors the treasury activity against approved strategy, policy, practices and market conditions.

Approves changes to treasury management practices and procedures.

Reviews the performance of the treasury management function using benchmarking data on borrowing and investment provided by Sector.

Monitors the performance of the appointed treasury advisor and recommends any necessary actions.

Ensures the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function.

Monitors the adequacy of internal audit reviews and the implementation of audit recommendations.

Treasury and Pension Fund Manager

Has responsibility for the execution and administration of treasury management decisions, acting in accordance with the Council's Treasury Policy Statement and CIPFA's 'Standard of Professional Practice on Treasury Management'.

Treasury Team

Undertakes day to day treasury investment and borrowing activity in accordance with strategy, policy, practices and procedures and recommends changes to these to the TMG.

Interest Rate Forecasts 2015 – 2018

APPENDIX 3

387

Capita Asset Services Interest Rate View													
	Mar-15	Jun-15	Sep-15	Dec-15	Mar-16	Jun-16	Sep-16	Dec-16	Mar-17	Jun-17	Sep-17	Dec-17	Mar-18
Bank Rate View	0.50%	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	1.50%	1.75%	1.75%	2.00%
3 Month LIBID	0.50%	0.50%	0.60%	0.80%	0.90%	1.10%	1.10%	1.30%	1.40%	1.50%	1.80%	1.90%	2.10%
6 Month LIBID	0.70%	0.70%	0.80%	1.00%	1.10%	1.20%	1.30%	1.50%	1.60%	1.70%	2.00%	2.10%	2.30%
12 Month LIBID	0.90%	1.00%	1.10%	1.30%	1.40%	1.50%	1.60%	1.80%	1.90%	2.00%	2.30%	2.40%	2.60%
5yr PW IB Rate	2.20%	2.20%	2.30%	2.50%	2.60%	2.80%	2.90%	3.00%	3.20%	3.30%	3.40%	3.50%	3.60%
10yr PW IB Rate	2.80%	2.80%	3.00%	3.20%	3.30%	3.50%	3.60%	3.70%	3.80%	3.90%	4.00%	4.10%	4.20%
25yr PW IB Rate	3.40%	3.50%	3.70%	3.80%	4.00%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%
50yr PW IB Rate	3.40%	3.50%	3.70%	3.80%	4.00%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%
Bank Rate													
Capita Asset Services	0.50%	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	1.50%	1.75%	1.75%	2.00%
Capital Economics	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	-	-	-	-	-
5yr PW IB Rate													
Capita Asset Services	2.20%	2.20%	2.30%	2.50%	2.60%	2.80%	2.90%	3.00%	3.20%	3.30%	3.40%	3.50%	3.60%
Capital Economics	2.20%	2.50%	2.70%	3.00%	3.10%	3.20%	3.30%	3.40%	-	-	-	-	-
10yr PW IB Rate													
Capita Asset Services	2.80%	2.80%	3.00%	3.20%	3.30%	3.50%	3.60%	3.70%	3.80%	3.90%	4.00%	4.10%	4.20%
Capital Economics	2.80%	3.05%	3.30%	3.55%	3.60%	3.65%	3.70%	3.80%	-	-	-	-	-
25yr PW IB Rate													
Capita Asset Services	3.40%	3.50%	3.70%	3.80%	4.00%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%
Capital Economics	3.25%	3.45%	3.65%	3.85%	3.95%	4.05%	4.15%	4.25%	-	-	-	-	-
50yr PW IB Rate													
Capita Asset Services	3.40%	3.50%	3.70%	3.80%	4.00%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%
Capital Economics	3.30%	3.50%	3.70%	3.90%	4.00%	4.10%	4.20%	4.30%	-	-	-	-	-

Please note – The current PWLB rates and forecast shown above have taken into account the 20 basis point certainty rate reduction effective as of the 1st November 2012

The commentary was produced on 7 January 2015.

Economic Background

UNITED KINGDOM

After strong UK GDP growth in 2013 at an annual rate of 2.7%, and then in 2014 0.7% in Q1, 0.9% in Q2 2014 (annual rate 3.2% in Q2), Q3 has seen growth fall back to 0.7% in the quarter and to an annual rate of 2.6%. It therefore appears that growth has eased since the surge in the first half of 2014 leading to a downward revision of forecasts for 2015 and 2016, albeit that growth will still remain strong by UK standards. For this recovery to become more balanced and sustainable in the longer term, the recovery needs to move away from dependence on consumer expenditure and the housing market to exporting, and particularly of manufactured goods, both of which need to substantially improve on their recent lacklustre performance. This overall strong growth has resulted in unemployment falling much faster than expected. The MPC is now focusing on how quickly slack in the economy is being used up. It is also particularly concerned that the squeeze on the disposable incomes of consumers should be reversed by wage inflation rising back significantly above the level of inflation in order to ensure that the recovery will be sustainable. There also needs to be a major improvement in labour productivity, which has languished at dismal levels since 2008, to support increases in pay rates. Unemployment is expected to keep on its downward trend and this is likely to eventually feed through into a return to significant increases in wage growth at some point during the next three years. However, just how much those future increases in pay rates will counteract the depressive effect of increases in Bank Rate on consumer confidence, the rate of growth in consumer expenditure and the buoyancy of the housing market, are areas that will need to be kept under regular review.

Also encouraging has been the sharp fall in inflation (CPI), reaching 1.0% in November 2014, the lowest rate since September 2002. Forward indications are that inflation is likely to remain around or under 1% for the best part of a year. The return to strong growth has helped lower forecasts for the increase in Government debt over the last year but monthly public sector deficit figures during 2014 have disappointed until November. The autumn statement, therefore, had to revise the speed with which the deficit is forecast to be eliminated.

EUROZONE

The Eurozone is facing an increasing threat from weak or negative growth and from deflation. In November 2014, the inflation rate fell further, to reach a low of 0.3%. However, this is an average for all EZ countries and includes some countries with negative rates of inflation. Accordingly, the ECB took some rather limited action in June and September 2014 to loosen monetary policy in order to promote growth. It now appears likely that the ECB will embark on full quantitative easing (purchase of EZ country sovereign debt) in early 2015.

Concern in financial markets for the Eurozone subsided considerably after the prolonged crisis during 2011-2013. However, sovereign debt difficulties have not gone away and major issues could return in respect of any countries that do not dynamically address fundamental issues of low growth, international uncompetitiveness and the need for overdue reforms of the economy, (as Ireland has done). It is, therefore, possible over the next few years that levels of government debt to GDP ratios could continue to rise for

some countries. This could mean that sovereign debt concerns have not disappeared but, rather, have only been postponed. The ECB's pledge in 2012 to buy unlimited amounts of bonds of countries which ask for a bailout has provided heavily indebted countries with a strong defence against market forces. This has bought them time to make progress with their economies to return to growth or to reduce the degree of recession. However, debt to GDP ratios (2013 figures) of Greece 180%, Italy 133%, Portugal 129%, Ireland 124% and Cyprus 112%, remain a cause of concern, especially as some of these countries are experiencing continuing rates of increase in debt in excess of their rate of economic growth i.e. these debt ratios are likely to continue to deteriorate. Any sharp downturn in economic growth would make these countries particularly vulnerable to a new bout of sovereign debt crisis. It should also be noted that Italy has the third biggest debt mountain in the world behind Japan and the US.

Greece: the general election due to take place on 25 January 2015 is likely to bring a political party to power which is anti EU and anti austerity. However, if this eventually results in Greece leaving the Euro, it is unlikely that this will directly destabilise the Eurozone as the EU has put in place adequate firewalls to contain the immediate fallout to just Greece. However, the indirect effects of the likely strengthening of anti EU and anti austerity political parties throughout the EU is much more difficult to quantify. There are particular concerns as to whether democratically elected governments will lose the support of electorates suffering under EZ imposed austerity programmes, especially in countries which have high unemployment rates. There are also major concerns as to whether the governments of France and Italy will effectively implement austerity programmes and undertake overdue reforms to improve national competitiveness. These countries already have political parties with major electoral support for anti EU and anti austerity policies. Any loss of market confidence in either of the two largest Eurozone economies after Germany would present a huge challenge to the resources of the ECB to defend their debt.

USA.

The U.S. Federal Reserve ended its monthly asset purchases in October 2014. GDP growth rates (annualised) for Q2 and Q3 of 4.6% and 5.0% have been stunning and hold great promise for strong growth going forward. It is therefore confidently forecast that the first increase in the Fed. rate will occur by the middle of 2015.

CHINA

Government action in 2014 to stimulate the economy appeared to be putting the target of 7.5% growth within achievable reach but recent data has indicated a marginally lower outturn for 2014, which would be the lowest rate of growth for many years. There are also concerns that the Chinese leadership has only started to address an unbalanced economy which is heavily over dependent on new investment expenditure, and for a potential bubble in the property sector to burst, as it did in Japan in the 1990s, with its consequent impact on the financial health of the banking sector. There are also concerns around the potential size, and dubious creditworthiness, of some bank lending to local government organisations and major corporates. This primarily occurred during the government promoted expansion of credit, which was aimed at protecting the overall rate of growth in the economy after the Lehmans crisis.

JAPAN

Japan is causing considerable concern as the increase in sales tax in April 2014 has suppressed consumer expenditure and growth to the extent that it has slipped back into recession in Q2 and Q3. The Japanese government already has the highest debt to GDP ratio in the world.

CAPITA ASSET SERVICES FORWARD VIEW

Economic forecasting remains difficult with so many external influences weighing on the UK. Our Bank Rate forecasts, (and also MPC decisions), will be liable to further amendment depending on how economic data transpires over 2015. Forecasts for average earnings beyond the three year time horizon will be heavily dependent on economic and political developments. Major volatility in bond yields is likely to endure as investor fears and confidence ebb and flow between favouring more risky assets i.e. equities, or the safe haven of bonds. The overall longer run trend is for gilt yields and PWLB rates to rise, due to the high volume of gilt issuance in the UK, and of bond issuance in other major western countries. Increasing investor confidence in eventual world economic recovery is also likely to compound this effect as recovery will encourage investors to switch from bonds to equities.

The overall balance of risks to economic recovery in the UK is currently evenly balanced. Only time will tell just how long this current period of strong economic growth will last; it also remains exposed to vulnerabilities in a number of key areas.

The interest rate forecasts in this report are based on an initial assumption that there will not be a major resurgence of the EZ debt crisis. There is an increased risk that Greece could end up leaving the Euro but if this happens, the EZ now has sufficient fire walls in place that a Greek exit would have little immediate direct impact on the rest of the EZ and the Euro. It is therefore expected that there will be an overall managed, albeit painful and tortuous, resolution of any EZ debt crisis that may occur where EZ institutions and governments eventually do what is necessary - but only when all else has been tried and failed. Under this assumed scenario, growth within the EZ will be weak at best for the next couple of years with some EZ countries experiencing low or negative growth, which will, over that time period, see an increase in total government debt to GDP ratios. There is a significant danger that these ratios could rise to the point where markets lose confidence in the financial viability of one, or more, countries, especially if growth disappoints and / or efforts to reduce government deficits fail to deliver the necessary reductions. However, it is impossible to forecast whether any individual country will lose such confidence, or when, and so precipitate a sharp resurgence of the EZ debt crisis. While the ECB has adequate resources to manage a debt crisis in a small EZ country, if one, or more, of the larger countries were to experience a major crisis of market confidence, this would present a serious challenge to the ECB and to EZ politicians.

Downside risks to current forecasts for UK gilt yields and PWLB rates currently include:

- Geopolitical risks in Eastern Europe, the Middle East and Asia, increasing safe haven flows.
- UK strong economic growth is weaker than we currently anticipate.

- Weak growth or recession in the UK's main trading partners - the EU, US and China.
- A resurgence of the Eurozone sovereign debt crisis.
- Recapitalisation of European banks requiring more government financial support.
- Monetary policy action failing to stimulate sustainable growth and to combat the threat of deflation in western economies, especially the Eurozone and Japan.

The potential for upside risks to current forecasts for UK gilt yields and PWLB rates, especially for longer term PWLB rates include: -

- An adverse reaction by financial markets to the result of the UK general election in May 2015 and the economic and debt management policies adopted by the new government
- ECB either failing to carry through on recent statements that it will soon start quantitative easing (purchase of government debt) or severely disappointing financial markets with embarking on only a token programme of minimal purchases which are unlikely to have much impact, if any, on stimulating growth in the EZ.
- The commencement by the US Federal Reserve of increases in the central rate in 2015 causing a fundamental reassessment by investors of the relative risks of holding bonds as opposed to equities, leading to a sudden flight from bonds to equities.
- A surge in investor confidence that a return to robust world economic growth is imminent, causing a flow of funds out of bonds into equities.
- UK inflation returning to significantly higher levels than in the wider EU and US, causing an increase in the inflation premium inherent to gilt yields.

This page is intentionally left blank

REPORT FOR: CABINET

Date of Meeting:	19 February 2015
Subject:	Revenue and Capital Monitoring for Quarter 3 as at 31December 2014
Key Decision:	Yes
Responsible Officer:	Simon George, Director of Finance and Assurance
Portfolio Holder:	Councillor Sachin Shah, Portfolio Holder for Finance and Major Contracts
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendix 1 - Revenue Summary (Directorates) Appendix 2 – MTFS 2014/15 to 2016/17 Savings Tracker Appendix 3 - Debt Management 2014/15 Appendix 4 – Capital Programme as at 31 December 2014

Section 1 – Summary and Recommendations

This report sets out the Council's revenue and capital monitoring position as at Quarter 3 2014/15(31December 2014).

Recommendations:

1. That Cabinet note the revenue and capital forecast positions detailed in this report as at Quarter 3 2014/15.
2. That cabinet approve the virement set out in paragraph 76.
3. That Cabinet note the reduction to the Capital Programme outlined in paragraph 77.
4. That Cabinet approve increases to the capital programme as set out in para 78.

Reason: (For recommendation)

To report the 2014/15 forecast financial position as at 31 December 2014.

Section 2 – Report REVENUE MONITORING

1. The Quarter 3 forecast indicate a potential net budget overspend of £1.006m on Directorate budgets. This is offset by savings on corporate budgets to give a balanced position. These are an increase in investment income of £350k, a saving on pay inflation of £85k, a saving on the contribution to the litigation provision of £175k, additional Education Services grant of £252k and an assumed use of contingency of £144k.
2. Cabinet agreed in year savings of £1.601m in July and £131k in November for implementation with immediate effect, to contribute to future Medium Term Financial Strategy targets. The variances now reported allow for these savings being achieved in full. Table 1 below summarises the Quarter 3 position and Appendix 1 provides more detail:

Table 1: Revenue Monitoring – Quarter 3 2014/15

	Revised Budget	Forecast Outturn	Quarter 3 Variance	Variance	Quarter 2 Variance
	£000	£000	£000	%	£000
Resources	26,638	26,400	(238)	-0.9%	(530)
Environment and Enterprise	41,111	40,602	(509)	-1.2%	(481)
Community, Health and Wellbeing	75,873	76,967	1,094	1.4%	462
Children and Families	47,171	47,830	659	1.4%	811
Total Directorate Budgets	190,793	191,799	1,006	0.5%	262
Corporate Items	(16,367)	(17,373)	(1,006)	6.1%	(350)
Total Budget Requirement	174,426	174,426	0	0.0%	(88)
HRA	(905)	(821)	84		268

RESOURCES

3. At Quarter 3 Resources are reporting an under spend of £238k on a budget of £26.6m, an increase in expenditure forecast of 292k when compared to Quarter 2.
4. The increase in forecast at Quarter 3 compared to Quarter 2 is as a result of the following:
 - Additional expenditure identified across the Resources directorate (£250k), including SAP improvements and policy and procedure developments for the HR transformation project.
 - Expected spend by Legal and Governance to secure more business with other local authorities (£150k).
 - Increase in pension contribution for all ex- Harrow IT staff TUPE to Capita (£102k).
 - Implementation of Process Integration(PI) for HMRC and Database System (DBS) payment (£42k).
 - Customer Care Platform Harrow (CCPH) upgrade staffing cost originally classified as capital (50k).
5. The above are mitigated by £300k as a result of the delay to a number of revenue IT projects.

ENVIRONMENT AND ENTERPRISE

6. At Quarter 3, Environment & Enterprise are reporting an under spend of £509k on the total net budget of £41.1m, an increase from the position reported at Quarter 2 [£481k underspend]. This includes under spends of £63k which will be requested as carry forwards at year end;
 - £34k Emergency Relief Scheme
 - £5k Transformational Challenge Award
 - £24k Sustainable Drainage
7. The under spend relates in the main to increased income from the Civic Amenity site (£163k), cemeteries (£108k) and commercial lettings (£123k). This is coupled with the budget originally set aside for early termination of waste vehicles which is now no longer required (£110k).
8. A budget pressure on salaries of £0.9m has been identified following the Towards Excellence restructuring which is being contained within the directorate mainly through vacancy management. The on-going vacancy management has also generated further underspends within Commissioning Services of £148k and Economic Development of £57k.
9. The above favourable variations are partially offset by the forecast overspend on waste disposal costs of £283k due to increased waste tonnage delivered to the WLWA. The forecast payment to the WLWA in 14/15 is £7.8m, which could fluctuate depending on residents' recycling habits as well as seasonal trends on garden waste.

10. Parking income is volatile and the achievement of the income budget is subject to a number of factors such as footfall, economic recovery, drivers' behaviour and compliance to traffic rules, and weather condition. At Quarter 3, an overall parking income of £10.3m is forecast, which will be closely monitored. Work is also ongoing to determine the financial implications arising from legislative changes in relation to the use of CCTV cameras for parking enforcement activities.
11. Of the £1.926m 14/15 MTFS targets, there are three red rated savings;
- £300k saving relating to parking income at Harrow Leisure Centre car park as a result of delayed implementation to permit further public and stakeholder consultation. A new charging regime is anticipated to be in place from 1 April 2015. The shortfall will be mitigated by a range of other favourable variances including the over recovery of parking income.
 - £25k relating to revenue generation from fleet sponsorship / advertisement which remains under review by Procurement colleagues. The position reported assumes this is not achieved in 14/15.
 - £100k saving related to Trading Standards. The position reported assumes £70k of this saving will not be achieved in 14/15. The achievement of this saving is subject to Proceeds of Crime Act income, of which the reconciliation is undertaken by Home Office annually at year end.

COMMUNITY, HEALTH AND WELLBEING

12. The Community, Health and Wellbeing Directorate is forecasting an overspend of £1,094k at Quarter 3, an increase of £632k compared to Quarter 2, as detailed below.

	Revised Budget	Forecast Outturn	Quarter 39 Variance	Variance	Qtr 2 Variance
	£'000	£'000	£'000	%	
Adult Services	61,089	61,619	530	0.87%	530
Community and Culture	6,598	6,479	-119	-1.80%	-73
Housing General Fund	6,676	7,818	1,142	17.11%	244
Public Health	1,045	592	-453	-43.35%	-232
Transformation	465	459	-6	-1.29%	-6
Total Budget	75,873	76,967	1,094	1.44%	463

ADULT SERVICES

13. Adults are reporting a projected overspend of £0.530m against a total net budget of £61.1m, no change against the Quarter 2 position.
14. The majority of Adults budgets are demand led and the Council has a statutory duty to meet vulnerable adults' needs. It is therefore

challenging to strike a balance between safeguarding adults against harm and abuse and simultaneously balancing the budgets.

15. There are a number of pressures across the directorate and the key variations are detailed below:

- There continues to be an increase in number of referrals and complexity of care required to support service users, some of which may impact the ability to fully deliver those MTFs savings which were predicated on the costs of care being provided in the community at lower weekly cost. As a result of these pressures, an overspend of £621k on the purchasing budget is forecast. This assumes that the balance of savings of £1.3m will be delivered and a draw-down of £150k from the business risk reserve to offset the Continuing Health Care and Ordinary Resident cases.
- These pressures are likely to continue in the longer term and may be resolved by wider integration with health once the BCF has been agreed. In the short term the priority is to protect service users whilst managing the financial position
- £173k relates to the Deprivation of Liberty Safeguards (DoLS), a new legislative requirement in the current financial year.
- £127k of the overspend relates to Mental Health S75- Central North West London Hospitals Trust (CNWL) in part as a result of Harrow Clinical Commissioning Groups decision to close Roxbourne (which, in the Council's view, has resulted in increased costs for social care), together with increases in the number of care packages. The Council is actively supporting CNWL on various projects to mitigate these pressures where possible.

16. The mitigations assumed in reporting this position are:

- Wider determinants of public health delivered by adult social care to be funded by public health grant flexibility of £140k, there may be a further ability to increase this figure given the Public Health Grant underspend reported elsewhere.
- Use of £150k of the £750k business risk reserve in relation to the Continuing Health Care and Ordinary Resident cases. It is very likely that the remainder of the business risk reserve will need to be drawn down by the end of the financial year.
- £105k from Winter Pressures from the Clinical Commissioning Group (CCG).
- Capitalisation of £100k staff costs associated with the MyCep capital project is being explored.
- Other initiatives across the directorate.

17. In addition, it should be noted that the NHS funding transfer for 2014/15 of £4.445m, whilst agreed between the Council and the Clinical Commissioning Group (CCG), has yet to be paid by NHS England.
18. Although there is movement within budget heads, there is no movement in total between Quarter 2 and Quarter 3.

COMMUNITY AND CULTURE

19. Community and Culture are reporting a projected underspend of £119k against a total net budget of £6.598m. The positive movement of £46k from Quarter 2 mainly relates to underspends on repairs and maintenance budgets within the Leisure and Libraries service and capitalisation of equipment purchases.
20. If the existing nil spend on the Leisure and Libraries repairs and maintenance budget continues, a further £33k underspend is possible.

HOUSING GENERAL FUND

21. The forecast overspend on housing has increased from £244k at quarter 2 to £1.142m an increase of £898k. This is on a net budget of £6.7m.
22. The reported pressure at quarter 2 of £244k assumed the costs of homelessness would be mitigated as a result of a number of initiatives which would reduce the number of families in B&B to 78 by 31 March 2015, yielding an average of 100 families in B&B at any one time during 2014/15.
23. Although implemented, extraordinary growth in homeless families in Harrow and London-wide has exceeded the benefit of these measures, resulting in an estimated 160 families likely to be in B&B by 31 March 2015. This equates to an additional 1 to 2 families in B&B per week for remainder of the financial year as opposed to an equivalent reduction expected at Quarter 2.
24. This represents a deterioration against Quarter 2 expectations of 82 families over six months, yielding a financial impact of some £407k (represented as 82 families x 26 weeks at an average of £191 per family per week). Other pressures account for the remaining £106k yielding an increase in the estimated cost of B&B of £513k.
25. This is partly offset by an additional £70k of income expected to be generated from the Private Sector Leasing ("PSL") scheme.
26. A further £0.533m is now not expected to be received from the Council's Discretionary Housing Payments ("DHP") fund following a joint review between Housing and Revenues & Benefits Services. The Council has a total of £1.138m DHP allocation for 2014/15 of which some £500k was originally allocated for Housing General Fund. Of this some £417k is already committed for deposits in respect of Private tenants and rent short falls for Council tenants and it is anticipated the DHP allocation will not be sufficient to meet the original £500k allocated to Housing. The review also indicates the Council's DHP fund will be insufficient to meet total demand.

27. A review of the impact of the main measures assumed at Quarter 2 is included in the table below which sets out the movement in estimated forecast compared to Quarter 3:

Table 2 Homelessness Changes

Description	Assumed Quarter 2 £'000	Estimated Quarter 3 £'000	Change £'000
Placement of families in routine Council voids; 20 out of an anticipated 40 placements have been made)	-428	-187	+241
Families moved out of London	-182	-43	+139
Other measures	-133	-	+133
Increase in B&B costs	-743	-230	+513
Other :			
DHP – reduced income	290	823	+533
B&B professional fees	363	240	-123
Private Sector Leasing – improvement in net cost estimate	-484	-554	-70
Other, including bad debt provision			+45
Change in forecast			+898

28. The combined impact, across London, of rapidly increasing rents in the private rental sector house prices and the continuing impact of the Government's Welfare Reforms has resulted in extraordinary growth in the number of families seeking temporary accommodation from Councils in London.

29. The Housing Service has implemented a range of initiatives, listed below, which are aimed at preventing the number of families in B&B from exceeding 160 by 31 March 2015.

- Increase in PSL rents and a proposed increase for B&B from April 2015;
- Increased use of Council stock to accommodate homeless families including Grange Farm;
- An increased drive for Out of London moves using the Council's Grants to Move initiatives, will free up more Council properties for use as temporary accommodation;
- Expedition of the Grants to Move and Empty Property Grants schemes to move suitable families out of London and bring empty homes into use by offering incentives;

30. Savings required in the previous MTFs process have been achieved in the Bed & Breakfast ("B&B") budget, as well as savings generated by empty homes and grants to move initiatives. This has, however, been obscured by extraordinary growth in the numbers of families seeking temporary accommodation over the last year, leading to an overall pressure, outlined above, even after offsetting the £400k carry forward

and charging an additional £40k to HRA reflecting the allocation staff within the Housing Needs Service.

31. The Housing Service continues to explore new initiatives with the aim of reducing expenditure on B&B and increasing income, and work continues to clarify the level of DHP that may ultimately be drawn down in 2014/15. This work will also inform decision-making in respect of the 2015-16 budget.

HOUSING REVENUE ACCOUNT

32. The forecast outturn shows an adverse variation of £84k. Additional depreciation charges of £216k for non-dwellings and £187k for dwellings only result in a transfer of resources to the Major Repairs Reserve therefore have no overall impact on the resources available to the Council's HRA. These arise from changes in methodology applied for 2013/14 final accounts. A review of the debt profile has indicated a lower than budgeted contribution to the bad debt provision will be required, and this is also the main reason for the £184k improvement from Quarter 2.
33. Impairment charges for non-dwellings estimated at £1.5m have not been included in the forecast outturn although, under current regulations, a charge against HRA balances is required. This issue has been raised by a number of Councils as the regulations are not consistent with the Government's stated objective of encouraging new build. DCLG are in the process of discussing this issue with CIPFA.

Table 3 HRA Forecast

Period 9	Original budget	Revised Budget	YTD Actual	Forecast outturn	Variation
	£000	£000	£000	£000	£000
Balance b/fwd (pre audit)	-3,533	-3,533	0	-3,574	-41
Net (surplus) deficit	-978	-905	-11,649	-821	84
Balance c/fwd	-4,511	-4,438		-4,395	43

PUBLIC HEALTH

34. The budgets for 2014/15 reflect the commissioning intentions agreed by Cabinet in December.
35. A £593k underspend is being reported at Quarter 3 against Public Health Grant, however of this £140k is reflected within Adult Social Care representing the wider public health responsibilities being delivered.
36. 30% of the Public Health budget relates to Sexual Health Services, of which 63% relates specifically to Genito Urinary Medicine (GUM) service. The forecast against GUM assumes a spend largely against budget and is based on the first two quarter activity levels, modelling this to be representative of activity throughout the year. If this level of activity does not continue, the forecast underspend will reduce accordingly.

37. At the end of 2013/14, unspent grant of £666k was carried forward specifically for Public Health within the Council's ring-fenced reserve. This unspent grant is being regularly reviewed and to date £306k is committed against the reserve. It is likely that this reserve will be held as a sexual health reserve to assist mitigation of potential growth in future years should this be necessary.
38. The variation between Quarters 2 and 3 relate to forecast underspends realised across the service.

TRANSFORMATION

39. Transformation is reporting a projected underspend of £6k against a total net budget of £465k. This is due to the start date for Harrow Mutual Support Network been pushed back one month to 1st of May 2014 reducing the spend by £12.5k which is partly offset by staffing cost pressures.
40. Costs relating to Take Part totalling £30k have been incurred and are reflected in the corporate forecast as this is funded from the MTFIS implementation Fund.

CHILDREN AND FAMILIES

41. As at Quarter 3 the total forecast overspend for the Directorate is £0.659m, a reduction of £152k since Quarter 2. There are several areas of pressure. Special Needs Transport (£0.592m), (£280k) is owing to the delay in implementing the service transformation programme after it was necessary to carry out additional consultation that delayed the start date of the programme and (£312k) due to growth in demand, Children with Disability staffing (£91k) and Children with Disability client costs (£211k) due to demand. There is a pressure in Targeted Services staffing (£499k) as a result of agency and interims covering vacancies and sickness and additional staff to manage caseloads and client spend (£0.610m) due to demand. This is offset by one off un- ring fenced grants, staff vacancies and other management actions.
42. The overall movement between Quarter 2 and Quarter 3 is a reduced reported overspend of £152k. This reduction results mainly from the identification of £104k of early savings in Business Support and a reduction in forecast spend in Placements of £114k. This is offset by a small increase in forecast spend in Special Needs Transport.

CORPORATE BUDGETS

Interest and Finance Charges

43. There is an increase in investment income due to higher than anticipated cash balances of £350k.

Central Contingency

44. The Central Contingency for unforeseen items in 2014/15 is £0.921m. There have been no formal drawdowns against the contingency, however the balance on General fund before use of contingency is £144k. It has therefore been assumed that there will be a drawdown of £144k leaving £777k. There are still a number of uncertainties within the

forecasts by directorates and so it has not been forecast that the contingency will not be required.

Pay Inflation

45. £0.950m has been provided in respect of a 1% pay award with effect from 1 April 2014. The award that has been agreed gives some staff lump sum payments in December 2014 and April 2015, with a 2.2% increase for most staff from January 2015. The overall cost in 2014/15 is just under 1% giving a saving of £85k.

Gas and Electricity Inflation

46. £450k has been provided against increases in price. The call against this provision will not be established until near the year end when winter bills are available.

Contingencies and Reserves

47. The contingencies are there to cover unavoidable inflation pressures for the pay award and energy inflation above 1.3% together with other unforeseen items and spending pressures and to cover areas of risk and uncertainty. There are also specific reserves for the Medium Term Financial Strategy (MTFS) implementation costs, carry forwards, Business risks and the Transformation and Priority Initiatives Fund (TPIF). The current position is detailed in table 4 below.
48. In June Cabinet approved carry-forwards of £4.008m which are now included within individual directorate budgets. There is also £195k in respect of grants brought forward from earlier years that will be drawn down as utilised. The main grant is Planning Development Grant.
49. The balance on the Transformation and Priority Initiatives Fund (TPIF) brought forward from 2013/14 is £3.370m. There have been drawdowns of £100k in relation to urgent arboriculture works, £150k potholes and £30k to fund the Helping You. £801k was added back to the fund from the in-year savings agreed at July Cabinet. This leaves a balance of £3.891m on the fund at Quarter 3.
50. The balance on the Business Risk reserve brought forward from 2013/14 is £2.859m. This is intended to cover a number of commercial risks that were identified and there have been no drawdowns to date.
51. The balance on the MTFS Implementation reserve brought forward from 2013/14 is £6.074m. A further £800k was added to the reserve from the in-year savings agreed at July Cabinet and an additional £131k from the in-year savings agreed at November Cabinet to make £7.005m. £1.893m has been drawn down to Quarter 3 on demolition costs for Civic 2 (£174k), Project Minerva (£1.282m), severance costs (£415k) and budget consultation costs (£22k) leaving a balance of £5.112m.

Table 4 Contingencies and Earmarked Reserves

Contingency and Reserves						
	Unforeseen Contingency	Pay and Energy Inflation	TIPIF	Carry Fwd	Business Risk Reserve	MTFS Implementation
	£000	£000	£000	£000	£000	£000
Balance at start of Year	921	1,400	370	4,203	859	3,278
Addition June Cabinet			3,000		2,000	2,796
Addition July Cabinet			801			931
Draw down *	(144)		(280)	(4,008)		(1,893)
Balance	777	1,400	3,891	195	2,859	5,112
* assumed use of contingency, but not formally actioned						

Reserves and Provisions

52. The Council must hold adequate provisions and reserve balances to cover known and anticipated events and in respect of its statutory duties as appropriate. General non earmarked balances stand at £10m. All the provisions are reviewed on a quarterly basis. As at Quarter 3 the Council has adequate provisions in respect of Insurance, Litigation and Employment cases.

Debt Management

53. The latest position on Council Tax, Business Rates and Housing Benefits bad debts provision is included within Appendix 3.

MTFS IMPLEMENTATION TRACKER

54. The 2014/15 budget includes approved MTFS savings of £12.939m. The progress on implementation is summarised below in table 5 below and shown in more detail in Appendix 2:

Table 5 RAG Rating of 2014/15 Savings

	Resources	Environment & Enterprise	Community, Health & Wellbeing	Children & Families	Corporate	Total
	£m	£m	£m	£m	£m	£m
Red	0.000	-0.425	-0.140	0.000	0.000	-0.565
Amber	0.000	-0.273	-2.825	-0.650	0.000	-3.748
Green	-1.730	-1.228	-3.802	-1.348	-0.518	-8.626
Total	-1.730	-1.926	-6.767	-1.998	-0.518	-12.939

CAPITAL PROGRAMME

Capital Programme Forecast at Quarter 3

55. The forecast at Quarter 3 is £73.897m, 62% of the total capital programme and a reduction of 11 percentage points when compared with Quarter 2. This will continue to be monitored closely.

56. Overall an Outturn variance of £44.522m is being forecast. This covers both general fund and HRA. The general fund is projecting an underspend of £40.817m of which £40.541m will be slipped into 2015/16 year and £276k is no longer required. The HRA is forecasting an underspend of £3.705m.
57. Tables 5 and 6 below summarise the capital forecast position and Appendix 4 shows the capital programme in more detail:

Table 5. Analysis of Outturn variance

Directorate	Outturn variance	Split of outturn variance by year		Split of outturn variance by funding		Slippage	Slippage by funding		Underspend after slippage
		13/14 Carry forward	14/15 budget	Grant/sec106	LBH		Grant /Sec 106/ HRA	LBH	
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
CH&W	-6201	-2464	-3737	-3062	-3139	-6104	-3015	-3089	-97
Children	-25,497	-4,188	-21,309	-24,694	-803	-25,497	-24,694	-803	0
E&E	-2,257	-2,137	-120	-276	-1,981	-2,257	-276	-1,981	0
Resources	-6860	-3329	-3531	-128	-6732	-6681	-128	-6553	-179
HRA	-3,705	0	-3,705	-3,705	0	-3,097	-3,097	0	-608
Total	-44,520	-12,118	-32,402	-31,865	-12,655	-43,636	-31,210	-12,426	-884

Table 6 Summary of forecast by directorate

Directorate	Original Programme	CFWD's	Adjustments	External	LBH	TOTAL BUDGET	Forecast	Forecast Variance	Slippage	Underspend after slippage
CH&W	5,428	3,588	1,561	4,209	6,369	10,578	4,375	-6,202	6,105	-97
CHILDREN	42,296	11,767	-317	52,836	910	53,746	28,249	-25,497	25,497	0
E&E	14,790	10,674	-453	5,105	19,906	25,012	22,754	-2,258	2,258	0
RESOURCES	9,413	9,322	-127	0	18,608	18,608	11,748	-6,860	6,681	-179
TOTAL GENERAL FUND	71,927	35,351	665	62,151	45,793	107,943	67,126	-40,817	40,541	-276
TOTAL HRA	9,527	949	0	0	10,476	10,476	6,771	-3,705	3,097	-608
TOTAL GENERAL FUND & HRA	81,454	36,300	665	62,151	56,269	118,419	73,897	-44,522	43,638	-884

Children and Families

58. The forecast at Quarter 3 has further reduced from Quarter 2 by £5.83m and now totals £28.249m which is 53% of the total budget. The forecast underspend is £25.497m all of which will be slipped into 2015-16 for the following reasons:
59. There is projected slippage on the primary expansion phases 1 and 2, secondary expansion and SEN expansion totalling £15.049m. As at December 2014 all Agreed Maximum Price (AMP) schedules have been agreed for the phase 2 primary expansion programme. Works have commenced on all sites under Pre-Construction Works to ensure programmes can be maintained. The construction market remains difficult and prices have exceeded 10% nationally but the overall AMPs are within this market inflation figure and the Council can still accommodate all costs without the need for borrowing at this time.

60. The phase 3 primary expansion programme is still undergoing statutory consultation to determine which schools will be covered and this will result in £1.7m of slippage to 2015/16.
61. £820k of Harrow funded IT development has been re-phased to 2015/16 to reduce MRP costs in 2015/16.
62. School amalgamations are expected to slip by £700k as a result of less schools amalgamating in 2014/15 than budgeted.
63. Schools capital maintenance is forecast to slip by £972k as a result of the expansion work taking place on a large number of schools.
64. As a result of the AMP schedules being finalised, the service is proposing to realign the capital programme for 2014/15 to reflect the Agreed Maximum Prices for the phase 2 schemes. The proposed virements are shown below and retain the programme within the overall existing 2014/15 budget.

Whitmore School Expansion

65. The service is requesting an increase to the capital budget for the Whitmore School Sixth Form Block expansion project of £155k. The current total budget for the scheme is £2m which is fully funded by the school. Of the increase in budget, £133k will be met by further contributions from the school and the remaining £22k will be met from the contingency within the overall Schools capital programme. During the Value Engineering process a number of items were removed from the scheme in an attempt to bring the scheme within the agreed budget however some of these have had to be reinstated, increasing the cost. The proportion of funding to be met from the schools capital programme is only 1% of the overall project value. The Whitmore School Sixth Form Block expansion will increase the overall value of the Council's assets by over £2m, at minimal cost to the council's own capital programme.

Community, Health and Wellbeing

66. As at Quarter 2 the forecast was £5.084m, 56% of the Community Health and Wellbeing 2014/15 capital budget. At Quarter 3 the revised forecast is £4.375m, 41% of the total budget and a significant reduction when compared to Quarter 2.
67. The forecast under spend is £6.202m, of which £6.105m will be slipped to 2015/16 and £97k is no longer needed.
68. There are two key reasons why budget is being slipped:
 - The following projects are due to start/have started but it is envisaged that projects will not be completed in this financial year and therefore a proportion of the budget will need to be slipped into the next financial year. The current forecast slippage is shown in brackets, as below;

- Adults Social Care-Framework-I & IT Integration (£70k)
 - MOSAIC Implementation - Adults & Children's Services (£570k)
 - Leisure centre capital infrastructure (£100k)
 - Carers Services Charges (£50k)
 - Mental Health Supported Housing Repairs (£41k)

 - Headstone manor (£981k)
- The following projects will be slipped into 15/16 on the basis that the strategy is not likely to be finalised until the last quarter of this year/ next financial year:
 - Capital Strategic Review (£462k)
 - Quality outcome for People with Dementia (£150k)
 - Sec 106 Banister Sport Pitch (£1m)
 - Market Shaping And Development (£200k)
 - Safeguarding Quality Assurance Quadrants (QAQ) (£140k)
 - Integrated Health Model (£200k)
 - Community Capacity Grant (£332k)
 - Reformed of social Charges (150k)

 - The Empty Property Grant is an ongoing scheme that will slip into next financial year by £274k.

 - The grant provider for the Warmer Home Programme has extended the deadline for completion of works to 30th September 2015, and the scheme budget is expected to slip into 15/16 by £1.387m.

 - The Disabled Facilities grant and some element of the Empty Properties grant and Private initiatives will underspend by £97k.

Resources

69. As at Quarter 2 the forecast was £16.976m, 91% of the Resource's 2014/15 capital budget. At Quarter 3 the revised forecast is £11.748m, 63% of the budget and a reduction of 28 percentage points when compared to Quarter 2.
70. The forecast under spend is £6.860m of which £6.681m will be slipped into 2015/16 and £179k of the budget is no longer required. The main items for slippage are detailed below:
- Delay in agreeing schemes with Capita have meant that the SAP/Financial ledger and System Improvement project will result in £189k underspend in 14/15 which will be slip to 15/16.
 - The expected payment to WLWA in respect of a loan for infrastructure is currently projected to slip by £448k, based on the latest payment profile supplied by the WLWA. There may be further slippage on this project.

- Due to delay in the delivery of Share Point and Wi-Fi, Mobile and Flex project payments are re-profiled resulting in £933k slippage.
- Small schemes will slip £76k to 15/16.
- The ICT Infrastructure and Corporate Application Project will slip £519k due to the delivery date being moved back.
- £1.822m of Information Technology Outsourcing Transformation's milestone payment has to be move back due to a delay in Capita's delivery of the project.
- The 13/14 Business Transformation Programme Refresh project budget of £213k that was carried forward from last financial year is no longer required, this budget together with the 14/15 BTP Refresh budget of £113k will all slipped to 2015/16.
- The IT Improvement Project which includes the Telephony Upgrade Project is delayed due to Capita's resourcing problems and the budget of £730k will be slipped to 2015/16.
- The Customer Care Platform Harrow Project is largely completed, but it is anticipated that the stabilisation payment of £150k will not be payable this year and will slip to 2015/16.
- The IT Corporate Refresh which includes CRM Replacement, Civic W2 Upgrade and other system upgrade budget of £1.375m will be slipped into 2015/16 due to a commercial decision on timing and a clash of the implementation time with the financial year end.
- £113k of the LAA Performance Reward Grant will be slipped to next financial year – No further project has been identified.

71. £179k of budget is being forecast as no longer required as detailed below:

- £36k of capital spend across a number of IT projects has now been reviewed and re-classified as revenue.
- The 13/14 and 14/15 BTP Hardware Refresh has spent £143k less than anticipated on laptops and Wyse boxes.

Environment & Enterprise

72. As at Quarter 2 the forecast was £22.221m, 87% of the Environment and Enterprise's 2014/15 capital budget. At Quarter 3 the revised forecast is £22.754m, 91% of the budget and an increase of 4 percentage points when compared to Quarter 2.

73. The forecast under spend at Quarter 3 is £2.258m and will all be slipped into 2015/16. The main items for slippage are detailed below:

- Pinner Park Farm £480k. The costs in this financial year primarily relate to scheme development and consultations. Once the 2nd stage consultation is concluded in early part of 2015/16, planning application will be prepared. Full delivery in 2015/16 is anticipated.
- Green Grid £276k – A number of Section 106 funded projects are in the planning stage and it is anticipated that these schemes will be delivered in 2015/16.
- Neighbourhood Investment Scheme £120k – Significant progress is being made in delivering various NIS schemes in every ward this year. Contributions are made by a number of wards to provide funding for green gym installation. It is anticipated that the remaining sum will be utilised in 15/16. There are a couple of projects already identified for which NIS budget will provide the match funding for grant applications in 15/16.
- BTP Public Realm £1.381m – There has been long delay in this IT project and a detailed delivery plan for providing a suitable solution is still awaited from Capita.
- A budget of £650K is no longer required for Carbon Reduction Schools Programme. The original budget of £1m was based on at least 10 schools in the REFIT project with an average spend of £100k including boilers. The school expansion programme means a change in this position as some of the works (including boilers) will be accommodated in the School expansion capital programme. For 2014/15, the programme has been changed to reflect this and it is forecast that only £350k of expenditure will be required.

Housing Revenue Account

74. As at Quarter 2 the forecast was £6.865m, 66% of the HRA's 2014/15 capital budget. At Quarter 3 the revised forecast is £6.771m, 65% of the budget.
75. The forecast under spend is £3.705m. This is as a consequence of better sequencing of work, tender savings and preparation works for the development of a four year capital programme and a new Better Homes standard. Any underspend will be retained in the HRA to be used in future programmes.

Virements

76. As described in paragraph 65 it is recommended that £22k is vired from the contingency from the overall Schools capital programme to Whitmore High School Sixth Form Block expansion.

Reduction to the Capital Programme

77. The Schools Carbon Reduction Programme was reduced by £650k as outlined in paragraph 73.

Additions to the Capital Programme

78. Since Quarter 2, Council approved the addition of £1.387m to the Capital Programme in November 2014, to reflect the award of Green Deal grant and this is reflected in the approved programme.

Cabinet is recommended to approve the following additions to the programme utilising the external funding available:

	£000
TFL traffic management schemes – additional funding approved	35
GLA – Outer London Fund- additional funding to original notification	27
North Harrow CPZ use of s106 planning developer contribution to fund scheme agreed at Traffic and road Safety Advisory Panel in October 2014	30
Whitmore School sixth form block expansion. Additional expenditure Funded by the school (see paragraph 65).	133
Total	220

Legal Implications

79. Section 151 of the Local Government Act 1972 states that without prejudice to section 111, every local authority shall make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has responsibility for the administration of those affairs". Section 28 of the Local government Act 2003 imposes a statutory duty on a billing or major precepting authority to monitor, during the financial year, its income and expenditure against budget calculations.
80. Under Allocation of Responsibilities in the Constitution, Cabinet is responsible for all decisions, which are expected to result in variations to agreed revenue or capital budgets. Cabinet must agree, or delegate agreement for all virements between budgets as set by the Financial Regulations.

Equalities

81. Decision makers should have due regard to the public sector equality duty in making their decisions. The equalities duties are continuing duties they are not duties to secure a particular outcome. The equalities impact will be revisited on each of the proposals as they are developed. Consideration of the duties should precede the decision. It is important that Cabinet has regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:
82. A public authority must, in the exercise of its functions, have due regard to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
83. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
84. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
85. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- (a) Tackle prejudice, and
- (b) Promote understanding.
86. Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act. The relevant protected characteristics are:
- Age
 - Disability
 - Gender reassignment
 - Pregnancy and maternity
 - Race,
 - Religion or belief
 - Sex
 - Sexual orientation

- Marriage and Civil partnership

Financial Implications

87. Financial matters are integral to the report.

Performance Issues

88. Good financial performance is essential to achieving a balanced budget. The financial performance is integrated with the strategic performance of the Council through quarterly Directorate Improvement Boards which consider the financial position alongside performance including key projects, service KPIs (including customer data and complaints) and workforce. Monitoring of finance and performance is reported regularly to the Corporate Strategic Board and Cabinet and is also considered by the Council's Performance and Finance Scrutiny Sub- Committee.
89. The overall projected percentage variance from the revenue budget is forecast to be 0%.
90. For the 2014/15 savings built into the MTFs, the overall position is that 67% of the savings are RAG rated as green, 29% RAG rated amber and 4% RAG rated red.
91. There is a performance target of 90% of the approved capital programme for 2014/15 being spent in year. The current projection is for spend to be 62% of budget.
92. Council Tax Collection: The collection rate is slightly below the target profile at the end of the third quarter at 83.76% against a profile of 84.0%.
93. Business Rates Collection: The collection rate is 2.79% below profile at 83.21% compared to a target of 86.0%.

Environmental Impact

94. There are none directly related to this report

Risk Management Implications

95. The risks to the Council and how they are being managed are set out in the report.
96. Risks are included on the Directorate risk registers.

Equalities implications / Public Sector Equality Duty

97. A full equalities impact assessment was completed on the budget when the budget was set by Full Council. Equalities implications are taken into account by individual directorates whilst running services and making decisions to vire money. A full equality impact assessment will be completed on the budget for 2015/16.

Council Priorities

98. The Council's vision is:

Working Together to Make a Difference for Harrow

99. The Council's priorities are:

Making a difference for the vulnerable
Making a difference for communities
Making a difference for local businesses
Making a difference for families

100. This report deals with Revenue and Capital monitoring which is key to delivering the infrastructure to deliver the Council's priorities.

Section 3 - Statutory Officer Clearance

Name: Dawn Calvert	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 26 January 2015		
Name: Linda Cohen	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 10 February 2015		

Ward Councillors notified:	NO, as it impacts on all Wards
EqlA carried out:	NO
EqlA cleared by:	Information for noting only

Section 6 - Contact Details and Background Papers

Contact:

Dawn Calvert (dawn.calvert@harrow.gov.uk), Head of Strategic Finance & Business

Tel: 020 8424 1393

Background Papers:

[Cabinet Report February 2014: Final Revenue Budget 2014/15 and Medium Term Financial Strategy 2014/15 to 2016-17 and EIA.](#)

[Cabinet Report June 2014: Revenue and Capital Outturn 2013/14](#)

**Call-In Waived by the
Chairman of Overview
and Scrutiny
Committee**

NOT APPLICABLE

[Call-in applies]

Revenue Summary				Appendix 1	
	Revised Budget	Forecast Outturn	Quarter 3 Variance	Variance	Quarter 2 Variance
	£000	£000	£000	%	£000
Resources					
Controllable Budget					
Customer Services	24,013	23,652	(361)	(1.5%)	(361)
Director of Resources	1,660	1,666	6	0.4%	(2)
Finance & Assurance	9,912	9,855	(57)	(0.6%)	(39)
HRD & Shared Services	2,621	2,634	13	0.5%	(133)
Legal & Governance	3,384	3,553	169	5.0%	30
Procurement	973	1,005	32	3.3%	2
Strategic Commissioning	1,732	1,692	(40)	(2.3%)	(27)
Total Controllable Budget	44,295	44,057	(238)	(0.5%)	(530)
Uncontrollable Budget	(17,657)	(17,657)	0	0.0%	0
Total Directorate Budget	26,638	26,400	(238)	(0.9%)	(530)
Environment and Enterprise					
Controllable Budget					
Commissioning Services	9,284	9,136	(148)	(1.6%)	(150)
Directorate Management	1,059	928	(131)	(12.4%)	(136)
Corporate Estate	(458)	(584)	(126)	27.5%	(87)
Economic Development & Research	718	622	(96)	(13.4%)	(95)
Planning	318	310	(8)	(2.5%)	(13)
Environmental Service Delivery	12,925	12,925	0	0.0%	0
Total Controllable Budget	23,846	23,337	(509)	(2.1%)	(481)
Uncontrollable Budget	17,265	17,265	0	0.0%	0
Total Directorate Budget	41,111	40,602	(509)	(1.2%)	(481)
Community, Health and Wellbeing					
Controllable Budget					
Adult Services	54,100	54,630	530	1.0%	529
Community and Culture	4,031	3,912	(119)	(3.0%)	(73)
Housing General Fund	3,661	4,803	1,142	31.2%	244
Public Health	(376)	(829)	(453)	120.5%	(232)
Transformation	398	392	(6)	(1.5%)	(6)
Total Controllable Budget	61,814	62,908	1,094	1.8%	462
Uncontrollable Budget	14,059	14,059	0	0.0%	0
Total Directorate Budget	75,873	76,967	1,094	1.4%	462
Children and Families					
Controllable Budget					
Management & Business Support	4,354	3,382	(972)	(22.3%)	(862)
Early Intervention Services	4,921	4,765	(156)	(3.2%)	(145)
Targeted Services	16,718	17,827	1,109	6.6%	1,180
Commissioning & Schools	2,608	2,446	(162)	(6.2%)	(179)
Special Needs	7,506	8,346	840	11.2%	817
Schools	(7)	(7)	0	0.0%	0
Total Controllable Budget	36,100	36,759	659	1.8%	811
Uncontrollable Budget	11,071	11,071	0	0.0%	0
Total Directorate Budget	47,171	47,830	659	1.4%	811
Total Directorate Budgets	190,793	191,799	1,006	0.5%	262
Corporate Items	(16,367)	(17,373)	(1,006)	6.1%	(350)
Total Budget Requirement	174,426	174,426	0	0.0%	(88)

MTFS 2014/15 to 2016/17 – Savings

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
	CHILDREN & FAMILIES					
CF 017	Consolidation of staffing structure including proposed deletion of 1 Divisional Director post 2015/16	-148	0	0	Green	£23k relates to full year effect of a Commissioner post which was deleted in 2013/14. £125k relates to deletion of a Divisional Director post, of which £25k achieved by removal of 0.2 FTE overlap from former job share arrangement, £100k achieved by maximising use of grant
CF 018	Deletion of Head of Education Strategy & School Organisation	-50	0	0	Green	Post deleted
CF 019	Reconfiguration of Early Intervention Service to support the Families First Programme	-150	0	0	Amber	The cumulative MTFS saving is £300k. This is currently being achieved by using Troubled Families funding to support this saving for which a carry forward of £672k has been agreed by Cabinet. The continuation of Troubled Families Grant is uncertain beyond 2014/15.
CF 020	Children's Centres remodelling to reconfigure the local offer	-200	0	0	Green	Budgets and staffing reconfigured, saving is expected to be delivered.
CF 021	Special Needs Transport II - demand management including Independent Travel Training	-45	0	0	Green	Saving delivered
CF 022	Special Needs Transport III - full market engagement including outsourcing of some routes	-500	0	0	Amber	Due to delay in Cabinet approval of the final business case, implementation has been delayed and there is a likely pressure of £280k in 2014/15 not being achieved. Part of this pressure is expected to continue in 2015/16 because a number of the outsourced routes are not achieving the required percentage savings.
CF 023	Introduction of Charging for non-Statutory Educational Psychology to schools	-90	0	0	Green	Saving delivered - Schools and academies are buying back service.

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
CF 024	Review of semi supported provision including potential closure of Honeypot Lane	-410	0	0	Green	Facility closed and staff made redundant.
CF 026	Savings from commissioning budgets including connexions, parenting support, drugs & alcohol and clinic in a box	-255	0	0	Green	Career Advice and Guidance contract amended and Council contribution to Harrow School Improvement Partnership reduced.
CF 027	Recommissioning of Respite Care for CWD	-100	0	0	Green	Short Breaks Contracts have been re tendered and saving expected to be delivered
CF 028	Consolidation of Early Years training functions - including reductions in contracts & staffing	-50	0	0	Green	Pre School support, Home visiting and relationship counselling contracts ceased.
	Total Children & Families Savings	-1,998	0	0		
	ENVIRONMENT & ENTERPRISE					
E&E011	Public Realm Integrated Service Model (PRISM) efficiencies. Towards Excellence Programme efficiencies	25	-375	0	Green	Towards Excellence restructure completed and staff salaries realigned to reflect the new costed structure. A shortfall in salaries is being managed through vacancies. Savings profiled to 15/16 (£375K) relate to route optimisation work.
E&E013	Public Realm Post reductions. Efficiency in management and support to Borough's allotments	-24	0	0	Green	
E&E012	Further management reductions in Environment	-145	0	0	Green	The Towards Excellence restructure resulted in less actual savings than originally assumed in the MTFS due to changes to the posts/grades following staff consultation. This budget saving is being contained by holding the Divisional Director Property Services vacant.
E&E016	Climate Change - Flexible retirement and consumables budget	-58	0	0	Green	Climate Change team has been deleted; work is now integrated with Commissioning Services division.

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
E&E023	Consolidation of Civic Centre accommodation to secure utility cost savings. Transformation Project	-122	-58	0	Green	Civic 2 has been converted to a car park and schools have taken possession of Civic 3, 4, 5 & 6 from 19 May 2014. The saving will be a combination of the reduction in business rates and utilities costs. Revised valuations have been received in respect of Business rates for some of the changes and the forecast charges for business rates are based on this. Utilities savings are as yet unclear.
E&E033	Trading Standards and Proceeds of Crime Act savings (linked to review of SLA with Brent trading Standards)	-100	0	0	Red	At Period 9 a shortfall of £70k is forecast. The saving will be met by generating additional POCA income; at Period 9, £200k income is anticipated.
E&E039	Revenue maximisation - Fleet sponsorship: Explore advertisement opportunities for PRS fleet	-25	0	0	Red	This is being taken forward by Procurement team as part of the corporate initiative 'Using the Market'. Potential income for advertising on fleet is £25K, but profiled to 2015/16.
E&E041	Grass Verge Maintenance reduction	-165	0	0	Green	The reduction in grass verge maintenance will be implemented in 14-15 resulting in savings on contract hire and staffing costs. It is anticipated that the saving will be made in full in 14-15.
E&E043	Grounds maintenance: Annualised hours	0	-81	0	Green	A consultation pack on changes to working patterns, including the introduction of annualised hours, is being prepared, with a view to implementing annualised hours by the end of 14-15.

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
E&E046	Review fine turf service standards	-29	0	0	Green	An in house team provides maintenance to keep turfed areas, primarily sports / football pitches in good condition to enable them to be hired out. In February, Cabinet agreed a 2% increase in pitch fees and the service aims to increase the marketing and promotion of such facilities to generate further income.
E&E058	Procurement Savings - others	-273	0	0	Amber	At Period 9 a shortfall of £43k is being forecast. Every effort is being made to achieve this target despite the challenge.
E&E 008 14/15	Budget Realignments for Parking Services (Income re-alignment, no staff impact) Based on the review of historical performance, enforcement of parking and traffic offences for traffic management reasons in 2012/13 recovered more than the budgeted figure.	-700	0	0	Green	The achievement of this saving is dependent on the outcome of the government consultation in relation to local authority parking.
E&E 009 14/15	Textiles Recycling Additional income generated from textiles recycling contract.	-10	0	0	Green	New 4 year contract has been signed in August 2013 with a better price per tonne as a result of favourable market prices for textiles. Based on the income for Periods 1-9, the additional income will be achieved in full.
E&E 010 14/15	Increase in income relating to leisure centre car parks Increase in leisure centre parking income	-300	0	0	Red	Implementation is not expected until April 2015. A forecast increase in enforcement, CPZ and parking income will mitigate the shortfall in 14-15.
	Total Environment & Enterprise Savings	-1,926	-514	0		
	COMMUNITY, HEALTH AND WELLBEING					
	Adults Services					

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
CHW013	Contract Management - efficiencies	-100	0	0	Green	Expected to be realised and will be evidenced by balanced Purchasing budget at year end. However given the increases in referrals and costs associated with complexity of care, and forecast outturn variance this may be difficult to evidence. Potentially this will be delivered through: 1) Managing inflation £500k 2) Renegotiation of the supported accommodation contracts at Canning Rd / Parkside Way - £50k 14/15 (£100k full year effect)
CHW015	West London Alliance (WLA) Joint Procurement: Approved Provider Credition (APC) Residential Care	-100	0	0	Green	Savings on target to be delivered. Tracking of placements made through the West London Alliance (WLA) will evidence savings delivered throughout the year
CHW017	Voluntary Sector Funding. Reversal of 2012/13 growth	-100	0	0	Green	Achieved
CHW018	Voluntary Sector Funding	-200	0	0	Green	Achieved

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
CHW019/20	Reduction in use of residential placements for the most complex, by investing in community placements.	-1,500	0	0	Amber	Plan developed and being monitored weekly. Impact of increased volume of referrals and complexity of care required to support service users may impact the ability to fully deliver savings which were predicated on the basis of costs of care being provided at lower cost in the community. Anticipate savings being delivered through a mix of the following: 1) Moves to sheltered accommodation 2) Towards Independence (Shared lives) 3) Increased community placements 4) Management of Ordinary Residence and appropriate reviews of health cases 5) Managing inflation (via WLA) to assist delivery of MTFs £500k
CHW021	Day Care Strategic Review	-300	0	0	Green	savings on target to be delivered
CHW022	Purchasing Budget [community based efficiencies]. Market development providing greater choice in services leading to reductions in cost.	-1,000	0	0	Amber	Plan developed and being monitored weekly. Latest evidence indicates that the some of the costs of complex care provided in the community are more costly than originally estimated. Anticipate savings being delivered through a mix of the following: 1) PB clawback 2) External day care converted to PB's 3) Home Care 2 project 4) Market development (10%) resulting in increased choice and therefore lower costs 5) Top 50 community packages 6) Innovative care solutions i.e. CSV

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
CHW023	Commissioning Staff. Review of staffing structures.	-300	0	0	Amber	Restructure in progress and expected to be fully implemented by 1/12/14. Impact of delay in implementing will be compensated by variations on other budgets
CHW024	Share Complaints team with another local authority and/ or aggregate within Council. Originally intended these savings would be delivered through a shared service approach which will continue to be explored but may be accommodated within wider staff changes as appropriate to deliver the savings.	-104	0	0	Green	Achieved and delivered
CHW025	Sharing of Joint Assessment Team with another local authority. Originally intended these savings would be delivered through a shared service approach which will continue to be explored but may be accommodated within wider staff changes as appropriate to deliver the savings.	-93	0	0	Green	Assumed £50k delivered via charges for managing client finances, although latest indications suggest that compensatory savings may necessary to fully deliver saving. Restructure in progress and expected to be fully implemented by 1/12/14
CHW028	Supporting People - targeted efficiency savings through specific contracts	-1,324	0	0	Green	Savings fully delivered through efficiencies and renegotiated contracts
CHW032	Meals on Wheels. Review options for service provision.	-190	0	0	Green	Plans in place. Ongoing monitoring will evidence achievement of savings as per plan.
	Total Adults Savings	-5,311	0	0		
	Housing					

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
CHW004	Homelessness [100 families & anticipated B&B HB changes). Savings from 2012-13 MTFS assumed to arise from increased subsidy for B&B placements which did not actually materialise.	-100	0	0	Red	A review of activity levels during 2013/14 showed some 30 families were provided with accommodation, thereby avoiding the requirement to use B&B. This resulted in the achievement of B&B savings for 2013/14. The same review however identified extraordinary growth for temporary accommodation over and above that anticipated at the time of budget construction due primarily to uncertainties around the timing and content of the Government's Welfare Reforms.
CHW037	Housing Needs - Private Sector Leasing Scheme. Income generation	-25	0	0	Amber	Considered achievable at this stage
CHW038	Housing Service Efficiency Review. Saving in staffing costs	-70	0	0	Green	On target
CHW041	Invest to Save - cash incentives. Used to free up HRA properties to house families from the waiting list. Savings result from reduced B&B expenditure.	-48	0	0	Green	On target
CHW047	Empty Homes Initiative. Reduced cost of temporary accommodation as a result of bringing empty properties back into use.	-300	0	0	Green	Expenditure on B&B has been reduced as a result of the empty home initiative. The extraordinary growth in families seeking temporary accommodation has however obscured the achievement of this saving.
	Total Housing Savings	-543	0	0		
	Community and Culture					
CHW048	Cultural Services review of structure	-15	0	0	Green	Achievable - 3rd year of payment protection

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
CHW051	Library Volunteers. Support provided by volunteers.	-40	0	0	Red	Historic MTFS item related to library volunteers that is no longer relevant under new contract with Carillion. However, Community and Culture is underspending as a directorate and this pressure is compensated by underspends elsewhere.
CHW053	Cultural Strategy Review efficiencies - savings subject to tender with Ealing & Brent	-400	0	0	Green	This saving is split between, £135k split over libraries and leisure contracts and £265k managed through a grant saving.
CHW055	Reduce Adult Learning Subsidy. Services to be funded by grant.	-50	0	0	Green	To be achieved
CHW056	Reduce subsidy to harrow young musicians	-10	0	0	Green	To be achieved
CHW062	Deletion of post supporting community festivals	-48	0	0	Green	Achieved - postholder left 2013. Restructure not yet carried out.
	Total Community & Culture savings	-563	0	0		
	Public Health					
CHW068	Further Public Health Efficiencies. Funding existing Council revenue funded services.	-100	0	0	Green	On target
CHW009 14/15	Reduction in Council's Contribution to Public Health Budget	-250			Green	On target
	Total Public Health	-350	0	0		
	Total CHW	-6,767	0	0		
	RESOURCES					
	Customer Services					
RES027	Use of Artificial Intelligence to divert switchboard calls. Reducing use of staff, introduced in 2013/14 with full year impact of saving in 2014/15	-60	0	0	Green	Delivered -Artificial switchboard is in place, staffing has been reduced accordingly

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
RES029	Further channel shift through roll out of My Harrow account. Reduction in Access Harrow staffing resulting from self-serve via MHA, website and IVR	-60	-60	0	Green	Delivered-60,000+ MHA accounts handle 14,000+ enquiries per month. Staffing levels have been reduced.
RES030	Close Face to Face (F2F) and Telephony Channels for Public Realm Enquiries. Over a 3 year period close face to face contact in Access Harrow for Public Realm queries and migrate to Internet contact.	-30	-70	-50	Green	Delivered-TE project delays mean that full functionality is not available, however staffing levels have been reduced.
RES031	Reconfigure One Stop Shop to self-serve area and close F2F (face to face) advice	-100	-190	-100	Green	Delivered -Face to face appointments reduced by 61% in 2013/14 with further 20% reduction due in 2014/15. Staff reduced in line with expectations.
RES045	Print Contract Savings. Letting of contract for printers and photocopiers at lower cost.	-100	0	0	Green	Delivered - Based on the new contract. However, there is still an uncertainty around the cost of Annodata decommissioning and outstanding invoices, however the expectation is that this will be covered by an accrual & carry forward from 13/14.
	Strategic Commissioning					
RES036	Merger of Corporate Performance Team and Service Performance Team, reducing staffing. Merging of two management posts undertaking similar specialisms across the council to one single Business Intelligence team and the delivery of the new operating model (next saving).	-93	0	0	Green	Delivered

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
RES038	Performance, Research & Analysis Business Case and New Operating Model Strategic Commissioning. Aggregation of posts undertaking similar specialisms across the council to one team which is then reduced to deliver the saving through a more efficient delivery of the service.	-97	0	0	Green	Delivered
RES040	Communications - reduction in number of campaigns. This is a reduction in the contract price for the next two years agreed with Westco.	-46	0	0	Green	Delivered
	HRD					
RES042	Reduction in HRD posts. Deletion of 2 posts.	0	-75	0	Green	On target
RES046	Cessation of External recruitment Advertising. Reduce the volume of recruitment advertising in journals and papers and increase use of internet advertising including the council's own site	-75	0	0	Green	On target to Deliver
	Internal Audit					
RES048	Reduce co-sourcing budget. Reduce the use of external partners to provide specialist support to audit.	-16	0	0	Green	Delivered
	Insurance Service					
RES053	Reduced broker fees through more in-house handling and increased income on third party insurance schemes	-3	0	0	Green	On target through increased handling of injury claims in-house. Current savings in 2014/15 £4,268.
RES058	Deletion of Corporate Risk Management Support Service. Deletion of post in 2013.	-30	0	0	Green	Delivered

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
RES059	Cross Council Insurance Claims. Reduce cost of insurance claims against the Council by better risk management.	-70	0	0	Green	On target through several initiatives: 1) A proactive approach to injury claims handled in-house is resulting in fewer claimants resorting to instructing solicitors. In 2013/14 there were seven such claims delivering typical savings of £10k per claim. 2) Joint working with Health & Safety and Waste Management has resulted in funding being made available for four way cameras on the refuse fleet, which is expected to lead to claim savings.3) A project is underway to mitigate the cost of tree root claims against the Council.
RES060	Reduced Contribution to Insurance Provision. Reduce cost of insurance claims against the Council by better risk management.	-100	0	0	Green	On target
	Legal & Governance					
RES068	E-canvass Project. Reduced staffing following electronic canvas.	-20	0	0	Green	waiting for commentary from department
RES072	Increase to Registrars Fee Income Target. Income budget reduced in 2012-13 to reflect actual received, additional income to be received from 2013/14.	-100	0	0	Green	waiting for commentary from department
	Corporate Finance					
RES073	Finance restructure. Reduced staff costs.	-300	0	0	Green	Saving has been built into the budget and saving is on track to be delivered in full.
	Collections and Benefits					
RES078	Deletion of 4 FTE posts in Housing Benefits	0	-140	0	Red	Delays in the implementation of Universal Credit put this saving at risk.
RES080	Staff reductions to match DWP Admin grant reduction	-48	0	0	Green	Delivered

Item No		2014/15	2015-16	2016-17	2014/15	
		£000	£000	£000	RAG Status	Comments
RES081	Concessionary Travel - Changes to Transport for London (TFL) grant distribution. Reallocation of levy costs between London Boroughs.	-102	0	0	Green	Delivered
RES082	Revenues Staffing Reductions	0	0	-40	Green	On target
RES083	Housing Benefits Staffing Reductions as Benefits moves to DWP. Reduced staffing required as Housing Benefits transfers to Universal Credit and is no longer administered by Harrow.	0	0	-125	Red	Delays in the implementation of Universal Credit put this saving at risk.
RES 003 14/15	To delete the post of Chief Executive and associated business support	-280	0	0	Green	Delivered
	Total Resources Savings	-1,730	-535	-315		
	CORPORATE					
Tech 029	Terms and conditions. Savings arising from renegotiated terms and conditions with staff.	-268	-187	-31	Green	Delivered
Tech 002 14/15	Saving in use of Consultants across the Council	-250	0	0	Green	Built into 2014/15 budget
	Total Corporate	-518	-187	-31		
	Total	-12,939	-1,236	-346		

Council Tax

Currently, bad debt provisions (BDP) of £4.158m exist [~~£4.898m~~- £0.740k; w/offs done 01/04/14-31/12/14] for Council Tax against a potential BDP of £3.342m for debts accrued to 31 March 2014.

COUNCIL TAX	Arrears as at 1 st of April	Arrears as at Qtr 3	BDP	BDP as at Qtr 3
	£000	£000	%	£000
Pre 2008-2019	654	458	100	458
2010-2011	566	446	100	446
2011-2012	707	564	100	564
2012-2013	1,015	757	100	757
2013-2014	3,131	1,489	75	1,117
2014-2015	n/a	n/a	65	0
Total	6,073	3,714		3,342

National Non Domestic Rates (NNDR)

Currently, bad debt provisions of £2.235m [~~£1.722m~~- £0.774k; w/offs done 01/04/14 to 31/12/14] exist for business rates (NNDR) against a potential BDP of £1.427m. Under Business Rates retention, the effect on the local authority is 30% of any surplus or deficit.

NATIONAL NON DOMESTIC RATES (NNDR)	Arrears as at 1 st of April	Arrears as at Qtr 3	BDP	BDP as at Qtr 3
	£000	£000	%	£000
Pre 2013-2014	1,262	479	100	479
2013-2014	2,101	948	100	948
2014-2015	n/a	n/a	50	
Total	3,363	1,427		1,427

Council Tax and Business Rates Court Cost

Currently, bad debt provisions (BDP) of £950k (**CT £850k+ NDR £100k**) exists for Court Costs against a potential BDP of £954k. From previous years trends, this amount of provision appears to be adequate and in line with our overall provisions policy.

Court Cost	Arrears as at 1 st of April	Arrears as at Qtr 3	BDP	BDP as at Qtr 3
	£000	£000	%	£000
Pre 2011-2012	235	174	100	174
2011-2012	129	99	100	99
2012-2013	190	134	75	100
2013-2014	616	360	60	216
2014-2015	0	729	50	365
Total	1,170	1,496		954

Housing Benefits

Currently, bad debt provisions of £2.745m [**£3.936m** - £1.191m w/off 1/4/14 to 31/12/14] exist for Housing Benefit overpayment debt against a potential BDP of £3.617m (£2.246m + £1.371m = £3.617m). The under provision is anticipated to be funded from the of overpayments although there is some risk that there may be a balance that will need to be met from revenue.

Housing Benefit DEBTORS	Outstand as at 1 st of April	Outstand as at Qtr 3	BDP	BDP as at Qtr 3
	£000	£000	%	£000
Pre 2012-2013	1,204	801	100	801
2012-2013	764	407	100	407
2013-2014	1,882	841	50	421
2014-2015	0	2,055	30	617
Totals	3,850	4,104		2,246

Housing Benefit LIVE CASES	Outstand as at 1 st of April	Outstand as at Qtr 3	BDP	BDP as at Qtr 3
	£000	£000	%	£000
Pre 2012-2013	413	242	100	242
2012-2013	596	330	75	248
2013-2014	1,395	655	50	328
2014-2015	0	1,846	30	553
Totals	2,404	3,073		1,371

Over the last year there have also been new initiatives from the DWP, specifically the Real Time Information Bulk Data Matching exercise (RTI), which means the DWP is currently providing retrospective information to the authority about claimant changes not previously known to Harrow. This has resulted in a higher than normal increase in the raising of Housing Benefit overpayment debts which unfortunately is increasing the overpayments figures and adding pressure to the bad debt provision. Whilst we are addressing this for the future (the Income expectation from this source of income is being reduced in the MTFs for 2015/16), currently there is some risk that the general fund may have to contribute to this area to ensure adequate bad debt provision exists in 2014/15 if sufficient overpayments are not collected to fund the full requirement as would normally be the case.

This page is intentionally left blank

Capital Programme forecast at 31 December 2014

Appendix 4

Project	Original Programme	CFWD's	Adjustments	External (E)	LBH (B)	TOTAL BUDGET	Forecast	Forecast Variance	Slippage	Underspend after slippage
	£	£	£	£	£	£	£	£	£	£
Adults Social Care-Framework-I & IT Integration	0	140,591	0	0	140,591	140,591	70,591	-70,000	70,000	0
MOSAIC Implementation - Adults & Children's Services	250,000	522,604	0	0	772,604	772,604	202,000	-570,604	570,604	0
Milman's Day Centre - Remodeling & Refurbishment	0	0	0	0	0	0	0	0	0	0
Bedford House Boilers	0	0	0	0	0	0	0	0	0	0
Mental Health Supported Housing Repairs	0	51,078	0	0	51,078	51,078	10,078	-41,000	41,000	0
Renovation Grants	70,000	0	37,292	0	107,292	107,292	107,292	0	0	0
Disabled Facilities Grants	1,500,000	0	0	510,000	990,000	1,500,000	1,500,000	0	0	0
Disabled Facilities Grants (additional Grant)	0	50,000	0	0	50,000	50,000	0	-50,000	0	-50,000
Empty Properties & Private Sector Initiatives Grants	676,000	269,743	0	476,000	469,743	945,743	631,000	-314,743	267,743	-47,000
Headstone Manor	0	1,218,155	137,000	0	1,355,155	1,355,155	374,000	-981,155	981,155	0
Upgrading the People's Network and Installing Wi-Fi	0	43,534	0	0	43,534	43,534	43,534	0	0	0
Upgrading Library Management System	0	0	0	0	0	0	0	0	0	0
Library Centre Capital Infrastructure	300,000	43,055	0	0	343,055	343,055	243,055	-100,000	100,000	0
106 Banister Sport Pitch	1,000,000	4,000	0	1,004,000	0	1,004,000	0	-1,004,000	1,004,000	0
Library Capital Investment	0	6,988	0	0	6,988	6,988	6,988	0	0	0
Sports & Leisure Short Breaks Grant	0	0	0	0	0	0	0	0	0	0
Refurbishment of 64 Pinner Road	0	0	0	0	0	0	0	0	0	0
Stanmore Library - Meeting Room	0	0	0	0	0	0	0	0	0	0
Adults Personal Social Services - Community Capacity Grant	532,000	338,334	0	532,000	338,334	870,334	638,334	-232,000	232,000	0
Maintenance of Adults Properties	100,000	0	0	0	100,000	100,000	0	-100,000	100,000	0
Capital Strategic Reviews	0	684,633	0	0	684,633	684,633	223,000	-461,633	461,633	0
Aztec Cafe and The Bridge - Phase 1	0	15,584	0	0	15,584	15,584	15,584	0	0	0
Quality Outcome for People With	150,000	0	0	0	150,000	150,000	0	-150,000	150,000	0
Reform Of Social Care Funding	250,000	0	0	125,000	125,000	250,000	100,000	-150,000	150,000	0
In House Residential Establishment	0	0	0	0	0	0	0	0	0	0
Integrated Health Model	250,000	0	0	125,000	125,000	250,000	50,000	-200,000	200,000	0
Carers Services Charges	100,000	0	0	50,000	50,000	100,000	50,000	-50,000	50,000	0
Market Shaping And Development	250,000	0	0	0	250,000	250,000	50,000	-200,000	200,000	0
Green Deals Communities Funding	0	0	1,387,100	1,387,100	0	1,387,100	0	-1,387,100	1,387,100	0
Safeguarding Quality Assurance Quadrants (QAQ)	0	200,000	0	0	200,000	200,000	60,000	-140,000	140,000	0
TOTAL CH&W	5,428,000	3,588,299	1,561,392	4,209,100	6,368,591	10,577,691	4,375,456	-6,202,235	6,105,235	-97,000
Schools Expansion Programme - Phase 1	5,870,000	1,656,604	-725,000	6,801,604	0	6,801,604	3,876,575	-2,925,029	2,925,029	0
Schools Expansion Programme - Phase 2	14,375,000	3,066,754	0	17,441,754	0	17,441,754	9,954,000	-7,487,754	7,487,754	0

Project	Original Programme	CFWD's	Adjustments	External (E)	LBH (B)	TOTAL BUDGET	Forecast	Forecast Variance	Slippage	Underspend after slippage
	£	£	£	£	£	£	£	£	£	£
SEN Provision	5,325,000	1,243,284	-394,692	6,173,592	0	6,173,592	3,413,000	-2,760,592	2,760,592	0
Secondary Expansions	10,100,000	2,958,687	1,049,692	14,108,379	0	14,108,379	6,408,000	-7,700,379	7,700,379	0
Schools Expansion Programme contingency	0	0	0	0	0	0	0	0	0	0
School Amalgamation	700,000	622,959	0	1,322,959	0	1,322,959	622,959	-700,000	700,000	0
Bulge Classes	150,000	0	-26,896	123,104	0	123,104	123,104	0	0	0
Free School Meals	621,000	0	-116,000	505,000	0	505,000	400,000	-105,000	105,000	0
Schools Capital Maintenance	1,350,000	69,191	0	1,419,191	0	1,419,191	569,191	-850,000	850,000	0
Schools Expansion Programme Phase 3	1,805,000	0	0	1,805,000	0	1,805,000	100,000	-1,705,000	1,705,000	0
Devolved Formula Non VA Schools	0	736,710	333,546	1,070,256	0	1,070,256	948,000	-122,256	122,256	0
IT Development	0	910,000	0	0	910,000	910,000	106,700	-803,300	803,300	0
Catering in schools (2011-12)	0	0	0	0	0	0	0	0	0	0
High School Development (2011-12)	0	0	0	0	0	0	0	0	0	0
Whitmore School - Sports Pitch	0	64,750	25,000	89,750	0	89,750	89,750	0	0	0
Whitmore School	2,000,000	0	-462,207	1,537,793	0	1,537,793	1,537,793	0	0	0
Project Fees During Defect Period	0	0	0	0	0	0	0	0	0	0
Austistic Spectrum Disorder	0	0	0	0	0	0	0	0	0	0
Children's Centre Funding	0	0	0	0	0	0	0	0	0	0
Primary Capital Grant	0	0	0	0	0	0	0	0	0	0
Primary School No 1 - rebuild BSF	0	0	0	0	0	0	0	0	0	0
Primary School Old Entitlement Grant (2012-13)	0	438,100	0	438,100	0	438,100	100,000	-338,100	338,100	0
AL CHILDREN	42,296,000	11,767,039	-316,557	52,836,482	910,000	53,746,482	28,249,072	-25,497,410	25,497,410	0
Affordable Warmth	0	86,050	0	0	86,050	86,050	86,050	0	0	0
BTP - Public Realms	0	1,405,759	17,000	0	1,422,759	1,422,759	41,504	-1,381,255	1,381,255	0
Carbon Reduction Programme 2012/13	0	262,199	0	0	262,199	262,199	262,199	0	0	0
Carbon Reduction Programme 2013/14	0	161,963	0	0	161,963	161,963	161,963	0	0	0
Carbon Reduction Programme 2014/15	1,300,000	0	-787,000	350,000	163,000	513,000	513,000	0	0	0
CCTV Camera Extension Project	0	384,862	0	0	384,862	384,862	384,862	0	0	0
CCTV Crime Reduction Cameras 14/15	575,000	0	-65,000	0	510,000	510,000	510,000	0	0	0
CCTV Enforcement Monitoring System Re-engineering	0	86,907	42,000	0	128,907	128,907	128,907	0	0	0
City Farm/Pinner Park Farm	0	717,292	-118,000	0	599,292	599,292	119,000	-480,292	480,292	0
Civic Centre Parking	0	135,245	0	0	135,245	135,245	135,245	0	0	0
Corporate Accommodation Maintenance	433,000	264,586	215,000	0	912,586	912,586	912,586	0	0	0
Development of a Consolidated, Integrated Civic One Building	0	26,268	0	0	26,268	26,268	26,268	0	0	0
Harrow Card	0	140,000	-140,000	0	0	0	0	0	0	0
Harrow Green Grid	343,000	204,377	0	297,000	250,377	547,377	271,377	-276,000	276,000	0
Harrow On Hill Station	100,000	0	0	0	100,000	100,000	100,000	0	0	0
High Priority Plan Maintenance Corporate Property	430,000	90,102	0	0	520,102	520,102	520,102	0	0	0
Highway Drainage Improvements & Flood Defence Infrastructure	525,000	177,825	30,000	0	732,825	732,825	732,825	0	0	0
Highway Improvement Programme	5,500,000	789,325	65,000	0	6,354,325	6,354,325	6,354,325	0	0	0

Project	Original Programme	CFWD's	Adjustments	External (E)	LBH (B)	TOTAL BUDGET	Forecast	Forecast Variance	Slippage	Underspend after slippage
	£	£	£	£	£	£	£	£	£	£
Leisure Centre Car Park CCTV	0	0	0	0	0	0	0	0	0	0
Leisure Centre Car Park Charging	0	60,000	34,000	0	94,000	94,000	94,000	0	0	0
Neighbourhood Investment Scheme	210,000	269,511	0	0	479,511	479,511	359,511	-120,000	120,000	0
Parking Management Programme	750,000	62,209	53,000	0	865,209	865,209	865,209	0	0	0
Public Realm Services – Parks, Open Spaces & Cemeteries	850,000	318,782	258,000	0	1,426,782	1,426,782	1,426,782	0	0	0
Public realm Services – Waste and Recycling	200,000	251,014	0	0	451,014	451,014	451,014	0	0	0
Roxborough Bridge Underpass CCTV	0	7,024	0	0	7,024	7,024	7,024	0	0	0
Section 106 Schemes	0	357,528	40,000	0	397,528	397,528	397,528	0	0	0
Street Lighting Improvement Programme	1,500,000	733,082	0	0	2,233,082	2,233,082	2,233,082	0	0	0
TfL Major Schemes	0	264	-264	0	0	0	0	0	0	0
TfL Principal Roads	868,000	553,390	259,254	1,680,644	0	1,680,644	1,680,644	0	0	0
TfL Transport Capital	1,206,000	872,034	-41,954	2,036,080	0	2,036,080	2,036,080	0	0	0
Town Centre Infrastructure	0	0	0	0	0	0	0	0	0	0
Town Centre Regeneration	0	2,256,513	-313,580	741,420	1,201,513	1,942,933	1,942,933	0	0	0
Transport Local Implementation Plan 2 - Programme of investment	0	0	0	0	0	0	0	0	0	0
TOTAL E&E	14,790,000	10,674,111	-452,544	5,105,144	19,906,423	25,011,567	22,754,020	-2,257,547	2,257,547	0
43 Council Tax Support	0	83,000	0	0	83,000	83,000	137,000	54,000	0	54,000
IT Transformation	125,000	3,544,137	-450,000	0	3,219,137	3,219,137	1,397,000	-1,822,137	1,822,137	0
My Harrow Services Account Dev Prog	0	97,094	0	0	97,094	97,094	72,094	-25,000	25,000	0
IT Improvement Project	750,000	0	0	0	750,000	750,000	0	-750,000	720,000	-30,000
SAP: Financial Leger/Systems Control Imp	0	385,592	0	0	385,592	385,592	196,200	-189,392	189,392	0
BTP - Business Support	0	0	0	0	0	0	0	0	0	0
BTP - SAP SRM Procurement	0	0	0	0	0	0	0	0	0	0
BTP CCAD - Customer Contact Assess & Decide	0	8,000	0	0	8,000	8,000	0	-8,000	8,000	0
BTP - Mobile & Flex	401,000	1,956,741	60,000	0	2,417,741	2,417,741	1,485,000	-932,741	932,741	0
BTP - Corporate Resources	0	82,000	0	0	82,000	82,000	82,000	0	0	0
BTP - PCI Cap	0	0	0	0	0	0	0	0	0	0
BTP Minor Projects	0	236,062	0	0	236,062	236,062	66,062	-170,000	150,000	-20,000
SAP Minor Developments	0	70,361	0	0	70,361	70,361	70,361	0	0	0
ICT Infrastructure & Corporate Applications	0	729,890	100,000	0	829,890	829,890	311,348	-518,542	490,542	-28,000
IT Corporate System Refresh	1,300,000	0	350,000	0	1,650,000	1,650,000	142,000	-1,508,000	1,365,000	-143,000
LAA Performance Reward Grant	0	128,374	0	0	128,374	128,374	15,000	-113,374	113,374	0
BTP - Hardware Refresh	213,000	488,424	0	0	701,424	701,424	363,424	-338,000	326,000	-12,000
Loan Payment - Capital	6,624,000	1,199,345	0	0	7,823,345	7,823,345	7,375,345	-448,000	448,000	0
Small Schemes (Council wide)	0	312,857	-219,662	0	93,195	93,195	17,630	-75,565	75,565	0
IER Grant	0	0	32,370	0	32,370	32,370	17,370	-15,000	15,000	0
TOTAL RESOURCES	9,413,000	9,321,877	-127,292	0	18,607,585	18,607,585	11,747,834	-6,859,751	6,680,751	-179,000

Project	Original Programme	CFWD's	Adjustments	External (E)	LBH (B)	TOTAL BUDGET	Forecast	Forecast Variance	Slippage	Underspend after slippage
	£	£	£	£	£	£	£	£	£	£
TOTAL GENERAL FUND	71,927,000	35,351,326	664,999	62,150,726	45,792,599	107,943,325	67,126,382	-40,816,943	40,540,943	-276,000
Housing Programme	7,527,000	949,000	0	0	8,476,000	8,476,000	6,057,550	-2,418,450	1,810,200	-608,250
Grant Funded Extensions	0	0	0	0	0	0	0	0	0	0
Aids & Adaptations	0	0	0	0	0	0	0	0	0	0
Affordability Housing	2,000,000	0	0	0	2,000,000	2,000,000	713,000	-1,287,000	1,287,000	0
TOTAL HRA	9,527,000	949,000	0	0	10,476,000	10,476,000	6,770,550	-3,705,450	3,097,200	-608,250

REPORT FOR: CABINET

Date of Meeting:	19 February 2015
Subject:	Capital Programme 2015/16 to 2018/19
Key Decision:	Yes
Responsible Officer:	Simon George, Director of Finance and Assurance
Portfolio Holder:	Councillor Sachin Shah, Portfolio Holder for Finance and Major Contracts
Exempt:	No
Decision subject to Call-in:	No, as the decision is reserved to Council
Wards affected:	All
Enclosures:	Appendix 1 - Proposed Capital Programme 2015/16 to 2018/19

Section 1 – Summary and Recommendations

This report sets out the proposed capital programme for 2015/16 to 2018/19.

Recommendations:

Cabinet is requested to approve the proposed capital programme, as detailed within Appendix 1 for recommendation to Council,

Reason: To enable the Council to have an approved capital programme for 2015/16 to 2018/19.

Section 2 – Report

Development of the Capital Programme

1. This report sets out the Council's proposals for capital investment over the next four years. These provide for a very substantial investment of £239m in infrastructure on General Fund and Housing Revenue Account services.
2. The proposed capital programme has been prepared in the current climate of increased demand pressures, reduced external funding from Central Government as well as current challenging property market conditions.
3. The existing capital programme is a four year rolling programme with first year approved budgets and the subsequent three years provisional budgets subject to confirmation. The proposed programme extends the existing programme by one year, to align it with the four year Medium Term Financial Strategy (MTFS).
4. Service directorates were invited to bid for capital resources, as part of their service proposals for 2015/16 to 2018/19. The starting point for this exercise was a refresh of the existing programme to 2017/18 and the extension of programmes to 2018/19. The proposals were scored using an updated scoring matrix to take account of the council's new priorities and in order to give a higher weighting to projects that generate revenue savings. These were then subject to challenge by officers and members.
5. A draft Capital Programme was reported to Cabinet in December 2014 and was agreed for consultation, together with the Revenue budget and MTFS. .
6. As well as the pressures highlighted in the first paragraph, flexibility in the capital programme is also constrained by a number of factors:
 - Unavoidable spending requirements such as the need to provide school places for the increasing school population, and major repairs to the Council's buildings and carriageway and footway resurfacing.
 - Restrictions in the way funding can be used e.g. ring fenced funding such as Transport for London and DfE grants for schools.
 - The limited availability of capital receipts.
 - A limited capacity to fund borrowing. Although there are no specific limits to borrowing in order to fund capital expenditure, since the introduction of the prudential borrowing framework, Councils must however consider the revenue implications in the context of the overall revenue budget commitments in the medium term. Proposals must be affordable.
7. A list of the proposed projects is detailed in appendix 1.

Changes To The Programme Since December Cabinet

8. The following changes have been made to the programme considered at December Cabinet. These add £8.729m to the Harrow funded programme in 2015/16, £14.004m in total.

Table 1

Amendments To The Capital Programme	2015-16	2016-17	2017-18	2018-19	Total
	£000	£000	£000	£000	£000
Children & Families					
Addition to schools programme financed by contributions from schools and s106 planning developer contributions	1,964	-150	-60	0	1,754
Less External funding	-1,964	150	60	0	-1,754
Net Change to Children's Harrow Funded programme	0	0	0	0	0
Resources					
* Amended indicative ICT budget to reflect potential costs of new ICT contract	7,229	-1,775	525	525	6,504
Regeneration					
Haslam House	1,500	6,000			7,500
Net Addition to Harrow Funded Programme	8,729	4,225	525	525	14,004
HRA - adjustments to programme detailed in HRA report elsewhere on this agenda	397	1,900	0	0	2,297
* The final spend will be dependant on the outcome of contract negotiations.					

9. The gross value of the proposed General Fund programme is £67.2m for 2015/16, with external funding of £31.1m and a net cost to the Council of £36.1m.

Backlog Maintenance

10. The Council has considerable backlog maintenance – the figures from the latest Asset Management Plan are as follows:
- Corporate, Education and Miscellaneous buildings - £5m
 - Highways – £80m

The level of investment contained within this programme does not clear the full backlog. It should be noted that the Council cannot afford to fully address the backlog in the short-term, however, the Council will do at least what is necessary in order to comply with health and safety legislation. The programme does include projects which address some of the backlog. The investment that has taken place in the Civic Centre is freeing up buildings for disposal and hence removing some of the backlog maintenance requirement.

Environment and Enterprise

11. There has been significant reprofiling of projects across the first 3 years, with £1.120m being brought forward to 2015/16 from 2016/17, mainly to fund waste bins. There has been a reduction in the highways programme of £750k from 2016/17 and the net is a reduction of £920k in 2017/18. The programme added for 2018/19 totals £9.095m in respect of rolling programmes.

12. The draft programme allows for substantial highways works, to address some of the backlog, improvement to the ageing street lighting and drainage infrastructure.
13. The programme also provides for investment in Parks improvements and Parks buildings.
14. There is provision for a number of Carbon reduction schemes. Carbon reduction schemes result in savings in energy costs.
15. There is provision for collaboration with the GLA/TfL on a project to enhance the quality and safety of Harrow on the Hill station and bus station including provision of step free access. The Council contribution of £3m is earmarked for 2017/18, and is aimed at (and conditional upon) leveraging in the significant investment required by GLA/TfL to deliver the project over a series of phases.
16. There is provision for Station Road Highway and Environmental improvements. This reflects a bid that has been made to the GLA's High Street fund with a council contribution of £100k with the balance coming from the High Street fund, TfL and s106.

Children's Services

17. The existing programme for Children & Families is budgeted to be funded entirely from grant. The proposed programme, both re-profiles the programme and also adds to the programme to reflect the requirements of the school expansion programme, not all of which is funded from grant. The net increase in Harrow funded expenditure is £6.120m in 2015/16, £11.355m in 2016/17, £8.715m in 2017/18 but with an assumption that grant will exceed expenditure by £2.615m in 2018/19. The total of Harrow funded expenditure over the four years is £23.575m.
18. The existing programme has been re-profiled to reflect the anticipated spend profile as a result of all of the Agreed Maximum Price schedules for the School Expansion Programme Phase 2 schemes being finalised in December 2014.
19. In addition it is proposed to increase the existing capital programme by £1.754m to reflect contributions from schools of £1.385m and s106 funds totalling £369k for which the cost of the works in relation to these is included in the overall programme. This is a net nil cost to Harrow.

Community, Health and Wellbeing

20. The net proposed programme changes are -£793k in 2015/16, -£843k in 2016/17 and £798k in 2017/18. £1.670m has been added in 2018/19 in respect of rolling programmes.
21. The programme provides for a targeted programme of improvements to the Council's leisure and library facilities. There will be ongoing contractual commitments around the replacement of Lifecycle gym equipment which will need to be included in future planning years.
22. The Government's reforms of Health and Social Care require significant investment in IT systems to support them. Provision for this has been included, with an assumption that 50% of the costs will be supported by grant. There is a further scheme not included in the draft programme

which is still under consideration. Should the grant funding not be allocated as anticipated, the schemes will be funded within overall available resources.

23. Provision has been made for Disabled Facility Grants (received via the Better Care Fund) to provide adaptations for vulnerable residents.
24. Provision of £1m has been made in 2017/18 for a refit of the Central Library and for Library refurbishments.

Resources

25. The Council outsourced the provision of IT services to Capita in November 2010. This contracts ends in October 2015 and the procurement of a new partner is currently being undertaken.
26. The proposed Resources programme has been updated to include potential additional indicative capital costs of £6.8m in 2015/16 arising from the ending of the Capita contract and transfer to the new service provider. The new provider has not yet been selected and the appointment will be the subject of a separate report to cabinet, in which the final revenue and capital costs will be set out.
27. The programme provides for further enhancement of existing systems.

Regeneration

28. A series of projects will be designed within the overarching Regeneration programme to deliver the Council's priorities. The Cabinet report in December 2014 presented the draft Regeneration Strategy and approval was obtained to progress a number of core components of the Strategy. External consultancy support will be required to take forward the programme and is estimated at £250K per year. One of the core components is to develop several of council's own sites for housing to provide both affordable housing and private rented sector (PRS) housing. A wide range of sites in Council ownership are being evaluated. Haslam House site has been identified as a pilot scheme for the PRS project with the potential of providing 25-40 housing units depending on the option chosen. The work undertaken so far has allowed more robust costing including construction and professional fees of £7.5M to be built in to the 2015/16 capital programme.

Capital Receipts

29. Historically the timing and value of capital receipts has proved difficult to forecast, and have tended to be later than anticipated. The draft capital programme does not assume any capital receipts in future years. To the extent that capital receipts are actually received, this will enable a reduction in capital financing costs, commencing in the year following their receipt. However the council is planning to move away from disposals towards developing its own assets and delivering a sustainable revenue stream.

Housing Revenue Account (HRA)

30. The HRA Capital Programme is detailed in a separate report to Cabinet elsewhere on this agenda.

Capital Funding

31. The capital programme is funded from a number of sources. These include:

- External Funding of the order of £31m in 2015/16, £75m across the four year programme period, primarily from the DfE and Transport for London;
- Borrowing;
- Capital receipts;
- s106 planning agreements in relation to specific schemes;
- Direct Revenue Financing (Housing Revenue Account).

It is anticipated that the General Fund programme will be financed as follows:

Table 2: New borrowing requirement

General Fund Programme				
	2015-16	2016-17	2017-18	2018-19
	£m	£m	£m	£m
Planned spending	67.255	51.677	38.637	21.807
External funding	-31.107	-19.307	-12.907	-11.407
Net Prudential Borrowing	36.148	32.370	25.730	10.400

32. The revenue implications of this new borrowing, in the context of the Council's treasury management activity, are set out in the table below. The revenue implications are factored into the revenue budget report for 2014/15 to 2018/19 being considered by Cabinet elsewhere on this agenda. The table below shows for each year what the full year's effect of that year's capital programme and capital receipts are. The table only includes the revenue effects of the programme that is proposed and excludes the revenue implications of previous years' capital programmes. It also excludes the impact of other changes to funding the existing programme e.g. interest rate changes.

Table 3: Capital Financing Implications of Capital Programme

	2015-16	2016-17	2017-18	2018-19	2019-20
	£000	£000	£000	£000	£000
MRP		2,207	4,554	6,131	7,357
Interest	581	1,178	1,131	744	209
Total	581	3,385	5,685	6,875	7,566

33. The table above reflects the cost in each year of financing 2015/16 to 2018/19 programme. There is no MRP impact in 2015/16 as MRP in relation to expenditure in 2015/16 does not commence until 2016/17. The Council as at 20 January 2015 had cash balances of £142m and as such it is very likely that for 2015/16 any borrowing would be made internally (That is to say from Council cash balances rather than taking on an additional external loan).

34. There is no new planned borrowing in respect of the HRA programme. This is because under HRA Reform, the HRA is allowed to keep all of its net income rather than transferring some to the Government. This income will allow the HRA to maintain its capital programme without the need for further borrowing. In addition, the HRA will be at its “borrowing cap” so cannot borrow any more. These issues are more fully explained in the HRA budget report elsewhere on the agenda.
35. It should be noted that the capital financing costs are based on a number of assumptions about the level of capital expenditure, level of capital receipts, timing of any borrowing, interest rates, and use of the minimum revenue provision. The revenue budget reflects the best estimate based on these assumptions.

Harrow's Community Infrastructure Levy (CIL)

36. Harrow's CIL came into effect on 1st October 2013 and enables the Council to levy a charge on certain types of new development to help fund improvements to local infrastructure such as schools, transport, green spaces, health and leisure facilities. To date Harrow has receipts in respect of CIL total £128k. Harrow's CIL is an additional levy on top of the London Mayor's existing Crossrail CIL. The Harrow CIL is underpinned by the Infrastructure Delivery Plan (IDP) which sets out the infrastructure required to enable investment and planned growth in the Borough. Against an infrastructure bill, estimated to be at least £150m, CIL is expected to account for circa £20-30m by 2026, depending upon the level development permitted and the ability of the development industry to bring new proposals forward. It is likely that a significant proportion of the CIL contributions may be made in kind – for example through the provision of new social & community facilities within new developments. In this context, CIL is additional top-up funding, but is not the primary source of funding for infrastructure and, even with CIL funding, there will still remain a funding gap that requires choices and priorities to be made.
37. To date, no firm arrangements have been made regarding the governance for spending CIL receipts. Based upon experience with tariffs previously, officers consider that the most transparent and appropriate means of managing infrastructure delivery in future, is through a single but expanded and dynamic IDP process that addresses the following requirements:
 - Long (10 year+) and short term (1-3 year) strategic infrastructure delivery programmes
 - A clear and transparent approval process for all infrastructure projects
 - Consultation with the community on infrastructure delivery (including the obligation to pass CIL to the local communities impacted by development)

- Engagement with the development industry about priorities and capacity, including their potential role in assisting delivery
- Effective monitoring of progress against the infrastructure plans and the effective implementation of the spatial vision for the borough set out in the adopted Local Plan

Harrow's Infrastructure Delivery Plan (IDP)

38. The IDP identifies the types and quantum of social, physical and environmental infrastructure required to support development and growth within the Borough to 2026, and sets this out in a detailed delivery plan. In particular it:
- Provides a benchmark of existing infrastructure provision, identifying how well existing needs are met;
 - Identifies what new infrastructure is being planned as well as future infrastructure requirements to support existing population change as well as the new housing and employment growth planned for through the Council's Spatial Strategy;
 - Provides an indication of the potential costs and means of funding the required infrastructure through public funding, developer contribution and other sources;
 - Establishes responsibilities for delivery of individual projects, when and where infrastructure will be provided, and provides a basis for collaborative and effective working between stakeholders.
39. The effectiveness of the IDP is in capturing Harrow's future infrastructure improvements and requirements in one place. As such, the IDP represents the beginning of a long-term (10 year) capital works programme for the Council, providing an overarching framework for the consideration of a coordinated programme of delivery across all service areas and rational basis for the evaluation and prioritisation of individual project bids for capital investment.
40. The proposed capital programme for 2015/16 to 2018/19 will deliver a number of the infrastructure improvements identified in the IDP. Going forward, closer alignment of the capital programme to the delivery against the IDP will significantly aid in Council's communication of a clear and coherent picture around its strategic investment choices and decisions.
41. However, it is not intended that the IDP be a static document, rather it will be subject to periodic review and updated as necessary to take account of improvements already delivered, new population projections, changes in demands for different infrastructure provision, development completions and changes in service delivery and/or service funding. Such information will routinely be feed-in from the various service areas, enabling the IDP to provide a 'top-down' approach to Council's strategic decision-making about its future investment in capital improvements alongside other funding initiatives and property disposals.

Governance Structure For Delivery Of The Programme

42. The processes and procedures implemented surrounding the governance of the capital programme have continued to be developed. All capital projects are now included in VERTO, the Council's project management system.
43. Governance of the Capital Programme in 2015/16 will continue to include monthly monitoring and review, the Capital Forum process and reporting to Cabinet at the end of each quarter.

Options considered

44. These are as detailed in paragraph 6.

Legal Implications

45. Included in the body of the report.

Financial Implications

46. Financial matters are integral to the report.

Performance Issues

47. The capital programme proposed represents a significant investment by the Council in infrastructure. This will have an impact on a range of performance indicators across the Council's services.
48. Monitoring of the approved programme, including Capital Forum, is ongoing and is essential for good financial management. As well as performing project assessments on completed projects it will be important to develop and track performance measures to ensure that the Council can evidence and demonstrate good value for money (VFM).
49. Target for spend. It is proposed that a performance target is set of 90% of the approved budget for the programme being spent in 2015/16. Having approved an investment programme it is important that the programme is then substantially delivered in the planned timeframe, in line with member priorities.

Environmental Impact

50. The Council adopted the climate change strategy in September 2009 and set an annual target to reduce corporate and borough carbon emissions by 4% a year.
51. Capital expenditure of this scale will have an environmental impact on the Council's operations (and the wider borough). The investment carries the risk of increasing carbon emissions. Hence each proposed project is required to consider their respective carbon impacts and include measures to ensure that the above target is supported.

52. Some of the projects will specifically support the strategy in terms of mitigation and adaptation.

Risk Management Implications

53. The individual schemes within the programme will either be incorporated within departmental registers or have individual registers. A significant consideration in developing the programme has been the risks arising from not keeping our infrastructure in good order. Not doing so would lead to an increase in health and safety risks and additional costs in replacing assets when they deteriorate too much to repair.

Equalities implications/Public Sector Equality Duty

54. One of the aims of the Capital Strategy is to ensure the responsible allocation of funding in line with the Council's priorities and legislative requirements such as equalities legislation. Equalities implications form part of the way that the projects are prioritised. All of the schemes benefit either all protected characteristic groups through improving general service provision, or particular groups such as those connected by their age in relation to the school expansion schemes and age and disability in relation to carer and residential establishment investments. Where individual scheme design could have a less than positive impact on certain protected characteristic groups, a full EqIA will be undertaken.

55. Decision makers should have due regard to the public sector equality duty in making their decisions. Consideration of the duties should precede the decision. It is important that Cabinet has regard to the statutory grounds in the light of all available material such as material in the press and letters from residents. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:

A public authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

The relevant protected characteristics are:

- *Age*
- *Disability*
- *Gender reassignment*
- *Pregnancy and maternity*
- *Race,*
- *Religion or belief*
- *Sex*
- *Sexual orientation*
- *Marriage and Civil partnership*

Council Priorities

The Council's vision is:

Working Together to Make a Difference for Harrow

56. This report deals with the use of financial resources which is key to delivering the Council's new priorities:

- Making a difference for the vulnerable
- Making a difference for communities
- Making a difference for local businesses
- Making a difference for families

Section 3 - Statutory Officer Clearance

Name: Dawn Calvert	<input checked="" type="checkbox"/>	on behalf of Chief Financial Officer
Date: 5 February 2015		
Name: Linda Cohen	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 10 February 2015		
Ward Councillors notified:	NO, as it impacts on all Wards	
EqIA carried out:	NO	
EqIA cleared by:	No direct equalities impact from this report. Any projects with potential impacts will separately be required to do an impact assessment.	

Section 6 - Contact Details and Background Papers

Contact: Dawn Calvert, Head of Strategic Finance and Business
Email: dawn.calvert@harrow.gov.uk

Background Papers: None

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---

Capital Programme

Outline Capital Bids 2015/16 to 2018/19

Project Title	Description	2015/16			2016/17			2017/18			2018/19			TOTAL		
		Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Bid Value	Grant Funding	Net Bid Value
Children & Families - New																
Primary Expansion Phase 3 - additional 3 schools	The original capital programme included 3 expansions in Phase 3. Latest projections indicate the need for an additional 3 expansions in Phase 3. This phase will cover September 2015 and September 2016. These are likely to be expensive solutions as we have already expanded the schools with simpler solutions. Without scoping based on specific schools, an estimate of £2.5m is being allowed for each of 3 expansions.	5,280		5,280	2,805		2,805	165		165			0	8,250	0	8,250
Primary Expansion Phase 4 - 4 schools	Latest projections indicate the need for a Phase 4 primary expansion programme, requiring 4 additional forms of entry. This phase will cover September 2017 and September 2018. These are likely to be expensive solutions as we have already expanded the schools with simpler solutions. Without scoping based on specific schools, an estimate of £2.5m is being allowed for each of 3 expansions.	420		420	4,200		4,200	4,200		4,200	1,680		1,680	10,500	0	10,500
Secondary Expansion	The growth in demand for primary places will progress to secondary schools and it is projected that there will be a shortfall of Year 7 places from 2018. Additional capacity has been secured through the expansion of two schools, Bentley Wood and Whitefriars and the permanent location of Avanti House will contribute to an overall increase in places. In addition, a further 6 forms of entry has been secured through the successful free school bid opening on the Heathfield School site. However, there will still be a shortfall of places from September 2020 rising to approx. 13 forms of entry in September 2023.			0			0			0	525		525	525	0	525

Outline Capital Bids 2015/16 to 2018/19

Project Title	Description	2015/16			2016/17			2017/18			2018/19			TOTAL		
		Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Bid Value	Grant Funding	Net Bid Value
SEN Expansion	There is pressure for special educational needs (SEN) provision places, which will be alleviated in the medium term as additional places will become available from 2015 following successful TBNP applications in accordance with Harrow's Special Schools and SEN Placement Planning Framework. However, in light of the projections and in light of the Government's Special Educational Needs and Disability reform agenda, consideration needs to be given to the next phase of expansion. A time limited task and finish group has been established, which will drive forward work on producing a refresh of the Harrow SEN strategy.	420		420	4,200		4,200	4,200		4,200	1,680		1,680	10,500	0	10,500
Capital Maintenance	Five years ago a comprehensive survey of all schools a significant maintenance backlog on our school premises. Since then, the majority of our High Schools and a small number of primary schools have transferred to academy status, and recently the condition of some of our primary schools has led to them being accepted on a national programme for school rebuilds. However, a backlog remains in our remaining primary and high schools which needs to be addressed as well as trying to develop an ongoing proactive maintenance			0			0			0	1,350		1,350	1,350	0	1,350
Bulge Classes	The pupil numbers in Harrow have risen rapidly in recent year, particularly at primary intake level. This has given rise to the School Expansion Programme which is covered in other bids. However, until permanently expanded schools are available, the short term measure has been to provide 'bulge classes' in multiple schools across the borough. These are where an additional form of entry are placed in a particular year which then passes through the school without being followed by additional classes.			0	150		150	150		150	150		150	450	0	450
Capital Maintenance funding estimate 2018-19	Estimated allocation for Capital Maintenance to contribute to schools capital programme for 2018-19			0			0			0		2,000	-2,000	0	2,000	-2,000
Basic Need funding estimate 2018-19	Estimated allocation for Basic Need to contribute to schools capital programme for 2018-19			0			0			0		6,000	-6,000	0	6,000	-6,000

Outline Capital Bids 2015/16 to 2018/19

Project Title	Description	2015/16			2016/17			2017/18			2018/19			TOTAL		
		Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Bid Value	Grant Funding	Net Bid Value
Devolved Formula capital	Devolved Formula capital is an allocation of funding on a formulaic basis based on school census data collected in January each year. Local authorities are required to pass on the funding to each of its maintained schools. Voluntary Aided schools receive their allocation directly from the EFA. Local authorities have no control over this funding	361	361											361	361	0
Sub Total New Programme		6,481	361	6,120	11,355	0	11,355	8,715	0	8,715	5,385	8,000	-2,615	31,936	8,361	23,575
Existing programme rephased																
School Expansion Phase 2 Programme 2014-16	This project is the second phase of the School Expansion Programme and will involve the permanent expansion of 12 primary schools and the associated capital works. Two of the project will be delivered through the Priority Schools Building Programme and will have little or no budget. The remaining 10 are delivered using Basic Need and Targeted Basic Need funding from the EFA. There is a deadline for the delivery of the TBNP-funded schools of September 2015.	8,611	8,611	0			0			0			0	8,611	8,611	0
School Expansion Phase 3 Programme 2014/16	The latest round of projections are showing yet another increase in the final expected sustainable peak in primary numbers. There will be further analysis before Phase 3 is taken forward, but based on current projection it would lead to a further 3 expansions being required. These are likely to be expensive solutions as we have already expanded the schools with simpler solutions. Without scoping based on specific schools, an estimate of £2.5m is being allowed for each of 3 expansions.	4,500	4,500	0	2,550	2,550	0	150	150	0			0	7,200	7,200	0
SEN Expansion Programme	Three special schools are being expanded and three mainstream schools will open additional places for pupils with special educational needs. These will be delivered by September 2015 in accordance with TBNP timescales	4,338	4,338	0			0			0			0	4,338	4,338	0
Secondary School Expansion Programme	The existing secondary expansion programme is being delivered by the successful TBNP bids to expand Bentley Wood School and extend the age range at Whitefriars Community School to fund a new secondary school. These will be delivered by September 2015 in accordance with TBNP timescales	6,582	6,582	0			0			0			0	6,582	6,582	0

Outline Capital Bids 2015/16 to 2018/19

Project Title	Description	2015/16			2016/17			2017/18			2018/19			TOTAL		
		Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Bid Value	Grant Funding	Net Bid Value
Children's Capital Maintenance Programme 2014-18	Five years ago a comprehensive survey of all schools revealed an £85m maintenance backlog on our school premises. Since then, the majority of our High Schools have transferred to academy status, and recently the condition of some of our primary schools has led to them being accepted on a national programme for school rebuilds. However, a backlog remains in our remaining primary and high schools which needs to be addressed as well as trying to develop an ongoing proactive maintenance	906	906	0	1,350	1,350	0	1,350	1,350	0			0	3,606	3,606	0
Bulge Classes 2014-18	The pupil numbers in Harrow have risen rapidly in recent year, particularly at primary intake level. This has given rise to the School Expansion Programme which is covered in other bids. However, until permanently expanded schools are available, the short term measure has been to provide 'bulge classes' in multiple schools across the borough. These are where an additional form of entry are placed in a particular year which then passes through the school without being followed by additional classes.	0	0	0	0	0	0			0			0	0	0	
School expansion programme contingency	5% contingency added to Phase 2, SEN expansion and existing secondary expansion programmes	204	204		0	0	0	0	0	0			0	204	204	0
Sub Total		25,141	25,141	0	3,900	3,900	0	1,500	1,500	0	0	0	0	30,541	30,541	0
Total Children & Families		31,622	25,502	6,120	15,255	3,900	11,355	10,215	1,500	8,715	5,385	8,000	-2,615	62,477	38,902	23,575
Community, Health & Wellbeing																
Housing GF																
Better Care Fund - Disabled Facilities Grant	Grants to fund adaptations to private properties to help enable residents to remain in their existing homes	1,500	650	850	1,500	650	850	1,500	650	850	1,500	650	850	6,000	2,600	3,400
Improvement Grant	Grants to private landlords to improve the condition of their properties, generally in exchange for a lease agreement	70	0	70	70	0	70	70	0	70	70	0	70	280	0	280
Empty Property Grants	Grants to help bring empty properties back into use, generally in exchange for nomination rights for a period of time	250		250	250		250	250		250	250	0	250	1,000	0	1,000
Sub Total		1,820	650	1,170	1,820	650	1,170	1,820	650	1,170	1,820	650	1,170	7,280	2,600	4,680
Community & Culture																

Outline Capital Bids 2015/16 to 2018/19

Project Title	Description	2015/16			2016/17			2017/18			2018/19			TOTAL		
		Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Bid Value	Grant Funding	Net Bid Value
Leisure & Libraries Capital Infrastructure 14-18	Capital to be invested in a targeted programme to improve the infrastructure of the Council's leisure and library facilities. There is a high risk, particularly with Harrow Leisure Centre, that failure to maintain the infrastructure will inevitably lead to a building closure if a major fault occurs and be a risk to leisure income. The libraries' self service kiosks will also need to be refreshed by 2016-17.	300	0	300	300	0	300	150	0	150	150	0	150	900	0	900
Central Library Refit & Library Refurbishments	Investment in library estate to be detailed and agreed in the planned library services strategy in April 2015.	0	0	0	0	0	0	1,000	0	1,000	0	0	0	1,000	0	1,000
Sub Total		300	0	300	300	0	300	1,150	0	1,150	150	0	150	1,900	0	1,900
Adults																
Integrated Health Model	Develop a connection to the Health N3 Secure Network Integrating IT systems (MOSAIC and Jade) to develop an integrated care record across health and social care Development of buildings (existing or new) to allow the set up of shared treatment facilities for health and social care IT infrastructure to support a move to 24/7 availability of care	500	250	250	500	250	250	500	250	250	500	250	250	2,000	1,000	1,000
Carers Service Charges	The investment will include the development of a Resource Allocation System for Informal Carers and new Information & Advice on-line systems. An On-line self assessment system will also be required to manage the scale of demand likely to approach the Council.	100	50	50	100	50	50	0	0	0	0	0	0	200	100	100
Reform of Social Care Funding	The Capital funding will be used to support the implementation of the Dilnot Commission and build new information system(s) to support the requirements including self-assessment tools to mitigate the large increase in demand for assessment and financial modelling.	575	191	384	475	191	284	0	0	0	0	0	0	1,050	382	668
Adult Projects funded from Community Capacity Grant	A range of projects to be identified to develop community capacity with a view to reducing revenue costs on an ongoing basis	49	49	0	49	49	0	290	290	0	290	290	0	678	678	0
In-house Residential Establishments	Investment to maintain the infrastructure of the Council's internal residential and day care facilities.	100	0	100	100	0	100	100	0	100	100	0	100	400	0	400
Sub Total		1,324	540	784	1,224	540	684	890	540	350	890	540	350	4,328	2,160	2,168
Total Community, Health & Wellbeing General Fund		3,444	1,190	2,254	3,344	1,190	2,154	3,860	1,190	2,670	2,860	1,190	1,670	13,508	4,760	8,748
Resources Directorate																

Outline Capital Bids 2015/16 to 2018/19

Project Title	Description	2015/16			2016/17			2017/18			2018/19			TOTAL		
		Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Bid Value	Grant Funding	Net Bid Value
Capital cost of transition and transformation of ICT service	This represents an indicative value of the likely capital cost of transition and transformation of IT Services to the new supplier, based on the previous transformation programme undertaken by the current supplier.	6,800		6,800			0			0			0	6,800		6,800
Purchase of existing IT assets	This is the purchase of assets from existing supplier for new supplier to run ICT Services. This is based upon the written down value of existing assets	500		500			0			0			0	500		500
Ongoing refresh & enhancement of ICT	Replacement, upgrades and enhancements to applications, infrastructure and end user devices, not included within the agreed supplier service charges or transformation programme	2,000		2,000	2,000		2,000	2,000		2,000	2,000		2,000	8,000		8,000
Other potential costs of implementation of new ICT contract	This is to cover potential costs associated with successful implementation for example: Council side costs including costs of employing Capita to complete works required	1,000		1,000			0			0			0	1,000		1,000
<i>Total required for new ICT Contract</i>		<i>10,300</i>	<i>0</i>	<i>10,300</i>	<i>2,000</i>	<i>0</i>	<i>2,000</i>	<i>2,000</i>	<i>0</i>	<i>2,000</i>	<i>2,000</i>	<i>0</i>	<i>2,000</i>	<i>16,300</i>	<i>0</i>	<i>16,300</i>
IT Mobile & Flex	Council side costs for ongoing deployment and potential third party costs for further development	320		320			0			0			0	320		320
IT BTP Refresh	Refresh of hardware for past BTP projects as included in original project cost models. Ongoing benefits realised through original implementation are dependent upon systems continuing to function.			0	300		300			0			0	300		300
<i>Sub Total ICT</i>		<i>10,620</i>	<i>0</i>	<i>10,620</i>	<i>2,300</i>	<i>0</i>	<i>2,300</i>	<i>2,000</i>	<i>0</i>	<i>2,000</i>	<i>2,000</i>	<i>0</i>	<i>2,000</i>	<i>16,920</i>	<i>0</i>	<i>16,920</i>
West London Waste Infrastructure Loan	Loan to part finance a new energy from waste facility.	3,883		3,883	915		915						0	4,798		4,798
Total Resources		14,503	0	14,503	3,215	0	3,215	2,000	0	2,000	2,000	0	2,000	21,718	0	21,718
Environment & Enterprise																
Flood Defence	Renewal of ageing drainage infrastructure to reduce the risk of flooding impact on residents, properties and business continuity.	300		300	300		300	300		300	300		300	1,200	0	1,200
Waste & Recycling	Replacement of aged, damaged and/or lost wheeled bins, as well as bins provision for new residential developments within the borough.	1,190		1,190	200		200	200		200	200		200	1,790	0	1,790
Highways Programme	Renewal and replacement of highways and footways.	5,500		5,500	4,850		4,850	4,800		4,800	4,800		4,800	19,950	0	19,950
Highways Drainage	Improvements to critical drainage areas identified in Surface Water Management Plan as required by The Flood & Water Management Act 2010.	225		225	200		200	200		200	200		200	825	0	825
Local Impementation Plan (TfL) including CPZs	Implementation of the Mayor of London's Transport Strategy as well as Harrow's Transport Local Implementation Plan & parking management programmes.	2,374	2,074	300	2,374	2,074	300	2,374	2,074	300	2,374	2,074	300	9,496	8,296	1,200

Outline Capital Bids 2015/16 to 2018/19

Project Title	Description	2015/16			2016/17			2017/18			2018/19			TOTAL			
		Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Bid Value	Grant Funding	Net Bid Value	
Parks Buildings	Improvements to parks buildings which are most in need of repair, and key strategic buildings to be made fit for purpose.	200		200	200		200	200		200	200		200		800	0	800
Parks Improvements	Improvements to parks to provide safe access and use of facilities for all.	500		500	475		475	475		475	475		475		1,925	0	1,925
Street Trees	Replacement of trees stock which poses a risk in terms of safety and potential damage to properties, and new trees planting to support Climate Change strategy.	75		75	75		75	75		75	75		75		300	0	300
Street Lighting	Replacement of aged and dangerous lighting columns as well as investment in new lighting to support Climate Change strategy.	1,500		1,500	1,500		1,500	1,500		1,500	1,500		1,500		6,000	0	6,000
Corporate Accommodation	Improvements to civic buildings to provide a safe and secure environment in which to operate its business.	246		246	231		231	155		155	155		155		787	0	787
High Priority Planned Maintenance	Improvements to corporate properties (excluding schools) to ensure that they are in a safe condition for occupants.	420		420	450		450	275		275	275		275		1,420	0	1,420
Carbon Reduction (Corporate sites)	Provision of retro-fit energy efficiency measures in corporate buildings.	300		300	300		300	300		300	300		300		1,200	0	1,200
Replacement of Parks Litter Bins	Replacement of aged and damaged waste bins in parks with bins of appropriate size in the right locations.	65		65	65		65	65		65	65		65		260	0	260
Green Grid Programme	Improvements to Harrow's green infrastructure to provide a network of interlinked and multifunctional open spaces.	343	143	200	343	143	200	343	143	200	343	143	200		1,372	572	800
Harrow on the Hill Station	Improvements to the station and surrounding area to create step free access	2,000	2,000	0	12,000	12,000	0	11,000	8,000	3,000			0		25,000	22,000	3,000
Station Road Highway and Environmental Improvements	Improvement scheme totalling £408k for which a bid has been made to the GLA High Streets fund of £190k. £8k is s106 funding and £110k has been agreed froms part of the TFL LIPprogramme shown as part of that programme	298	198	100											298	198	100
5 Digital Audio Tape (DAT) machines	Purchase of noise nuisance recording systems to support noise investigations.	50		50			0			0			0		50	0	50
Green Gyms	Installation of outdoor gym equipment within parks to promote health and well being.	150		150	50		50	50		50	50		50		300	0	300
Harrow Card	Introduction of a discount card to support local businesses and to increase local employment opportunities.	200		200			0			0			0		200	0	200
Total Environment & Enterprise		15,936	4,415	11,521	23,613	14,217	9,396	22,312	10,217	12,095	11,312	2,217	9,095		73,173	31,066	42,107
Regeneration																	
Regeneration Programme	Regeneration Development expenditure, working towards delivery of 25 year strategy with specific Capital investment proposals to follow consultation launched in early 2015.	250	0	250	250	0	250	250	0	250	250	0	250		1,000	0	1,000

Outline Capital Bids 2015/16 to 2018/19

Project Title	Description	2015/16			2016/17			2017/18			2018/19			TOTAL		
		Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Value £000	External Funding £000	Net Value £000	Gross Bid Value	Grant Funding	Net Bid Value
Haslam House redevelopment	This is a pilot project for the Council's private rented sector housing programme and will deliver between 25 and 40 units depending on the option chosen.	1,500		1,500	6,000		6,000							7,500		7,500
Total Regeneration		1,750	0	1,750	6,250	0	6,250	250	0	250	250	0	250	8,500	0	8,500
Total General Fund		67,255	31,107	36,148	51,677	19,307	32,370	38,637	12,907	25,730	21,807	11,407	10,400	179,376	74,728	104,648
HRA capital programme	Continued investment in the Council's existing housing stock, as well as the commencement of a programme of new build housing	21,656	923	20,733	13,137	110	13,027	15,315	2,356	12,959	9,139	0	9,139	59,247	3,389	55,858
Total Programme		88,911	32,030	56,881	64,814	19,417	45,397	53,952	15,263	38,689	30,946	11,407	19,539	238,623	78,117	160,506

REPORT FOR: **CABINET**

Date of Meeting:	18 February 2015
Subject:	Expansion of HB Public Law
Key Decision:	No
Responsible Officer:	Tom Whiting, Corporate Director of Resources
Portfolio Holder:	Councillor Graham Henson, Portfolio Holder for Performance, Corporate Resources and Policy Development
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	None

Summary and Recommendations

This report sets out Hounslow's agreement to join HB Public Law in the next few months and asks Cabinet to support their inclusion.

Recommendations:

Cabinet is requested to:

- (1) Welcome Hounslow Council's decision to ask HB Public Law to discharge its legal function, and

(2) Delegate to the Director of Legal & Governance Services, following consultation with the Portfolio Holders for Performance, Corporate Resources and Policy Development and Finance and Major Contracts, authority to execute an agreement with Hounslow underpinning the relationship, and to make any necessary amendments to the agreement with Barnet.

Reason: To support HB Public Law delivering a cost effective and high quality legal service and its plans for growth.

1. Background

- 1.1 As a large employer, service provider, regulator and landowner, Harrow has a steadily increasing demand for legal advice and advocacy. That demand is driven by both significant changes in the law, eg the Care Act 2014, and the increasingly difficult decisions facing the Council as it copes with reduced income.
- 1.2 In 2010 a shared legal service model was explored to see how it might address the 'perfect storm' of increasing demand, greater complexity of work and pressure on budgets.
- 1.3 Experience elsewhere suggested that creating a larger legal practice to support more than one authority could deliver the following benefits:
 - A greater range and depth of legal expertise;
 - More flexibility in response to Council demands;
 - Reduced cost;
 - Improved career opportunities for staff;
 - Reduced reliance on private sector legal advice;
 - Improved ability to recruit and retain the best staff; and
 - Greater resilience.
- 1.4 Given these benefits, HB Public Law was established in 2012 on the merging of Harrow and Barnet's legal teams, which has allowed both Councils to enjoy improved services at a reduced cost.

2. Options considered

- 2.1 When the project was first developed, one option was for the Barnet/Harrow merger to be its conclusion, but its Leaders were clear from the start that further growth and expansion would be pursued, to create a sustainable, quality legal practice capable of supporting a range of public sector clients.

3. Recent Developments

- 3.1 A Cabinet report in November 2014 explained and authorised the setting up of a separate legal practice, HBPL Ltd, capable of supporting private sector providers of services to local authorities.
- 3.2 A subsequent report in January 2015 welcomed Bevan Brittan LLP, a leading national law firm as HB Public Law's private sector partner. This report also advised members that discussions were on going with

other authorities who wished to join HB Public Law, but that at the time nothing had been agreed.

4. Current situation

5.1 For the last six months officer have been discussing with LB Hounslow the possibility of HB Public Law discharging their legal function. These discussions have included a meeting between the respective Leaders, and presentations to Hounslow legal staff.

5.2 Hounslow agreed at its Cabinet meeting on 10th February 2015 to:

- Enter into a shared services arrangement with the London Borough of Harrow in order for the London Borough of Harrow to discharge this Council's function in respect of the delivery of legal services in accordance with Section 101 of the Local Government Act 1972 and of the Local Government (Arrangements for the Discharge of Functions) (England) Regulations 2000 and
- Instruct the Chief Executive to agree a suitably worded contract for the provision of legal services from HBPL following appropriate consultation with the affected staff

5. Structure of New Arrangement

5.3 As is clear from the above, no formal agreement has yet been executed between the 2 authorities, but Hounslow's agreement to delegate its legal function to Harrow is based on Hounslow agreeing to:

- Delegate its legal function to Harrow for 5 years;
- Retain a Monitoring Officer who will also discharge the 'client' function in relation to the arrangement;
- Transfer its legal staff to Harrow under the TUPE regulations;
- Commission an agreed number of legal hours from HB Public Law each year for an agreed hourly rate;
- Pay set up costs to include, eg scanning paper files, and funding the pension fund deficit on transferring employees (calculated in accordance with Harrow's fund actuarial assumptions);
- Provide hot desk at its civic centre;
- Channel all its legal work (including that currently outsourced) through HB Public Law.

5.4 In order to ensure service continuity, Hounslow wish that for at least the first 9 months its work will be done, so far as is possible, by its transferring staff. Thereafter the work will be allocated, in consultation with Hounslow clients, in accordance with how the new, larger practice is organised.

5.5 In addition to the above the proposed agreement would include detailed provisions to cover:

- The scope of the services HB Public Law will offer;
- Service standards, liaising with clients and key performance indicators
- Managing conflicts of interest;
- Risk management and quality accreditation
- Minimising the impact on both authorities if Hounslow decided to withdraw;

- Dispute resolution;
- Extending the agreement if the parties so wish;
- Confidentiality and data protection;
- Insurance;
- Payment of bills and disbursements;

5.6 The above reflect the arrangements which underpin Harrow's relationship with Barnet.

6. Implications of the Recommendation

6.1 Once implemented this recommendation will result in HB Public Law increasing in size by almost 50%, and discharging the legal function of a third London Borough. This will require a significant change management programme and considerable effort from its management team.

6.2 Once consolidated this should increase HB Public Law's market presence and ability to retain existing clients and attract new ones. It will also allow it to develop new services which a smaller practice could not support. This will mean that its clients, including Harrow as the host authority, will have a reduced need to commission expensive external legal advice.

Resources, costs

6.3 As host authority Harrow will be liable for the staffing, infrastructure and support costs of the larger practice, but these will be fully recovered from authorities using HB Public Law's services.

Staffing/workforce

6.4 It is proposed that Hounslow's legal staff (excluding their Monitoring Officer) transfer to Harrow under the TUPE regulations, and join Harrow's pension scheme. The agreement will provide that the transfer be fully funded in accordance with Harrow's pension fund actuarial assumptions.

Performance Issues

6.5 The proposed agreement with Hounslow will include detailed provisions to ensure a quality and timely service is provided. HB Public Law has consistently delivered to a high standard against equivalent provisions in its agreement with Barnet.

Environmental Implications

6.6 HB Public Law operates a flexible working model to minimise staff travel, and hence the impact of its operation on the environment. This will be replicated in the agreement with Hounslow, through eg the provision of hot desks.

Risk Management Implications

6.7 The project will be overseen by a Project Board including Hounslow's Chief Executive and Harrow's Director of Legal & Governance Services, and that oversight will include risk management.

7. Legal Implications

- 7.1 The council has the power to provide legal services by virtue of s111 of the Local Government Act 1972.
- 7.2 Each authority, by virtue of the 1972 Act, has the power to arrange for the discharge of their functions by another authority.
- 7.3 There is a legal basis for the sale and purchase of legal services between local authorities using Section 1 of the Local Authority (Goods and Services) Act 1970.
- 7.4 HB Public Law will need to comply with all Solicitors' Regulatory Authority regulations in relation to acting for Hounslow.

8. Financial Implications

- 8.1. As stated above all staffing, infrastructure and support costs pertaining to the expansion of the practice will be recovered from LB Hounslow.
- 8.2 The proposal before Hounslow ensures that Harrow is indemnified in respect of liabilities for transferring staff, that there is no adverse impact on its pension fund and that the costs of employing the additional staff are fully recovered.
- 8.3 Legal and Governance have savings to be delivered for future years, which are dealt with in the Budget reports elsewhere on the agenda.

9. Equalities implications

- 9.1 There are no equalities implications arising directly out of the recommendation, but as the project is implemented, a full equalities impact assessment will be undertaken to ensure awareness and mitigation of any adverse impacts.

10. Council Priorities

- 10.1 The Council wants to be a modern, efficient Council, able to meet the challenges ahead. It aims to protect frontline services by delivering support functions in the most cost effective way, including collaborating with other boroughs on shared services and procurement opportunities. This initiative supports these aims as it puts the legal service in a much stronger position to develop services for other organisations and widening its client base, thereby providing a resilient legal service so that the Council can focus resources into front line services.

Section 3 - Statutory Officer Clearance

Name: Simon George Chief Financial Officer

Date: 9 February 2015

Name: Hugh Peart on behalf of the
Monitoring Officer

Date: 9 February 2015

Ward Councillors notified: No, as it impacts on all
Wards

EqIA carried out: No (we do not yet have
the details of all
employees likely to be
affected. A full EqIA will
be undertaken as part of
the implementation
project)

Section 4 - Contact Details and Background Papers

Contact: Hugh Peart, Director of Legal & Governance
Services, 0208 4242 1287, hugh.peart@harrow.gov.uk

Background Papers: None.

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---

Date of Meeting:	19 February 2015
Subject:	Calendar of Meetings 2015/16
Key Decision:	No
Responsible Officer:	Hugh Peart, Director of Legal and Governance Services
Portfolio Holder:	Councillor David Perry, Leader of the Council and Portfolio Holder for Strategy, Partnerships and Corporate Leadership
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	None
Enclosures:	None

Section 1 – Summary and Recommendations

This report sets out the proposals for the Council's Calendar of Meetings for the Municipal Year 2015/16.

Recommendations:

Cabinet is requested to approve the Calendar of Meetings for the Municipal Year 2015/16.

Reason: (For recommendation)

The Calendar of Meetings is approved on an annual basis at this time of the year for the succeeding Municipal Year. Advance approval of the Calendar facilitates the planning and forward commitments of both Members and officers. It will allow the room booking arrangements to be put in place at the earliest opportunity.

Section 2 – Report

- 2.1** The Calendar of Meetings provides the framework for the Council's democratic processes.
- 2.2** It is established practice for the Authority's Calendar of Meetings for the succeeding Municipal Year to be the subject of consideration and agreement at this time of the year.
- 2.3** The draft Calendar for 2015/16 follows the pattern established for 2014/15 where possible, other than those changes which are necessary as a result of public holidays, school terms, and religious festivals.
- 2.4** As a result of the budget savings, it is proposed to reduce the number of meetings of the Overview and Scrutiny Committee and its Sub-Committees. The Member Development Panel will become a Working Group.
- 2.5** In addition Council at its meeting on 13 November 2014 resolved to establish a Pension Board in accordance with the provisions of the Public Services Pension Act 2013 and to have twice yearly meetings. The meetings of the Board have been incorporated into the draft Calendar.
- 2.6** The Calendar makes no specific allowance for Members' commitments at the annual national party conferences or the Local Government Association General Assembly and Conference. However, as in previous years, the relevant dates in 2014 as indicated on the Calendar are:
- (i) Labour Party Conference: 27 - 30 September 2015
 - (ii) Conservative Party Conference: 4 - 7 October 2015
 - (iii) Liberal Democrat Party Conference: 19 - 23 September 2015
- 2.7** A draft of the proposed Calendar for the Municipal Year 2015/16 was provided to the Labour Group in advance of this meeting.

In addition, Unison and GMB have also been provided with the draft dates for meetings of the Employees' Consultative Forum.

Options considered

None other than it was considered prudent to have a programme in place and to follow the pattern of meetings from previous years.

Performance Issues

There are no performance implications associated with this report.

Environmental Implications

There are no environmental impacts associated with this report.

Risk Management Implications

To ensure that meetings are held so that a decision making process is in place. This not included on the Directorate or any other separate risk register that might be in place.

Legal Implications

There are no legal implications associated with this report.

Financial Implications

There are no financial implications associated with this report.

Equalities implications / Public Sector Equality Duty

No equalities impact assessment has been carried out. However, the Calendar takes account of religious days and, where possible, no meetings are held on those days and all Members were consulted on their observance of religious festivals.

Council Priorities

The publication of a transparent Calendar of Meetings in relation to decision making at committees contributes the administration's priorities of making a difference for the vulnerable, communities, local businesses and families by providing clear information on opportunities that are available to attend and listen to debates and to participate through the avenues of Petitions, Public Questions and Deputations.

Section 3 - Statutory Officer Clearance

Name: Caroline Eccles	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 10 February 2015		
Name: Steve Tingle	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 23 January 2015		

Ward Councillors notified:	NO.
EqIA carried out:	NO
EqIA cleared by:	N/A

Section 4 - Contact Details and Background Papers

Contact: Contact: Elaine McEachron, Democratic & Electoral Services Manager.

Tel: 020 8424 1097 E-mail: elaine.mceachron@harrow.gov.uk

Background Papers: None.

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---

Committee Calendar Summary 2015/16

Meeting	Quarter 1	Quarter 2	Quarter 3	Quarter 4
COUNCIL	19/5	24/9, 3/12	25/2	19/5
CABINET	21/5, 17/6, 16/7	17/9, 15/10, 19/11	10/12, 21/1, 18/2	17/3, 21/4, 24/5
Advisory Panels:				
Corporate Parenting	7/7	20/10	12/1	12/4
Harrow Business Consultative	-	-	26/1	-
Local Development Framework	AD HOC			
Major Developments	2/7	4/11	29/2	
Traffic and Road Safety	3/6	8/10	11/2	-
Consultative Forums:				
Employees'	-	12/11	14/1	-
Tenants', Leaseholders' and Residents'	8/7	6/10	4/2	27/4
GOVERNANCE, AUDIT, RISK MANAGEMENT AND STANDARDS COMMITTEE	22/7	10/9	8/12, 27/1	5/4
HEALTH AND WELLBEING BOARD	28/5, 2/7	24/9, 5/11	7/1, 3/3	11/5
LICENSING & GENERAL PURPOSES COMMITTEE	19/5 (Sp)			19/5 (Sp)

Meeting	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Licensing & General Purposes				
Subsidiary Bodies:				
Chief Officers' Employment	AD HOC			
Licensing	AD HOC			
Personnel Appeals	AD HOC			
OVERVIEW & SCRUTINY COMMITTEE	19/5 (Sp), 9/6, 1/7	16/9, 17/11	19/1, 23/2	19/4, 19/5 (Sp)
Scrutiny Sub-Committees:				
Health and Social Care	8/6	26/10	3/2	-
Performance and Finance	14/7	24/11	-	21/3
Call-In	AD HOC			
Call-In (Education)	AD HOC			
PENSION BOARD	26/5	-	3/11	-
PENSION FUND COMMITTEE	23/6	8/9	26/11	9/3
PLANNING COMMITTEE	27/5, 24/6, 15/7	2/9, 30/9, 21/10, 18/11	16/12, 13/1, 17/2	16/3, 13/4, 25/5
STANDING ADVISORY COUNCIL ON RELIGIOUS EDUCATION	25/6	22/10	2/12	3/3
Other Meetings:				
Group Meetings	Council	11/5	21/9, 30/11	22/2
	Cabinet	18/5, 15/6, 13/7	9/9, 12/10, 16/11	7/12, 18/1, 15/2
Member Training		22/6, 20/7	7/9, 19/10, 2/11	15/12, 11/1, 1/2
Trading Standards Joint Advisory Board		11/6	-	14/1
				10/3

Calendar of Meetings

1 May 2015 - 31 May 2016

May 2015

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
					1	2
3	4 <i>Public Holiday</i>	5	6	7 <i>Election Day - Parliamentary</i>	8 <i>VE Day</i>	9
10	11 <i>Group Meetings</i>	12	13	14 <i>Ascension Day</i>	15	16
17	18 <i>Group Meetings</i>	19 ANNUAL COUNCIL (6.30 pm) LICENSING AND GENERAL PURPOSES COMMITTEE (SPECIAL) OVERVIEW AND SCRUTINY COMMITTEE (SPECIAL)	20	21 CABINET	22	23 <i>Eve of Shavuot</i>
24 <i>Shavuot – First Day</i> <i>Pentecost</i>	25 <i>Shavuot – Second Day</i> <i>Public Holiday</i>	26 PENSION BOARD	27 PLANNING COMMITTEE	28 HEALTH AND WELLBEING BOARD	29	30
31	<i>Half Term</i>					

April 2015						
S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

June 2015						
S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

June 2015

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
	1	2	3 Traffic & Road Safety Advisory Panel	4	5	6
	7 <i>All Saints' Day</i>	8 Health and Social Care Scrutiny Sub-Committee	9 OVERVIEW AND SCRUTINY COMMITTEE	10	11 <i>Corpus Christi</i>	12
	13	14	15 Group Meetings	16	17 CABINET	18 <i>Trading Standards Joint Advisory Board</i>
	19	20	21	22 Member Training (7.00 pm)	23 PENSION FUND COMMITTEE	24 PLANNING COMMITTEE
	25	26	27	28	29 <i>St Peter & St Paul's Day</i>	30 <i>LGA General Assembly (30 June - 2 July)</i>

May 2015						
S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

July 2015						
S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

July 2015

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
			1 OVERVIEW AND SCRUTINY COMMITTEE	2 HEALTH AND WELLBEING BOARD Major Developments Panel	3	4
5	6	7 Corporate Parenting Panel	8 Tenants', Leaseholders' and Residents' Consultative Forum	9	10	11
12	13 Group Meetings	14 Performance and Finance Scrutiny Sub-Committee	15 PLANNING COMMITTEE	16 CABINET	17 <i>Eid-UI-Fitr</i>	18
19	20 <i>Member Training (7.00 pm)</i> <i>School Term ends</i>	21	22 GOVERNANCE, AUDIT, RISK MANAGEMENT AND STANDARDS COMMITTEE	23	24	25 <i>Eve of Tisha B'av</i>
26 <i>Tisha B'av</i>	27	28	29	30	31	

June 2015						
S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

August 2015						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

August 2015

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	
						1	
2	3	4	5	6	7	8	
9	10	11	12	13	14	15	
16	17	18	19	20	21	22 <i>Assumption</i>	
23	24	25	26	27	28	29	
30	31 <i>Public Holiday</i>						

July 2015						
S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

September 2015						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

September 2015

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
		1 <i>School Term begins</i>	2 PLANNING COMMITTEE	3	4	5
6	7 <i>Member Training (7.00 pm)</i>	8 PENSION FUND COMMITTEE	9 Group Meetings	10 GOVERNANCE, AUDIT, RISK MANAGEMENT AND STANDARDS COMMITTEE	11	12
13 <i>Eve of Rosh Hashanah</i>	14 <i>Rosh Hashanah – First Day</i>	15 <i>Battle of Britain Day Rosh Hashanah – Second Day</i>	16 OVERVIEW & SCRUTINY COMMITTEE	17 CABINET	18	19 Note: Liberal Democrat Party Annual Conference 19 - 23 September
20	21 Group Meetings	22 <i>Eve of Yom Kippur</i>	23 <i>Eid-UI-Adha Yom Kippur</i>	24 HEALTH AND WELLBEING BOARD COUNCIL	25	26
27 Note: Labour Party Annual Conference 27 - 30 September <i>Eve of Tabernacles</i>	28 <i>Tabernacles – First Day</i>	29 <i>Tabernacles – Second Day</i>	30 PLANNING COMMITTEE			

August 2015						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

October 2015						
S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

October 2015

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
				1	2	3
4 Note: Conservative Party Annual Conference 4 – 7 October <i>Eve of Eighth Day of Tabernacles</i>	5 <i>Tabernacles – Eighth Day</i>	6 Tenants', Leaseholders' and Residents' Consultative Forum	7	8 Traffic and Road Safety Advisory Panel	9	10
11	12 Group Meetings	13 <i>Navaratri (13 Oct – 21 Oct)</i>	14 <i>Al-Hijira</i>	15 CABINET	16	17
18	19 <i>Member Training (7.00 pm)</i>	20 Corporate Parenting Panel	21 PLANNING COMMITTEE	22 SACRE	23 <i>Ashura</i>	24
25	26 Health & Social Care Scrutiny Sub-Committee	27	28	29	30	31
Half Term						

September 2015						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

November 2015						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

November 2015

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
1 <i>All Saints' Day</i>	2 <i>Member Training (7.00 pm)</i>	3 PENSION BOARD	4 Major Developments Panel	5 HEALTH AND WELLBEING BOARD	6	7
8 <i>Remembrance Sunday</i>	9 <i>Dhanteras</i>	10 <i>Kali Chaudas</i>	11 <i>Armistice Day</i> <i>Diwali (9 – 11 Nov)</i>	12 Employees' Consultative Forum	13	14
15	16 Group Meetings	17 OVERVIEW AND SCRUTINY COMMITTEE	18 PLANNING COMMITTEE	19 CABINET	20	21
22	23	24 Performance and Finance Scrutiny Sub-Committee	25	26 PENSION FUND COMMITTEE	27	28
29 <i>Advent Sunday</i>	30 Group Meetings <i>St Andrew's Day</i>					

October 2015						
S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

December 2015						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

December 2015

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
		1	2 SACRE	3 COUNCIL	4	5
6 <i>Eve of Hanukkah</i>	7 <i>Group Meetings</i> <i>Hanukkah – First Day</i>	8 GOVERNANCE, AUDIT, RISK MANAGEMENT AND STANDARDS COMMITTEE	9	10 CABINET	11	12
13	14 <i>Hanukkah – Eighth Day</i>	15 <i>Member Training (7.00 pm)</i>	16 PLANNING COMMITTEE	17	18 <i>School Term ends</i>	19
20	21	22	23	24 <i>Christmas Eve</i>	25 <i>Christmas Day Public Holiday</i>	26 <i>Boxing Day</i>
27	28 <i>Public Holiday</i>	29	30	31 <i>New Year's Eve</i>		

November 2015						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

January 2016						
S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

January 2016

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
					1	2
					<i>New Year's Day Public Holiday</i>	
3	4	5	6	7	8	9
	<i>School Term begins</i>			HEALTH AND WELLBEING BOARD		
10	11	12	13	14	15	16
	<i>Member Training (7.00pm)</i>	Corporate Parenting Panel	PLANNING COMMITTEE	Employees' Consultative Forum	<i>Trading Standards Joint Advisory Board</i>	<i>Tamil Thai Pongal</i>
17	18	19	20	21	22	23
	<i>Group Meetings</i>	OVERVIEW AND SCRUTINY COMMITTEE		CABINET		
24	25	26	27	28	29	30
	<i>Tu B'Shevat</i>	Harrow Business Consultative Panel	GOVERNANCE, AUDIT, RISK MANAGEMENT AND STANDARDS COMMITTEE			
31						

December 2015						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

February 2016						
S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29					

February 2016

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
	1 <i>Member Training (7.00 pm)</i>	2	3 Health and Social Care Scrutiny Sub-Committee	4 Tenants', Leaseholders' and Residents' Consultative Forum	5	6
7	8 <i>Chinese New Year</i>	9 <i>Shrove Tuesday</i>	10 <i>Ash Wednesday</i>	11 Traffic and Road Safety Advisory Panel	12	13
14	15 Group Meetings	16	17 PLANNING COMMITTEE	18 CABINET	19	20
<i>Half Term</i>						
21	22 Group Meetings	23 OVERVIEW AND SCRUTINY COMMITTEE	24	25 COUNCIL (Council Tax)	26	27
28	29 Major Developments Panel					

January 2016						
S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

March 2016						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

March 2016

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
		1 <i>St David's Day</i>	2	3 HEALTH AND WELLBEING BOARD SACRE	4	5
6	7	8 <i>Maha Shivaratri</i>	9 PENSION FUND COMMITTEE	10 <i>Trading Standards Joint Advisory Board</i>	11	12
13	14 Group Meetings	15 <i>Member Training (7.00 pm)</i>	16 PLANNING COMMITTEE	17 CABINET <i>St Patrick's Day</i>	18	19
20 <i>Palm Sunday</i>	21 Performance and Finance Scrutiny Sub-Committee	22	23	24 <i>School Term ends Maundy Thursday</i>	25 <i>Good Friday Public Holiday</i>	26
27 <i>Easter Day</i>	28 <i>Easter Monday Public Holiday</i>	29	30	31		

February 2016						
S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29					

April 2016						
S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

April 2016

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
					1	2
3	4 <i>Member Training (7.00 pm)</i>	5 GOVERNANCE, AUDIT, RISK MANAGEMENT AND STANDARDS COMMITTEE	6	7	8	9
10	11 <i>School Term begins</i>	12 Corporate Parenting Panel	13 PLANNING COMMITTEE	14 <i>Vaisakhi</i>	15 <i>Ram Navami</i>	16
17	18 Group Meetings	19 OVERVIEW AND SCRUTINY COMMITTEE	20	21 CABINET	22 <i>Eve of Passover</i>	23 <i>St George's Day Passover – First Day</i>
24 <i>Passover – Second Day</i>	25	26	27 Tenants', Leaseholders' and Residents' Consultative Forum	28 <i>Eve of Seventh Day of Passover</i>	29 <i>Passover – Seventh Day</i>	30 <i>Passover – Eighth Day</i>

March 2016						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

May 2016						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

May 2016

CALENDAR 2015-16

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
1	2 <i>Public Holiday</i>	3	4	5 <i>London GLA & Mayoral Election – provisional</i> <i>Ascension Day</i>	6	7
8 <i>VE Day</i>	9 Group Meetings	10	11 HEALTH AND WELLBEING BOARD	12	13	14
15 <i>Pentecost</i>	16 Group Meetings	17	18	19 ANNUAL COUNCIL (6.30 pm) LICENSING AND GENERAL PURPOSES COMMITTEE (Special) OVERVIEW AND SCRUTINY COMMITTEE (Special)	20	21
22	23	24 CABINET	25 PLANNING COMMITTEE	26 <i>Corpus Christi</i>	27	28
29	30	31	<i>Half Term</i>			

April 2016						
S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

June 2016						
S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

REPORT FOR: **CABINET**

Date of Meeting:	19 February 2015
Subject:	Paediatric Speech and Language Therapy Services
Key Decision:	No
Responsible Officer:	Chris Spencer, Interim Corporate Director of Children and Families
Portfolio Holder:	Councillor Simon Brown, Portfolio Holder for Children, Schools and Young People
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	None

Section 1 – Summary and Recommendations

1. London North West Healthcare NHS Trust has been the provider of a paediatric speech and language therapy services to Harrow children and young people for many years.
2. The changes in legislation with regard to special educational needs and disability (SEND) within the Children and Families Act 2014 make it appropriate to strengthen the joint commissioning arrangements with the Harrow Clinical Commissioning Group (CCG) for this service to achieve the best outcomes for children and young people in Harrow.

3. This report sets out the background, the present position and the case for the proposed recommendation.
4. Officers will bring a further report to cabinet to seek approval to award a new contract.

Recommendations:

Cabinet is requested to:

- a) Give approval to entering into a Section 75 agreement with the Harrow CCG from June 2015.
- b) Approve the joint re-procurement of paediatric speech and language therapy services at a date to be determined in consultation with Harrow CCG. Officers will report back with an update by April 2016.
- c) Approve under waiver an award of a contract to NWLHT to provide the service for a period commencing on the 1 April 2015 and ending on the 30 June 2015 with an estimated contract value of £172,000.00. The approval of this recommendation is requested through a waiver of Contract Procedure Rules 6 (Authorisation) and 7 (Procurement Method) as set out in clause 13 and Table 2 of Contract Procedure Rules 2014.

Reason: (For recommendations)

Owing to the changes in SEND legislation there is a need to ensure the future arrangements for commissioning the service are robust and consistent with changes in legislation. The joint re-tendering of the service will provide the opportunity to research best practice in this field and ensure best value.

Section 2 – Report

Introduction

5. The Children and Families Act 2014 has introduced major changes to the support for children and young people with special educational needs and disability. The Act states local authorities and its commissioning partner bodies must make arrangements ('joint commissioning arrangements') for the education, health and care provision to be secured for children and young people that have special educational needs and who have a disability.

6. The proposed recommendation will allow the Council to continue to support vulnerable children and young people with speech, language and communication needs in partnership with the health service.

Background and current position

7. **National picture:** Communication is a foundational life skill and research indicates that the development of a child's communication ability has an impact on their literacy, school performance and employment prospects as well as on their emotional wellbeing and behaviour. Most children acquire speech and language skills with relative ease. Where difficulties arise they may be due to neurodevelopmental problems or other impairments. Others may be as a result of reduced developmental opportunities, limiting the child's learning of language which are commonly linked to social disadvantage. Speech, language and communication needs (SLCN) encompass a wide range of difficulties related to all aspects of communication in children and young people. These can include difficulties with fluency, forming sounds and words, formulating sentences, understanding what others say, and using language socially.
8. **Local Picture in Harrow:** Harrow Council and Harrow CCG commission a service for children and young people with SLCN between the ages of 0 – 18 years (19 years if in special school).
9. The overarching aim of the service is to support the delivery of universal, targeted and specialist services to identify and to ensure the improved outcomes for children and young people with communication and language difficulties in Harrow. The service follows a universal, targeted and specialist model of provision. The model adopted for this service is recommended by the Royal College of Speech and Language Therapists, Position Paper 2006, and supported by the Bercow review 2008.
10. The **universal service** supports all children in terms of facilitating good practice in their everyday settings to ensure optimum development of speech, language and communication. This includes: core training to health professionals, management strategies, development and provision of appropriate literature/products to support schools and parents, information and signposting to relevant resources to support SLCN.
11. The **targeted service** works with parents, school staff and early years practitioners to identify and support children with speech, language and communication difficulties who require targeted interventions. Targeted interventions may be led by education staff with support from a speech and language therapist (SLT). The degree of SLT involvement will be dependent on the context, the competences of the wider workforce and the needs of the children and young people.
12. The **specialist service** supports children/young people with identified and complex SLCN and/or eating and drinking difficulties requiring a specialist service that should be led by the speech and language therapy service with support from schools, early years practitioners, parents and carers.

Why a change is needed

13. A change is needed for the following reasons:

- to ensure we have an appropriate service specification that meets the needs of all children and young people in Harrow;
- to achieve a fully jointly commissioned arrangement as required by the Children and Families Act 2014.

Options Considered

Options	Advantage	Disadvantage
Transfer funding to the CCG to commission the service. The local authority would enter a section 75 agreement in order to jointly commission this service.	<p>CCG becomes the main commissioner and local authority becomes the associate commissioner.</p> <p>This option gives commissioners time to re-visit the service specification and then undertake a joint tendering exercise.</p> <p>Tight joint monitoring arrangements would be required.</p> <p>This is the preferred option and the one being recommended.</p>	The budget from the health service sits within a block contract.
Split the service and fund individual parts separately	There is not an advantage for this option as this service is jointly commissioned.	This option does not support our joint commissioning arrangements with health.
Continue with the current arrangement	There is no advantage to continue with the current arrangement as it is important we develop the service in accordance with the Children and Families Act 2014.	We would not be achieving the joint commissioning and partnership working as required by the Children and Families Act 2014

14. The preferred option would require the local authority to enter into an agreement with the CCG under section 75 of the National Health Services Act 2006. This is an agreement between local authorities and NHS bodies. The section 75 agreement will include arrangements for pooling resources and delegating the primary commissioning function to the CCG and the local authority becoming an associate commissioner for the service. The service will be jointly commissioned and jointly monitored.

Performance Issues

15. This service has been monitored on a quarterly basis and has been performing well. The provider has provided good quality information to support the monitoring arrangements.
16. The service has reported continued significant rise in demand for new assessments particularly within the schools services. From 1st of August 2014 the speech and language therapy service at London North West Healthcare NHS Trust had an active caseload of 1839 children and young people which reflects a 13% growth in comparison to 1630 patients reported in August 2013. Of the 1839, 1326 (72%) are males and 513 (28%) are females.

Age	0-4	5-9	10-14	15-19
No. of Children and Young People	680	783	275	101
% of Children and Young People	37	42.6	14.9	5.5

Ethnicity	White	Mixed	Asian or Asian British	Black or Black British	Other Ethnic category	Did not state their ethnicity
No. of Children and Young People	504	100	741	213	58	223
% of Children and Young People	27.4%	5.4%	40.3%	11.6%	3.1%	12.2%

17. Partnership working with colleagues within children's and education services continues on a positive trend across the service with some significant achievements. The provider has made positive working relationships with staff in schools, children's centres and other educational settings.

Environmental Implications

18. There are no environmental implications.

Risk Management Implications

19. There is no separate risk register in place and the service is not included in the directorate risk register.

Legal Implications

20. The proposals in the Report will enable the council to comply with the requirements in the Children and Families Act 2014
21. Paediatric speech and language therapy services are Part B services under public procurement legislation and so the award of a temporary contract to NWLHT is allowed.

Financial Implications

22. The annual value of the contract will be £688k. This is funded in the main from the ring fenced Dedicated Schools Grant (DSG) and is contained within the overall DSG funding available for special educational needs.

Equalities implications / Public Sector Equality Duty

23. Harrow Council and Harrow CCG will need to comply with the Equality Act 2010 when making decisions affecting the delivery of this service. The proposal of entering a Section 75 agreement and joint re-procurement with the CCG will deliver better value for money whilst achieving better outcomes for service users. An equality impact assessment has been carried out and concludes there is no identified and potential unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.

Council's vision:

24. The report incorporates the administration's priorities:
- Making a difference for the vulnerable
 - Making a difference for families.

Section 3 - Statutory Officer Clearance

Name: Jo Frost	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 6 February 2015		
Name: Stephen Dorrian	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 6 February 2015		

Ward Councillors notified:	NO, as it impacts on all Wards
EqIA carried out:	Yes
EqIA cleared by:	EqIA quality assurance group 5.1.15

Section 6 - Contact Details and Background Papers

Contact: Roger Rickman, Divisional Director, Special Needs Services, Children and Families Directorate

Tel: 020 8966 6334

Background Papers:

Speech, Language and communication needs task and finish group – report January 2014

Profile of Children and Young People accessing Paediatric Speech and Language Therapy Services – September 2014

Equality Impact Assessment – February 2015

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---

This page is intentionally left blank

REPORT FOR: **CABINET**

Date of Meeting:	19 February 2015
Subject:	School Performance and Standards
Key Decision:	No
Responsible Officer:	Chris Spencer, Interim Corporate Director of Children and Families
Portfolio Holder:	Councillor Simon Brown, Portfolio Holder for Children, Schools and Young People
Exempt:	No
Decision subject to Call-in:	No, as the recommendation is for noting
Wards affected:	All
Enclosures:	Harrow Policy and Strategy for School Improvement

Section 1 – Summary and Recommendations

This report sets out

- a) An overview of Performance and Standards in schools at all key stages
- b) An analysis of the performance of underachieving groups
- c) Information on progression of Young People beyond Key Stage 4
- d) The profile of schools in respect of Ofsted inspection judgements
- e) An overview of the LA strategy for supporting and challenging all schools to improve on their previous best

Recommendations:

Cabinet is requested to note the information provided and to seek any additional information as appropriate.

Reasons for recommendation:

To keep the Cabinet updated and informed of the performance of, and standards being achieved in state-funded schools in Harrow (Local Authority maintained, Academies and Free schools)

Section 2 – Report

2. Introduction

2.1 Schools in Harrow are amongst the best performing in the country and this has, on the whole, been maintained over a number of years. The Performance and Standards report provides a summary analysis for all LA maintained and Academy schools' performance for 2014, as well as trends over the past three years. The information is based on the Department for Education data (DfE), EYFS performance data, Raiseonline data (Unvalidated), and information on Post 16 destinations for pupils aged 16+. The report also provides information on Ofsted inspection judgements on schools in Harrow and how the Local Authority monitors the performance of schools.

2.2 There are 62 state funded schools in Harrow which include LA maintained schools, Academy schools and Free schools. The table below sets out each type of school:

Type of School	Number of LA Maintained Schools (including VA)	Number of Academy and Free Schools	Total by Type
Nursery	1		1
Primary	40	4	44
Secondary	2	8	10
All through (5-18)		1	1
Primary Special	1	1	2
Secondary Special	2		2
Alternative Provision	1	1	2
Total (All)	47	15	62

2.3 Of the primary schools within the LA area, 8 are voluntary aided faith schools (6 Catholic, 1 Jewish, 1 Church of England), one is an academy faith school (Hindu). One faith school was established as a 5-18 Free school (Hindu). Five primary schools and two secondary school are additionally resourced to meet specific needs of pupils with Special Educational Needs and Disabilities.

2.4 The LA maintained alternative provision incorporates the Pupil Referral Unit which makes provision for permanently excluded pupils and other pupils who are not able to attend school.

2.5 In keeping with the Council's School Amalgamation Policy, within the primary sector, 10 infant and 10 junior schools have been amalgamated over the past five years to become 10 all-through primary phase schools. There are 3 infant and 3 junior schools currently subject to Cabinet decision, in respect of this Policy.

3. Overview of Performance and Standards

3.1 Early Years Foundation Stage

3.1.1 The EYFS Profile is a teacher assessment of children's development at the end of the EYFS (the end of the academic year in which the child turns five). It should support a smooth transition to Key Stage 1 (KS1) by informing the professional dialogue between EYFS and KS1 teachers. This information should help Year 1 teachers plan an effective, responsive and appropriate curriculum that will meet the needs of all children. The Profile is also designed to inform parents or carers about their child's development against the early learning goals (ELGs).

3.1.2 Following an independent review of the EYFS by Dame Clare Tickell, a new Profile was published in March 2012. The new Profile and revised EYFS have a stronger emphasis on the three prime areas which are most essential for children's healthy development. These three areas are: communication and language; physical; and personal, social and emotional development. The new profile made changes to the way in which children are assessed at the end of the EYFS. The new profile requires practitioners to make a best-fit assessment of whether children are emerging, expected or exceeding against each of the new 17 ELGs. The new profile was introduced in September 2012.

3.1.3 Standards have continued to rise in the EYFS in response to the priority given by schools and the local authority to this area. Whilst standards have risen, the gap between the lowest attaining 20% of pupils and the rest of the cohort has continued to narrow (2013-14 – 34.9%) but is still above the national average of 33.9%. At the same time the key indicator of a good level of development has shown a significant improvement from 45% in 2012-13 to 61% in 2013-14. Demographic changes are having an impact on assessments at entry level.

3.1.4

Good level of development (1)	2011-12	2012-13	2013-14
Harrow	60%	45%	61%
Statistical Neighbours	65%	50%	60%
England	64%	52%	60%

(1) A pupil achieving at least the expected level in the Early Learning Goals within the three prime areas of learning and within literacy and numeracy is classed as having "a good level of development".

The percentage inequality gap in achievement across all the Early Learning Goals (1)	2011-12	2012-13	2013-14
Harrow	30.8%	37.9%	34.9%
Statistical Neighbours	30.9%	34.4%	33.3%
England	30.1%	36.6%	33.9%

(1) The percentage gap in achievement between the lowest 20 per cent of achieving children in a local authority (mean score), and the score of the median.

3.2 Key Stage 1

3.2.1 Harrow's 2014 Key Stage 1 (KS1) results are an improvement on our 2013 results across all subjects. Harrow's results have remained above both the national and statistical neighbour averages over the last few years and again in 2014.

3.2.2 The percentage of pupils achieving or exceeding the expected level in Key Stage 1 (KS1) teacher assessments for the last three years is shown below, comparing Harrow to its statistical neighbours and England.

3.2.3 KS1 Speaking & Listening has remained consistent over the last 3 years at L2+, and above or in line with the national and statistical neighbour trend. In addition L3 attainment has remained 3% above the national trend in 2013-14 and 2% above the statistical neighbours.

3.2.4

Speaking & Listening	2011-12		2012-13		2013-14	
	L2+	L3	L2+	L3	L2+	L3
Harrow	90%	26%	90%	26%	90%	27%
Statistical Neighbours	88%	23%	89%	24%	90%	25%
England	88%	22%	89%	23%	89%	24%

3.2.5 KS1 Reading in Harrow has steadily increased during the last 3 years at L2+, L2B+ and L3 reflecting the national trend. Reading is above or in line with the national and statistical neighbours trends.

Reading	2011-12			2012-13			2013-14		
	L2+	L2B+	L3	L2+	L2B+	L3	L2+	L2B+	L3
Harrow	89%	79%	29%	90%	79%	31%	92%	84%	32%
Statistical Neighbours	88%	77%	27%	90%	80%	29%	91%	81%	31%
England	87%	76%	27%	89%	79%	29%	90%	81%	31%

3.2.6 Writing has increased by 3% at L2+ and 8% at L2B+ from 2012-13 to 2013-14. For the last 3 years Harrow's attainment in Writing has remained broadly in line with or above the national and statistical neighbour attainment levels.

Writing	2011-12			2012-13			2013-14		
	L2+	L2B+	L3	L2+	L2B+	L3	L2+	L2B+	L3
Harrow	87%	69%	17%	87%	67%	20%	90%	75%	20%
Statistical Neighbours	84%	65%	14%	86%	68%	15%	88%	71%	17%
England	83%	64%	14%	85%	67%	15%	86%	70%	16%

3.2.7 Maths remains Harrow's strongest subject and attainment has steadily increased over the last 3 years at all levels, and by 2% and 6% at L2+ and L2B+ respectively. Harrow's attainment in Maths is above or broadly in line with the national and statistical neighbours attainment levels.

Maths	2011-12			2012-13			2013-14		
Level attained	L2+	L2B+	L3	L2+	L2B+	L3	L2+	L2B+	L3
Harrow	92 %	79%	25 %	93 %	78%	28 %	95 %	84%	28 %
Statistical Neighbours	91 %	77%	23 %	92 %	79%	24 %	93 %	81%	26 %
England	91 %	76%	22 %	91 %	78%	23 %	92 %	80%	24 %

3.2.8 Science has increased by 4% at L2+ and 3% at L3 from 2012-13 to 2013-14 with L3 increasing to 5% above the national trend. Over the last 3 years Science has remained above or broadly in line with national and statistical neighbours trends.

Science	2011-12		2012-13		2013-14	
Level attained	L2+	L3	L2+	L3	L2+	L3
Harrow	89%	24%	88%	24%	92%	27%
Statistical Neighbours	89%	22%	90%	23%	91%	25%
England	89%	21%	90%	22%	91%	22%

3.3 Key Stage 2

Attainment

3.3.1 Harrow continues to show strong performance and improvement across Key Stage 2. All Key Stage 2 outcomes show performance above national averages in 2013-14. Standards continue to be above national averages in all areas and from 2011-12 to 2013-14 Key Stage 2 outcomes in Harrow improved at a higher rate than the national average.

3.3.2 In 2013-14 83% of Harrow's pupils achieved Level 4 or above in Reading, Writing & Maths at Key Stage 2, which was above both the national average of 79% and the statistical neighbour average of 82%.

Percentage of pupils achieving Level 4 or above in Reading, Writing and Maths in Key Stage 2	2011-12	2012-13	2013-14
Harrow	79%	79%	83%
Statistical Neighbours	77%	78%	82%
England	75%	76%	79%

Expected Progress between KS1 and KS2

3.3.3 Harrow's pupils continue to make better progress from Key Stage 1 to 2 than the national average in Reading, Writing and mathematics. The table below shows that Harrow's results have been consistently broadly in line with our Statistical Neighbours and at or above the England average for the last three years.

KS1 to KS2 Progress - Reading	2011-12	2012-13	2013-14
Harrow	91%	90%	94%
Statistical Neighbours	91%	91%	93%
England	90%	88%	91%

Writing	2011-12	2012-13	2013-14
Harrow	93%	92%	93%
Statistical Neighbours	92%	93%	95%
England	90%	92%	93%

KS1 to KS2 Progress – Maths	2011-12	2012-13	2013-14
Harrow	90%	92%	93%
Statistical Neighbours	89%	91%	92%
England	87%	88%	90%

Source: DfE Statistical First Release

- 3.3.4 Despite the overall strong profile, one school fell below the national ‘floor standards’ of 65% of pupils achieving Level 4 or above in Reading, Writing and Maths.
- 3.3.5 Five schools are below the median for pupil progress in all three subjects of Reading Writing and Maths and six schools progress is below the median in two of the three subjects. Seven schools progress is below the median in one of the three subjects.

3.4 Key Stage 4

Attainment

- 3.4.1 Harrow schools outcomes at the end of Key Stage 4 are in the top quartile nationally, with 61.3% of Harrow’s pupils achieving 5 or more A*-C GCSEs including English & Maths in 2013-14. These results are above both the national average (56.1%) but are below Harrow’s statistical neighbours – 65.0%. These outcomes, as expected, reflected a fall from the 2013 Harrow averages of 65.4%. The table below sets out the trend at GCSE over a three year period.

5+ A*-C inc. English & Maths GCSE

Percentage of pupils at the end of KS4 achieving 5+ A*-C inc. English & mathematics GCSEs at GCSE or equivalent	2011-12	2012-13	2013-14 (1, 2)
Harrow	63.6%	65.4%	61.3%
Statistical Neighbours	62.5%	66.3%	65.0%
England	58.4%	60.8%	56.1%

Source DfE Statistical First Release

- (1) The significant difference between the 2014 and previous year’s result is largely due to the new 2014 methodology applied by the DfE, with the main difference being an early entry policy to only count a pupil’s first attempt at a qualification.
- (2) The 2013-14 results are still provisional

3.4.2 In summary at KS4

- Standards of attainment at Key Stage 4 continue to be significantly above the national average.
- 5+ A*-C GCSEs including English and mathematics are not comparable to previous years due to the change in the DfE's methodology of how the results are published – see note 1 above.
- Harrow is placed 23rd in the country for 5+ A*-C GCSEs including English and maths, 9th in Outer London and 13th in London as a whole.
- For the English Baccalaureate measure Harrow is ranked 20th in the country, 9th in Outer London and 13th in London as a whole.
- No school in Harrow falls below the secondary school performance 'floor' standard

3.4.3 The significant difference between the 2014 and previous year's result is largely due to the new 2014 methodology applied by the DfE.

3.4.4 Harrow's decline reflected the average for our region (4.5%; National 6.6%). However, Harrow's relative position compared to all local authorities improved against both measures and significantly so for any 5 GCSEs at A*-C (from 97th to 23rd).

3.4.5 The national, regional and local drop in performance at GCSE was expected due to changes in the way schools' performance is measured from 2014. The drop in performance coincides with a number of important reforms:

a) The Implementation of Alison Wolf's Review of Vocational Education that:

- restricted the qualifications counted in performance measures
- prevented any qualification from counting as larger than one GCSE
- capped the number of non-GCSEs included in performance measures at two per pupil

b) An early entry policy to only count a pupil's first attempt at a qualification

- School performance measures had been calculated using the best result achieved in a subject. In September 2013 the DfE announced that only the first result a pupil achieved would count in performance measures from 2013/14.

Expected progress between KS2 and KS4

3.4.6 Harrow's schools continue to be among the highest performing nationally for adding value from Key Stage 2 to Key Stage 4.

Expected Progress between KS2 and KS4 - English

KS2 to KS4 Progress - English	2011-12	2012-13	2013-14 (1)
Harrow	81.2%	78.3%	81.4%
Statistical Neighbours	75.8%	79.0%	80.6%
England	68.1%	70.5%	71.0%

Source DfE Statistical First Release

(1) The 2013-14 results are still provisional

Expected Progress between KS2 and KS4 - Maths

KS2 to KS4 Progress - Maths	2011-12	2012-13	2013-14 ⁽¹⁾
Harrow	79.4%	81.8%	74.0%
Statistical Neighbours	76.6%	79.5%	75.4%
England	68.7%	70.8%	65.4%

Source DfE Statistical First Release

(1) The 2013-14 results are still provisional

- Although variable year on year young people in Harrow make good progress in both English and mathematics throughout their secondary school years.
- For the percentage of learners who have made expected progress in English, Harrow is ranked 7th in the country (13th in 2013), 4th in Outer London and 5th in London as a whole.
- For the percentage of learners who have made expected progress in maths Harrow is ranked 16th in the country (7th in 2013), 8th in Outer London and 12th in London as a whole.

3.4.7 London has been the best performing region since the academic year 2008/09. More pupils in London are making expected progress in English between KS2 and KS4 (78.8%) than any other region. This is also an increase compared to last year when the percentage of pupils making expected progress in English between KS2 and KS4 was 78.2%. The number of pupils in London making expected progress in mathematics between KS2 and KS4 has dropped for the first time in 6 years. The number of pupils that achieved expected progress in London in 2014 was 73% compared to 78.6% last year. All regions experienced a drop in their mathematics performance but it should be noted, more London pupils continue to make expected progress in Maths than any other region.

4 Analysis of the performance of underachieving groups

4.1 Despite the strong profile of performance in Harrow, there are significant groups of pupils that do not attain as well as their peers. These groups often attain in line with their group nationally but do not attain as well as their peers in Harrow. These underachieving groups within Harrow are as follows:

- specific ethnic groups, especially black pupil groups, at Key Stage 2 and 4.
- those with Special Educational Needs (SEN)
- those eligible for Free School Meals (FSM)
- those speaking a language other than English as their first language

4.1.2 The analysis of underachieving groups performance relative to national and statistical neighbors is only available for EYFS, KS2 and KS4. This is provided below.

4.2 Ethnic Group attainment

Early Years Foundation Stage

4.2.1 The pupil characteristics of the 2013-14 EYFS cohort help to better understand Harrow's 2013-14 results. Of the 3,070 pupils in Harrow's schools at the end of Reception a majority came from the following ethnic groups Indian (683), Asian other (577), White other (437), White British (377) and Black African (156).

4.2.2 Harrow's 2013-14 all pupils' good level of development results (61%) were below the national average (64%). Of the ethnic bands published only the Mixed and Asian pupils results were above the national results. The results of Harrow's black pupils (52%) are substantially lower than the all black pupils nationally (61%).

2013-14 Good level of development (GLD)	White		Mixed		Asian		Black		Chinese		All pupils	
	Number of eligible pupils	% GLD	Number of eligible pupils	% GLD	Number of eligible pupils	% GLD	Number of eligible pupils	% GLD	Number of eligible pupils	% GLD	Number of eligible pupils	% GLD
Harrow	740	62	215	65	1,304	63	313	52	11	x	2,837	60
England	430,086	65	31,247	64	60,178	60	31,947	61	2,283	62	618,997	64

Source: DfE Statistical First Release

Key Stage 2

4.2.3 The information above shows that Harrow's average has continued to increase over the last few years, staying above the statistical neighbours and national averages.

4.2.4 For different ethnic groups, the table below shows that pupils from a mixed background have improved over the last few years. The results of the pupils from a black ethnic group in Harrow schools have also improved from 66% in 2010-11 to 74% in 2013-14, however in 2013-14 their results still remain below the Harrow average (83%) as well as below those of black pupils in Harrow's statistical neighbours schools (77%) and nationally (77%). The 2013-14 Level 4 or above in Reading, Writing and Maths of Black African (72.3%), Black Caribbean (74.8%) and Black Other (79.2%) groups were also below the Harrow average of 83.5%.

4.2.5 Level 4 or above Reading, Writing and Maths from 2011-12 to 2013-14 by Ethnic Origin

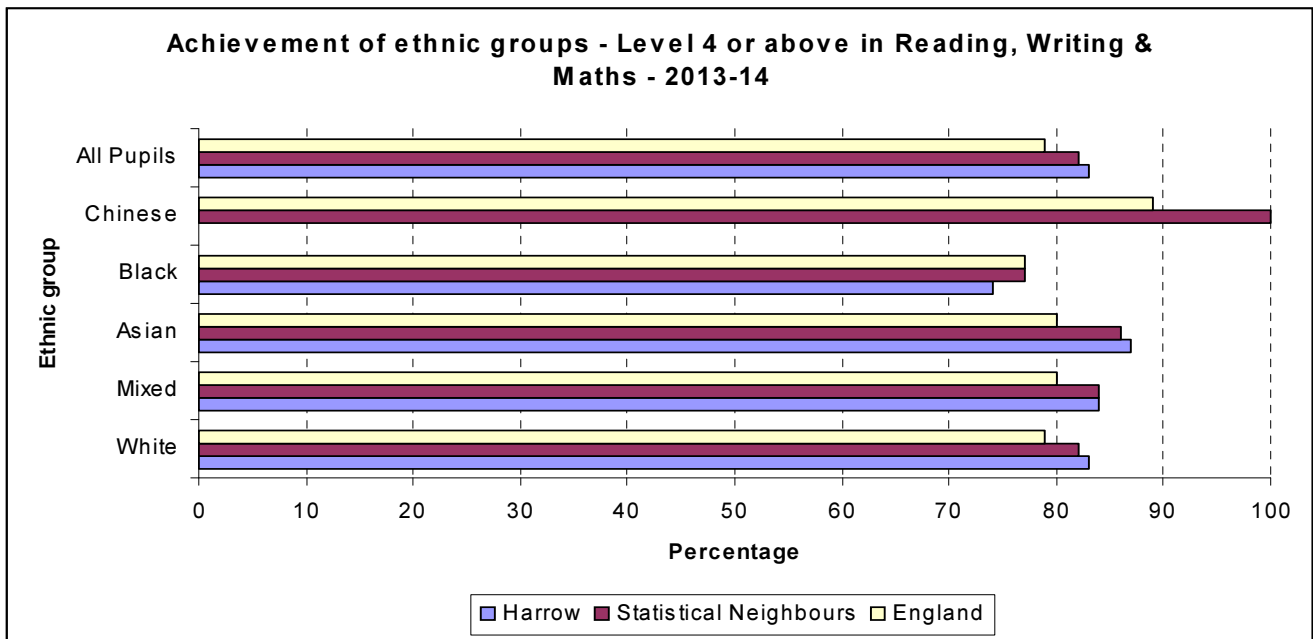
Year	Local Authority	White		Mixed		Asian	
		#	%	#	%	#	%
2011-12	Harrow	659	80	185	77	1,020	84
	Statistical Neighbours	-	76	-	78	-	82
	England	420,442	75	22,648	76	51,443	76
2012-13	Harrow	640	80	216	78	1,063	82
	Statistical Neighbours	-	78	-	79	-	83
	England	411,667	76	23,719	77	54,272	76
2013-14	Harrow	732	83	211	84	1,098	87
	Statistical Neighbours	-	82	-	84	-	86
	England	424,093	79	25,988	80	56,763	80

Year	Local Authority	Black		Chinese		All Pupils	
		#	%	#	%	#	%
2011-12	Harrow	326	66	8	100	2,304	79
	Statistical Neighbours	-	70	-	82	-	77
	England	27,205	72	1,881	85	535,009	75
2012-13	Harrow	331	73	12	x	2,377	79
	Statistical Neighbours	-	71	-	94	-	78
	England	27,887	74	1,761	86	530,795	76

2013-14	Harrow	313	74	17	x	2,521	83
	Statistical Neighbours	-	77	-	100	-	82
	England	30,391	77	1,946	89	551,484	79

Source: DfE Statistical First Release

4.2.6 The chart below for 2013-2014 shows that whilst all pupils in Harrow have performed above both the national and Harrow's statistical neighbour averages particular ethnic groups within Harrow do not fare so well. The achievement of Harrow's black pupils is not only below both the national average as well as the statistical neighbour average; it is also the lowest in all of the ethnic groups included in the chart. The results of Harrow's Asian and White British pupils are significantly above the national average as well as above the statistical neighbour average.



Key Stage 4

4.2.7 The information above shows that Harrow's all pupils results have remained above the national averages for the last 3 years.

4.2.8 However as the table below shows that for ethnic groups, the comparison to the statistical neighbours is not as positive with Harrow's results falling below for two of the three years. Only the results of the Asian and Chinese pupils have been both consistently and significantly above Harrow's average results over the last three years. In contrast the results of Harrow's White, mixed and Black pupils have consistently remained below the Harrow, statistical neighbour and national averages, with the Black pupils' results being significantly below.

4.2.9 The provisional 2013-14 5 A*-C GCSEs including English and mathematics of Black African (47.9%), Black Caribbean (51.1%) and Black Other (59.5%) groups were significantly below the Harrow average of 61.3%. (In terms of statistical neighbours and England comparisons, data has not yet been published for 2013-14. Comparative information below is for 2012-13 and trends over time)

5+ A*-C GCSEs including English and mathematics by Ethnic Origin

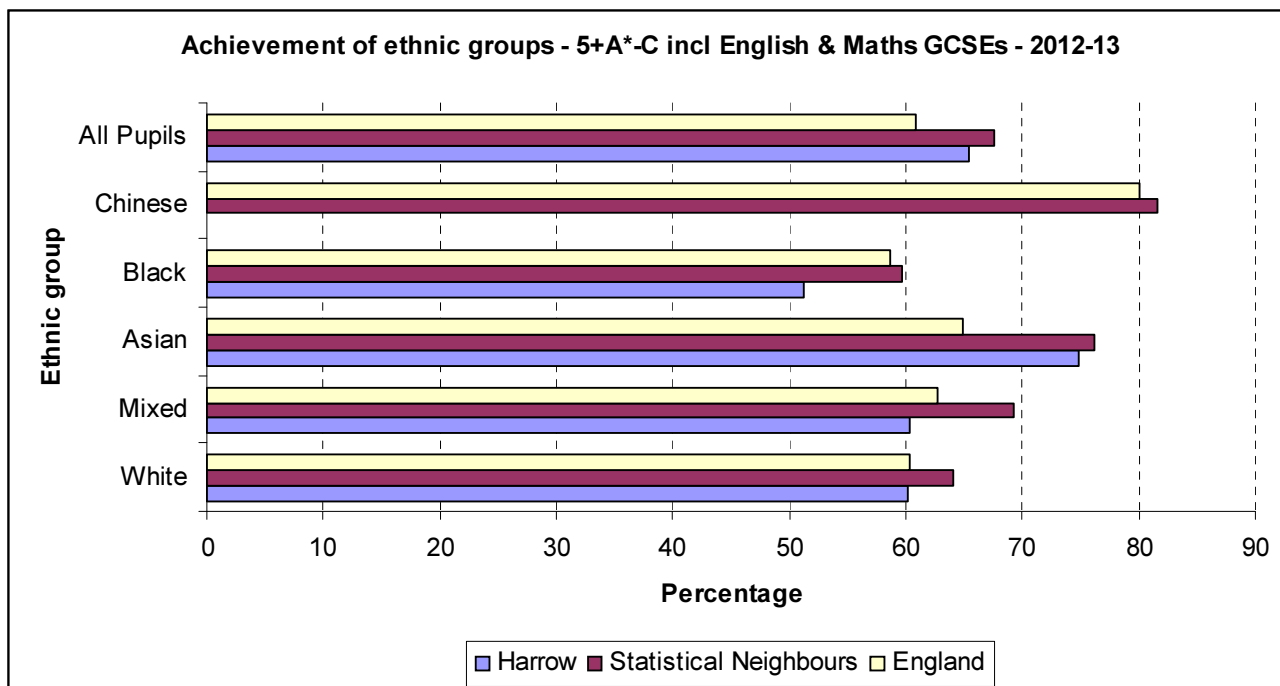
Year	Local Authority	White		Mixed		Asian	
		#	%	#	%	#	%
2010-11	Harrow	633	59.9	150	62.0	876	74.0
	Statistical Neighbours	-	61.4	-	64.7	-	72.7
	England	463,229	58.1	18,716	58.7	42,721	62.5

2011-12	Harrow	592	61.8	161	57.8	891	70.7
	Statistical Neighbours	-	61.9	-	65.7	-	73.4
	England	454,394	58.7	20,080	60.0	44,242	63.4
2012-13	Harrow	586	60.1	139	60.4	945	74.8
	Statistical Neighbours	-	64.0	-	69.2	-	76.1
	England	459,582	60.3	21,551	62.7	46,257	64.9

Year	Local Authority	Black		Chinese		All Pupils	
		#	%	#	%	#	%
2010-11	Harrow	390	51.5	13	100.0	2,141	64.6
	Statistical Neighbours	-	55.2	-	x	-	63.7
	England	25,085	55.0	2,255	80.2	564,874	58.4
2011-12	Harrow	368	52.4	18	83.8	2,113	63.6
	Statistical Neighbours	-	56.2	-	84.0	-	65.0
	England	25,890	55.3	2,266	78.8	559,076	59.1
2012-13	Harrow	379	51.2	12	x	2,152	65.4
	Statistical Neighbours	-	59.6	-	81.6	-	67.6
	England	27,177	58.7	2,200	80.1	569,121	60.8

Source: DfE Statistical First Release; Please note - The 2013-14 KS4 pupil characteristics have not yet been published.

4.2.10 No comparative data for 2013-14 has been published; the chart below shows that Harrow's 2012-13 results. These showed performance below statistical neighbours for every ethnic group included, with the Black pupils performing well below all of the other ethnic groups, as well as the statistical neighbour and national averages.



4.3 Gap between SEN attainment and all pupils

Key Stage 2

4.3.1 Overall the attainment of pupils with Special Educational Needs (SEN), at Key Stage 2 relative to this group nationally, compares well with both national and statistical neighbour averages as can be seen in the tables below. However, the gap in Harrow has increased over the last three years. The most recent results have shown an increase in the gap of 52.1, which is higher than that of Harrow's statistical neighbours (46.2%) and in-line with the national gap (51.9%).

The SEN/non-SEN gap – achieving Level 4 or above in Reading, Writing & Maths in Key Stage 2 tests	2011-12 %	2012-13 %	2013-14 %
Harrow	47.5	48.8	52.1
Statistical Neighbours	51.0	49.9	46.2
England	55.0	53.3	51.9

Source: DfE Statistical First Release

Key Stage 4

4.3.2. For young people with a Special Educational Need, the gap at GCSE has fluctuated over the last three years. In 2012-13 Harrow's gap (49.1%) was higher than both its statistical neighbours (46.5%) and the national average (47.2%).

4.3.3 Harrow's SEN gap in 2013-14 (provisional) is 47.3%. The 2013-14 national SEN results are yet to be published.

The SEN/non-SEN gap – achieving 5 A* - C GCSE inc. English and Maths	2010-11 %	2011-12 %	2012-13 %
Harrow	51.0	46.3	49.1
Statistical Neighbours	49.8	46.5	46.5
England	47.6	47.0	47.2

Source DfE Statistical First Release

4.4 Gap between the attainment of FSM eligible pupils and their peers

Key Stage 2

4.4.1 Harrow's gap between pupils eligible for free school meals and non-fsm pupils at Key Stage 2 has been closing over the last three years, with a gap of 14% in 2013-14. This gap is in-line with the statistical neighbours but narrower than the national gap.

The FSM eligibility/non-FSM gap – achieving Level 4 or above in Reading, Writing & maths in Key Stage 2 tests	2011-12 %	2012-13 %	2013-14 %
Harrow	19	17	14
Statistical Neighbours	18	17	14
England	19	19	18

Source DfE Statistical First Release

Key Stage 4

4.4.2 The achievement of Harrow's young people eligible for Free School Meals at the end of Key Stage 4 was significantly lower and therefore better than both the statistical neighbour and national averages. In 2012-13, Harrow achieved a further reduction in the gap between FSM and non-FSM, which was down to the lowest in the last few years - 19.9%. The 2013-14 FSM results are yet to be published.

Harrow's FSM gap in 2013-14 (provisional) is 21.6%. The 2013-14 national FSM results are yet to be published.

The FSM eligibility/non-FSM gap – achieving 5 A*- C GCSE inc. English and Maths	2010-11 %	2011-12 %	2012-13 %
Harrow	26.7	28.8	19.9
Statistical Neighbours	25.4	23.1	24.2
England	27.5	26.3	26.7

Source DfE Statistical First Release

4.5 Performance of pupils with English as a second language

Key Stage 2

4.5.1. In 2013-14 pupils whose first language is English (85%) performed better than the pupils whose first language is other than English (82%). The attainment of Harrow's pupils whose first language is not English has overall stayed in line with the statistical neighbour averages and above the national averages over the last three years, as can be seen in the table below.

Level 4 or above in Reading, Writing and maths by first language

Year	Local Authority	English %	Other %
2011-12	Harrow	80	79
	Statistical Neighbours	77	77
	England	75	73
2012-13	Harrow	82	78
	Statistical Neighbours	78	78
	England	76	73
2013-14	Harrow	85	82
	Statistical Neighbours	82	82
	England	79	77

Source DfE Statistical First Release

Key Stage 4

4.5.2 When comparing the percentage achieving 5 or more A*-C grades at GCSE or equivalent *including* English and mathematics in 2012-13, pupils whose first language is English (60.8%) did not perform as well as pupils whose first language is other than English (68.7%). Prior to 2012-13 pupils whose first language is English consistently attained the higher results at GCSE, as is shown in the table below. The 2013-14 results by language are yet to be published.

5 A*-C GCSEs including English and mathematics by first language

Year	Local Authority	English %	Other %
2010-11	Harrow	67.1	61.4
	Statistical Neighbours	65.7	65.8
	England	58.5	57.5
2011-12	Harrow	64.5	62.8
	Statistical Neighbours	65.8	64.6
	England	59.2	58.1
2012-13	Harrow	60.8	68.7
	Statistical Neighbours	67.5	68.5
	England	60.9	60.1

Source DfE Statistical First Release

5. Information on Progression of Young People beyond KS4

5.1 Harrow is in the top 10 authorities nationally for the successful progression after GCSE of young people entitled to free school meals. Seven others are also London authorities. Harrow is also among the highest performing authorities in the country for the percentage of young people who are in Education, Employment or Training (EET) after the age of 16. In 2013 Harrow was ranked 1st in London for the participation of young people at ages 16 and 17. Harrow has been recognised for

these achievements and recently hosted a 'best practice' visit by OFSTED and London Councils with respect to EET.

- 5.2 Challenges remain because levels of participation are so high, those who do not participate often need specialist intervention. For example, as a percentage of our young people who are Not in Education, Employment or Training (NEET) too many have a special educational need. We also need to have more success with children looked after by the local authority. In order to reduce NEET figures further, Harrow has, in addition to existing programmes, facilitated a pre-NEET programme for young people aged between 14 and 16 this year who are at risk of being NEET.

6. The profile of schools in respect of Ofsted Judgement

- 6.1 Currently, the proportion of schools in Harrow that are at least good or outstanding on Ofsted criteria is 87%. This is a total of 51 schools and includes all four special schools (100% outstanding) and secondary schools (70% outstanding and one Requires Improvement). The proportion of good and outstanding schools in Harrow is well above the national average in England.
- 6.2 Partly as a result of the Ofsted bar being raised significantly higher than previously, seven schools (12%) currently requires improvement. There is only one school currently in the official Ofsted category of Special Measures. The Harrow School Improvement Partnership (HSIP) Advisers are working very closely with the eight schools that are not yet good, to ensure that they reach the minimum acceptable standard as soon as possible. Robust Partnership Plans supported by close monitoring ensure that the right level of challenge and support is provided for these schools.
- 6.3 Almost all Ofsted reports published for Harrow schools, speak very positively about the good work of the local authority in supporting and challenging the schools to move forward. For example, *'The school has continually worked in a very positive way with the advisory service at Harrow Local Authority, welcoming the high quality expertise and support it receives, when requested'*, and *'The local authority provides the right level of support for this improving school, and support is reducing now that senior leaders are demonstrating that external help is not needed to make the school good'* are typical statements made in Ofsted reports over the past 18 months.
- 6.4 The Ofsted inspection framework sets out detailed criteria against which inspection judgements are made. If a school does not meet criteria for Good, it will be judged to be Requires Improvement or below. An annual Risk Assessment is carried out by HSIP to identify those schools which may be at risk of an Ofsted inspection below Good. Given the strong emphasis in the framework on the performance of groups, a number of schools are vulnerable. Focussed work is being done with these schools to improve the outcomes of vulnerable groups and to close the achievement gap between these groups of pupils and their peers locally.

7. LA strategy for supporting and challenging all schools to improve

- 7.1 The Harrow Policy and Strategy for School Improvement (annex 1) provides the framework for the Local Authority to fulfil its statutory responsibilities in respect of monitoring, support, challenge and intervention in respect to all schools. This policy is now well understood by schools, many of whom have valued the clarity the Policy now provides.
- 7.2 The Policy sets out a rigorous process for the categorisation of schools into one of the following categories:

- Self improving schools
 - Vulnerable schools
 - Schools Causing Concern (SCC)
- 7.3 Criteria applied to make judgements are clearly defined within the Policy.
- 7.4 Three meetings attended by senior officers are held per year to review the performance of each school, against the policy criteria. Where schools are judged to be a 'vulnerable' or a 'SCC', priorities and actions to secure rapid improvement agreed and implemented. Where despite additional support or where weaknesses are so significant, the LA uses its powers to intervene. These powers include the power to issue a warning notice, remove delegated powers in respect of the schools budget and staffing and to establish an Interim Executive Board (IEB). In Harrow an IEB was established on one occasion in 2014 and warning notices were issued on three occasions over the past four years.
- 7.5 The HSIP Senior Advisers manage and co-ordinate the targeted support to schools in need of improvement. For those schools which are judged by Ofsted 'Good' and above and by the LA to be self improving schools, there is a range of school improvement provision available locally, that they can draw in to ensure that they maintain or improve on their previous best.
- 7.6 The HSIP Senior Advisers and the HSIP team also work closely with Good and Outstanding schools. The vast majority of these schools have sustained Good or moved from Good to Outstanding
- 7.7 The Harrow Local Authority School Improvement approach is well regarded regionally and nationally. The Rigorous approach to securing improvements to schools below Good has led to a number of these schools moving to Good as judged by OFSTED. Of the seven schools currently below Good, three have made excellent progress in achieving a Good in their next inspection and three have made good progress can be seen in the rapid improvements secured in schools which have been judged to be below good. A number of these schools which have sustained good or moved from Good to Outstanding.
- 7.8 The full Policy and Strategy for School Improvement provides detailed criteria and processes.

Legal Implications

The Local Authority has statutory responsibility of monitoring of all Local Authority maintained schools, challenging schools to improve and intervene formally with those schools, whose performance is weak. In relation to academies, the Local Authority is expected to have a broad overview of performance and where it has concerns to raise these with Ofsted and the Department for Education (DfE).

Financial Implications

The Local Authority currently funds its strategy for school improvement, covering the cost of LA statutory functions. The remainder of the funding for school improvement provision comes directly from schools through their Dedicated Schools Grant (DSG). The overall resource funds Harrow School Improvement Partnership, which is highly regarded and is judged by schools to be providing excellent value for money.

Equalities implications / Public Sector Equality Duty

The weak performance of particular underachieving groups is a concern and the Local Authority through the Harrow School Improvement Partnership has established a 'Closing the Gap' strategy to ensure that all groups achieve in line with the high standards of achievement in Harrow. The strategy is focussed on supporting and challenging individual schools to improve the quality of their provision, so that all groups achieve well against their peers.

Council Priorities

The Council's vision:

Working Together to Make a Difference for Harrow

This report provides information on the performance of underachieving groups, and as such is focused on making a difference for the vulnerable. Educational performance and standards are critical in making a difference to the life chances and aspirations of families and communities. A well educated and skilled workforce secured through quality educational provision in Harrow, contributes significantly to local businesses and industry, within and beyond Harrow.

Section 3 - Statutory Officer Clearance

Name: Jo Frost	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 21 January 2015		
Name: Sarah Wilson	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 21 January 2015		
Ward Councillors notified:		NO, The information contained in this report affect all Wards
EqIA carried out:		NO This report is for information only. There is no decision to be made which would have an impact on the Council's

Equality, Policies and Procedures.
There are however, equality implications in respect of raising achievement of some ethnic minority groups, for children with SEND and those on free school meals.

Section 4 - Contact Details and Background Papers

Contact: Farzana Aldridge, Head of Service, School Improvement.
Tel : 020 8736 6520 farzana.aldrige@harrow.gov.uk

Background Papers: Harrow Policy and Strategy for School Improvement
(attached)

**Call-In Waived by the
Chairman of Overview and
Scrutiny Committee**

NOT APPLICABLE

*[Call-in does not apply as the
recommendation is for noting]*

London Borough of Harrow

Policy and Strategy for School Improvement

January 2015

Chris Spencer

Corporate Director of Children and Families

Farzana Aldridge

Head of Service – School Improvement

London Borough of Harrow

Policy and Strategy for School Improvement

1 Introduction

- 1.1 The London Borough of Harrow has a commitment to excellence in education and a strong belief that all children and young people deserve to be educated in schools that are highly successful, and judged to be at least Good. Supporting and enabling strong school leadership and management, including school governance, we aim to work in partnership with schools to secure highest standards of education. Our aim is 100% of the schools in Harrow will be Good and above, and 60% Outstanding. To secure this ambition we will not only brokerage high quality support, but also intervene early to halt possible decline.
- 1.2 Where a school's performance is of concern, the Local Authority will use its powers to secure rapid improvements, as described in section x
- 1.3 Our vision for education is that :
 - Pupil achievement and outcomes at the end of KS2, KS4 and Post 16 are within the top 10% nationally.
 - All schools are supported and challenged to be autonomous and self improving, securing the best possible outcomes for all children and young people.
 - All schools are able to demonstrate sustainable capacity for continuous improvement through a highly skilled and competent workforce, in particular outstanding school leadership.
 - Children and young people in Harrow are happy, resilient, enquiring, confident, articulate and driven to achieve the very best. They develop the ability and competencies to compete nationally and internationally in the world of work, and to adapt to the economically and changing world of technology.
 - Children and young people act as active citizens who respect human rights and recognise and value the cultural ethnic, religious and linguistic diversity of Harrow.
 - Children and young people build the understanding and competencies to develop healthy life styles and keeping safe.
- 1.4 The LA has a key role in supporting schools that face challenging circumstances and those that are identified as causing concern, as well as being accountable for the overall performance of Harrow schools.
- 1.5 As an LA we are committed to:
 - show a relentless commitment to raising standards through high quality learning, teaching and leadership based on self-evaluation and self improvement;
 - identify and disseminate best practice and challenge all schools to build upon this through collaboration;
 - where appropriate, to support schools to federate, consider becoming an academy and work collaboratively;
 - intervene early and establish constructive dialogue seeking self-remediation with advice, but to use powers to warn schools where improvement is not sufficient;
 - provide co-ordinated support from appropriate sections of Children's Services, targeted at those issues which bring about speedy improvement;
 - build the capacity of school leadership and management so that it generates self-improvement;
 - work in a constructive partnership with schools, Diocesan Authorities and other appropriate partners.

2. Our approach to school evaluation and improvement

- 2.1. We recognise that the responsibility for school improvement rests with schools themselves. The LA role is to provide support and challenge for schools, operating on the general principle of “intervention in inverse proportion to success”. Rigorous self-evaluation at all levels ensures that any weaknesses are rapidly identified and proactive systems and procedures to ensure that outcomes in achievement and well-being rapidly improve.
- 2.2. The key elements of this policy are:
 - the active promotion of regular, rigorous school self-evaluation that is accurate in its conclusions and which leads to clear and cohesive improvement planning;
 - evaluation and review that draw on shared criteria, based on the current Ofsted evaluation schedule and by which schools could be externally evaluated;
 - an open reporting framework and procedures that support dialogue and inform a shared agenda concerning educational provision that is constantly good or better;
 - effective use of performance data and early intervention with appropriate planning, prioritisation and identification of actions; and
 - celebrating and sharing good practice.
- 2.3. As a Local Authority, when schools are in challenging times, intervention may be necessary. We are committed to:
 - taking account of data to arrive at a professional and balanced judgement regarding the extent to which the school has capacity to improve
 - enabling failing schools to address issues promptly so that rapid improvement, results in their being removed quickly from the Ofsted category of Special Measures or of Serious Weaknesses
 - being decisive in using the full range of intervention powers, if schools are not making adequate progress
 - using clear criteria when identifying Schools Causing Concern, with particular emphasis on schools that are under-performing in relation to their pupil intake and general context

3. Legislation underpinning this Policy and Strategy

- 3.1 A range of legislative frameworks and guidance underpin this policy which include:
 - School Standards and Framework Act 1998
 - Education and Inspections Act 2006 ("the 2006 Act")
 - Apprenticeships, Skills, Children and Learning Act, 2009 (ASCL Act) (amended the 2006 Act)
 - The School Governance (Transition from an Interim Executive Board)(England) Regulations 2010 (Transition Regulations)
 - Academies Act 2010
 - Education Act 2011 (amended the 2006 Act)
- 3.2 *The Education and Inspections Act of 2006 (revised 2011)* outlines in Part 4 legislation on LA powers of intervention covering action and support on schools causing concern. This builds on existing statutory powers and good practice to ensure that every pupil is provided with the education and opportunities that they deserve.
- 3.3 The Act includes provision to ensure earlier action to address underperformance in schools through more prompt and timely use by the LA of the powers set out in the Act to challenge, and where necessary intervene, where a school is not able to address underperformance itself. LAs are expected to take robust action to tackle failure, and to challenge and support schools. Where schools have been deemed by Ofsted to be in Serious Weaknesses or Special Measures, the Act sets out the expectation that action to address weaknesses will lead to faster improvement than has been the case in the past.

- 3.4 In particular:
- authorities have the power to force a weak local authority school to federate, become an academy or take another partner for school improvement;
 - the ability of authorities to warn under performing schools and to intervene in them when necessary will be strengthened;
 - authorities have a duty to consider taking action immediately whenever a maintained school fails an inspection, and must reconsider action if progress is deemed unsatisfactory.
- 3.5 This policy explains what intervention Harrow LA can make in schools that they see as being a cause for concern i.e. schools which
- the LA itself judges to be failing to provide an adequate standard of education, or
 - or to need significant improvements, or
 - are at risk of not meeting the Government's floor targets for attainment and progress, or
 - judged as inadequate by Ofsted
- 3.6 Schools may not necessarily have been judged as requiring improvement or inadequate by Ofsted but the LA may feel it necessary to intervene in order to prevent future decline.
- 3.7 Academies and Free Schools are free from Local Authority control. However, we regard any child or young person learning within the Borough as a Harrow learner, whether they are attending a maintained school or not. Whilst the Local Authority does not have responsibility to how well Academies and Free Schools perform, we recognise that we can play an important role in supporting partnerships, developing respect and promoting collaboration between all schools in the Borough. We will work closely with the regional Schools Commissioner to ensure alignment between this role and the role of the LA.
- 3.8 Academies and Free Schools are able to buy in School Improvement Support (and other Council Services) should they wish to do so. The majority draw in School Improvement Support from HISIP.

4. A process for monitoring, support, challenge and intervention with schools

- 4.1 The Local Authority has in place a range of processes to monitor and evaluate the performance of all schools in Harrow. This includes:
- An annual overview and assessment of school published performance; taking account of performance over time, value added indicators and the performance and achievement of groups. Data is scrutinised to assess whether there is a declining trend, with a particular focus on decline, for a second and subsequent years.
 - An overview of LA available data and information on pupil attendance, behaviour and well-being, including concerns regarding the safeguarding of pupils, health and safety and SEND provision.
 - An overview of LA available data on levels of sickness, absence and turnover of staff.
 - Monitoring carried out of all schools by Senior School Improvement Advisers on the impact on the quality of provision and leadership on the outcomes for pupils.
 - An overview of financial management policies and practice, gathered through a review of all LA internal audit reports.
- 4.2 A termly overview of the quality and performance of schools is gathered by the LA at the 'Schools Monitoring Group' chaired by Divisional Director of Schools/Head of School Improvement.
- 4.3 All schools are entitled to core monitoring and support from the School Improvement Service through the analysis of performance data and through a review of the schools evaluation of teaching and learning and quality of leadership. An annual dialogue with schools culminates in an annual report. In addition to this, the vast majority of schools access additional school

improvement support from the HSIP, enabling them to improve on their previous best. This includes the vast majority of schools, which are already Good or Outstanding.

4.4 In broad terms the LA categorises schools into three groups:

- a) Those schools which are generally successful in sustaining improvement through self evaluation and a drive for continuous improvement. These schools can be a source of good and outstanding practice to be shared with other schools and may be invited by the LA to provide support to a school which is a cause for concern.
- b) Those schools which are vulnerable, but not a cause for formal concern. These schools may require a significant amount of support to help them to improve. The aim here is to help the school not to decline into a school causing concern. Schools in this group will resource the additional support from their own budgets. The LA will monitor rigorously the progress these schools make.
- c) Those schools which are formally identified by the LA as a 'cause for concern'. Schools Causing Concern are of two types; The first, whose overall effectiveness has been identified by Ofsted to Require Improvement and those who have either Serious Weaknesses or to require Special Measures. The second type of Schools Causing Concern is where significant weaknesses have been identified through LA monitoring of all available data, and this information would suggest that the school, if inspected, is at a significant risk of being judged inadequate or requiring improvement.

4.5 **The definition and the monitoring, support and challenge arrangements for each of these categories are set out in Annex A.**

5. Information that will define vulnerability or trigger a Cause for Concern

5.1 Achievement data

- schools that are close to or below the governments key indicators for minimum standards for pupil attainment and progress (floor standards)
- performance over time is the lowest percentile on one or more key performance indicators
- there is a declining trend in pupil achievement for a second or subsequent years on a number of key indicators
- significant underachievement by a significant proportion of pupils, or particular groups of pupils

5.2 Pupil engagement, behaviour, safety and well-being

- Poor attendance and behaviour not dealt with adequately by the school;
- Significant shortcomings in provision for pupils with disability and/or special educational needs (DSEN) and vulnerable pupils within the following areas:
 - Identification and assessment
 - Provision and resources
 - Outcomes and progress from relative starting points
 - Parental confidence
- Concerns regarding the safeguarding of pupils;
- Matters of health and safety which place individuals at serious risk of harm;
- Significant concerns regarding inclusive practice

5.3 Leadership and Management:

- The effectiveness of leadership and management, including governance as judged against Ofsted criteria and taking account of the capacity to improve;
- The quality of school self-evaluation and improvement planning;

- The quality of performance management and continuous professional development and the impact of these on outcomes for pupils;
- The leadership and management of safeguarding, including the extent to which systems, policies and procedures are in place, fit for purpose and achieving their stated aims;
- The quality of internal relationships, which might be poor where there is a breakdown in communication, low morale or where a sense of coherent direction is lacking;
- Financial information, including evidence of financial misconduct or neglect;
- Levels of sickness absence and staff turnover;
- Governor absence or lack of a chair of governors;
- Consistent failure to discharge statutory duties.

5.4 Quality of Provision

- Percentage of teaching that is less than good
- Percentage of NQT or teachers in their second or third year of teaching
- Any evidence of the extent to which assessment processes are rigorous and accurate
- Whether there is appropriate curriculum to meet pupils needs

5.5 Other Evidence

- Significant levels of harassment or racial tension;
- Serious quantifiable incapacity to deliver the curriculum effectively, which prejudices the future viability of the school;
- A less than satisfactory response to previous support and insufficient progress in addressing areas for which this support was given;
- A high level of concern / complaints raised by parents / carers in the local community.

6. Support for Schools Causing Concern

- 6.1 Where a school is a cause for concern, it will receive a commensurate amount of support, challenge and monitoring, including joint LA / school review as appropriate, which will be reported to the governing body.
- 6.2 Planned improvement support will be through a Rapid Improvement Partnership Plan (RIPP). This will be agreed between the school and the LA. This should complement the school development plan (SDP). It will set out the key objectives to be achieved, actions to be undertaken, success measures, professional development needs, timescales and resources to be allocated. The LA will ensure that any support provided is coherent and co-ordinated.
- 6.3 There will be regular monitoring and evaluation of agreed success against the RIPP, with progress reported to governors at least once each term. The senior adviser for the school will monitor and assess the impact of any support, taking into account the RIPP and the success criteria it includes.
- 6.4 Where the school, despite the extensive support it will have received, fails to make the necessary progress, the LA is required to comply with its duties to undertake formal intervention. This is likely to be in rare circumstances. The LA will take this action after detailed discussions with the GB and a rigorous analysis to establish whether the situation at the school is at least comparable in seriousness to a finding by Ofsted that the school would receive a judgement of serious weaknesses or special measures.

- 6.5 In line with the Education and Inspections Act, formal warning notice can be served by the LA, which can result in one or more of the following:
- appointment of additional governors
 - suspension of the delegated budget
 - federation and closure
- 6.6 The LA must have provided reasonable written notice to the governing body that intervention is being contemplated. When a notice is issued, it must inform them of their right to appeal to Ofsted within the initial period of 15 working days. The school can avoid intervention if Her Majesty's Chief Inspector (HMCI) decides not to confirm the warning notice following representations from the governing body. The governing body has a further period of 15 working days to respond appropriately to the warning notice starting immediately after the initial period or when HMCI confirms the notice if an appeal has been made.

7. Warning Notices (from DfE Guidance relating to Part 4 of the Education and Inspections Act 2006)

7.1 Establishing the grounds for a warning notice

A warning notice can be triggered by any of the following circumstances:

- a) The standards of performance at the school are unacceptably low, and are likely to remain so unless the LA exercises its statutory intervention powers;
- b) There has been a serious breakdown in management or governance which is prejudicing, or likely to prejudice, standards of performance;
- c) The safety of pupils or staff at the school is threatened (whether by a breakdown in discipline or otherwise)

7.2 Warning notices should only be used where there is evidence to justify both the LA's concerns and the school's reluctance to address these concerns through a professional dialogue with the LA within a reasonable timeframe.

7.3 **More detailed information on the evidence on which Warning Notices can be served. Appealing against Warning Notices, the role of Ofsted and the DfE are set out in Annex B.**

8. Status of Strategy

This strategy operates as a detailed but responsive framework within which the council's support and intervention role can be exercised. It is not intended to restrict the operation of the council's powers under the Education and Inspections Act 2006. In the event of any conflict between the Act and the strategy the Act shall prevail. Decisions will always be taken in the light of particular circumstances.

Farzana Aldridge
Head of Service – School Improvement

Definition and Monitoring, Support and Challenge Arrangements

	Defined by	Features
<p>Self sustaining and improving schools The overwhelming majority of schools in Harrow</p>	<ul style="list-style-type: none"> • Self-sustaining and strong practice to raise and maintain standards • Excellent track record over time 	<ul style="list-style-type: none"> • Track record of standards and pupil progress being above or significantly above National averages, for all pupils • Evidence of strong leadership, including governors • Evidence of school sharing its practice to support other schools
<p>Vulnerable schools These schools have the capacity to improve with a greater level of support</p>	<ul style="list-style-type: none"> • Schools facing significant challenge, which without further support will become a concern. • Schools may be on the verge of a detrimental Ofsted judgement or have received the overall effectiveness judgement of requires improvement from Ofsted - these schools may have a number of areas of concern. • The capacity to improve is good, but external support and challenge may be required to enable the school to remain on track to improve. 	<ul style="list-style-type: none"> • Broadly average or above average standards and achievement • Some variability in the achievement of groups, but school has appropriate strategies to address this • Overall strong leadership, but there may be some inconsistencies • Overall external evaluation shows an improving trend in pupil achievement and quality of teaching • Pupil attendance, behaviour and safeguarding may be in need of improvements
<p>Formal intervention</p> <ul style="list-style-type: none"> • If none of the previous support is effective • Schools which are failing their pupils and have an Ofsted inspection designation of special measures, serious weaknesses or the equivalent LA judgement • These schools may lack the capacity to improve 	<ul style="list-style-type: none"> • Schools Causing Concern Ofsted special measures, serious weaknesses or clear LA evidence that indicates significant weaknesses in for example standards of attainment, leadership, learning, teaching and inclusion. • Serious breakdown of leadership, discipline and/or order 	<ul style="list-style-type: none"> • School has been subject to additional support that is not demonstrating sufficient evidence of improvements • School has been judged by Ofsted as Special Measures or Serious Weaknesses • Serious concerns exist about safeguarding, financial management, behaviour and safety of pupils or serious breakdown of relationships, leaving the school vulnerable

Warning Notices

1. Evidence used to determine whether a Warning Notice is to be served

A. Evidence of unacceptably low standards

The definition of when standards are 'unacceptably low' is extended from the previous provision. The 2006 Act states that a warning notice can be issued if pupil performance is persistently below levels expected when pupils' prior achievement and the school's context is taken into account, even if the absolute level of attainment is apparently satisfactory.

Quantitative evidence may take one of the following forms; usually a combination of several of these indicators will apply:

1. the standards that the pupils might in all the circumstances reasonably be expected to attain;
2. where relevant, the standards previously attained by them; or
3. the standards attained by pupils at comparable schools;
4. the safety of pupils or staff at the school is threatened (whether by a breakdown of discipline or otherwise).

Some educational settings, especially special schools and pupil referral units, may have little standardised data. In these cases, reliance will be on other records, such as how well learners have met their individual targets.

Cases where schools are performing below the floor standards would be covered by point 1 above. There is a clear expectation that in those cases, where the school has a history of performing below floor, conversion to an academy with a strong sponsor may be the route to secure improvement. It should be noted that LAs are not limited to giving a performance and standards warning notice only to those schools which are persistently below the floor. If standards in the schools need to be challenged for another reason (e.g. there has been a sudden drop in performance or a school consistently performs below the level expected), then a warning notice may be a suitable tool if the LA believes it meets the criteria set out above.

B. Evidence of a breakdown in leadership or management

Key sources of information to justify a warning notice under criterion (2) are likely to be LA reports, reports from other professionals particularly the commentary on the quality of the school's self evaluation and target-setting, and Ofsted reports.

In addition, some data trends may indicate a breakdown in leadership and management, for example:

- Declining school popularity, usually revealed through falling rolls
- High or increasing absence or truancy rates
- High rates of staff turnover, or numbers of staff grievances
- Significant or increasing numbers of parental complaints.

Such data should be treated with caution, as they may also arise for reasons other than poor school leadership. LAs will therefore ensure that such indicators are confirmed by strong intelligence from sources such as Ofsted reports before considering a warning notice. Where such reports are unavailable, data trends should be considered only as the first signs of concern which would prompt the LA to investigate further, perhaps through an audit of the school's leadership.

C. Exceptions to (1) and (2) above

Even where the evidence referred to in parts (1) or (2) above exists, a warning notice is unlikely to be needed when the school is already working positively to address poor performance, and there is evidence of progress. Circumstances in which a LA might refrain from issuing a warning notice include when:

- The LA have notified Ofsted that the inspection of the school should be brought forward;
- The school acknowledges the problem and is working effectively with the professionals or other support commissioned by the LA, to rectify the problem;
- The school has taken positive steps, and is monitoring these effectively to rectify areas identified for improvement after an Ofsted requires improvement judgement.

2. Issuing a warning notice

Once the grounds for issuing a warning notice have been established, the LA will set out its concerns in writing to the governing body. This written notice must include:

The reasons for issuing the warning notice, including references to the quantitative and qualitative evidence the authority has used in deciding to issue the notice;

- a. The action the governing body needs to take in order to address the concerns raised;
- b. The action the LA is considering if the governing body do not comply satisfactorily with the warning;
- c. The date when the 15 working-day compliance period will come to an end;
- d. A reminder to the governing body that they may appeal to Ofsted within 15 working days if they feel that the grounds for issuing the warning notice are not valid or that the action proposed if the school fails to comply is disproportionate. The LA must send the warning notice to the governing body of the school and copy the notice to the headteacher, HMCI at Ofsted, and the appropriate appointing authority for church, foundation or voluntary schools.

3. Appealing against the warning notice

The governing body of a school that has received a warning notice can appeal to Ofsted under section 60 (7) of the Act, if it believes that the LA has:

- issued the warning notice without sufficient objective evidence, or;
- proposed action that is disproportionate to the scale of the issues facing the school.

The appeal must be made in writing within 15 working days of receipt of the warning notice. It should be sent to the Regional Divisional Manager at Ofsted, and copied to the LA.

The written appeal may contain, as appropriate:

- why the governors disagree with the grounds for the warning notice; or
- why the governors consider the action proposed by the authority is disproportionate to the scale of the issues facing the school; or
- a combination of both the above

Irrespective of whether the governing body has made representations to Ofsted, the governing body may make a complaint to the Secretary of State under section 496 and/or 497 of the Education Act 1996. This enables the Secretary of State to make a direction, if expedient to do so, where he is satisfied that a LA have acted, or are proposing to act unreasonably with respect to exercising of a power or performance of a duty under the 1996 Act, or certain other acts which are

read together with the 1996 Act (including the 2006 Act), or where the LA have failed to discharge a duty.

4. Power of the LA to require a governing body to enter into arrangements.

LAs have the power of intervention allowing them to direct the governing body of a maintained school to take certain steps if the school is eligible for intervention.

Section 63(1) of the Act sets out what sort of arrangements a governing body might be instructed to enter into:

- contracting with another party for the provision of advisory services to the governing body;
- collaborating with the governing body of another school;
- collaborating with a further education college or creating or joining a federation or considering becoming an academy.

Before using this power, the LA must consult the governing body of the school. In the case of a church school (foundation or voluntary), it must consult the, appropriate diocesan authority.

5. Expectation of the school responding to the warning notice

If the school does not appeal to Ofsted, or the appeal has been rejected, the school has 15 working days to comply with the warning notice to the LA's satisfaction. Such compliance may not involve full rectification of the problem, since it will not always be practical to do so, but it will involve positive steps towards the solution. For example, if the warning notice has been issued on the grounds of the relative underperformance of a particular group of pupils, the minimum expectation would be that the school amends its improvement plan to identify what support this group of pupils requires, how this additional support will be delivered, and how the effect of this additional support will be measured.

The development of the school's improvement plan as a result of the warning notice should be discussed with the LA or commissioned professional to ensure plans are sufficient. If the authority is content with the action proposed or taken, the warning notice should be rescinded and the intervention powers may not be used.

In all cases, the LA is required to use its intervention powers within 2 months of the end of the 15-day compliance period. If it fails to intervene within this time, a new valid warning notice must be issued. If the school is in special measures or requires significant improvement, the power is available as long as the school remains in one of those priorities.

6. Role of Ofsted

Ofsted will send an e-mail to the school, copied to the LA, acknowledging receipt of the appeal. Ofsted may request additional documentary evidence; if such evidence is requested, it should be supplied within 5 working days. Ofsted will scrutinise the evidence provided, and may also examine other relevant documents (e.g. the school's Ofsted report, RAISE online data). Ofsted may make its judgement based on written evidence alone, if the documentation is sufficiently comprehensive. In some circumstances, for example if there is insufficient written evidence to reach a decision, Ofsted may inspect the school. Ofsted will decide either to uphold or reject the appeal, and will communicate this decision in writing to the school and the LA. If the appeal is upheld, the warning notice will be rescinded. If the appeal is rejected, the warning notice will be reissued to the school. The school must take appropriate action to respond within 15 working days of receiving the reissued warning notice. Ultimately, irrespective of Ofsted's ratification of a warning notice, a school may appeal to the DfE under section 496 of the Education Act 1996, which allows the Secretary of State to consider whether a LA has acted unreasonably in exercising its functions.

7. Power of the Secretary of State to direct the LA to consider giving and to give a warning notice

The Secretary of State has the power to direct a LA to first consider giving a warning notice in specified terms and then, to direct the LA to give a warning notice in those terms where a LA has decided not to do so.

A direction to give a performance standards and safety warning notice in the terms specified may be given if the Secretary of State thinks there are reasonable grounds for the LA to do so and:

1. the LA have not given a warning notice to the governing body; or
2. the LA have done so, but in inadequate terms; or
3. the LA have given a warning notice to the governing body but Ofsted have failed or declined to confirm it; or
4. the school has become eligible for intervention, but the period of two months following the end of the compliance period has ended.

The LA may then decide to give the warning notice to the governing body in the specified terms and must give the Secretary of State a written response to the direction confirming this within 10 working days beginning with the day on which the direction was given. They must then give a performance standards and safety warning notice to the governing body within five working days from the day on which a response is given to the Secretary of State and on the same day give the Secretary of State a copy of the notice.

If the LA decides not to give a warning notice, then they must respond to the Secretary of State within 10 working days, beginning with the day on which the direction was given setting out the reasons for that decision. If having considered these reasons, the Secretary of State believes that a warning notice is still necessary then the LA will be directed to give a warning notice in those specified terms. The LA must then give this performance standards and safety warning notice to the governing body within five working days beginning with the date when the direction is given.

Once this warning notice has been given, the school has 15 working days to comply with the terms of the warning notice or make representations to Ofsted as with any other warning notice given. The LA must judge whether the school has complied with the terms of the warning notice. If the LA concludes that the school has failed to comply with the warning notice and has also given written notice to the governing body that they propose to exercise one or more of their intervention powers, then it is "eligible for intervention" as set out in Part 4 of, and Schedule 6 to, the 2006 Act, and the intervention powers of the Secretary of State and the LA may be exercised.

- 8.** Harrow LA will use its powers to appoint additional governors at maintained schools subject to special measures, in need of significant improvement, or at which the governing body has not complied with a formal warning. The LA is no longer required to have received a notice of receipt of the inspection report from the Secretary of State, or to wait for a 10 day period to have elapsed once that notice has been received, before the LA can appoint additional governors. Harrow LA may appoint a specially constituted governing body in place of the existing governors at a school that is eligible for intervention. This body remains as the 'Interim Executive Board'. The power may only be exercised with the consent of the Secretary of State and the governing body must be given written notice of the exercise of the power.

9. Power of the LA to suspend right to delegated budget

LAs have powers to suspend a school's right to a delegated budget if a school is eligible for intervention. This power will be used by Harrow LA if appropriate.

10. Guidance relating to schools requiring special measures and serious weaknesses (schools in Ofsted priorities)

There is a set of 'overarching principles' to which Harrow adheres:

- minimising the time a school spends in the priority of special measures or requiring serious weaknesses;
- building the capacity of the school's leadership and management;
- taking action to secure improvements immediately after a school is judged to be failing;
- using opportunities for collaboration or federation with other schools, trusts, colleges or other organisations;
- giving consideration to a school opting to become a trust school or an academy;
- involving parents and carers in the preparation of a statement of action, which should consider all the options available for securing improved pupil outcomes, and sets out clearly what action is to be taken, by whom and by when;
- keeping action under review, so that good progress is made within the first 12 months.

Schools in special measures will normally receive monitoring visits from Ofsted within a year to check on progress. When insufficient progress has been made, the Secretary of State will give notice to the LA that the case has become urgent. The authority will be required to review action taken so far and produce a new statement of action.

This page is intentionally left blank

Date of Meeting:	19 February 2015
Subject:	Proposal to amalgamate Whitchurch First School and Nursery and Whitchurch Junior School
Key Decision:	Yes
Responsible Officer:	Chris Spencer, Interim Corporate Director of Children and Families
Portfolio Holder:	Councillor Simon Brown, Portfolio Holder for Children, Schools and Young People
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	Belmont
Enclosures:	Appendix A – Considerations about the proposal in relation to the Decision Makers Guidance

Section 1 – Summary and Recommendations

Statutory proposals were published in January 2015 that would effect the amalgamation of Whitchurch First School and Nursery and Whitchurch Junior School. Cabinet approval is sought to enable the two schools to combine on 1 April 2015.

Recommendations:

Cabinet is requested to approve the statutory proposals to combine Whitchurch First School and Nursery and Whitchurch Junior School on 1 April 2015.

Reason: (For recommendations)

In line with the Council's amalgamation policy, combining the two schools would give the opportunity to further improve educational standards by enabling planning as a coherent whole across the primary phase of the national curriculum and providing greater flexibility across and between key stages. Access to the whole primary curriculum supports and informs whole school planning, assessment, pastoral systems, etc, and provides opportunities for wider staff development and experience across the full primary phase.

Section 2 – Report

Introduction

1. Harrow Council has an Amalgamation Policy that requires separate infant and junior schools to combine when a headteacher vacancy arises in either or both schools unless there are compelling and over-riding reasons not to.
2. There are two key statutory stages to the processes leading to a decision to amalgamate two schools:
 1. Statutory consultation, following which a decision is made whether to proceed to the next statutory stage of publishing statutory proposals;
 2. Publication of statutory proposals, which is followed by a 4 week representation period.

Options considered

3. The Amalgamation Policy was agreed initially in February 2005. The policy subsequently has been revised and up-dated and was confirmed by Cabinet in July 2013.
4. The Headteacher of Whitchurch First School and Nursery retired in Summer 2014. In accordance with the Amalgamation Policy, a joint steering group of governors from the two schools was convened to plan the consultation about the amalgamation proposal and report to the Interim Executive Board and the Governing Body on the outcomes of the consultation.

5. The statutory consultation was held from Monday 3 November 2014 until Friday 12 December 2014. 60 written responses to the consultation were received from parents, staff, governors and other interested stakeholders. 47 of the responses (78.3%) support the proposal, 2 (3.3%) do not support the proposal, and 11 (18.3%) are not sure. Following the consultation, the Interim Executive Board and the Governing Body wrote to Harrow Council in support of the amalgamation proposal.
6. On 18 December 2014, the Portfolio Holder for Children, Schools and Young People considered the outcome of the consultation and the views of the Interim Executive Board and the Governing Body and decided to publish statutory proposals.
7. Linked statutory proposals were published on 5 January 2015 with a statutory representation period of 4 weeks that if approved would effect the amalgamation of the Whitchurch schools to provide an all through primary school. The local authority received no representations during the representation period. The Governing Bodies of the two schools have responded to the statutory proposals as follows.
8. The Interim Executive Board (IEB) of Whitchurch First School and Nursery has responded that they are supportive of the proposed amalgamation to take place between Whitchurch First and Junior School. The IEB considers it is the correct decision from an economic perspective as they are in the same building, from a staff perspective in terms of professional development and enhancing teaching and learning and also for the pupils so that they can enjoy a fully supportive primary education without the transition from First to Junior school. The IEB welcome the concept of a newly constituted Governing Body effectively representing all parts and stakeholders of the school.
9. The Governing Body of Whitchurch Junior School has responded that their views remain unchanged from the views expressed in December 2014 regarding the amalgamation of Whitchurch Junior School with Whitchurch First School and Nursery. The Governing Body of Whitchurch Junior School decided in a unanimous vote that it was in the best interests of the children that both schools should amalgamate.
10. Cabinet has the following options:
 - a. Reject the proposals;
 - b. Approve the proposals without modification;
 - c. Approve the proposals with modification;
 - d. Approve the proposals, with or without modification, subject to certain conditions being met.

Determination of statutory proposals

11. In its role as the Decision Maker, Cabinet must have regard to the statutory and non-statutory guidance, provided by the Department for Education, when determining statutory proposals. Appendix A provides Cabinet with commentary on the salient points contained in the Decision Makers' Guidance.

Recommendation

12. The Corporate Director of Children and Families recommends that Cabinet approve the proposals to effect the amalgamation of the two schools with effect from 1 April 2015, namely to:
- extend the age range of Whitchurch Junior School to establish a primary school with an age range of 4 years (Reception) to 11 years (Year 6) plus nursery from 1 April 2015;
 - expand the capacity of Whitchurch Junior School from 1 April 2015 to accommodate 840 pupils plus nursery when the school is fully expanded in 2020; and
 - discontinue Whitchurch First School and Nursery on 31 March 2015.
13. In line with the Council's amalgamation policy, combining the two schools would give the opportunity to further improve educational standards by enabling planning as a coherent whole across the primary phase of the national curriculum and providing greater flexibility across and between key stages. Access to the whole primary curriculum supports and informs whole school planning, assessment, pastoral systems, etc, and provides opportunities for wider staff development and experience across the full primary phase.

14. Performance Issues

15. Schools in Harrow perform well in comparison to national and statistically similar local authorities. The vast majority of primary schools and secondary schools are judged 'good' or 'outstanding' by OfSTED. As at October 2014, 87% of Harrow's primary and secondary schools are judged 'good' or 'outstanding', compared to 85% in London and 80% nationally (Source: Ofsted Data View).
16. The Schools White Paper and Education Act 2011 maintain a focus on driving up standards in schools, and place more of the responsibility with the schools directly for their improvement. The role of the Local Authority in measuring performance and driving improvement has changed significantly and is reduced from its previous level. However, the Local Authority maintains a strategic oversight and enabling role in local education, and is likely to retain some role in monitoring educational achievement and key measures such as exclusions and absence. The Local Authority is also statutorily responsible for supporting and improving underperforming schools.
17. The Local Authority continues to monitor key education indicators. The indicators are used locally to monitor, improve and support education at both school and local authority level. They are also used within information provided to the DfE.

Year	Key Stage 2	Reading, Writing & Maths L4+	KS1-KS2 Expected Progress - Reading	KS1-KS2 Expected Progress - Writing	KS1-KS2 Expected Progress - Maths
2011-12	Harrow	79%	91%	93%	90%
	National	74%	90%	90%	87%
2012-13	Harrow	79%	90%	92%	92%
	National	75%	88%	92%	88%
2013-14	Harrow	83%	94%	93%	93%
	National	79%	91%	93%	90%

Source: DfE Statistical First Release

18. The indicators fall within the following areas:

- Attendance and exclusions - remain a statutory duty for the Local Authority to monitor and improve.
- Underperforming schools – schools are assessed at Key Stage 2 & Key Stage 4 against defined floor standards.
- Closing the Gap - is a fundamental part of Ofsted's school inspection process, and accordingly, the Local Authority monitors the attainment of identified groups of pupils in its schools. The table below includes the gap at key stage 2 between pupils eligible for free school meals and their peers and the gap between Harrow's SEN children and their peers – children with a SEN provision includes School Action, School Action Plus or a Statement.

2013-14 Key Stage 2 – Closing the Gap	Harrow	National
Achievement gap between pupils eligible for free school meals and their peers, based on pupils achieving level 4 or above in Reading, Writing and mathematics at Key Stage 2.	14%	18%
Achievement gap between pupils with special educational needs and their peers, based on pupils achieving level 4 or above in Reading, Writing and mathematics at Key Stage 2.	52%	52%

Environmental Impact

19. There is no significant environmental impact arising from this proposal.

Risk Management Implications

20. Risk included on Directorate risk register? No
Separate risk register in place? No

High Level Risks	Consequences	Mitigating/Control Actions
Confusion for stakeholders.	Stakeholders struggle to give clear views.	The brief notice and full proposal were developed with close reference to the government guidance and contained as full information as possible. Consultation meetings were held to allow scope for discussion and for questions to be

		answered.
Challenge to decision making.	Delay.	The decision maker must have due regard to the Department for Education School Organisation Guidance for proposers and decision-makers in reaching its decisions on school reorganisation proposals.

Legal Implications

21. The Local Authority has a statutory entitlement under Sections 15 and 19 of the Education and Inspections Act 2006, to issue statutory proposals in respect of school reorganisation.
22. New school organisation regulations and associated guidance came into force on 28 January 2014 and the process has been amended to streamline the process. The statutory proposals were published on 5 January 2015 following the decision made by the Portfolio Holder on 18 December 2014. Cabinet must determine the proposals within two months of the representation period, which ended on 2 February 2015, or the matter is referred to the Office of the Schools Adjudicator for determination. Cabinet must have regard to the Secretary of State's guidance when reaching its decision, and should consider the representations received during the course of the publication period when making its decision.

Financial Implications

23. From April 2015, there would be a new budget for the combined school calculated in accordance with the Harrow schools funding formula, which is essentially based on an amount per pupil.
24. Under the current school funding arrangements, as a combined school there will be loss of one 'lump sum' which each school receives annually as part of its budget. This reduction is implemented over time. In the year following the proposed amalgamation (2016/17) the combined school would receive the equivalent of 85% of two lump sums. This would allow time for the Governing Body to plan for this change which represents a comparatively small amount of the combined school budget (about 5%). Funding efficiencies arising from combining the schools can be used to offset this reduction. The Governing Body and leadership team of a combined school should be able to plan strategically in a cost effective manner in the best interests of the children in order to achieve positive outcomes for the children in the long term.

Equalities implications / Public Sector Equality Duty

25. The equality impact assessment indicates that the equalities impact of Cabinet's decision will be effectively neutral. No child would be displaced if the schools amalgamate nor if they were to stay separate. Harrow's community schools are inclusive schools and this would continue in a combined school. The proposal is intended to build on

the many positives already in place at the schools. In an all through school, there may be benefits for pupils with special educational needs as the amalgamation might help to alleviate issues of transition as it could provide continuous support for pupils and a common set of school rules and processes.

Council Priorities

26. The Council's vision is **Working Together to Make a Difference for Harrow**
27. The Council Priorities are as follows
- Making a difference for the vulnerable
 - Making a difference for communities
 - Making a difference for local businesses
 - Making a difference for families
28. The recommendation supports these priorities by providing opportunities to enhance educational standards and to further promote positive community outcomes by ensuring the most effective use of school facilities and coordinated extended services support to families and children.

Section 3 - Statutory Officer Clearance

Name: Jo Frost	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 21 January 2015		
Name: Sarah Wilson	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 21 January 2015		

Ward Councillors notified:	YES
EqIA carried out:	YES
EqIA cleared by:	Corporate Equalities Impact Assessment Quality Assurance Group

Section 4 - Contact Details and Background Papers

Contact: Johanna Morgan, Education Lead School Organisation,
020 8736 6841 johanna.morgan@harrow.gov.uk

Background Papers: Equalities Impact Assessment on the proposed amalgamation of Whitchurch First School and Nursery and Whitchurch Junior School.

**Call-In Waived by the
Chairman of Overview
and Scrutiny
Committee**

NOT APPLICABLE

[Call-in applies]

Considerations about the proposal in relation to the Decision-Makers Guidance

The decision maker for these statutory proposals is the local authority, and this report presents the proposals to Cabinet for determination. If the local authority fails to decide proposals within two months of the end of the representation period the local authority must forward proposals, and any received representations, to the Office of the Schools Adjudicator for decision. This two month period will end on 2 April 2015.

Decision Makers are required to have regard to guidance issued by the Secretary of State when they take a decision on proposals. New school organisation regulations and associated guidance came into force on 28 January 2014. The guidance documents are available at <https://www.gov.uk/government/publications/school-organisation-maintained-schools>.

The document 'Annex B: Guidance for Decision-makers' sets out some the factors that decision-makers should consider when deciding a proposal. These factors are not exhaustive and the importance of each will vary depending on the type and circumstances of the proposal. All proposals must be considered on their individual merits.

The format of this Appendix follows the framework of the Annex B guidance.

- The headings and text in italics at the start of each section contains extracts from the guidance that are directly relevant to the statutory proposals to assist Members to understand the factors to be considered.
- The text beneath the extracts in each section contains officer comment in relation to the factors.

Consideration of consultation and representation period

The decision-maker will need to be satisfied that the appropriate consultation and/or representation period has been carried out and that the proposer has had regard to the responses received. If the proposer has failed to meet the statutory requirements, a proposal may be deemed invalid and therefore should be rejected. The decision-maker must consider all the views submitted, including all objections to and comments on the proposal.

Consultation about the proposal to combine Whitchurch First School and Nursery and Whitchurch Junior School was conducted from Monday 3 November to Friday 12 December 2014. The consultation responses and outcomes (see 'Views submitted' section below) were reported to the Portfolio Holder for Children, Schools and Young People on 18 December 2014 when making the decision to publish statutory proposals.

Statutory proposals to combine Whitchurch First School and Nursery and Whitchurch Junior School were published on 5 January 2015 for a four week representation period which closed on 2 February 2015. In order to make the nature of the proposals explicit and clear for all stakeholders, the brief notice and the full proposals stated as full information as possible. It is considered that all necessary information was provided and made available for stakeholders and interested parties to see.

The brief notice and full proposals were developed with close reference to the Government guidance. It is considered that the published brief notice and full proposals comply with the statutory requirements.

Education standards and diversity of provision

Decision-makers should consider the quality and diversity of schools in the relevant area and whether the proposal will meet or affect the aspirations of parents, raise local standards and narrow attainment gaps.

The decision-maker should also take into account the extent to which the proposal is consistent with the government's policy on academies as set out on the department's website.

Quality of schools

Schools in Harrow perform well in comparison to national and statistically similar local authorities. The vast majority of primary schools and secondary schools are judged 'good' or 'outstanding' by OfSTED. As at October 2014, 87% of Harrow's primary and secondary schools are judged 'good' or 'outstanding', compared to 85% in London and 80% nationally (Source: Ofsted Data View).

Diversity of schools

There is a range of schools in Harrow offering diversity to parents both in terms of ethos and size. Harrow has a Church of England primary school, a Hindu primary school, a Jewish primary school, six Roman Catholic primary schools and two Roman Catholic high schools. Primary sector schools are organised as separate and combined infant and junior schools and have a range of planned admission numbers from one to four forms of entry.

Harrow is committed to securing greater autonomy, flexibility and scope for schools to drive their own agendas within a collaborative whole-borough framework. Harrow's success in this approach is demonstrated through the Harrow School Improvement Partnership and the Harrow Collegiate.

The community of Harrow schools has a tradition of collaboration and cooperation and is confident to develop and embrace innovative solutions. Within this context the local authority, in partnership with schools, will continue to explore routes that provide creative and innovative solutions for challenges faced by individual schools and groups of schools, and provide a means to secure school improvement.

Two primary schools established an academy trust to drive improvements in education attainment. Another primary school joined an academy trust with a high school.

Aspirations of parents

The Council's amalgamation policy contributes to maintaining and improving the educational performance of Harrow schools and their pupils. The Amalgamation Policy was agreed initially in February 2005. The policy subsequently has been revised and up-dated and was confirmed by Cabinet in July 2013.

Whitchurch schools proposals

Parents and stakeholders have had the opportunity to contribute and shape the proposals for the Whitchurch schools.

The statutory consultation was held from Monday 3 November 2014 until Friday 12 December 2014. Of the 60 written responses to the consultation received from parents, staff and governors, 47 (78.3%) support the proposal. The consultation responses and outcomes are summarised in the 'Views submitted' section below.

The local authority received no representations during the representation period which ended on 2 February 2015.

Raise local standards and narrow attainment gaps

The amalgamation policy is based on an educational rationale that will contribute to school improvement.

Closing the Gap is a fundamental part of Ofsted's school inspection process, and accordingly, the Local Authority monitors the attainment of identified groups of pupils in its schools.

Government policy on academies

The Government's policy on academies is not directly applicable to this amalgamation proposal. The proposal does not create a new school which is when the 'academy presumption' applies. The governing bodies of schools are at liberty to consider conversion to academy school status regardless of whether the school is combined or not.

Demand

In assessing the demand for new school places the decision-maker should consider the evidence presented for any projected increase in pupil population (such as planned housing developments) and any new provision opening in the area (including free schools).

The decision-maker should take into account the quality and popularity of the schools in which spare capacity exists and evidence of parents' aspirations for a new school or for places in a school proposed for expansion. The existence of surplus capacity in neighbouring less popular schools should not in itself prevent the addition of new places.

Reducing surplus places is not a priority (unless running at very high levels). For parental choice to work effectively there may be some surplus capacity in the system as a whole. Competition from additional schools and places in the system will lead to pressure on existing schools to improve standards.

The Whitchurch schools are already approved for expansion from September 2015. If it is decided to amalgamate the schools, the combined school would expand to four forms of entry from September 2015 and would fill incrementally over a 7 year period.

Full information about the projected demand for school places and the planning to increase school places across Harrow can be viewed in the 17 July 2014 Cabinet papers (item 21 School Expansion Programme Appendix B) at

<http://www.harrow.gov.uk/www2/ieListDocuments.aspx?CId=249&MId=62354&Ver=4>

School size

Decision-makers should not make blanket assumptions that schools should be of a certain size to be good schools, although the viability and cost-effectiveness of a proposal is an important factor for consideration. The decision-maker should also consider the impact on the LA's budget of the need to provide additional funding to a small school to compensate for its size.

A combined Whitchurch school would have the same number of pupil places as the separate schools. It has already been decided that the separate schools would expand permanently to become four forms of entry schools starting in September 2015, and this would continue to be the case for the combined school. When the school is full there would be 840 pupils plus

nursery. Under these amalgamation proposals, the planned admission number at Reception would be four forms (120 pupils). (Note: Whitchurch First School admitted an additional 30 pupils into Reception in September 2014 to help meet the increased demand for school places across Harrow in advance of the permanent expansion, so the combined school would be full in September 2020).

If approved a combined Whitchurch school would be one of four, four forms of entry all-through primary schools in Harrow. There are also three separate pairs of four forms of entry infant and junior schools. The key educational factors identified by Harrow Council in its case for combining schools do not relate to the size of the schools as such. The quality of education is more important than the type of structure it is provided in. It is considered that through-schools can operate with many additional advantages, as described in the amalgamation policy, that benefit pupils, staff and parents.

Proposed admission arrangements (including post-16 provision)

In assessing demand the decision-maker should consider all expected admission applications, not only those from the area of the LA in which the school is situated.

Before approving a proposal that is likely to affect admissions to the school the decision-maker should confirm that the admission arrangements of the school are compliant with the School Admissions Code. Although the decision-maker cannot modify proposed admission arrangements, the decision-maker should inform the proposer where arrangements seem unsatisfactory and the admissions authority should be given the opportunity to revise them.

No changes to admission arrangements arise from these proposals. Whitchurch First School and Nursery and Whitchurch Junior School are community schools that draw pupils from their local area. The admission arrangements of the schools are compliant with the School Admissions Code and would remain so as a combined school.

No changes to post-16 provision arise from the proposals.

National Curriculum

All maintained schools must follow the National Curriculum unless they have secured an exemption for groups of pupils or the school community.

Whitchurch First School and Nursery and Whitchurch Junior School follow the National Curriculum and no changes to this arise from these proposals.

Equal opportunity issues

The decision-maker must have regard to the Public Sector Equality Duty (PSED) of LAs/governing bodies, which requires them to have 'due regard' to the need to:

- *eliminate discrimination;*
- *advance equality of opportunity; and*
- *foster good relations.*

The decision-maker should consider whether there are any sex, race or disability discrimination issues that arise from the changes being proposed, for example that where there is a proposed change to single sex provision in an area, there is equal access to single sex provision for the other sex to meet parental demand. Similarly there should be a commitment to provide access

to a range of opportunities which reflect the ethnic and cultural mix of the area, while ensuring that such opportunities are open to all.

Equalities Impact Assessment has been undertaken on the proposal to combine Whitchurch First School and Nursery and Whitchurch Junior School. The equality impact assessment indicates that the equalities impact of Cabinet's decision will be effectively neutral. The assessment has not identified any potential for unlawful conduct or disproportionate impact and concludes that all opportunities to advance equality are being addressed.

No child would be displaced if the schools amalgamate nor if they were to stay separate. Harrow's community schools are inclusive schools and this would continue in a combined school. The proposal is intended to build on the many positives already in place at the schools. In an all through school, there may be benefits for pupils with special educational needs as the amalgamation might help to alleviate issues of transition as it could provide continuous support for pupils and a common set of school rules and processes.

Community cohesion

Schools have a key part to play in providing opportunities for young people from different backgrounds to learn with, from and about each other; by encouraging, through their teaching, an understanding of, and respect for, other cultures, faiths and communities. When considering a proposal, the decision-maker must consider its impact on community cohesion. This will need to be considered on a case-by-case basis, taking account of the community served by the school and the views of different sections within the community.

These are community schools which draw pupils from their local area and the pupil profiles reflect the ethnicity of their area. The October 2014 School Census demonstrates that the schools have an ethnically diverse pupil population.

Travel and accessibility

Decision-makers should satisfy themselves that accessibility planning has been properly taken into account and the proposed changes should not adversely impact on disadvantaged groups.

The decision-maker should bear in mind that a proposal should not unreasonably extend journey times or increase transport costs, or result in too many children being prevented from travelling sustainably due to unsuitable walking or cycling routes.

A proposal should also be considered on the basis of how it will support and contribute to the LA's duty to promote the use of sustainable travel and transport to school.

There would be no change to travel or transport arrangements arising from this amalgamation proposal because all the pupils attending the schools at the time of implementation would transfer to the combined school.

The combined school would build on the existing community use and extended school activities. Potential use of the school site by the community could be enhanced by the ability to plan for one school rather than two separate schools.

Capital

The decision-maker should be satisfied that any land, premises or capital required to implement the proposal will be available and that all relevant local parties (e.g. trustees or religious authority) have given their agreement. A proposal cannot be approved conditionally upon funding being made available.

Where proposers are relying on the department as the source of capital funding, there can be no assumption that the approval of a proposal will trigger the release of capital funds from the department, unless the department has previously confirmed in writing that such resources will be available; nor can any allocation 'in principle' be increased. In such circumstances the proposal should be rejected, or consideration deferred until it is clear that the capital necessary to implement the proposal will be provided.

There are agreed construction plans for the expansion of the Whitchurch schools and there would need to be some additional works to support the operation of a combined school. If possible, once the requirements have been agreed, these works would be incorporated into the planned expansion building works for completion by September 2015. Where schools are based on the same site economies of scale may arise following the combining of the two schools, for example as a result of being able to have a combined school office. Harrow Council's Schools Capital team would work with the Headteacher and Governing Body to agree the changes to accommodation that would be required.

School premises and playing fields

Under the School Premises Regulations all schools are required to provide suitable outdoor space in order to enable physical education to be provided to pupils in accordance with the school curriculum; and for pupils to play outside safely.

Guidelines setting out suggested areas for pitches and games courts are in place although the department has been clear that these are non-statutory.

The Whitchurch schools are already approved for expansion. Government regulations and guidelines are considered when undertaking the design work to accommodate the additional pupils. Full consideration is given to suitable outdoor and indoor space in order to enable physical education to be provided to pupils in accordance with the school curriculum; and for pupils to play outside safely.

Closure proposals (under s15 EIA 2016)

The decision-maker should be satisfied that there is sufficient capacity to accommodate displaced pupils in the area, taking into account the overall quality of provision, the likely supply and future demand for places. The decision-maker should consider the popularity with parents of the schools in which spare capacity exists and evidence of parents' aspirations for those schools.

The proposed legal closure of Whitchurch First School and Nursery is to effect the amalgamation of the two Whitchurch schools and does not displace any pupils. All the pupils attending the schools at the time of amalgamation would transfer to the combined school. The combined school would have the same number of pupils overall as the two separate schools.

Schools causing concern

For all closure proposals involving schools causing concern, copies of the Ofsted monitoring letters for the relevant schools should be made available. Decision-makers should have regard

to the length of time the school has been in special measures, requiring improvement or otherwise causing concern. The decision-maker should also have regard to the progress the school has made, the prognosis for improvement, and the availability of places at other existing or proposed schools within a reasonable travelling distance. There is a presumption that these proposals should be approved, subject to checking that there are sufficient accessible places of an acceptable standard available to accommodate displaced pupils and to meet foreseeable future demand for places in the area.

This section of the Department for Education Guidance for Decision-makers is written on the premise that a school may be closed for because it has been made subject to special measures. This is not applicable to these proposals. Harrow Council's Amalgamation Policy is being implemented and the proposal to discontinue Whitchurch First School and Nursery has been triggered by the resignation of the headteacher.

Community Services

Some schools may be a focal point for family and community activity, providing extended services for a range of users, and its closure may have wider social consequences. In considering proposals for the closure of such schools, the effect on families and the community should be considered. Where the school is providing access to extended services, provision should be made for the pupils and their families to access similar services through their new schools or other means.

Harrow's schools view themselves as serving their local communities and the amalgamation proposal would not change this.

An all through school would ensure the most effective and coordinated use of school facilities and extended services support to families and children.

Views submitted during the expansion consultation

The statutory consultation was held from Monday 3 November 2014 until Friday 12 December 2014. Officers attended open consultation meetings during the consultation period at the schools about the amalgamation proposal to give a presentation and answer questions. The consultation paper was sent to all parents, members of staff and governors. The proposal evaluation document was made available from the school offices and Harrow Council website, and was available at the parents meetings.

Consultation responses

60 written responses to the consultation were received from parents, staff, governors and other interested stakeholders:

- Whitchurch First School received 39 written responses - 31 support combining the two schools, 2 do not support combining the two schools and 6 respondents are not sure;
- Whitchurch Junior School received 21 written responses - 16 support combining the two schools and 5 respondents are not sure.

A number of comments were included with the responses and the four main themes are given in the headings below together with officer response to the themes.

Leadership and Management

The post of Headteacher for the combined school would be ring fenced to the substantive Headteacher. A process would be developed to satisfy the governing body that the post holder has suitable qualifications, experience and ability to undertake the role. The Interim Executive

Board and the governors of the Junior school are very mindful of the need to secure the leadership of a combined school, if agreed, and a timeline would be agreed with Harrow Council accordingly.

A review of the staffing structure for the combined school would follow confirmation of the appointment of a Headteacher. This review would ensure there are appropriate leadership and management structures and arrangements in place.

Cost effectiveness; Sharing policies; Practical implications of a merger; Implementation/operation of the school

Detailed guidance has been developed to support the amalgamation policy, which includes details of the activities for the implementation stage of the process with notes, indicative timescales and template document for an Implementation Plan. Officers would support the school governors and senior leadership with the implementation work.

There are two phases to the Amalgamation Implementation Plan. Those actions that have to be completed prior to the date of the amalgamation, for example confirming the leadership of the all through school and planning to reconstitute the governing body. Other aspects of the Implementation Plan would take place over a longer timescale. For example, building works and appointments to the combined school staffing structure.

Harrow Council is keen that a school's governing body is representative of its community. Schools that have combined in Harrow have usually followed a model in which governors have resigned in order to allow elections across both previously existing schools. This is an important action. It acknowledges and values the experience and expertise of the governors that have contributed to the success of the school that is technically closed. It demonstrates the commitment to build and develop the best practice across both schools. The implementation working group would draft an instrument of governance for the governing body of the combined school, and a timeline would be agreed for any elections and appointments to the re-constituted governing body.

Transition and continuity; Consistency and Shared ethos; Support for parents and children; Good teachers; How will it affect the children; Is it beneficial to the children's education; Maintaining standards

The amalgamation policy is based on an educational rationale that will contribute to school improvement. The potential benefits are set out in the policy and include:

- organisational structure is aligned with the National Curriculum Key Stages. Planning across Foundation, Key Stages 1 and 2 as a coherent whole for the primary phase provides greater flexibility across and between the Key Stages;
- teachers and classroom staff have access to the whole primary curriculum. This supports and informs whole school planning, assessment, pastoral systems, etc, and provides opportunities for wider staff development and experience across the full primary phase;
- more consistency between year groups and key stages in learning, planning and assessment;
- improved use of teachers' skills, specialist teaching and improved pastoral arrangements.

Staff changes impact on jobs, etc

During the consultation the Executive Headteacher stressed that following amalgamation the first need would be to consolidate and for there to be stability for the foreseeable future. It is important to retain teachers and other staff, build skills and develop teaching.

The combined school would have the same number of pupils overall, and there would be a similar staffing need. Over time, the staffing structure for a combined school would need to reflect the needs of the size, ethos and age range of the school. If the schools combine, there

would be a review of the staffing structure which would bring the two former staff groups together in an appropriate staffing model for a combined all-through primary school.

A review of the staffing structure for the combined school would follow confirmation of the Headteacher. Any new staffing structure would be subject to consultation with all staff and their professional associations/unions and appointments would be made over time to the new staffing structure. It should be borne in mind that changes to staffing structures happen in schools at times regardless of amalgamation.

Any duplication of roles would be considered as part of the processes. In a larger sized school there would be new opportunities and consolidation of roles in structures that are proposed. No redundancies have arisen in the schools that have been combined to date and there is no reason for the situation to be different in this instance. The trade unions are very experienced and understand the process well.

Governing Body response to the consultation

The Interim Executive Board of Whitchurch First School and Nursery is supportive of the amalgamation between Whitchurch First and Junior School. The Board are in agreement with Harrow Council's key educational factors as set out in its proposal evaluation for joining the schools together.

The Governing Body of Whitchurch Junior School decided in a unanimous vote that it was in the best interests of the children that both schools should amalgamate. Therefore it is the recommendation of the Junior School governing body that both schools should merge.

The responses to the consultation indicate strong agreement with the Council's proposal to amalgamate the Whitchurch schools.

Representations about the statutory proposals

No representations in relation to the statutory proposals were received by Harrow Council by the closing date of the representation period on 2 February 2015. The Governing Bodies of the two schools have responded to the statutory proposals as follows.

Governing Bodies of Whitchurch First School and Nursery and Whitchurch Junior School

The Interim Executive Board (IEB) of Whitchurch First School and Nursery has responded that they are supportive of the proposed amalgamation to take place between Whitchurch First and Junior School. The IEB considers it is the correct decision from an economic perspective as they are in the same building, from a staff perspective in terms of professional development and enhancing teaching and learning and also for the pupils so that they can enjoy a fully supportive primary education without the transition from First to Junior school. The IEB welcome the concept of a newly constituted Governing Body effectively representing all parts and stakeholders of the school.

The Governing Body of Whitchurch Junior School has responded that their views remain unchanged from the views expressed in December 2014 regarding the amalgamation of Whitchurch Junior School with Whitchurch First School and Nursery. The Governing Body of Whitchurch Junior School decided in a unanimous vote that it was in the best interests of the children that both schools should amalgamate.

This page is intentionally left blank

Date of Meeting:	19 February 2015
Subject:	Proposals to amalgamate and expand Welldon Park Infant and Nursery School and Welldon Park Junior School
Key Decision:	Yes
Responsible Officer:	Chris Spencer, Interim Corporate Director Children and Families
Portfolio Holder:	Councillor Simon Brown, Portfolio Holder for Children, Schools & Young People
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	Roxeth
Enclosures:	Appendix 1 – Representations to the statutory proposals Appendix 2 – Considerations about the proposal in relation to the Decision-Makers Guidance Appendix 3 – Letter from the Governing Bodies of Welldon Park Infant and Nursery School and Welldon Park Junior School

Section 1 – Summary and Recommendations

Statutory proposals to amalgamate and expand permanently Welldon Park Infant and Nursery School and Welldon Park Junior School were published on 5 January 2015 for a four week representation period. This report provides information and recommendations to enable Cabinet to determine the statutory proposals.

Recommendations:

Cabinet is requested to approve the statutory proposals to:

1. combine Welldon Park Infant and Nursery School and Welldon Park Junior School on 1 September 2015;
2. expand permanently Welldon Park Infant and Nursery School and Welldon Park Junior School, or the primary school if the schools are combined, by one form of entry (30 pupils) from 1 September 2015.

Reason: (For recommendation)

To implement the Council's Amalgamation Policy and to enable the Local Authority to fulfil its duties to provide sufficient school places in its area.

Section 2 – Report

Introductory paragraph

1. The Council has an Amalgamation Policy that requires separate infant and junior schools to combine when a headteacher vacancy arises in either or both schools unless there are compelling and over-riding reasons not to. The Local Authority has a statutory responsibility to provide sufficient school places for its area.
2. Like many boroughs, Harrow is experiencing significant growth in the pupil population and has been creating additional school places to meet the increased demand since September 2009.
3. The latest school roll projections predict that the increased demand for Reception places will continue at a high level until at least 2023/24. In July 2014, Cabinet agreed to the publication of statutory proposals to expand permanently a third phase of primary schools.
4. The decision sought will help the Council meet its corporate priorities to make a difference for families, communities and the vulnerable by ensuring sufficient school places in its area.

Options considered

5. The Amalgamation Policy was agreed initially in February 2005. The policy subsequently has been revised and up-dated and was confirmed by Cabinet in July 2013.
6. The Policy requires schools to amalgamate unless there are compelling and overriding reasons not to combine. The resignation of

the headteacher of Welldon Park Junior School has triggered the implementation of the Amalgamation Policy.

7. In July 2014, Cabinet agreed to delegate to the interim Corporate Director of Children and Families, in consultation with the Portfolio Holder for Children, Schools and Young People, the decision about the final list of schools that should be moved to the statutory process for permanent expansion.
8. Consultation about the proposed amalgamation and expansion was held from Monday 29 September to Friday 14 November 2014. On 11 December 2014, following consideration of the consultation outcomes, Cabinet approved the publication of statutory proposals. Information about the consultation outcomes is included in Appendix 2 to this report in the section 'Views submitted during the consultation'.
9. Statutory proposals to amalgamate and expand Welldon Park Infant and Nursery School and Welldon Park Junior School were published on 5 January 2015 for a four week representation period which closed on 2 February 2015.
10. Two representations in relation to the statutory proposals were received by Harrow Council by the closing date of the representation period on 2 February 2015. The representations by a resident and by the Governing Bodies are attached as Appendix 1 and Appendix 3 to this report. Commentary about the issues raised in the representations is given in Appendix 2 together with officer comment.
11. The resident respondent expressed their view that the statutory proposals had not been widely circulated and that without the full details of the building option that a full response on the expansion proposal was not possible. The representation is attached as Appendix 1. The main concerns were listed as follows:
 - The close proximity of any new buildings to gardens.
 - The possibility of being overlooked.
 - The disruption the building works may cause.
 - The increase in traffic and parking across drives in a small cul de sac.
 - Impact on saleability and price of property.
 - Noise impact of larger school population.
12. The Governing Bodies of Welldon Park Infant and Nursery School and Welldon Park Junior School submitted a joint response to the proposal for the amalgamation. A copy is at Appendix 3.
13. In their response the Governing Bodies outlined:
 - That the schools are unique being on separate sites and that this was a reason for not amalgamating in November 2009 and nothing had changed. That they felt that the separation of the sites would not secure the financial advantages of amalgamation.

- Their concerns that the consultation was meaning less and that the outcome was a foregone conclusion.
- That both governing bodies were not opposed to the educational amalgamation as such but had serious concerns about the physical constraints of separate sites; the building requirements, financial implications of the loss of the 'lump sum' and the timescale for the appointment of the headteacher for September 2015 with a decision in February. They suggested that any decision to amalgamate should be subject to it not happening unless and until the recruitment of an executive headteacher.
- The Governing Bodies raised their concerns about the uncertainty of the situation for the schools' future and stated that the decision rests with cabinet and therein the responsibility.

There was no reference to the expansion of the two schools.

14. Cabinet has the following options:
- a. Reject the proposals;
 - b. Approve the proposals without modification;
 - c. Approve the proposals with modification;
 - d. Approve the proposals, with or without modification, subject to certain conditions being met.

Recommendation

15. The Corporate Director of Children and Families recommends that Cabinet approves the statutory proposals as published to:
- combine Welldon Park Infant and Nursery School and Welldon Park Junior School on 1 September 2015;
 - expand permanently Welldon Park Infant and Nursery School and Welldon Park Junior School, or the primary school if the schools are combined, by one form of entry (30 pupils) from 1 September 2015.

The combined school would fill incrementally from the point of admission into the school.

16. The reasons for this recommendation include:
- The Governing Bodies supported the proposed expansion in their response to the consultation reported to Cabinet in December 2014.
 - That the Governing Bodies of both schools are not opposed to the educational rationale for amalgamation and this is aligned with the Council's Amalgamation Policy.
 - The issues raised in terms of the school site are being addressed through the site scoping and feasibility study processes. The expansion options are being developed for both sites and now this would be extended to consider the amalgamation.
 - Schools Forum will be considering a Split Site factor for the schools funding formula.

- Officers from Education Strategy and Harrow School Improvement Partnership are supporting both schools and will continue to do so through the amalgamation process.
 - It is very important that there is a clear timeline for the amalgamation process and expansion so that there is clarity about the future. Extended periods of uncertainty are to be avoided and therefore it is proposed that the amalgamation and expansion are implemented with effect from September 2015.
17. Officers acknowledge the points made by the Governing Bodies concerning the recruitment of a Headteacher of the combined school and their suggestion to align amalgamation to the recruitment of a Headteacher. Acting leadership arrangements are in place at both schools which are being supported by the Council and will continue until the end of this academic year. It is intended that following Cabinet's decision the recruitment process for a Headteacher will commence with the appointment taking effect from September. Should there be any delay in recruitment, the existing leadership arrangements will be reviewed and supported accordingly.
18. In relation to the representation from the resident, full officer comment is given in Appendix 2. There will be engagement with local residents as part of the planning application process. At that time, there will be detailed proposals for the development on both sites, outline timelines for the programme and construction. As part of the planning application, the school will be required to submit a School Travel Plan. An independent Transport Assessment will be undertaken and the outcomes of the Transport Assessment would be submitted as part of the planning application.

Performance Issues

19. Schools in Harrow perform well in comparison to national and statistically similar local authorities. The vast majority of primary schools and secondary schools are judged 'good' or 'outstanding' by OfSTED. As at October 2014, 87% of Harrow's primary and secondary schools are judged 'good' or 'outstanding', compared to 85% in London and 80% nationally (Source: Ofsted Data View).
20. The Schools White Paper and Education Act 2011 maintain a focus on driving up standards in schools, and place more of the responsibility with the schools directly for their improvement. The role of the Local Authority in measuring performance and driving improvement has changed significantly and is reduced from its previous level. However, the Local Authority maintains a strategic oversight and enabling role in local education, and is likely to retain some role in monitoring educational achievement and key measures such as exclusions and absence. The Local Authority is also statutorily responsible for supporting and improving underperforming schools.
21. The Local Authority continues to monitor key education indicators. The indicators are used locally to monitor, improve and support education

at both school and local authority level. They are also used within information provided to the DfE.

Year	Key Stage 2	Reading, Writing & Maths L4+	KS1-KS2 Expected Progress - Reading	KS1-KS2 Expected Progress - Writing	KS1-KS2 Expected Progress - Maths
2012	Harrow	79%	91%	93%	90%
	National	74%	90%	90%	87%
2013	Harrow	79%	90%	92%	92%
	National	75%	88%	92%	88%
2014 (P)	Harrow	82%	93%	92%	93%
	National	78%	91%	93%	93%

Source: DfE Statistical First Release, (P) - Provisional

22. The indicators fall within the following areas:

- Attendance and exclusions - remain a statutory duty for the Local Authority to monitor and improve.
- Underperforming schools – schools are assessed at Key Stage 2 & Key Stage 4 against defined floor standards.
- Closing the Gap - is a fundamental part of Ofsted’s school inspection process, and accordingly, the Local Authority monitors the attainment of identified groups of pupils in its schools. The table below includes the gap at key stage 2 between pupils eligible for free school meals and their peers and the gap between Harrow’s SEN children and their peers – children with a SEN provision includes School Action, School Action Plus or a Statement.

2013 Key Stage 2 – Closing the Gap	Harrow	National
Achievement gap between pupils eligible for free school meals and their peers, based on pupils achieving level 4 or above in Reading, Writing and mathematics at Key Stage 2.	17%	19%
Achievement gap between pupils with special educational needs and their peers, based on pupils achieving level 4 or above in Reading, Writing and mathematics at Key Stage 2.	49%	53%

23. There is a complex interrelationship between a number of other performance issues such as traffic congestion, road safety, traffic and parking enforcement and travel plan performance, as referred to earlier in the report, and all these considerations are taken into account in assessing school expansion proposals.

Environmental Impact

24. The Council’s over-arching climate change strategy sets a target to reduce carbon emissions by 4% a year. Schools account for 50% of the council’s total carbon emissions. Reducing emissions from schools is therefore a vital component in meeting the Council’s target. However there is a significant risk that the expansion programme will increase emissions rather than reduce them. Phase 2 of the School

Expansion Programme will have an impact on carbon emissions that will need to be carefully considered in this context.

25. The RE:FIT Schools Programme will be available to retrofit existing school buildings to improve their energy efficiency. For new-build schools, the design standards will need to ensure that they meet high energy use efficiency standards. Of particular importance will be the use of low carbon technologies – particularly for space heating – and these will need to be thoroughly investigated during the design phase.
26. For many of the projects in the school expansion, programme, planning applications will be required and part of the application will be a school travel plan. Through this process and the development of the solutions for the schools, the impact of the additional pupils and their travel modes will be addressed.

Risk Management Implications

27. The directorate and corporate risk management implications for the Council arising from school place planning are included on the directorate and corporate risk registers and are reported regularly to Cabinet in quarterly update reports on the School Expansion Programme.

Legal Implications

28. The Local Authority has a statutory entitlement under Sections 15 and 19 of the Education and Inspections Act 2006, to issue statutory proposals in respect of school reorganisation.
29. The Council has a statutory duty under the Education Act 1996 to ensure the provision of sufficient schools for the provision of primary and secondary education in its area.
30. For maintained schools, there are prescribed requirements in order to make specific alterations. This includes expanding existing schools to add additional form groups. The requirements are set out in the Education and Inspections Act 2006 and associated regulations.
31. New school organisation regulations and associated guidance came into force on 28 January 2014 and the process has been amended to streamline the process. The new statutory requirements and national guidance have been followed when publishing the statutory proposals for the expansion of Welldon Park Infant and Nursery School and Welldon Park Junior School.
32. The statutory guidance on expansion of schools confirms factors which should be taken into account by local authorities when determining proposals. Appendix 2 to this report sets out considerations about the proposal in relation to the Department for Education School Organisation Guidance for proposers and decision-makers.
33. The Council must ensure it meets its public law duties when making

decisions, including meeting its public sector equality duty. It must consider all relevant information, disregard irrelevant information, act in accordance with the statutory requirements and make its decision in a fair and transparent manner.

Financial Implications

34. Any school expansion programme will inevitably have significant financial implications. All schools proposed for expansion have raised concerns about available funding and clarity about funding is essential to maintain their commitment to the School Expansion Programme. School revenue budgets are funded from the Dedicated Schools Grant (DSG). As the Department for Education (DfE) allocates DSG based on pupil numbers, any increase in pupil numbers results in additional revenue funding for the expanding school. The revenue funding is allocated to schools based on the Harrow Schools' Funding Formula. School budgets are based on pupil numbers in the October prior to the start of the financial year, so there is always a funding lag when schools increase their pupil numbers. To ensure that schools who agree to an additional class are not financially penalised, the Harrow School Funding Formula provides 'Additional Class Funding' for the period from September to the end of March, following which the mainstream funding formula will take effect. This ensures that schools have adequate funding for at least the average costs of a teacher and some set up costs.
35. Under the current school funding arrangements, as a combined school there will be loss of one 'lump sum' which each school receives annually as part of its budget. This reduction is implemented over time. In the year following the proposed amalgamation (2016/17) the combined school would receive the equivalent of 85% of two lump sums. This would allow time for the Governing Body to plan for this change which represents a comparatively small amount of the combined school budget (about 5%). Funding efficiencies arising from combining the schools can be used to offset this reduction. The Governing Body and leadership team of a combined school should be able to plan strategically in a cost effective manner in the best interests of the children in order to achieve positive outcomes for the children in the long term. The Schools Forum will consider the introduction of a split site factor as part of the Schools Funding Formula from April 2017 when it may be required after the lump sum reduction has been implemented.

Capital

36. The budget for the school expansion programme, including primary school expansions in Phase 1 and Phase 2 and three expansions at Phase 3, secondary school expansions and provision for pupils with special educational needs (SEN) is £91.788m. Also included in this programme are budget allocations for capital works associated with amalgamations and bulge classes.
37. At its meeting on 16 October 2014, Cabinet delegated authority to use

suitable national or local public sector Framework(s) to:

- a) undertake feasibility studies, surveys and provide professional costs and technical services, and;
- b) design and build / refurbish school facilities.

Following site scoping work to develop initial options, detailed feasibility work has begun to develop design proposals and develop costings.

This work is being progressed before final decisions are made by Cabinet to ensure that the necessary building work could be completed by September 2016 and any necessary interim accommodation requirements could be made for the intake of additional children in September 2015.

38. Based on current estimates and market conditions it is expected that it is possible to deliver this programme with Education Funding Agency capital grants, without the need for council capital funding. If the programme is not deliverable within the current programme then borrowing may be required. This risk is being monitored closely in consultation with Cabinet Members.

Equalities implications / Public Sector Equality Duty

39. Section 149 of the Equality Act 2010 requires that public bodies, in exercising their functions, have due regard to the need to (1) eliminate discrimination, harassment, victimisation and other unlawful conduct under the Act, (2) advance equality of opportunity and (3) foster good relations between persons who share a protected characteristic and persons who do not share it.
40. Equalities Impact Assessments have been undertaken on the proposals to amalgamate and to permanently expand Welldon Park Infant and Nursery School and Welldon Park Junior School. The Equalities Impact Assessments are included in Background Papers. The conclusions of these assessments are that the implications are either positive or neutral in that the amalgamation and expansion of the schools will help to ensure all children in Harrow have access to a high quality school place. The assessments have not identified any potential for unlawful conduct or disproportionate impact and conclude that all opportunities to advance equality are being addressed.
41. Harrow's schools are successful, inclusive and provide a diversity of provision. The school expansion programme will ensure sufficient school places for the increasing numbers of children in Harrow and will build on the successful provision that already exists in Harrow's schools. By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.

Council Priorities

42. The Council's vision is: **Working Together to Make a Difference for Harrow.**
43. The Council Priorities are as follows:

- Making a difference for the vulnerable
- Making a difference for communities
- Making a difference for local businesses
- Making a difference for families

44. The recommendation supports these priorities by:
- Ensuring Harrow Council fulfils its statutory duties to provide sufficient school places in its area.
 - Providing high quality local mainstream and special educational need provision in schools for children close to where they live.
 - Providing opportunities to enhance educational standards and to further promote positive community outcomes by ensuring the most effective use of school facilities and coordinated extended services support to families and children.

Section 3 - Statutory Officer Clearance

Name: Jo Frost	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 21 January 2015		
Name: Sarah Wilson	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 21 January 2015		

Ward Councillors notified:	YES
EqIA carried out:	YES
EqIA cleared by:	Corporate Equalities Impact Assessment Quality Assurance Group

Section 4 - Contact Details and Background Papers

Contact: Johanna Morgan, Education Lead School Organisation,
020 8736 6841 johanna.morgan@harrow.gov.uk

Background Papers: Equalities Impact Assessments on the proposed amalgamation and expansion of Welldon Park Infant and Nursery School and Welldon Park Junior School

**Call-In Waived by the
Chairman of Overview
and Scrutiny
Committee**

NOT APPLICABLE

[Call-in applies]

This page is intentionally left blank

Representations to the statutory proposals about the Welldon Park schools

The Statutory Proposals to combine and expand Welldon Park Infant and Nursery School and Welldon Park Junior School were published on 5 January 2015 for a four week representation period which ended on 2 February 2015.

One representation was received by email from a resident whose property backs onto Welldon Park Junior School objecting to the expansion of the school

Email from a resident dated 27 January 2015

I am writing in response to the Statutory Proposals for the expansion of Welldon Park School.

I would like to comment firstly that it does not seem to have been widely publicised to local residents, that this representation period for comment on the proposals is in fact open. As you are aware from the meetings attended by local residents, it has been very difficult to comment on the expansion proposals due to the lack of information on building and site plans. Therefore we could not give our full views to be considered at consultation stage. Although there were not a huge number of written replies by residents to the proposals, those nearest to the school (including ourselves) I believe may be greatly affected by the expansion.

I understand that the following will now take place:

- A decision by Cabinet on 19th February, whether to proceed with the expansion – taking any comments into account (even though they are comments without access to all the facts on build).
- Site scoping to finish at the end of term.
- A pre planning engagement with residents.
- Statutory Planning timeframe – representation by residents.

As our property backs onto Welldon Park Middle School, it is vital that we are made aware of all the timescales in relation to the expansion in order that we can make our views known and have them listened to and for them to influence the final decision on the planning of any expansion.

In particular we are concerned about:

- The close proximity of any new buildings to our small back garden.
- The possibility of being overlooked by any build upwards.
- The disruption the building works may cause.
- The increase in traffic and parking across drives in our small cul de sac.
- Impact on saleability and price of our property.
- Noise impact of larger school population.

I should be grateful if you would put my concerns to Cabinet for consideration, however I feel that without access to information on the planning proposals, no actual decision on whether to go ahead should be made at Cabinet on 19th February, as it may be that none of

the planning proposals are acceptable to residents. The Council are expecting residents to comment on the Proposal without all the relevant information.

Without all the relevant information, I can only object to the expansion of the school.

Please acknowledge receipt of this response and advise me of all the timescales for comments on planning proposals once they are known to you.

Considerations about the proposal in relation to the Decision-Makers Guidance

The decision maker for these statutory proposals is the local authority, and this report presents the proposals to Cabinet for determination. If the local authority fails to decide proposals within two months of the end of the representation period the local authority must forward proposals, and any received representations, to the Office of the Schools Adjudicator for decision. This two month period will end on 2 April 2015.

Decision Makers are required to have regard to guidance issued by the Secretary of State when they take a decision on proposals. New school organisation regulations and associated guidance came into force on 28 January 2014. The guidance documents are available at <https://www.gov.uk/government/publications/school-organisation-maintained-schools>.

The document 'Annex B: Guidance for Decision-makers' sets out some the factors that decision-makers should consider when deciding a proposal. These factors are not exhaustive and the importance of each will vary depending on the type and circumstances of the proposal. All proposals must be considered on their individual merits.

The format of this Appendix follows the framework of the Annex B guidance.

- The headings and text in italics at the start of each section contains extracts from the guidance that are directly relevant to the statutory proposals to assist Members to understand the factors to be considered.
- The text beneath the extracts in each section contains officer comment in relation to the factors.

Consideration of consultation and representation period

The decision-maker will need to be satisfied that the appropriate consultation and/or representation period has been carried out and that the proposer has had regard to the responses received. If the proposer has failed to meet the statutory requirements, a proposal may be deemed invalid and therefore should be rejected. The decision-maker must consider all the views submitted, including all objections to and comments on the proposal.

Consultation about the proposals to combine and expand Welldon Park Infant and Nursery School and Welldon Park Junior School was conducted from Monday 29 September to Friday 14 November 2014. The consultation responses and outcomes (see 'Views submitted during the consultation' section below) were reported to Cabinet on 11 December 2014 when making the decision to publish statutory proposals.

Statutory proposals to expand to combine and expand Welldon Park Infant and Nursery School and Welldon Park Junior School were published on 5 January 2015 for a four week representation period which closed on 2 February 2015. In order to make the nature of the proposals explicit and clear for all stakeholders, the brief notice and the full proposals stated as full information as possible. It is considered that all necessary information was provided and made available for stakeholders and interested parties to see.

The brief notice and full proposals were developed with close reference to the Government guidance. It is considered that the published brief notice and full proposals comply with the statutory requirements.

Education standards and diversity of provision

Decision-makers should consider the quality and diversity of schools in the relevant area and whether the proposal will meet or affect the aspirations of parents, raise local standards and narrow attainment gaps.

The decision-maker should also take into account the extent to which the proposal is consistent with the government's policy on academies as set out on the department's website.

Quality of schools

Schools in Harrow perform well in comparison to national and statistically similar local authorities. The vast majority of primary schools and secondary schools are judged 'good' or 'outstanding' by OfSTED. As at October 2014, 87% of Harrow's primary and secondary schools are judged 'good' or 'outstanding', compared to 85% in London and 80% nationally (Source: Ofsted Data View).

Diversity of schools

There is a range of schools in Harrow offering diversity to parents both in terms of ethos and size. Harrow has a Church of England primary school, a Hindu primary school, a Jewish primary school, six Roman Catholic primary schools and two Roman Catholic high schools. Primary sector schools are organised as separate and combined infant and junior schools and have a range of planned admission numbers from one to four forms of entry.

Harrow is committed to securing greater autonomy, flexibility and scope for schools to drive their own agendas within a collaborative whole-borough framework. Harrow's success in this approach is demonstrated through the Harrow School Improvement Partnership and the Harrow Collegiate.

The community of Harrow schools has a tradition of collaboration and cooperation and is confident to develop and embrace innovative solutions. Within this context the local authority, in partnership with schools, will continue to explore routes that provide creative and innovative solutions for challenges faced by individual schools and groups of schools, and provide a means to secure school improvement.

Two primary schools established an academy trust to drive improvements in education attainment. Another primary school joined an academy trust with a high school.

Aspirations of parents

The responses to the consultation undertaken on Phase 2 school expansion proposals in September – October 2013 indicate broad agreement with the Council's approach to creating additional school places in Harrow. Over 60% of respondents agreed with the Council's approach to creating additional school places in Harrow.

94 responses to the consultation were received from parents and staff of Welldon Park Infant and Nursery School and Welldon Park Junior School on the proposals to combine and expand the two schools were:

- 36% of responses supported the amalgamation proposal; 57% opposed it and 7% were unsure.
- 58% supported expansion to 3FE; 26% opposed it and 15% were unsure.

15 responses to the expansion consultation online were received:

- 53% of responses agreed with the approach to creating additional school places in Harrow; 40% disagreed and 7% were unsure.
- 24% agreed with the proposal to permanently expand the Welldon Park Schools; 67% opposed it and 7% were unsure.

The consultation responses from the school communities supported the proposed expansion. Over one third supported amalgamation, though over half were opposed.

The response level of 109, from the school communities and online, needs to be viewed in the context of over 900 consultation papers being distributed:

- over 400 consultation papers distributed to the school communities;
- 500 consultation papers distributed to local residents.

Also the publicising of the online consultation response portal on the Harrow Council website.

The consultation responses and outcomes are summarised in the 'Views submitted during the consultation' section below. Members need to consider all the factors in the government guidance when making their decision.

Raise local standards and narrow attainment gaps

A key principle identified by officers and representative primary headteachers in the work to develop expansion proposals was the maintenance of high quality education standards, and all schools with council support as necessary will work to ensure high education standards are promoted through the expansions. The governing bodies and senior leadership teams of the schools will ensure appropriate structures are in place to manage the increased numbers of pupils and deliver the curriculum.

Suitable accommodation and facilities will be provided to accommodate the increased pupil numbers. Revenue funding is based on pupil numbers and the funding for increased numbers of pupils can enable opportunities for schools to be creative in use of resources to promote pupils' learning.

Closing the Gap is a fundamental part of Ofsted's school inspection process, and accordingly, the Local Authority monitors the attainment of identified groups of pupils in its schools.

Government policy on academies

The Government's policy on academies is not directly applicable to these amalgamation and expansion proposals. The amalgamation proposal does not create a new school which is when the 'academy presumption' applies. The governing body of schools are at liberty to consider conversion to academy school status regardless of whether the school is expanded or not.

Demand

In assessing the demand for new school places the decision-maker should consider the evidence presented for any projected increase in pupil population (such as planned housing developments) and any new provision opening in the area (including free schools).

The decision-maker should take into account the quality and popularity of the schools in which spare capacity exists and evidence of parents' aspirations for a new school or for places in a school proposed for expansion. The existence of surplus capacity in neighbouring less popular schools should not in itself prevent the addition of new places.

Reducing surplus places is not a priority (unless running at very high levels). For parental choice to work effectively there may be some surplus capacity in the system as a whole.

Competition from additional schools and places in the system will lead to pressure on existing schools to improve standards.

The Greater London Authority (GLA) prepares the pupil projections for Harrow Council. The GLA uses a range of information and data to prepare the projections including the number of births, number of pupils in Harrow schools, migration to Harrow and new housing development. Across London the population is growing, and the main reason for this is increasing birth rate.

The demand for Reception class places (for pupils reaching 5 years of age) in Harrow schools is increasing:

- In January 2006 there were 2,224 Reception aged pupils in Harrow schools;
- In January 2013 there were 2,879 Reception aged pupils in Harrow schools;
- In January 2014 there were 3,030 Reception aged pupils in Harrow schools;
- In January 2016 it is projected there will be 3,463 Reception aged pupils in Harrow schools.

To ensure sufficient school places to meet the increased demand, temporary additional Reception classes have been opened since 2009. In order to meet the actual and predicted increased demand in the next few years there is a need to increase the number of permanent school places, in the primary sector initially and in the secondary sector in due course. Additional places are also required to meet increased demand for provision to meet special educational need.

In September 2012 there were a total of 2,550 permanent Reception class places in Harrow's primary sector schools. Phase 1 of the primary school expansion programme was implemented in September 2013 with 8 schools in the borough permanently increasing their Reception intakes. In September 2015, when all the Phase 2 schools are expanded, there will be 3,240 permanent Reception places.

In order to ensure sufficient school places to meet the predicted increased demand by September 2016, Harrow needs to increase the number of permanent Reception places by at least a further 300 places to a total of 3,540. The Phase 3 proposals, that include Welldon Park Infant and Nursery School and Welldon Park Junior School, aim to ensure sufficient school places at the right time and in the right location to meet the increased demand up to 2016/17. Full information about the projected demand for school places and the planning to increase school places across Harrow can be viewed in the 17 July 2014 Cabinet papers (item 21 School Expansion Programme Appendix B) at

<http://www.harrow.gov.uk/www2/ieListDocuments.aspx?CId=249&MId=62354&Ver=4>

School size

Decision-makers should not make blanket assumptions that schools should be of a certain size to be good schools, although the viability and cost-effectiveness of a proposal is an important factor for consideration. The decision-maker should also consider the impact on the LA's budget of the need to provide additional funding to a small school to compensate for its size.

Harrow's school expansion programme is very significant and is expected to involve all schools in opening additional classes on either a permanent or temporary basis. Over half the primary schools in Harrow will be permanently expanded by the end of the school expansion programme.

School revenue budgets are funded from the Dedicated Schools Grant (DSG). As the Department for Education (DfE) allocates DSG based on pupil numbers, any increase in pupil numbers results in additional revenue funding for the expanding school. The revenue funding is allocated to schools based on the Harrow Schools' Funding Formula. School budgets are based on pupil numbers in the October prior to the start of the financial year, so there is always a funding lag when schools increase their pupil numbers. To ensure that schools who agree to an additional class are not financially penalised, the Harrow School Funding Formula provides 'Additional Class Funding' for the period from September to the end of March, following which the mainstream funding formula will take effect. This ensures that schools have adequate funding for at least the average costs of a teacher.

Proposed admission arrangements (including post-16 provision)

In assessing demand the decision-maker should consider all expected admission applications, not only those from the area of the LA in which the school is situated.

Before approving a proposal that is likely to affect admissions to the school the decision-maker should confirm that the admission arrangements of the school are compliant with the School Admissions Code. Although the decision-maker cannot modify proposed admission arrangements, the decision-maker should inform the proposer where arrangements seem unsatisfactory and the admissions authority should be given the opportunity to revise them.

No changes to admission arrangements arise from these proposals. Welldon Park Infant and Nursery School and Welldon Park Junior School are community schools that draw pupils from their local area. The admission arrangements of the schools are compliant with the School Admissions Code and would remain so as a combined school.

No changes to post-16 provision arise from the proposals.

National Curriculum

All maintained schools must follow the National Curriculum unless they have secured an exemption for groups of pupils or the school community.

Welldon Park Infant and Nursery School and Welldon Park Junior School follow the National Curriculum and no changes to this arise from these proposals.

Equal opportunity issues

The decision-maker must have regard to the Public Sector Equality Duty (PSED) of LAs/governing bodies, which requires them to have 'due regard' to the need to:

- *eliminate discrimination;*
- *advance equality of opportunity; and*
- *foster good relations.*

The decision-maker should consider whether there are any sex, race or disability discrimination issues that arise from the changes being proposed, for example that where there is a proposed change to single sex provision in an area, there is equal access to single sex provision for the other sex to meet parental demand. Similarly there should be a commitment to provide access to a range of opportunities which reflect the ethnic and cultural mix of the area, while ensuring that such opportunities are open to all.

Equalities Impact Assessments have been undertaken on the proposals to combine and permanently expand Welldon Park Infant and Nursery School and Welldon Park Junior School. The conclusions of these assessments are that the implications are either positive or neutral in that the combining and expansion of the schools will help to ensure all children in Harrow have access to a high quality school place. The assessments have not identified any potential for unlawful conduct or disproportionate impact and conclude that all opportunities to advance equality are being addressed.

Harrow's schools are successful, inclusive and provide a diversity of provision. The school expansion programme will ensure sufficient school places for the increasing numbers of children in Harrow and will build on the successful provision that already exists in Harrow's schools.

Community cohesion

Schools have a key part to play in providing opportunities for young people from different backgrounds to learn with, from and about each other; by encouraging, through their teaching, an understanding of, and respect for, other cultures, faiths and communities. When considering a proposal, the decision-maker must consider its impact on community cohesion. This will need to be considered on a case-by-case basis, taking account of the community served by the school and the views of different sections within the community.

These are community schools which draw pupils from their local area and the pupil profiles reflect the ethnicity of their area. The October 2014 School Census demonstrates that the schools have an ethnically diverse pupil population.

Travel and accessibility

Decision-makers should satisfy themselves that accessibility planning has been properly taken into account and the proposed changes should not adversely impact on disadvantaged groups.

The decision-maker should bear in mind that a proposal should not unreasonably extend journey times or increase transport costs, or result in too many children being prevented from travelling sustainably due to unsuitable walking or cycling routes.

A proposal should also be considered on the basis of how it will support and contribute to the LA's duty to promote the use of sustainable travel and transport to school.

There would be no change to travel or transport arrangements arising from this amalgamation proposal because all the pupils attending the schools at the time of implementation would transfer to the combined school.

Schools that are proposed for expansion are located around the borough so that additional school places are available locally to where the children live. This approach minimises distances that children and parents have to travel to school and serves to promote accessibility. This helps to limit the need for car use by parents at the beginning and end of the school day. As far as possible, it is believed the schools chosen for expansion would be a popular choice amongst parents wishing to secure a place at their local schools.

The schools proposed for expansion, as is the case at many schools in Harrow, already have a degree of traffic and congestion issues from the current school intake and the expansions will exacerbate the problems if no mitigating measures are taken. To minimise the impact of the additional pupils a cross-council approach has been adopted to bring officers together from the

Children & Families and Environment & Enterprise directorates to work with schools and local residents. Transport Assessments at schools approved for expansion and Transport Statements at additional special educational needs place provision are undertaken and are submitted as part of the planning application for building work at the schools. Particular emphasis is being given to School Travel Plans as a means of focusing attention of the issues and to seek to bring about change in people's behaviour in delivering and collecting children.

Capital

The decision-maker should be satisfied that any land, premises or capital required to implement the proposal will be available and that all relevant local parties (e.g. trustees or religious authority) have given their agreement. A proposal cannot be approved conditionally upon funding being made available.

Where proposers are relying on the department as the source of capital funding, there can be no assumption that the approval of a proposal will trigger the release of capital funds from the department, unless the department has previously confirmed in writing that such resources will be available; nor can any allocation 'in principle' be increased. In such circumstances the proposal should be rejected, or consideration deferred until it is clear that the capital necessary to implement the proposal will be provided.

If these statutory proposals are approved, the Welldon Park schools would require building work to be undertaken to provide appropriate accommodation for the additional children.

Initial site scoping work at the Welldon Park schools has been undertaken by architects to identify potential design options to accommodate the additional children if the schools are approved for expansion.

Detailed feasibility work will be undertaken to develop the design proposal that will be subject to open pre-planning engagement with the school community and local residents so comments can be taken into account and influence the final design that is submitted in the planning application. This feasibility work would ensure that the necessary building work could be completed by September 2016 and any necessary interim accommodation requirements could be made for the intake of additional children in September 2015.

The budget for the school expansion programme, including primary school expansions in Phase 1 and Phase 2 and three expansions at Phase 3, secondary school expansions and provision for pupils with special educational needs (SEN) is £91.788m.

Based on current estimates and market conditions it is expected that it is possible to deliver this programme with Education Funding Agency capital grants, without the need for council capital funding. If the programme is not deliverable within the current programme then borrowing may be required. This risk is being monitored closely in consultation with Cabinet Members.

School premises and playing fields

Under the School Premises Regulations all schools are required to provide suitable outdoor space in order to enable physical education to be provided to pupils in accordance with the school curriculum; and for pupils to play outside safely.

Guidelines setting out suggested areas for pitches and games courts are in place although the department has been clear that these are non-statutory.

Government regulations and guidelines are considered in relation to all the schools proposed for expansion in the school expansion programme when undertaking the design work to accommodate the additional pupils. All schools are considered in the same fair and transparent manner when identifying the design for building works. The current school facilities are considered against Building Bulletin 103 to analyse any current and potential shortfalls. Full consideration is given to suitable outdoor and indoor space in order to enable physical education to be provided to pupils in accordance with the school curriculum; and for pupils to play outside safely.

Closure proposals (under s15 EIA 2016)

The decision-maker should be satisfied that there is sufficient capacity to accommodate displaced pupils in the area, taking into account the overall quality of provision, the likely supply and future demand for places. The decision-maker should consider the popularity with parents of the schools in which spare capacity exists and evidence of parents' aspirations for those schools.

The proposed legal closure of Welldon Park Junior School is to effect the amalgamation of the two Welldon Park schools and does not displace any pupils. It is also proposed to expand the school(s) by one form of entry to ensure there are sufficient places for the additional children living in the area. All the pupils attending the schools at the time of amalgamation would transfer to the combined school. The combined school would have the same number of pupils overall as the two separate schools.

Schools causing concern

For all closure proposals involving schools causing concern, copies of the Ofsted monitoring letters for the relevant schools should be made available. Decision-makers should have regard to the length of time the school has been in special measures, requiring improvement or otherwise causing concern. The decision-maker should also have regard to the progress the school has made, the prognosis for improvement, and the availability of places at other existing or proposed schools within a reasonable travelling distance. There is a presumption that these proposals should be approved, subject to checking that there are sufficient accessible places of an acceptable standard available to accommodate displaced pupils and to meet foreseeable future demand for places in the area.

This section of the Department for Education Guidance for Decision-makers is written on the premise that a school may be closed for because it has been made subject to special measures. This is not applicable to these proposals. Harrow Council's Amalgamation Policy is being implemented and the discontinuing of Welldon Park Junior School has been triggered by the resignation of the headteacher.

Community Services

Some schools may be a focal point for family and community activity, providing extended services for a range of users, and its closure may have wider social consequences. In considering proposals for the closure of such schools, the effect on families and the community should be considered. Where the school is providing access to extended services, provision should be made for the pupils and their families to access similar services through their new schools or other means.

Harrow's schools view themselves as serving their local communities and the amalgamation and expansion proposals would not change this. Indeed, by meeting the increased demand in their local area, the schools would reinforce their position at the heart of their communities.

Views submitted during the consultation

Consultation was held from Monday 29 September for six weeks closing on Friday 14 November 2014. Consultation was held at the same time on both the amalgamation and the expansion proposals. 109 responses were received to the consultation. Separate consultation questions were given to the school communities from those given to local residents because the amalgamation proposal was not relevant to the local residents without children attending the schools.

- 94 responses were received to the consultation questions for the school communities.
- 15 responses were received to the consultation questions for residents

A number of comments were included with the responses given and these are themed below with officer response.

Responses from the school communities to the consultation questions about amalgamation and expansion

Questions were asked in the consultation about the two proposals. They were:

- "Proposal One: Welldon Park Infant and Welldon Park Junior School are joined together to form one combined school on 1 Sept. 2015."
- "Proposal Two: To expand the school(s) to three forms of entry (90 places) with effect from 1 September 2015."

Both questions offered the option to respond 'Yes', 'No', or 'Not Sure' to each question. Opportunity was given for comments to be added after each question if the respondent wished to do so.

The following tables provide overall responses to the consultation questions.

Proposal One: Welldon Park Infant and Welldon Park Junior School are joined together to form one combined school on 1 Sept. 2015.

Please tick the relevant box to give your view

	Junior	Infant	Total (94)
I support combining the two schools	16	18	34 (36%)
I want the schools to stay separate	21	33	54 (57%)
I am not sure	5	1	6 (7%)

Proposal Two: To expand the school(s) to three forms of entry (90 places) with effect from 1 September 2015.

Please tick the relevant box to give your view (Note: 91 responses made to this question)

	Junior	Infant	Total (91)
I support expansion to three forms of entry as either combined or separate schools	25	28	53 (58%)
I do not support expansion to three forms of entry as either combined or separate schools	10	14	24 (26%)
I am not sure	6	8	14 (15%)

*Respondents were invited to indicate their interest by ticking **all** applicable boxes:*

	Junior	Infant	Total

Infant School parent	6	34	40 (34%)
Junior School parent	20	2	22 (18%)
Parent in both schools	13	13	26 (22%)
Member of staff in Infant School	3	6	9 (8%)
Member of staff in Junior School	13	4	17 (14%)
Other interested stakeholder	3	2	5 (4%)
<i>Note: Some multiple interests were indicated</i>	58	61	119

36% of responses supported the amalgamation proposal; 57% opposed it and 7% were unsure. 58% supported expansion to 3FE; 26% opposed it and 15% were unsure.

Responses from local residents to the consultation questions about expansion

Two questions were asked in the consultation. They were:

- “Do you agree with the approach to creating additional school places in Harrow?”
- “Do you agree with the proposal to permanently expand the Welldon Park Schools?”

Both questions offered the option to respond ‘Yes’, ‘No’, or ‘Not Sure’ to each question.

Opportunity was given for comments to be added after each question if the respondent wished to do so.

The following tables provide overall responses to the consultation questions.

The overall responses to Question 1 were:

Question 1: “Do you agree with the approach to creating additional school places In Harrow?”

Response	Number	Percentage
Yes	8	53.33%
No	6	40.00%
Not Sure	1	6.67%
Total	15	100%

The overall responses to Question 2 were:

Question 2: “Do you agree with the proposal to permanently expand the Welldon Park Schools?”

Response	Number	Percentage
Yes	4	23.67%
No	10	66.67%
Not Sure	1	6.66%
Total	15	100%

The response to the statutory consultation questions by respondent type is as follows.

Numbers Overall	
Harrow Resident	10
Parent/Carer	3
Pupil	0
School Staff	2
School Governor	0

Other	0
Blank	0
Total	15

The responses by respondent type for the first consultation question were as follows:

Do you agree with the approach to creating additional school places in Harrow?	Harrow Resident	Parent / carer	School Staff	Total
Yes	5	2	1	8
No	5	0	1	6
Not Sure	0	1	0	1
Totals	10	3	2	15

The responses by respondent type for the second consultation question were as follows:

Do you agree with the approach to permanently expand Welldon Park Infant and Junior Schools?	Harrow Resident	Parent / carer	School Staff	Total
Yes	3	1	0	4
No	6	2	2	10
Not Sure	1	0	0	1
Totals	10	3	2	15

Just over half the responses made to the first consultation question indicate agreement with the Council's approach to creating additional school places in Harrow.

Two thirds of the respondents to the second consultation question disagree with the Council's proposal to expand the Welldon Park schools, and just over a quarter agree with the proposal.

The response level of 15 needs to be viewed in the context of 500 consultation papers distributed to local residents. Also the publicising of the online consultation response portal on the Harrow Council website.

Other responses to the consultation

Governing Bodies

The Governing Body of Welldon Park Infant and Nursery School and the Governing Body of Welldon Park Junior School wrote a joint statement in response to the statutory consultation. The Governing Bodies recommended that the schools should not be combined and recommended that in principle the schools should be expanded.

Other responses

A letter was received from the staff of Welldon Park Infant & Nursery School in response to the statutory consultation stating disagreement with the proposal for amalgamation as a split site primary school and disagreeing that consultation should be taking place regarding expansion at the same time. The staff strongly believe alternative school models should be considered. Their preferred model for the school is an all through primary school with specialist provision for SEN on the present school site. The justification for their views is set out in the letter.

A junior school parent emailed some queries about the process and response mechanism of the consultation. Officer reply was given to the queries.

Officer response to the consultation comments

The six main themes in consultation comments and responses relate to:

- Lack of information about buildings and implications for residents;
- Other alternatives should be considered;
- The schools do well as they are - preference that they remain separate schools;
- The schools are already full to capacity;
- Traffic and congestion issues;
- Concerns about split site.

Lack of information about buildings and implications for residents

Information about the proposed expansion of the Welldon Park schools was sent to 500 residents in properties adjoining the school sites and along approach streets and included invitation to attend the consultation meeting for residents on 23 October 2014. This action was taken deliberately to give early information to residents about the proposal and so residents' perspectives can be taken into account from the outset. Inevitably, detailed information could not be given about the building arrangements if expansion is approved because site scoping work needs to be undertaken. However, the comments and issues stated by residents have been noted for consideration by Cabinet and these would inform the building design proposals should the expansion be approved.

The initial site scoping was completed by the end of December and was undertaken by the Council with the schools. Options will be developed for detailed feasibility work to develop design solutions to meet the requirements. This process will be undertaken in partnership with the school(s).

Other alternatives should be considered

Comments were made that it has been confusing to have consultation about the amalgamation and expansion proposals at the same time. Also, that there are alternative proposals that could be considered.

It is important to have clear proposals so that the consultation is not confusing. Harrow Council has an Amalgamation Policy and the consultation proposal is to amalgamate the two schools in accordance with the policy. The Council believes this is the best model for a primary school. The Steering Group included additional information about other models of school organisation for example, federation, and academy status.

Harrow Council also has a School Expansion Programme. Harrow Cabinet has approved that Phase 3 school expansion proposals be brought forward to meet the increased demand for places in 2015 and 2016. It is expedient to consult about both proposals at the same time rather than in close proximity to each other. Consultation at the same time on amalgamation and expansion proposals has occurred also at the Weald schools.

Some preference has been expressed for two separate primary schools to be created at the Welldon Park school sites to meet the increasing demand for school places. Although two additional forms of entry are projected to be needed in the South West Primary Planning Area within which the Welldon Park schools are located, there is not the demand for these additional forms of entry to be provided at the one location. Additional places are opened as local to the demand as possible to minimise any need for parents to use cars to take their children to and from school, and expansion by a form of entry at a different school location will be sought.

Additional considerations are:

- two community primary schools beside each other would have the potential to introduce unhelpful competition;

- concerns have been raised in consultation responses about the congestion on the road infrastructure for the proposed expansion of one form of entry, which can be expected to be heightened if a doubling of pupils was proposed;
- the capital costs of creating two primary schools are likely to be comparatively high.

The proposal that one of the schools could be a one form entry is not considered to be the most efficient form of school organisation. Although small schools do perform well, they are very susceptible to changes to funding and have little capacity to develop economies of scale as single entities.

For transparency, other school organisation options were outlined in the consultation document distributed to parents and staff that the working group had investigated. Also, at the parent consultation meetings, addresses giving alternative perspectives were made by the Headteacher of Welldon Park Infant and Nursery School and by the Chair of Governors of Welldon Park Junior School. During the consultation it was pointed out that comments on other models could be made and responses in other formats e.g. email or letters would also be accepted, and this has occurred.

The schools do well as they are - preference that they remain separate schools

Amalgamation is about combining two schools organisationally while preserving and building on what works well at each school. Achieving high educational standards and preserving ethos that is in the children's interests will be key focus of the governing body and leadership team of a combined school. A combined school enables the curriculum for the whole primary phase to be planned and delivered under one leadership. This provides continuity for the pupils throughout their primary education. It is of note that the governing bodies of the two schools have put forward options around extending the age range of each school to provide a primary school, therefore the concern does not appear to be about primary provision under one head teacher and governing body, but more about the individual schools amalgamating.

The schools are already full to capacity

Site scoping work has been undertaken and architects have made an assessment of the current buildings and compared them to the government's area guidance for a three form entry school and for the proposed amalgamation. This work is intended to ensure that there is sufficient and appropriate space for additional children on the school sites. The two schools sites are very different in their current buildings and accommodation and therefore the solutions will be site specific.

Points were made at the infant school parent consultation meeting that only two additional classrooms would be needed at the infant school site. Architects could perhaps look into the possibility of a second storey. The school were able to work around the hall space when there were 60 more children at the school before the changes in the age of transfer in September 2010 that led to the move from first and middle schools in Harrow.

The architects gave further feedback to the schools about site scoping options before the end of last term.

Traffic and congestion issues

The concerns expressed about traffic congestion, parking and road safety in the area are fully recognised and are the consistent major theme arising from the expansion consultations. To minimise the impact of the additional pupils attending the schools proposed for expansion, a cross-council approach is being implemented. This approach brings officers together from Children and Families, Enterprise and Environment and Communications to co-ordinate work.

Additional resource has been committed to ensure an appropriate profile to all the school expansion projects in particular.

- Transport Assessments are being undertaken at each of the schools proposed for expansion. The assessments provide an independent view of the proposals by reviewing baseline information about current traffic volumes and current issues and make recommendations about any impact as well as setting out any actions required. The assessments take account of the consultation responses already received.
- A Transport and Travel Planner Officer for the expansion projects works with schools to develop and implement effective travel strategies in conjunction with the schools. This is a key role in influencing and engaging with all stakeholders to change attitudes to travel through the review and the development of School Travel Plans in order to minimise the use of private car travel to the school, particularly by parents. This role also liaises with the Highways, Traffic Management and Enforcement teams to ensure that any necessary engineering work and enforcement action, including Safer Neighbourhood Teams, is provided in line with the travel plans developed. This officer is also involved in the pre-planning engagement activities and input into the planning applications.
- The Transport Assessment and School Travel Plans are submitted as part of the planning applications.
- There is a communication strategy for the expansion projects which includes raising the profile of school travel planning. Additional Communications officer time gives communication and engagement work a high profile.
- Parking enforcement officers visit the areas of all schools in Harrow and issue tickets when applicable. Two automatic number plate recognition CCTV cars have been introduced to reinforce enforcement work. They are dedicated to schools exclusively.

This proposal would require a building programme, for which planning permission would be needed. If an application is submitted, a decision on this will be a matter for the Planning Committee. This committee will consider highways and traffic concerns and the impact of the development on the local area. Residents and parents who believe they are impacted by this decision are entitled to make representations to the planning committee during the statutory planning consent timescales.

Concerns about split site

The governing bodies raised a concern about an amalgamated school on split sites and in particular the funding for this. Whilst it is true that all other amalgamations of primary schools in Harrow have been on one site, there is evidence of one head teacher and one governing body leading schools on different sites. Specifically, the hard federation of Heathland and Whitefriars worked successfully prior to conversion of the schools to academy status. Other schools in London and other areas have amalgamated on separate sites.

A combined school would receive a budget calculated in accordance with Harrow's funding formula, which is primarily based on an amount per pupil. In accordance with the Schools Funding Formula, as a combined school, there would be the loss of one 'lump sum' which currently totals £154,230 annually.

This would put the combined school in the same position as existing all-through primary schools over time. If the schools were to combine, in the first year, the two separate school budgets would be brought together.

In the year following the proposed amalgamation (2016/17) the combined school would receive the equivalent of 85% of two lump sums. This would allow time for the Governing Body to plan

for this change which represents a comparatively small amount of the combined school budget (about 5%). Funding efficiencies arising from combining the schools can be used to offset this reduction. The Governing Body and leadership team of a combined school should be able to plan strategically in a cost effective manner in the best interests of the children in order to achieve positive outcomes for the children in the long term.

It should also be noted that there is currently no provision in the School Funding Formula for split site schools as this is not relevant to Harrow. However, the Schools Forum will consider this funding element from April 2017 when it may be required after the lump sum reduction has been implemented.

Over time, other amalgamated schools have found that there have been efficiencies generated as a combined school including one Headteacher salary and shared back office functions. In general larger schools have greater economies of scale and capacity to deal with financial pressures and to be more flexible and creative with their funding although some of these savings will be more difficult to achieve on a split site.

Representations about the statutory proposals

Two representations in relation to the statutory proposals were received by Harrow Council by the closing date of the representation period on 2 February 2015. The representations by a resident and by the Governing Bodies are attached as Appendix 1 and Appendix 3 to this report. Commentary about the issues raised in the representations is given below together with officer comment.

Governing Bodies of Welldon Park Infant and Nursery School and Welldon Park Junior School

A joint response from the Governing Bodies was submitted and a copy is at Appendix 3. In their response the Governing Bodies outlined their concerns about amalgamation:

- That the schools are unique being on separate sites and that this was a reason for not amalgamating in November 2009 and nothing had changed. That they felt that the separation of the sites would not secure the financial advantages of amalgamation.
- Their concerns that the consultation was meaning less and that the outcome was a foregone conclusion.
- That both governing bodies were not opposed to the educational amalgamation as such but had serious concerns about the physical constraints of separate sites; the building requirements, financial implications of the loss of the 'lump sum' and the timescale for the appointment of the headteacher for September 2015 with a decision in February. They suggested that any decision to amalgamate should be subject to it not happening unless and until the recruitment of an executive headteacher.
- The Governing Bodies raised their concerns about the uncertainty of the situation for the schools' future and stated that the decision rests with Cabinet and therein the responsibility.

There was no reference to the expansion of the two schools.

Officer comment about the joint response by the Governing Bodies of Welldon Park Infant and Nursery School and Welldon Park Junior School

The Governing Bodies supported the proposed expansion in their response to the consultation reported to Cabinet in December 2014. The demand for places in the South West Primary Planning Area continues and this expansion would contribute to meeting this demand.

It is noted that the Governing Bodies of both schools are not opposed to the educational rationale for amalgamation and this is aligned with the Council's Amalgamation Policy. The Council's Amalgamation Policy is based on an educational rationale and it is considered that the educational benefits will be achieved across two sites.

The issues raised in terms of the school site are being addressed through the site scoping and feasibility study processes. The expansion options are being developed for both sites and now this would be extended to consider the amalgamation.

There would be a reduction in funding as the combined school would receive one 'Lump Sum' under the current funding formula. This is a graduated reduction over two years and would take effect from April 2017. The Schools Forum will be considering a Split Site factor for the schools funding formula. To inform the level of funding for this factor, Schools Finance Officers will work with the school and Schools Forum. This will be essential to ensure that there is an appropriate level of funding.

Officers from Education Strategy and Harrow School Improvement Partnership are supporting both schools and would continue to do so through the amalgamation process, including the appointment of the Headteacher.

It is very important that there is a clear timeline for the amalgamation process and expansion so that there is clarity about the future. Extended periods of uncertainty are to be avoided and therefore it is proposed that the amalgamation and expansion are implemented with effect from September 2015.

Representation from a resident

A representation was received by email from a resident whose property backs onto Welldon Park Junior School objecting to the expansion of the school and is at Appendix 1. The representation states:

1. It does not seem to have been widely publicised to local residents, that this representation period for comment on the proposals is in fact open;
2. It is vital that we are made aware of all the timescales in relation to the expansion in order that we can make our views known and have them listened to and for them to influence the final decision on the planning of any expansion;
3. In particular, concerns about:
 - The close proximity of any new buildings to our small back garden.
 - The possibility of being overlooked by any build upwards.
 - The disruption the building works may cause.
 - The increase in traffic and parking across drives in our small cul de sac.
 - Impact on saleability and price of our property.
 - Noise impact of larger school population.
4. Without access to information on the planning proposals, no actual decision on whether to go ahead should be made at Cabinet on 19th February, as it may be that none of the planning proposals are acceptable to residents.

Officer comment about the representation from a resident

Officer response is given using the numbers above.

1. The statutory proposals have been publicised in the normal manner and in accordance with the government guidance. This includes: the public notice has been published in Harrow Times, at the entrances to the schools and in the local library; the public notice and full proposals have been published on Harrow Council's website; letters have been sent to interested parties.

For the consultation that preceded the publication of the statutory proposals, letters about the consultation and publicising the consultation meeting for residents were delivered to residents of properties adjoining the school boundaries in the following roads: Northolt Road; Wyvenhoe Road; Roxeth Grove and Kingsley Road. Letters were also delivered to addresses on both sides of Wyvenhoe Road and Scarsdale Road and to addresses in Kingsley Road beyond the top end of Scarsdale Road.

2. At the consultation meetings the separate Planning processes that would follow if the proposal was approved were described. The current timeline is as follows:
 - Initial site scoping work was concluded by the end of December.
 - Feasibility design and survey work, including independent Transport Assessment, is being progressed from January up to Easter (if Cabinet approves the expansion proposal, though there may be some building work if the schools are combined, albeit while remaining on the two sites).
 - Pre-Planning engagement with the school communities and local residents would occur shortly before or soon after Easter. Written notification about this would be distributed to residents as was done for the consultation.
 - Planning application would be submitted in April followed by statutory Planning consultation, with a view to Planning Committee decision being made in June.
 - Construction work would commence in August for a period of 12-15 months.
3. The points of concern would be considered in design feasibility work, though concerns about impact on saleability and price of property would be outside the scope. Planning requirements in relation to these issues would be complied with. There would be early discussion with Planning officers about design proposals so that any potential issues would be identified and addressed early in the process. If the expansion of the schools is approved, pre-Planning engagement would occur around Easter 2015 when design proposals would be available for comments that could be incorporated into refining the design proposal. There would be statutory consultation following a planning application being submitted for any further comments and any concerns to be considered.
4. Statutory Planning processes would follow as outlined above if Cabinet decides to approve the expansion proposal. The Planning process and decision is separate from the school expansion decision. It is not normal to carry out a design phase prior to a decision on whether to expand or amalgamate a school. If a decision is made on expansion, a design for new works will be prepared and a planning application submitted. It is normal for these to follow the expansion decision because the Planning process would not happen if Cabinet decides not to expand the schools.

Though Planning is a subsequent and separate statutory process, extensive efforts were made during the consultation phase to bring the expansion proposal to the attention of local residents. This is to bring early awareness to residents of the possibility of new build and in recognition of concerns about traffic congestion around schools at school drop off and collection times. . As part of the planning application, the school will be required to submit a School Travel Plan. An independent Transport Assessment will be undertaken and the outcomes of the Transport Assessment would be submitted as part of the planning application.

This page is intentionally left blank



Acting Headteacher: Mr James Simmons

Welldon Park Junior School

Wyvenhoe Road

South Harrow

Middlesex

HA2 8LS

Tel: 020 8422 4304

Fax: 020 8422 0204

Email: office@welldonparkjunior.harrow.sch.uk

Website: www.welldonparkjunior.harrow.sch.uk

Twitter: @welldonparkjunior

WELLDON PARK SCHOOLS GOVERNING BODIES JOINT SUBMISSION REGARDING AMALGAMATION

Dear Johanna,

The following is the text of the submission agreed by the Governing Bodies of both Welldon Park Schools for inclusion in the Cabinet Agenda on 19th February 2015:

"Cabinet Members need to be made fully aware that the Welldon Park Infant and Junior Schools are absolutely unique in Harrow (as well as in London and elsewhere) by being on separate sites. They also need to be reminded that just five years ago, at a meeting on 12th November 2009, Cabinet agreed with the joint submission by the Governing Bodies that this was a very sound reason for deciding not to make them amalgamate, although it was Harrow Council Policy at that time.

It was believed nothing had changed since 2009 but both Governing Bodies agreed to comply with the Council's consultation procedure involving parents/carers, staff and governors even though their Chairmen had initially been told by Council Officers that, irrespective of the result, Council Policy would apply and Item 11 on page 4 of the Amalgamation Policy July 2013 would be ignored.

It was agreed to set up a Joint Governing Bodies' Working Group (between August and December 2014), engage the services of an experienced and neutral adviser, funded by both schools, and hold meetings with staff, parents/carers and residents that would be addressed by Council Officers. The outcome from all stakeholders was a significant "no" to amalgamation. This was mainly due to Council Officers being unable to explain what differed from the situation in 2009 as well as responding to questions regarding amalgamation by referring solely to the 24 Harrow Primary Schools, every single one of which share the same site, and repeatedly ignoring the situation of our two schools being physically separated. It was very much felt that this separation of sites would not allow us to benefit from any of the financial advantages amalgamation might bring when schools are on the same sites.

With Cabinet having decided (without discussion) on 11th December 2014 for the amalgamation process to go ahead we now feel obliged to require them to take into consideration the various reasons why we are still most concerned that amalgamation could have severe adverse results for our schools and thus for them to take responsibility for the outcome. The outcome has created a belief that the Council's consultation was meaningless, costly and time-wasting with the result being a foregone conclusion, causing further loss of faith by the public.

It must be stressed that both Governing Bodies are not opposed to educational amalgamation as such but are seriously concerned about the effect of physical

amalgamation on the schools' ability to provide the high standard of education which is their joint aim, especially in the transitional period.

So far as the pupils and parents are concerned there would remain two separate schools between pupils up to year 2 and those from year 3 upwards – a big difference with the 24 schools on one site across the Borough that have amalgamated. We have various concerns regarding the buildings, one school being 103 years old and the other built in the mid-70s. For example, what will happen to staffrooms, administration offices, reception, site security, entrances, meeting places, branding, telephones, computer and staff car parking? How will two separate buildings facilitate closer working of staff and pupils? Who will finance the necessary changes? Where are the budget savings to compensate for a joint reduction likely to exceed £150,000? None of the cost efficiencies, that the traditional two-school-on-one-site model might have realised elsewhere in the Borough, would be realised here. In our discussions with the Council Officers it was clear that they could not give both Governing Bodies definitive answers regarding any additional funding due to loss of school budget, help regarding change of infrastructure, IT and branding should the two schools become one.

There was also a lack of understanding of timescales regarding the advertisement and recruitment of a new Headteacher should the schools combine. Thus there are anxieties about the effect on staffing, particularly how to secure the services of someone with the necessary experience and talent to manage two schools combined in this way. We know that finding someone with this ability is likely to be very challenging, and both Governing Bodies fear that time would be far too short after February 2015 to advertise, interview and appoint in sufficient time before the start of the next scholastic year in September 2015. We have been recommended to suggest that any decision to introduce amalgamation should be subject to it not happening unless and until someone suitable is recruited to the role of Executive Headteacher.

As things stand, the future for both Welldon Park Schools seems very uncertain which is of great concern to both governing bodies. Bearing in mind that our duty is to provide secure and effective facilities for the benefit of our pupils it is essential that all the doubt and uncertainty resulting from the current situation is resolved before a step into the unknown is taken. The decision rests with the Cabinet and therein is the responsibility."

Yours sincerely,



John Nickolay
Chairman of WPJS
Governing Body

30/01/2015



Rev. Brian Bishop
Chairman of WPIS
Governing Body

30.01.15

REPORT FOR: CABINET

Date of Meeting:	19 February 2015
Subject:	Consultation on the draft Harrow Weald Conservation Areas Supplementary Planning Document (SPD)
Key Decision:	No
Responsible Officer:	Caroline Bruce, Corporate Director of Environment and Enterprise
Portfolio Holder:	Councillor Keith Ferry, Portfolio Holder for Planning and Regeneration
Exempt:	No
Decision subject to Call-in:	No
Wards affected:	Harrow Weald
Enclosures:	- Draft Harrow Weald Conservation Areas Supplementary Planning Document - Recommendation from LDF Panel – 29 January 2015

Section 1 – Summary and Recommendations

This report introduces the draft Harrow Weald Conservation Areas Supplementary Planning Document, including the two Conservation Area Appraisals and Management Strategies for each individual conservation area, which is proposed to be the subject of public consultation.

Recommendations:

Cabinet is requested to approve the draft Harrow Weald Conservation Areas

Supplementary Planning Document, attached as appendix 1, for a five week period of public consultation.

Reason: (For recommendation)

When adopted the Harrow Weald Conservation Areas SPD will constitute part of the Harrow Local Plan. This will form material considerations in the determination of planning applications both at planning committees and appeal proceedings. The SPD will also provide useful guidance to relevant Council departments when dealing with issues relating to Harrow Weald Conservation Areas. Before adoption can take place formal consultation on the SPD is required and amendments to it may be made as a result. These would be reported back to Cabinet prior to adoption.

Section 2 – Report

Introductory paragraph

2.0 The decision sought will help the Council meet the following corporate priorities:

- Making a difference for communities

2.1 The SPD for the Harrow Weald Conservation Areas will ensure the conservation of these areas which add to the attractiveness of the borough as a place to live. The public consultation for this would involve communities.

Options considered

2.1 The Council, at its Strategic Planning Advisory Panel meeting of 18 July 2006, agreed that Supplementary Planning Documents (SPDs) would be produced to cover the boroughs Conservation Areas. To date, SPDs have been produced for Harrow on the Hill, Pinner and Stanmore and Edgware conservation areas. Not to produce an SPD for the Harrow Weald Conservation Areas would be inconsistent with the approach adopted elsewhere and represent a gap in the Local Plan, with regard to these two conservation areas.

Background

2.2 Work commenced in 2006 to review the existing conservation area appraisals and management strategies, and to prepare Supplementary

Planning Documents (SPDs) to cover geographical clusters of conservation areas within the borough. Following the adoption of the Harrow on the Hill, Pinner and the Stanmore and Edgware SPDs, officers commenced work on the draft Harrow Weald SPD.

Current situation

2.3 Work on the draft Harrow Weald Conservation Areas SPD commenced in 2013 and is proposed to cover two conservation areas:

(i) West Drive; and (ii) Brookshill & Grimsdyke Estate

2.4 A Conservation Area Appraisal and Management Strategy (CAAMS) is required for both of the above areas. The existing CAAMS for Brookshill and Grimsdyke Estate has been revised and updated accordingly from the previous CAAMS and a new CAAMS has been produced for West Drive since there was not one in place before.

2.5 The CAAMS for both Conservation Areas includes a proposal to amend the boundaries of the West Drive and Brookshill & Grimsdyke Estate. The proposed changes to the boundaries will be consulted on as part of the consultation of this draft document. The draft West Drive CAAMS includes a proposed Locally Listed Historic Park and Garden and a new locally listed structure ie the historic kitchen garden walls in the grounds of the Eagles, which are to be consulted on as part of the consultation of this draft document.

2.6 The Harrow Weald Conservation Areas SPD intends to link both conservation areas by providing a strategic overview of the issues affecting them to inform policies and guidance that will assist in their preservation and enhancement.

2.7 Subject to approval from Cabinet, the SPD and associated documents will go out to public consultation later in 2015 for a period of five weeks. This is longer than the statutory requirement of four weeks to encourage consultation responses on this document as the individual CAAMS will not be subject to a separate additional phase of consultation to the SPD. Notification letters will be sent to ward councillors, amenity groups, Conservation Area Advisory Committee members and other stakeholders. The documents will be available to view at a number of places, including the Council's website and the Planning Services reception at the Civic Centre. The documents may be subject to revision in line with feedback received from the consultation process. The results of the public consultation process and how these have been addressed in finalising the SPD, will be presented back to LDF Panel and Cabinet before seeking formal adoption.

2.8 The Harrow Weald Conservation Areas SPD, once adopted, will be supplementary to the Core Strategy and the Development Management Policies Local Plan documents.

Performance Issues

2.9 Local Authorities have a statutory duty to publish proposals for the enhancement of their conservation areas under the National Planning Policy Framework and to make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. The proposal to publicly consult on the draft Conservation Areas Supplementary Planning Document (SPD) with the aim of making this formally adopted planning guidance as an SPD would help meet these objectives and to have a positive effect on local residents' perception of the degree to which the Council takes account of their views and how far people can influence decisions affecting their area, which are measured through the bi-annual Reputation Tracker.

Environmental Impact

2.10 The draft SPD includes consideration of how energy efficiency and microgeneration measures can be achieved whilst preserving the special character of the Harrow Weald conservation areas. This will therefore help the council to meet the council's climate change strategy in terms of mitigation and adaptation. An SEA screening opinion has been undertaken of the draft SPD which confirms the SPD would not likely to have any significant environmental effects. This screening opinion will be submitted to the Environment Agency, Natural England, and English Heritage for their comment at the time of consultation.

Risk Management Implications

2.11 Risk included on Directorate risk register? No

Separate risk register in place? No

There are no significant risks from consulting on this draft SPD.

Legal Implications

2.12 A Supplementary Planning Documents (SPD) provides detail to support policies in the development plan and must be consistent with that plan.

2.13 The Council is required under Town and Country Planning (Local Planning) (England) Regulations 2012 ("the Regulations") to consult formally on an SPD and to take into account representations received as a result of the consultation exercise before the document is adopted.

2.14 If the SPD does not comply with the Regulations, the Secretary of State may direct the Council not to adopt the SPD.

Financial Implications

2.15 The cost of publication of the draft SPD will be contained within the existing LDF service budget.

2.16 The draft Conservation Areas SPD includes a proposal to amend the conservation area boundaries for two conservation areas to remove areas not worthy of conservation area status and include those areas worthy of designation. Amending the conservation area boundary of the two conservation areas would remove 99 properties from the conservation area boundaries and add 7 other buildings or structures. It is also proposed to designate a locally listed park and garden covering part of the existing Brookshill and Grimsdyke Estate Conservation Area boundary and part of the proposed extension to the conservation area. This would include 5 buildings. Overall these proposals would decrease the workload of the Planning Service's Development Management, Administration, Conservation and Enforcement Teams. The costs of amending the conservation area boundaries and designating the locally listed historic park and garden would be met from existing Service budgets and resources.

Equalities implications

2.17 Was an Equality Impact Assessment carried out? No

2.18 By definition, supplementary planning documents cannot introduce new policies nor modify adopted policies and do not form a part of the development plan. Rather, their role is to supplement a 'parent' policy in a development plan document. The draft SPD the subject of this report supplements policies in the Development Management Policies Local Plan and Core Strategy. A full equalities impact assessment was carried out at each formal stage in the preparation of both these documents. The EQIA carried out in June 2012 for the Development Management DPD showed there would be no disproportionate adverse impact for any of the protected characteristics.

2.19 Therefore, there is no requirement to carry out an equalities impact assessment of the draft SPD the subject of this report, because the impact of implementing the adopted policies has already been considered as part of the Core Strategy and Development Management Policies equalities impact assessments.

Council Priorities

2.18 The decision sought will help the Council meet the priority of a making a difference for communities by helping ensure the attractiveness of the borough as a place to live and demonstrating that the Council seeks and listens to the views of its residents.

Section 3 - Statutory Officer Clearance

Name: Jessie Man	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 8 January 2015		
Name: Sian Webb	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 7 January 2015		

Ward Councillors notified:	YES
EqIA carried out:	NO
EqIA cleared by:	

Section 4 - Contact Details and Background Papers

Contact: Lucy Haile, Principal Conservation Officer, 0208 736 6101

Background Papers: None

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---

Introduction	
1. Introduction	4
1.1 Introduction	4
1.2 Purpose and scope of document	4
1.3 Status of document	5
Background	
2. Background	6
2.1 Legislative and Planning Policy Context	6
Special Interest	
3. Special Interest of Harrow Weald's Two Conservation Areas	7
3.1 Historical Development	8
3.2 Key designations	9
3.3 Setting	17
3.4 Views	18
Management	
4. Management of Harrow Weald's Conservation Areas	18
4.1 Issues and Opportunities for Enhancement	18
4.2 Protection Measures	29
4.3 Proactive measures	31
4.4 Monitoring Measures	33
4.5 Monitoring Measures	33
5. Guidance for Homeowners and Potential Developers	34
5.1 Introduction	34
6. Appendices	39

1. Brookshill Drive and Grimsdyke Estate Conservation Area Appraisal and Management Strategy	39
1.1 Introduction to the Conservation Area	39
1.1.1 Introduction	39
1.1.2 Planning Policy Context	40
1.1.3 Summary of Special Interest	41
1.1.4 Short History	41
1.1.5 Archaeology and Geology	44
1.2 The Character of the Conservation Area Today	44
1.2.1 Density of Development, Topography and Plan Form	44
1.2.2 Townscape Character	45
1.2.3 Key Views and Vistas	47
1.2.4 Architectural Qualities	48
1.2.5 Streetscape	53
1.2.6 Green Spaces and Ecology	54
1.3 Summary of Waxwell Lane Conservation Area	55
1.3.1 Problems, Pressures and Potential for Enhancement	55
1.3.2 Public Consultation	58
1.4 Waxwell Lane Conservation Area Management Strategy	58
1.4.1 Purpose of the Strategy	58
1.4.2 Management Proposals	59
1.4.3 Reviewing the Conservation Area Boundary	60
1.4.4 Article 4 Directions	61
1.4.5 Support	61
1.4.6 Guidance	62

2. West Drive Conservation Area Appraisal and Management Strategy	64
2.1 Introduction to the Conservation Area	64
2.1.1 Introduction	64
2.1.2 Planning Policy Context	64
2.1.3 Summary of Special Interest	65
2.1.4 Short History	66
2.1.5 Archaeology and Geology	67
2.2 The Character of the Conservation Area Today	68
2.2.1 Density of Development, Topography and Plan Form	68
2.2.2 Townscape Character	68
2.2.3 Key Views and Vistas	69
2.2.4 Land Uses	70
2.2.5 Architectural Qualities	70
2.2.6 Streetscape	71
2.2.7 Green Spaces and Ecology	71
2.3 Summary of Waxwell Close Conservation Area	72
2.3.1 Summary and Main Assets	72
2.3.2 Problems, Pressures and Potential for Enhancement	72
2.3.3 Public Consultation	78
2.4 Waxwell Close Management Strategy	78
2.4.1 Purpose of the Strategy	78
2.4.2 Management Proposals	78
2.4.3 Reviewing the Conservation Area Boundary	80
2.4.4 Support	81
2.4.5 Guidance	81

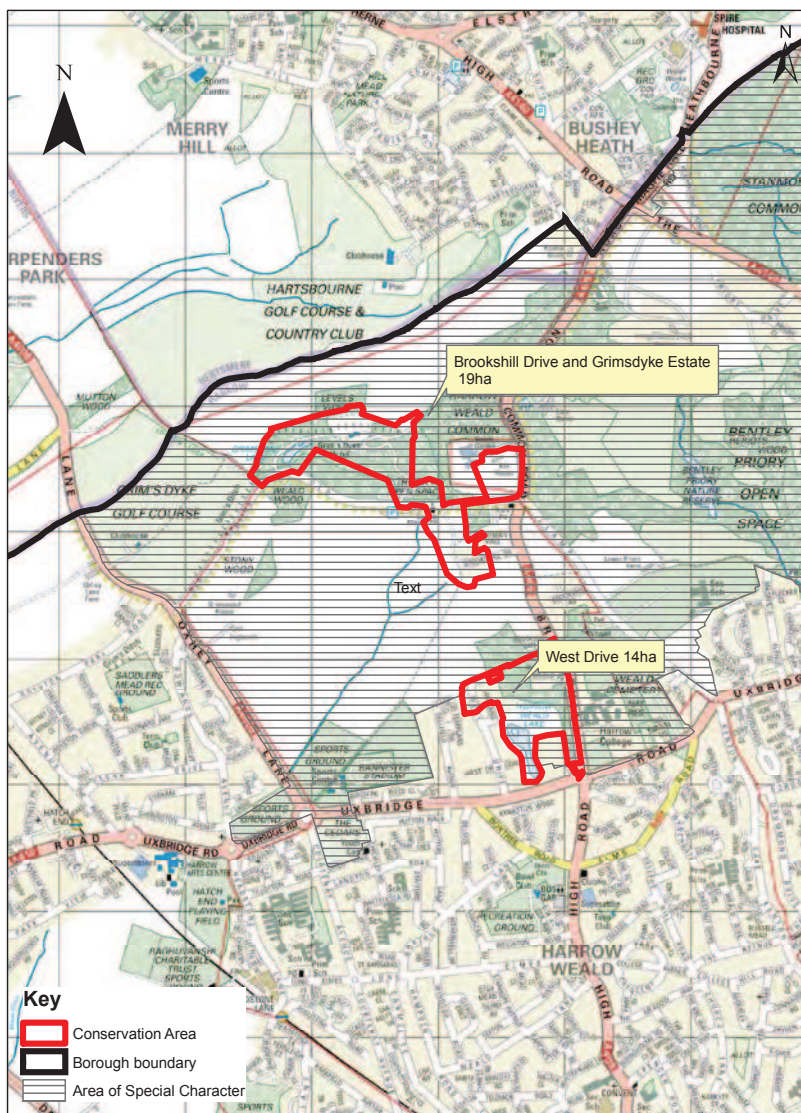
1.1 Introduction

- 1.1.1** The Harrow Local Plan is the term given to the group of planning documents that help shape the future of Harrow and are used in the determination of planning applications for development and changes of use in the Borough.
- 1.1.2** The Local Plan includes the Core Strategy, which sets out strategic policies to guide the location and form of growth in the Borough, and other 'development plan documents' setting out policies and plans for Harrow which are subject to a formal procedure of consultation and independent examination. The Local Plan also comprises a series of detailed supplementary planning documents.
- 1.1.3** The purpose of the Harrow Weald Conservation Areas Supplementary Planning Document (SPD) is to encourage sensitive development that would serve to preserve and enhance Harrow Weald's conservation areas.

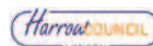
1.2 Purpose and scope of document

- 1.2.1** A supplementary planning document (SPD) can give effect to the planning policies of other documents in the Local Plan or those of regional spatial strategy – in greater London, the Mayor's London Plan. The purpose of this SPD is to implement local conservation policies by giving detailed design advice appropriate to the areas covered by the SPD.
- 1.2.2** Relevant Harrow Core Strategy policy is CS1 D and the conservation policies within the Development Management Document are relevant. The SPD supplements these local policies. In addition though the National Planning Policy Framework provides an over-arching policy background to the Harrow Weald SPD and London Plan policies 7.8 A, B, C, D, E, F and G are relevant.
- 1.2.3** SPDs are initiated by the Council but are subject to a four to six week consultation period with the public and other stakeholders. Following the consultation, the Council must consider the representations made and must publish a statement setting out the main issues raised and how these have been dealt with (for example, the Council might make changes to the SPD, in the light of representations made). The Secretary of State is empowered to direct the Council to modify the SPD or, indeed, not to adopt it at all; however it is the Government's policy only to use these powers of intervention where there are issues of national or regional importance. Once adopted, an SPD becomes a material consideration in the determination of relevant planning applications and appeals.
- 1.2.4** This document constitutes the SPD for Harrow Weald's two conservation areas. The SPD provides a strategic overview of issues affecting Harrow Weald's conservation areas which inform guidance that can be applied to deal with these. This document should be read together with the Conservation Area Appraisal and Management Strategies (CAAMS) which form the appendices for this document.
- 1.2.5** Once adopted, the appendices will be available separately on the Council's conservation web site: <http://www.harrow.gov.uk/conservation>

1.2.6 A map showing the location of each of Harrow Weald's two conservation areas, covered by this SPD is below.



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecutions or civil proceedings. London Borough of Harrow LA.100019206. 2011. DIGITAL MAP DATA (C) COLLINS BARTHOLOMEW LTD (2010)



Picture 1.1 Harrow Weald's Conservation Areas

1.3 Status of document

1.3.1 This SPD supplements policy DM 7A: *Heritage Assets* of the Harrow Development Management Policies Local Plan and is a material consideration in the determination of planning applications affecting the Stanmore and Edgware conservation areas.

1.3.2 The policy that the SPD supplements has been subject to Sustainability Appraisal. The SPD has been prepared in accordance with the requirements of the Part 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and having regard to the National Planning Policy Framework (paragraph 153). The SPD was the subject of public consultation from 17th June to 29th July, 2013. The

consultation was undertaken in accordance with Council's Statement of Community Involvement and the comments received were considered and amendments made to take these into account. The SPD has also been screened and the Council has determined that a full Strategic Environmental Assessment is not needed.

2.1 Legislative and Planning Policy Context

- 2.1.1** This section outlines the legislative and planning policy context to the identification and management of conservation areas.
- 2.1.2** Conservation areas were introduced through the Civic Amenities Act in 1967 and more than 9000 now exist nationally. These are places that can be perceived as having distinct identity; 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance' (Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990).
- 2.1.3** Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Harrow Council has a duty, as the local planning authority, to preserve or enhance the character and appearance of its conservation areas. Section 71 of the 1990 Act places a duty on local planning authorities to formulate and adopt policies and guidance to preserve and enhance their conservation areas. These broad requirements are reinforced and elaborated upon by National Planning Policy Framework (2012).
- 2.1.4** The Harrow Weald Conservation Areas SPD therefore provides overarching supplementary guidance for conserving and enhancing Harrow Weald's two conservation areas. Accompanying the SPD are individual character appraisal and management strategies (CAAMS) for both areas which are annexed to this document. These have been created in line with the 2006 English Heritage publication, 'Guidance on the Management of Conservation Areas'. Character appraisals are essentially analyses of what makes a conservation area special, while the management strategies proposals and plans seek to preserve or enhance those qualities. The CAAMS develop the guidance within the overarching SPD so they can address issues relating to specific conservation areas.
- 2.1.5** Supplementary Planning Documents are contained within the framework of the Local Plan which local planning authorities are required to produce under the 2004 Planning and Compulsory Purchase Act. The Local Plan contains Development Plan Documents (DPDs) including the Core Strategy. Supplementary Planning Documents, such as this one, provide further details and guidance on policies and proposals contained within the Core Strategy and other DPDs, and can relate to specific matters such as conservation areas. SPDs are an important material consideration in the determining of planning applications and appeals, as they are subject to rigorous consultation and will conform to broader development plan policies.
- 2.1.6** A screening opinion was undertaken by Harrow Council officers and sent to the three statutory bodies (Environment Agency, English Heritage and Natural England) in order to confirm that a Strategic Environmental Assessment of the SPD is not required.

3.0.1 Harrow Weald contains a significant number of the Borough's heritage assets including historic farm complexes, cottages, villas and lodges, among other heritage assets, displaying a distinctive rural and countryside character. West Drive conservation area for example has this atmosphere as it comprises the remnants of the Harrow Weald Park Estate, a Victorian country estate, ie the workers cottages, former kitchen garden walls, coach house and stables for the former mansion house (now demolished) along a gravel lane. Brookshill and Grimsdyke Estate conservation area has a similar feel as it contains a former Victorian mansion house and associated workers cottages (Grimsdyke Estate), as well as rural, vernacular agricultural buildings as part of a former farm unit along Brookshill Drive and cottages built for brick kiln workers, with later cottages and buildings and structures associated with brick making. Their context and layout, the spaces between these and the surrounding openness similar in both conservation areas. The importance of Harrow Weald's historic environment is reflected in its range of designated heritage assets: 1 registered park and garden, 1 proposed locally listed park and garden, 2 conservation areas and various listed and locally listed buildings. In total, these two conservation areas cover an area of just under 33 hectares. Brookshill Drive and Grimsdyke Estate is the larger of the two conservation areas covering 19 hectares.

3.0.2 The most identifiable elements that make up the special character of each of Harrow Weald's two conservation areas are noted below. The detailed character and appearance of each individual area is provided in the conservation area appraisal and management strategies that are provided within the appendices of this document.

Conservation Area	Special Character
Brookshill and Grimsdyke Estate (appendix 1)	Brookshill Drive comprises rural vernacular agricultural buildings, and cottages built for brick kiln workers, informal context and layout, spaces between them and surrounding openness. Just off Common Road is the Kiln site, the former core of the brick making area, with associated main house and remaining brick kiln, wells, walled gardens, summerhouse and replica drying sheds. Late 19th century Grimsdyke Estate comprises the planned form of the estates integral buildings; the relationship and architectural qualities of these and intimate character derived from lush landscaping and neighbouring woodland.
West Drive (appendix 2)	This area comprises a well-defined fragment of the original estate of Harrow Weald Park, a large Victorian country estate, now surviving as a semi-rural enclave along an unmade track along with surrounding remnants of the original estate landscaping including a lake, open meadow land, woodland and former carriage driveways. This area includes a well defined, informal and attractive group of two-storey cottages with a low density and distinctive semi-rural character. There is a historic close association with the rural, green and open setting on the edge of the green belt.

3.0.3 There are therefore a number of common qualities that account for their special interest and make these areas worthy of protection. Similar qualities include their rich display of architecture, usually of historic importance, complemented by extensive greenery and visually furnished with mature trees.

3.0.4 Harrow Weald's conservation areas met and continue to meet two or more of the following criteria set out in paragraph 3.43 of the Development Management Development Plan Document:

1. Areas with a high concentration of listed buildings whether statutorily or locally listed
2. Areas of historical, social, economic and/or architectural merit
3. Areas with a high proportion of buildings built prior to 1920, which remain largely unaltered
4. Areas built post 1920 that are innovative in planning or architectural detail, and where a large proportion remain unaltered
5. A significant group of buildings with distinct physical identity and cohesiveness
6. Areas which have a special quality, where the site layout and landscaping are of exceptionally high quality and/or contain historic open space, natural landmarks or topographical features

3.0.5 Contributing to, and helping to explain the special interest of, the Harrow Weald conservation areas is the area's historical development, other key designations, the setting of the conservation areas as and key views as explored in the next four sub-sections.

3.1 Historical Development

3.1.1 In order to understand today's special interest it is useful to consider the area's historical development. The earliest feature of note in the Harrow Weald area the Grim's Dyke, a Scheduled Ancient Monument, and is thought to be a Saxon linear earthwork.

3.1.2 Today's Harrow Weald would have once belonged to the Lord of the Manor and those with farming rights were able to lease acres from his estate for small farms. Sir Edward North was Lord of the Manor during the 16th century. At this time Weald woodlands were heavily coppiced for fuel and timber, which during the 17th century, led to areas of full-scale clearance in order to provide land on which to graze livestock. As such, although originally a woodland area, it began to adapt into a more arable and livestock economy.

3.1.3 Copse Farm, historically Weald Copse Farm and now in the current Brookshill Drive and Grimsdyke Estate Conservation Area, dates from the 17th century, and was developed as a result of cleared coppiced woodland, hence its name. Brookshill

Farm was developed much later during the 19th century. Brick kilns to the north and east of Brookshill Farm on the current site of the Kiln had an impact on the area as a collection of semi-detached cottages were built for the brick kiln workers and much of the bricks for the area likely came from this site. The owners of the Kiln from the 18th century to the 1930s also owned Brookshill Farm. By the mid-C18 these brick kilns had become one of the most significant industrial enterprises in North Middlesex. In the 19th century these owners were Samuel and Charles Blackwell of the firm Crosse and Blackwell who built a number of decorative cottages.

3.1.4 Prior to the development of Grimsdyke Estate, this area was covered in woodland. The soils of the area supported gravels and sands, which overlay clay. The extraction of these resources produced gravel pits from where materials were removed for the construction and surfacing of local roads, and to nearby Brick Kilns for the production of bricks. Grimsdyke Estate was designed around a principal house by Richard Norman Shaw for Frederik Goodhall now listed grade II* and the grounds were carefully landscaped including a lake and a moat. Many historically contextual buildings were built around this and is considered curtilage listed. The house was later purchased by William Gilbert of Gilbert and Sullivan fame.

3.1.5 The West Drive enclave's history relates primarily to it being the remnants of the Harrow Weald Park Estate a 19th century country estate. This grew up first around a mansion house (now demolished) built in the early 19th century by William Winsdale and primarily in the late 19th century around a mansion (also now demolished) built by Robert Sim an East India and China merchant. The associated walled kitchen gardens, coach house, workers cottages and historic landscaping remain, coupled with a small amount of later modest infill.

3.2 Key designations

3.2.1 There are many key designations that contribute to the significance of the conservation areas including greenery and open spaces and other designations from a heritage perspective. These are illustrated by conservation area on the next table.

Conservation Area	Designations (may only affect part of the conservation area)
	N.B. All trees are protected in conservation areas
Brookshill Drive and Grimsdyke Estate	Site of Importance for Nature Conservation (grade II and sites of metropolitan importance) Green Belt Harrow Weald Ridge Area of Special Character Scheduled Ancient Monument Amenity Green Space Registered Park and Garden

Conservation Area	Designations (may only affect part of the conservation area) N.B. All trees are protected in conservation areas
	Locally Listed Buildings Listed Buildings Tree Preservation Orders
West Drive	Site of Importance for Nature Conservation (grade II) Green Belt Harrow Weald Ridge Area of Special Character Locally Listed Buildings (within and within the setting e.g. the locally listed gate piers to Park Drive are linked to the Conservation Area) Listed Buildings Tree Preservation Orders Proposed Locally Listed Park and Garden Bounds: Outdoor sports pitches and cemeteries and churchyards

3.2.2 From a heritage perspective, there is a Scheduled Ancient Monument, Registered Historic Park and Garden, a proposed Locally Listed Park and Garden and Listed Buildings and Locally Listed Buildings affecting Harrow Weald's conservation areas. Their contribution to the significance of Harrow Weald's conservation areas is explained next.

- **Archaeology**

3.2.3 The Harrow area is very important for archaeology. The geology and topography of the area made Harrow popular with early settlers and traces of prehistoric man have been found in Harrow Weald. In addition, there is evidence of Romans in Stanmore and Saxons in both Sudbury and central Harrow.

3.2.4 Archaeological designations in Harrow consist of two types. The first are Scheduled Monuments, which are known archaeological features. The second are Archaeological Priority Areas (APAs), where there are suspected archaeological remains. There is a Scheduled Ancient Monument within the Brookshill Drive and Grimsdyke Estate Conservation Area but no APAs affect these conservation areas.

3.2.5 The Greater London Sites and Monuments Record (SMR) provides a computerised record of information regarding London's archaeological and historic fabric. The information held assists with the early identification of the archaeological and historic interest of an area or site when development is proposed. English Heritage maintains

the SMR for London. To find out more about the Greater London Archaeological Advisory Service (GLAAS) at English Heritage, visit: <http://www.english-heritage.org.uk/server/show/nav.9686>



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecutions or civil proceedings. London Borough of Harrow LA.100019206. 2011. DIGITAL MAP DATA (C) COLLINS BARTHOLOMEW LTD (2010)

Picture 3.1 Archaeology

- 3.2.6** The National Planning Policy Framework pages 30-32 should be read in relation to works that have the potential to affect Harrow Weald's archaeology.
- 3.2.7** A Scheduled Monument is an archaeological feature that the Secretary of State has deemed of national importance. 'Scheduling' is one of the ways we protect our archaeological heritage for future generations and is restricted to the most important sites and monuments. Scheduling is part of the Ancient Monuments and Archaeological Areas Act 1979. Large sections of Grim's Dyke are scheduled.
- 3.2.8** Those areas of Grim's Dyke that are specific to Harrow Weald, are shown on the map above. It is recommended that prior to commencing any works owners should check with the Ancient Monuments Inspector at English Heritage to establish if

Scheduled Monument Consent will be necessary. It would also be wise to check the terms of any lease or licence relating to the land. It is a criminal offence to damage a scheduled monument by carrying out unauthorised works.

Harrow Weald's Sceduled Ancient Monument

- Grim's Dyke

Grim's Dyke is a linear earthwork thought to date from before the Saxon period. It can be found in the areas of Hatch End and Harrow Weald, and in Pinner is best viewed at Montesole Playing Fields. It also runs through a number of private gardens and Shaftesbury Playing Fields.

Grim's Dyke is of historical and archaeological importance. When it was built is unclear but it can be described as a linear earthwork that is thought to date from just before the Roman invasion of England. Local legend often dates the ditch to the Saxon period, but this date is probably too late. 'Grim' is however the Saxon word for devil or goblin and was given to various linear earthworks similar to the one in Harrow, and as such it is likely that the earthwork's name was derived from this time. Many Saxon earthworks served as defence lines or boundary markers. Today, Grim's Dyke still marks boundaries between properties and follows the line of a number of residential gardens.

Little conclusive evidence has been found to accurately date the construction of the bank and ditch. However, archaeological excavations at Grim's Dyke Hotel in Harrow Weald carried out in 1979 found a 1st century, or slightly earlier, fire hearth.

3.2.9 There are two Archaeological Priority Areas (APAs) in Harrow Weald. These are identified below, and are highlighted on the last map.

Harrow Weald's Archaeological Priority Areas

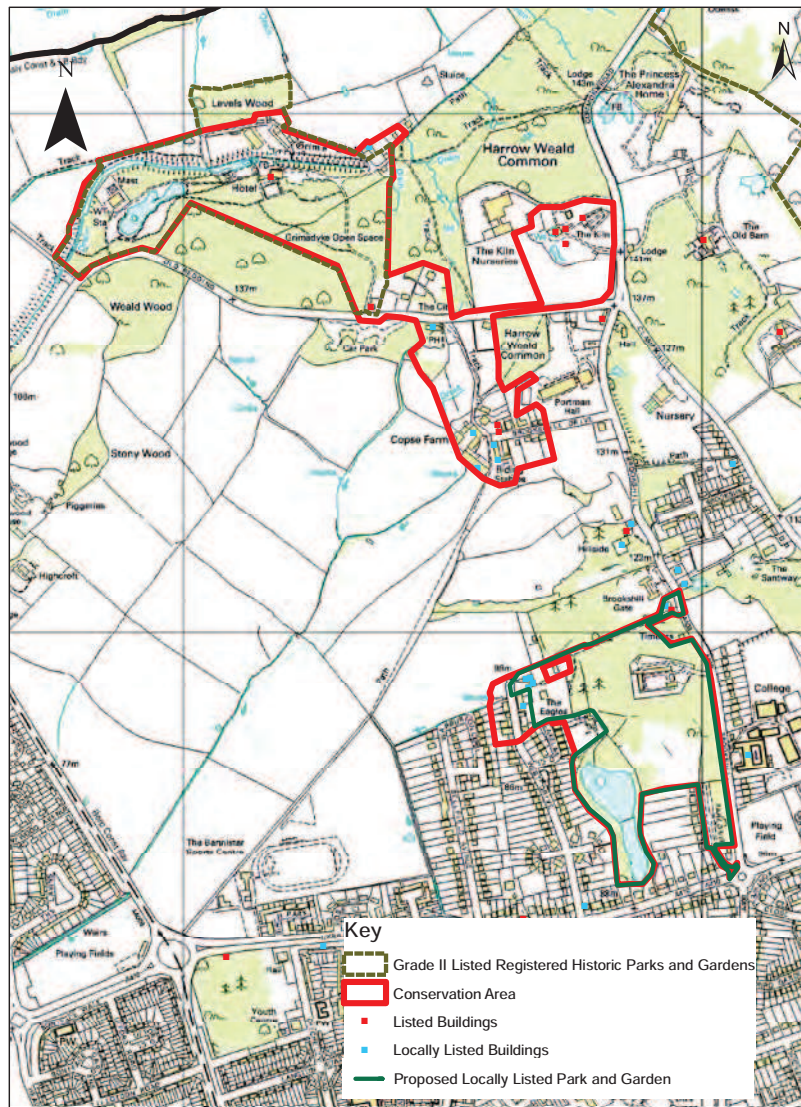
- Part of Grim's Dyke
- Possible site of medieval Bentley Priory

3.2.10 Where development is proposed within an APA, English Heritage will require applicants to provide sufficient information to assess the archaeological implications of the development. Outside these areas, English Heritage can also ask applicants to provide archaeological assessments if they feel that below ground archaeology may be at risk.

- **Listed and Locally Listed Buildings and Parks and Gardens**

3.2.11 The high quality of architecture and landscaping contributes to the special interest of the Harrow Weald conservation areas. There is generally a high proportion of listed and locally listed buildings within these conservation areas and there is both a nationally listed parks and garden and one proposed locally listed park and garden

overlapping with the Harrow Weald conservation areas. A listed building is one which is recognised as being of national architectural and historic interest whereas a locally listed building is one which is of local interest to a borough. The same applies to historic parks and gardens. The next map shows where they overlap with the Harrow Weald's conservation areas.



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecutions or civil proceedings. London Borough of Harrow LA.100019206. 2011. DIGITAL MAP DATA (C) COLLINS BARTHOLOMEW LTD (2010)



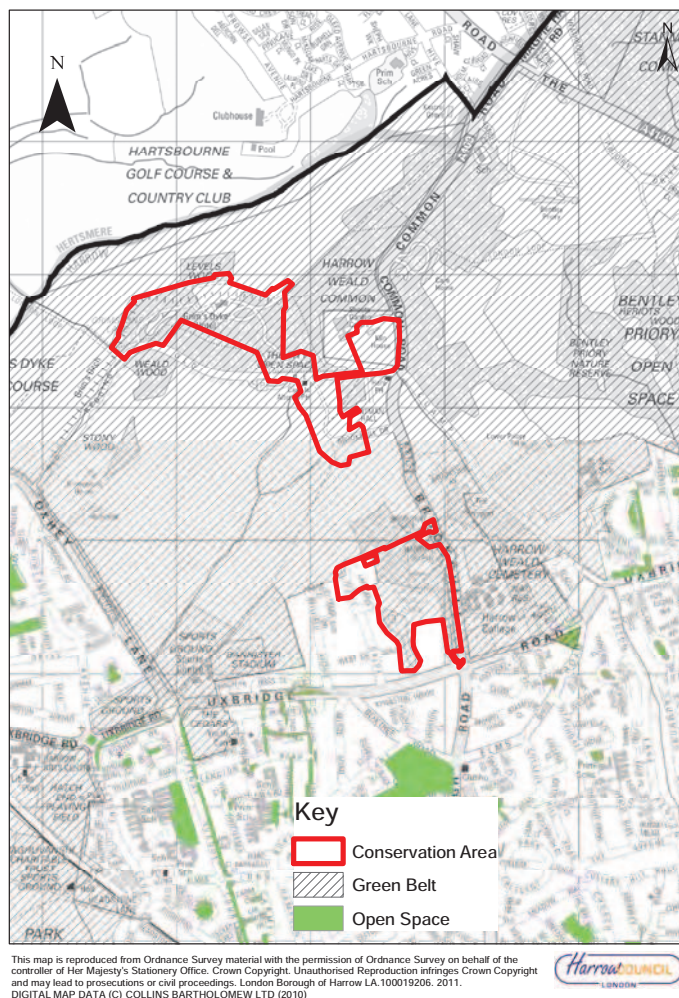
Picture 3.2 Listed and Locally Listed Buildings and Grade II Listed Parks and Gardens

- **Greenery, trees, biodiversity, open spaces and landscape**

3.2.12

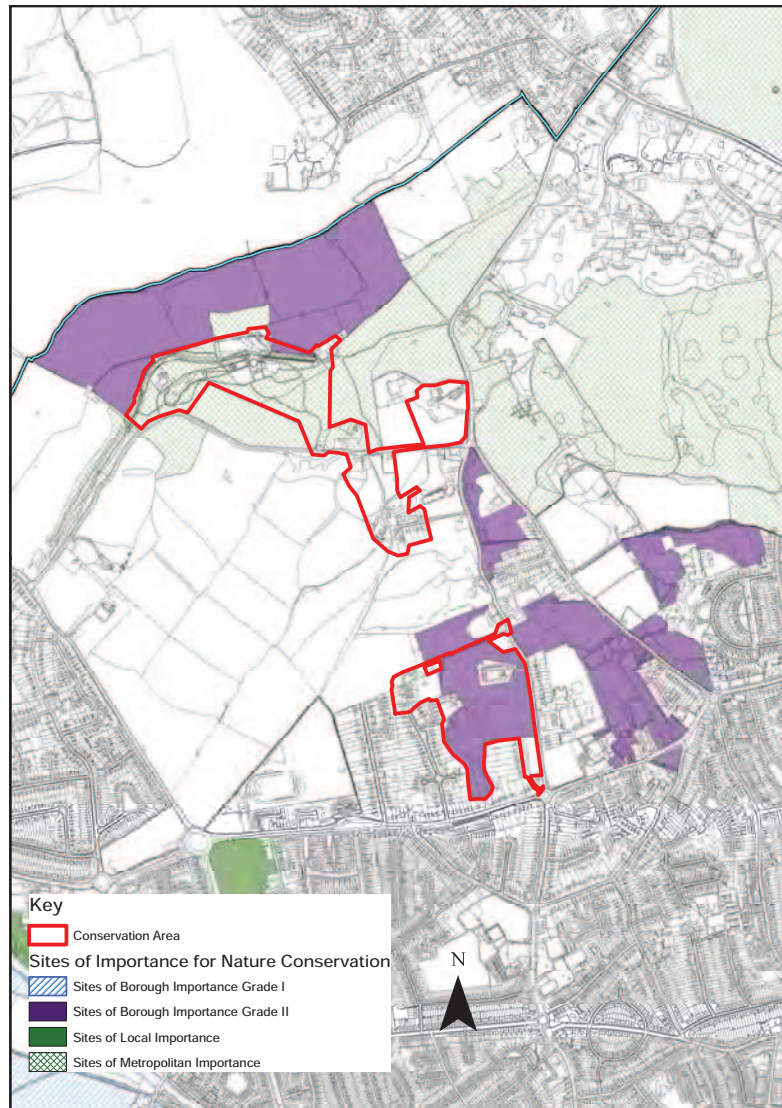
Historic parks and gardens affecting these conservation areas are explored above. Otherwise, in terms of greenery, biodiversity, open spaces and landscape, the following designations affect Harrow Weald's conservation areas contributing to their interest in terms of presenting in places an open, green and semi-rural character:

Green Belt, sites of significance for nature conservation and the Harrow Weald Ridge Area of Special Character (a local landscape/townscape designation). Amenity green space and natural and semi-natural green space also affect Brookshill Drive and Grimsdyke Estate CA. These designations are shown on the following three maps:



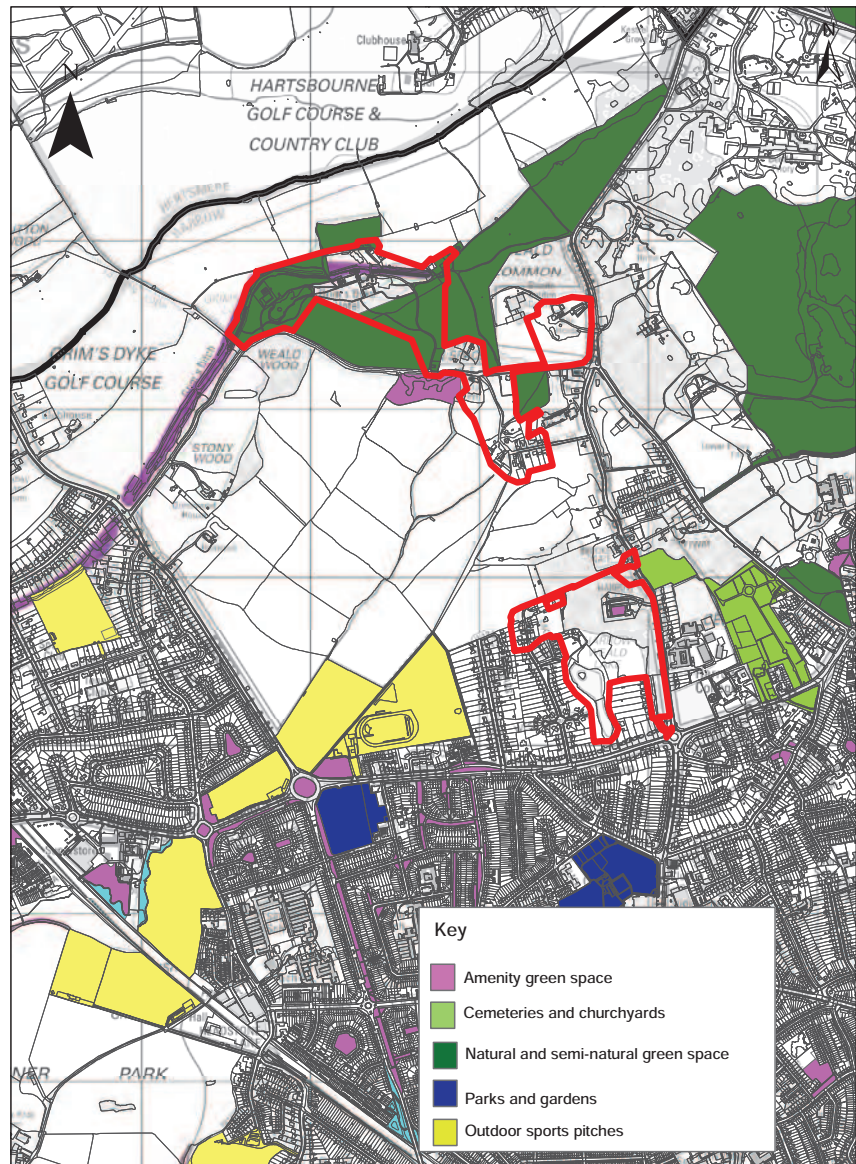
Picture 3.3 Harrow Weald Green Belt and Open Space
LBH LA.100019206.2014

3.2.13 Sites of significance for nature conservation include sites of borough importance and sites of local importance for nature conservation. Sites that are important to the borough are graded: grade I which are the best, and grade II which, while containing important wildlife habitats, are not as intrinsically rich as grade I sites. Damage to sites such as this would mean a significant loss to the borough. A site of Local Importance is one which is, or may be, of particular value to nearby residents or schools. All open green spaces contribute to the biodiversity of the area though.



Picture 3.4 Sites of Importance for Nature Conservation

3.2.14 Amenity green space affects the setting of both Conservation Areas. It is also contained within the Brookshill Drive and Grimsdyke Estate CA. Natural and semi-natural green space is also contained within this CA and is also within its setting. Cemeteries and churchyards affect the setting of the West Drive CA.

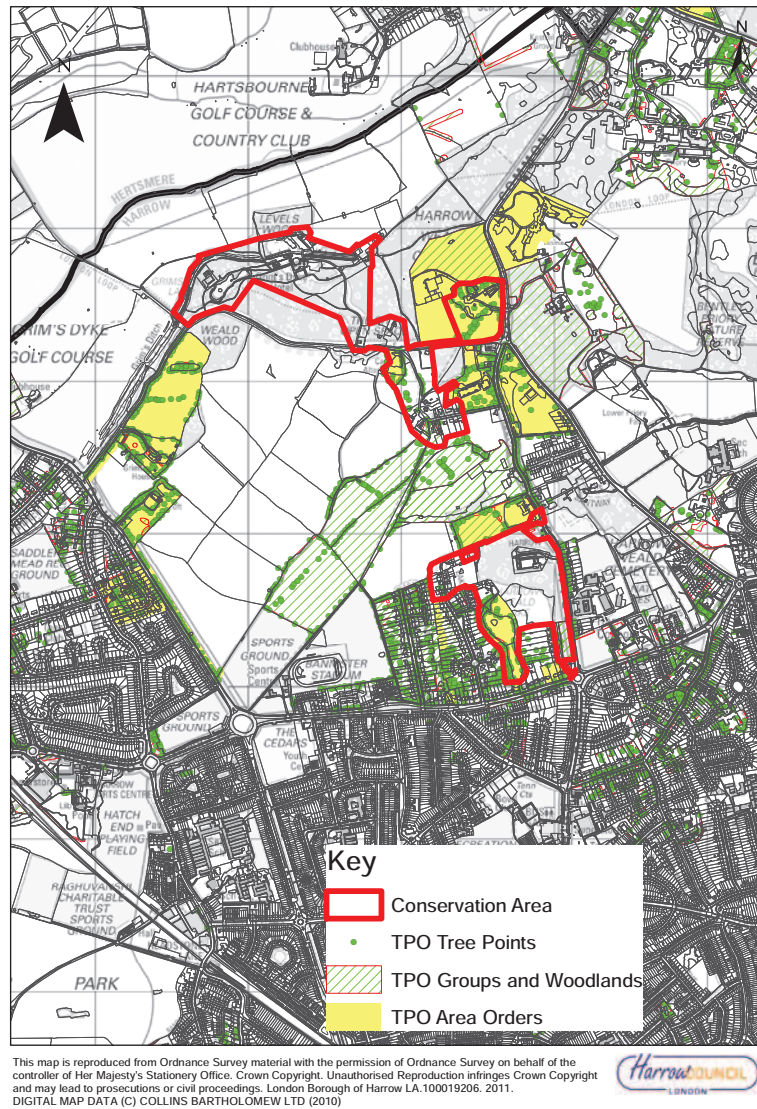


This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecutions or civil proceedings. London Borough of Harrow LA.100019206. 2011. DIGITAL MAP DATA (C) COLLINS BARTHOLOMEW LTD (2010)



Picture 3.5 Amenity green space, parks and gardens, cemeteries and churchyards, natural and semi-natural greenspace and outdoor sports pitches

3.2.15 All trees within conservation areas are protected, but some will still be afforded additional protection via a Tree Preservation Order (TPO). Harrow Weald's tree clusters are highlighted on map 3.5.



Picture 3.6 Tree clusters

3.3 Setting

3.3.1 Setting often contributes to the architectural or historic interest of conservation areas, as it does in the case of the Harrow Weald conservation areas, and as such development within the setting will be expected to respect the qualities and special interest of the conservation areas. Setting is defined in the National Planning Policy Framework as the surrounding in which a heritage asset is experienced. This can include, for example, usually land which obviously bounds the conservation area, but the setting may also include areas not immediately adjacent but areas further away that impact on views into or out of the area. Where the setting can be described as open space this is likely to offer protection to the conservation area and therefore development may not always be appropriate in areas where this is the case. Open space forming the setting of conservation areas can often make a contribution to their historic significance and development in such areas may therefore be inappropriate. It is important to note that open spaces can refer to public and private spaces and therefore both front and rear garden land are usually relevant.

Development is therefore expected to comply with English Heritage's guidance contained within their document entitled 'The Setting of Heritage Assets' published October 2011.

3.3.2 The key designations section above gives some indication of how designations in the setting of these conservation areas help contribute to their special interest. For example, in particular it is notable that the green, open spaces surrounding both Harrow Weald conservation areas help protect the intrinsic special interest of each conservation area which relates strongly to low densities of development and semi-rural character. The boundaries are relatively tightly drawn since other designations help to protect this aspect of their special interest.

3.4 Views

3.4.1 Views are considered within each conservation area appraisal, which form the appendices to this SPD. These are not exhaustive but indicate the types of views that are important to each area. They therefore tend to be targeted towards buildings of architectural merit or areas of green open space. They also tend to be views available to the public but this does not preclude private views from having equal significance. Strategic views across Harrow Weald include those from the View Point car park to the south and south-east and south-west and those to the north-east towards the Harrow Weald ridge from around where Uxbridge Road and Oxhey Lane meet.

3.4.2 Harrow Weald Ridge provide an elevated horizon of tree cover and open countryside which spans across the north of the Borough and acts as a visual reminder that Harrow is an outer-London borough, a transition between the highly urbanised characteristics of central & inner London and the more rural character of the counties beyond.

3.4.3 It is worth noting that views to, and from, Harrow Weald Ridge have been assessed and found worthy of protection under Policy DM3 Protected Views and Vistas.

4.1 Issues and Opportunities for Enhancement

4.1.1 The following table demonstrates key issues and opportunities for enhancement of Harrow Weald's two conservation areas. These issues, along with other general issues facing the conservation areas, can broadly be described as environmental, economic and social and are discussed next. The individual CAAMS discuss issues facing each conservation area in more detail.

<p>Conservation area and size</p>	<p>(a) Designation date (b) Article 4 Direction yes/no (c) Number of statutorily listed building entries (each entry may contain more than one address. Addresses such as 27-31 High St, for example, may be listed as one entry) (d) Number of locally listed buildings</p>	<p>Key issues and opportunities for enhancement</p>
<p>Brookshill and Grimsdyke Estate (19ha)</p>	<p>(a) Designated 1978 and extended in 1986, 1991, 1997, 2006 and proposed to be amended in 2014.</p> <p>(b) Yes - and more proposed</p> <p>(c) 4 listed buildings</p> <p>(d) 5 locally listed buildings</p>	<p>Pressure for telecommunication masts and other tall structures</p> <p>Views of the Radio Mast from the conservation area</p> <p>Protection of Grim's Dyke from the impact of tourism and planting</p> <p>Overhead cables for Grimsdyke Estate are obtrusive</p> <p>Tarmac of the car park at Grimsdyke Hotel has a deadening effect</p> <p>The gate pier by the stable block would benefit from repair.</p> <p>Elements of Gilbert's planned landscape could benefit from repair, maintenance or restoration, including lake, buildings/structures and pathways</p> <p>There is an opportunity for general enhancement of the Harrow Weald viewpoint adjacent the conservation area.</p> <p>Pressure for signage and lighting in places that could visually clutter the area.</p> <p>Vacant buildings, disrepair and neglect of some buildings and the need to secure their reuse and long term future.</p> <p>Elements of Gilbert's planned landscape could benefit from repair, maintenance or restoration, including lake, buildings/structures and pathways</p> <p>Fly tipping along the road leading from Old Redding to Copse Farm.</p> <p>Increased pressure for security equipment.</p>

Conservation area and size	(a) Designation date (b) Article 4 Direction yes/no (c) Number of statutorily listed building entries (each entry may contain more than one address. Addresses such as 27-31 High St, for example, may be listed as one entry) (d) Number of locally listed buildings	Key issues and opportunities for enhancement
		Streetscape and road maintenance Pressure for hardstanding to front gardens. Protection important for the locally significant Kiln site
West Drive (14ha)	(a) Designated 1980 and extended in 2006 and proposed to be amended in 2014. (b) No - proposed (c) 1 listed building (d) 8 locally listed buildings	The listed gate piers on Brookshill are missing the eagles that are described in their grade II list description. Pressure for more development including alterations, extensions and outbuildings Existing add hoc extensions and outbuildings Hardsurfacing Need to protect architectural features of interest Pressure for the new formation, laying out and construction of a means of access to a highway, a new driveway and alterations to the boundary treatment Limited protection for aspects of historic open space landscaping and built features of the landscaped grounds namely the locally listed gate pillars to Park Drive and historic walls e.g. to the former kitchen gardens.

- **Altering Existing Boundaries**

4.1.2 This table shows that conservation area boundaries are constantly under review. This is important as Local Planning Authorities have a continuing duty under the Planning (Listed Buildings and Conservation Areas) Act (sections 69 part 2 and 70

part 1) to consider whether it should amend the boundaries to existing conservation areas. This has therefore formed part of the appraisal process for these conservation areas in the appended CAAMS. It is recommended that the boundaries of both conservation areas be amended.

4.1.3 For West Drive Conservation Area it is recommended that part of the area be de-designated. The Conservation area had not had a formal written appraisal since it was designated in 1978. Upon careful review for this written appraisal it was recognised that a large part did not meet the criteria for conservation area status. Government policy introduced in March 2012 under the National Planning Policy Framework is clear (paragraph 127) that 'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest'.

4.1.4 At the same time it is recommended that the West Drive Conservation Area boundary be extended to include a large area of historically significant landscaping and three buildings/structures to the east of the existing boundary. This is important since although not many buildings would be added, Government guidance is clear that it is quality and interest of areas rather than individual buildings which should be the prime consideration in identifying conservation areas. The area now proposed for inclusion is strongly associated with the existing core of the conservation area ie a 19th century enclave of buildings associated with the Harrow Weald Park Estate since it forms the remainder of the estate landscaping and grounds that remains in large part intact.

4.1.5 Similarly, there is a proposal to extend the Brookshill and Grimsdyke Estate Conservation Area to include the Kiln site since the site contains an area of local architectural and historic significance that is integrally linked to the history and architectural qualities of the remaining conservation area.

- **Traffic, Parking and Stations**

4.1.6 The two Harrow Weald CAs are situated to the south of the borough boundary with Hartsmere and are contained to the north of the Uxbridge Road (A404), a principal thoroughfare that runs west to east through Harrow Weald towards Stanmore from Pinner. They are sited to the east of Oxhey Lane and the west of Common Road and Brookshill which like the Uxbridge Road are main London distributor roads. Bus routes run along each of these roads. The roads within the CAs are quieter roads.

4.1.7 The hierarchy of these major roads is evident by the numbers of vehicles and traffic speeds. The London Distributor roads do not run through any conservation areas but do impact on the entrances of West Drive CA. The contrast between the busy main London distributor roads and the CAs themselves emphasises the relatively quiet seclusion of these areas.

4.1.8 Both conservation areas contains private, unadopted roads with low traffic generation as a result that contributes to their quiet, secluded semi-rural character.

4.1.9 There are no stations very close to the Harrow Weald CAs which serves to emphasise the semi-rural and relatively remote character of these CAs within Harrow. Pinner station is the nearest and is served by the Metropolitan line. The CAs are well connected by bus routes however with these running up all three of the London distributor roads surrounding the CAs.

4.1.10 Car parks serve Brookshill Drive and Grimsdyke Estate CA. This is due to those within the Grimsdyke Hotel grounds and View Point, Harrow Weald just off Old Redding. As these are limited to small areas and/or are within the setting of the CA they are not too detracting. Car parks however can easily detract from a townscape and therefore rely heavily on well planted screening to mitigate against the effect of large expanses of hardsurfacing. That within the Grimsdyke Estate CA if increased could be harmful to the conservation area. On-street parking within the Conservation Areas is limited preserving the semi-rural character of the gravel drive enclaves of Brookshill Drive and West Drive.

- **Small Scale Alterations and the Need for Protection Measures**

4.1.11 Pressure for development exists within every conservation area. Good design and the use of high quality materials are sought as part of the planning process but small scale alterations such as window or door replacement can often be changed without the benefit of this process. Such alterations to homes may not have the same impact as large-scale redevelopments, but cumulatively they can severely detract from the character and appearance of conservation areas. It is for this reason that protection measures have been adopted for a number of Brookshill Drive and Grimsdyke Estate CA buildings through an Article 4 Direction, which removes household permitted development rights with a view to positively managing change.

4.1.12 Article 4 Directions can cover anything from changes to elevations, to boundary treatment and hardsurfacing of front gardens. Brookshill Drive and Grimsdyke Estate CA is covered by various Article 4 directions and more are proposed for West Drive CA. If a conservation area is covered by such a direction this will be outlined in the relevant appraisal and is also highlighted in the table within section 4.1. Further Article 4 Directions are proposed for both conservation areas (see appendices for details).

4.1.13 An adequate level of enforcement support is necessary to control unauthorised alterations and, at the same time, greater public awareness on what requires planning permission. This is particularly relevant for flats and businesses, where individual owners and/or occupiers may not be aware of how strict planning controls are.

- **Large Extensions and Demolition**

4.1.14 Properties within the Green Belt tend to sit comfortably within large plots. As this is the case for both Brookshill Drive and Grimsdyke Estate CA and parts of the West Drive CA, there is pressure to substantially enlarge homes here. However the NPPF stresses that development within areas of Green Belt should be restricted to safeguard areas of green and open land. The extent to which dwellings in the Harrow Weald CAs can be extended is therefore limited creating a linked pressure for part demolition and rebuild to allow for the reconfiguration of internal space to enlarge room sizes.

4.1.15 Demolition in conservation areas (in whole or in part) is protected by the planning process as policy DM7 of Harrow's Development Management Policies holds that 'Proposals that secure the preservation, conservation or enhancement of a heritage asset and its setting, or which secure opportunities for sustainable enjoyment of the historic environment, will be approved'. Demolition within conservation areas requires permission.

4.1.16 Buildings that are considered as making a positive contribution to the conservation area are identified with each appraisal. Alongside these, buildings that are considered to be neutral (i.e buildings that preserve the character of the area but are of no particular architectural merit) are outlined.

- **Pressure for New Housing**

4.1.17 Harrow Weald's CAs tend to incorporate properties sited comfortably within gardens. These sizeable gardens, in combination with the desirability of Harrow Weald as a place to live, the need to meet government housing targets and the lack of obvious proposal sites, makes such areas highly sought after to the developer. Building on garden land however in a conservation area, or within its setting, has the potential to harm its character and appearance.

4.1.18 New housing development is unlikely to be suitable for open green space within Harrow Weald's conservation areas, especially its gardens as this could harm the character and appearance of the conservation area, especially in terms of its biodiversity and amenity.

- **Basements**

4.1.19 An increasing number of basements are being proposed throughout Harrow. This is a direct result of the lack of land and high land values, appealing to families by providing additional space without the burden of having to move. There are issues associated with this type of development however. Not only are concerns often raised about ground movement, impact on tree roots or the structural integrity of existing and neighbouring structures, but where railings, grills or roof lights are proposed these can be visually disturbing to the conservation area. Therefore, this type of development is not always in keeping with the architectural character of historic buildings or garden settings. In addition, it is unlikely that subterranean development would be permitted where within the vicinity of a Scheduled Monument.

- **Pressure for Development in the Green Belt, Open Spaces or Within Sites of Importance for Nature Conservation**

4.1.20 Areas of open space are shown in the maps within section 3.2.

4.1.21 Parts of Harrow Weald Ridge provide substantial tree cover and extensive tracts of open and natural land. These in turn give rise to environmental consequences that make a positive contribution to their special character. In particular, they provide significant areas of relatively low light, air and noise pollution, as well as places for undisturbed habitat formation and wildlife movement.

4.1.22 Green Belt stretches across the north of the borough and runs fully across Brookshill Drive and Grimsdyke Estate CA and skims the edges and overlaps parts of West Drive CA. The Harrow Weald Ridge area of special character boundaries largely coincide with those of the Green Belt which underlines the strategic importance of the area's openness, to be safeguarded from inappropriate development. Green Belt means planning controls are more stringent in relation to extensions and especially to new development, which relies on very special circumstances. The NPPF provides guidance on what is and is not considered appropriate development within the Green Belt. The designation helps to preserve the openness between dwellings and to fields helping to preserve the character of the area. It contributes to the conservation areas' semi rural character.

4.1.23 Open spaces do not necessarily have to be publicly accessible park land but can be treed areas, or sports grounds, allotments or cemeteries for example. The physical and aesthetic attributes of open space should not be underestimated. These areas aid views of the historic buildings within the conservation areas and create buffers from surrounding suburban development. The most notable of these are the large areas of natural and semi-natural green space throughout Brookshill Drive and Grimsdyke Estate CA and the large open spaces around the West Drive CA. Significantly, there are also small areas of openness that are not designated as open space, but which are valuable in performing the same benefit.

4.1.24 All developments will be expected to incorporate appropriate elements of open space that make a positive contribution to and are integrated with the wider network.

- **Pressure to Hard Surface Front Gardens**

4.1.25 The continuing loss of front gardens is likely to be as a result of increasing car ownership, off street parking pressures, changes in garden fashions and also the absence in some cultures of any garden tradition. There is often pressure to overly hardsurface front gardens in West Drive and Brookshill Drive and Grimsdke Estate CAs. There is therefore a need for porous alternatives to impermeable materials and soft landscaping to soak up rainfall to reduce flooding, for the protection of building foundations, as well as to provide open spaces for pleasant townscapes. Where this is particularly relevant, this has been highlighted within the Management Strategies at the end of this document and an Article 4 Direction has been proposed unless one is already in place.

4.1.26 Greater controls were introduced to the General Permitted Development Order (GPDO) in October 2008 which insists on the use of permeable surfaces. To assist in recognising what constitutes a permeable material, the department for Communities and Local Government (DCLG) has produced guidance on driveways. This can be found at:

- <http://www.communities.gov.uk/documents/planningandbuilding/pdf/pavingfrontgardens.pdf>

- **Uses of buildings**

4.1.27 Although pressure for flat conversions within Harrow Weald is relatively low at present, conversions of large single family dwelling houses could have a significant effect on the character and appearance of Harrow Weald's CAs. Although the physical appearance of the original building may not substantially alter, its character and the character of the wider conservation area would change. The associated increase in car movements, fencing, bins and other features of flat conversions would likely result in a detrimental impact. A separate SPD is currently being produced on conversions and will be available in due course as part of the emerging LDF.

- **Telecommunications Installations**

4.1.28 The elevated position of Harrow Weald ridge creates the potential for telecommunication demand here. The effectiveness of telecommunication signals varies throughout Harrow Weald and therefore there is likely demand for telecommunication installations. If not carefully sited these add to street clutter which can detract from the richness of a conservation area's architecture and spaces and therefore the potential to detract from its character and appearance is high. A mast just outside the Rayners Lane CA for example could be re-sited to enhance the area. Proposals for telecommunication developments should be sympathetically designed and sited and will require careful consideration and discussion. Where telecommunication masts and boxes have already been sited, and where such positions would benefit from de-cluttering, the Council will work with the supplier to re-site the equipment to appropriate alternative locations.

4.1.29 The digital switchover will put additional pressure on the area for satellite dishes. These would be required to be discreetly and sympathetically sited so as not to detract from the conservation area, and located in gardens if possible.

- **Redundant Buildings and Sites**

4.1.30 Whilst the quality of Harrow Weald's environment is generally high, there are a few sites, structures and buildings the physical condition of which could be improved upon. Typically these fall in relatively hidden away sites and are buildings that are/were ancillary to the principal buildings e.g. in Brookshill Drive and Grimsdyke Estate CA this comprises some outbuildings and former associated agricultural buildings to the main listed Grimsdyke Hotel. This includes a former greenhouse and stables to the house. It also includes historic agricultural buildings along Brookshill Drive e.g. Cope Farm barn. Where structures are vacant and lacking in heating and general maintenance they deteriorate. Encouraging better maintenance and new uses for such structures is an essential part of this SPD and associated CAAMS.

4.1.31 It is important to note that English Heritage's annual 'Heritage at Risk' Register lists statutory listed buildings and other designated heritage at risk of neglect and decay. So, it could helpfully be used to highlight redundant buildings and sites within Harrow Weald. In addition, since 2012 SAVE Britain's heritage has published a regular catalogue on buildings at risk (both listed, curtilage listed and unlisted). The Council will consider putting items forward for this register too where appropriate to further highlight heritage at risk to help facilitate resolution of the issue.

- **Quality of the Harrow Weald Environment**

4.1.32 Much of the public realm within Harrow Weald is owned and managed by Harrow Council, but a significant proportion is in private ownership given parts of the roads are unadopted in both CAs. The streetscapes are in a good condition. The continued and appropriate maintenance of the area is necessary though.

4.1.33 Valuable areas of open space, within and around both CAs, provide biodiversity, wildlife habitat and also afford scenic views provided by the land. Important wildlife, such as bats, should be respected when considering development and lighting levels within open or garden areas.

- **Energy Efficiency and Climate Change**

4.1.34 With a growing awareness of sustainable development and the effects of climate change, in combination with increased fuel bills, there is an increased drive at both national and local level for places to become more energy efficient and environmentally friendly. More sustainable and efficient approaches to transport, energy, water and waste management, in response to climate change, concern is therefore encouraged. For example, water efficiency measures can often be retro-fitted to existing properties with little or no impact on the physical appearances of the conservation areas. Whilst these are positive objectives, there is potential for harm to be caused to Harrow Weald's CAs, especially to traditional built fabric and to the way the building functions.

4.1.35 There is an increased pressure to adapt buildings to improve energy efficiency through the installation of micro generation equipment, which includes structures such as solar panels and wind turbines. This is likely to have a significant effect on the townscape and roofscape of Harrow Weald's CAs and as such an Article 4 Direction that would require planning permission for all such elements will be considered for each conservation area.

4.1.36 Regard should be made though to the potential for district wide heating or cooling power schemes which might support the conservation areas by providing a renewable energy source that would eliminate the concerns that micro-generation technologies can present. However, the infrastructure that such schemes may necessitate could present a further development challenge in the areas. Likewise, climate change adaptation infrastructure in the form of sustainable urban drainage systems or other forms of flood defence or waste management may also require additional infrastructure which would also require care to ensure this preserved the character of the conservation areas.

4.1.37 The Council has produced a Sustainable Building Design SPD to promote and ensure developments will be more efficient and sustainable.

- **Bins**

4.1.38 Another pressure is for increased waste recycling. The conversion of garages into habitable rooms has meant more bins are stored in front gardens, particularly in the West Drive CA, which detract from the character and appearance of the area. Bin storage should therefore be considered as part of relevant planning applications to ensure these are concealed as far as possible from the streetscene. The sensitive placement of litter bins in the public realm is similarly important.

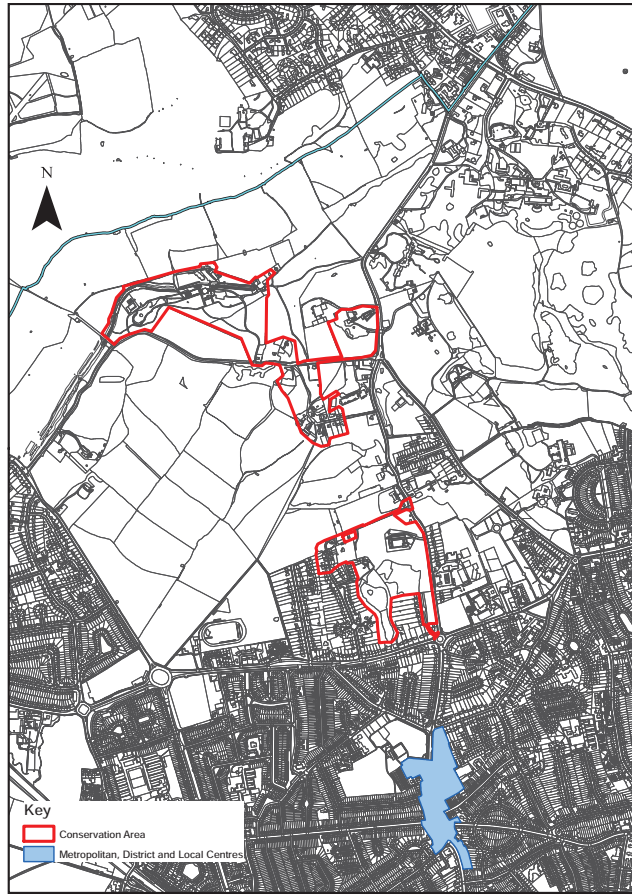
- **Pressure for Works to and Felling of Trees**

4.1.39 The trees within Harrow Weald's conservation areas are extremely important as they make a significant contribution to their character, historical development and appearance. They comprise a mix of native and exotic species found within the open spaces, in private gardens and as street trees. Trees within the conservation areas are protected by virtue of the conservation area designation and there are numerous individual and area Tree Preservation Orders as well. Generally, trees within the conservation areas are well managed by their owners. The main areas of pressure are connected with providing off street parking where there is pressure to fell street and private trees to create car parking spaces or afford access to them, and for extensions or basements which creates pressure on tree roots.

- **Commercial Viability**

4.1.40 There is one district centres within the Harrow Weald area: Harrow Weald is a district centre as shown on the following map. This is nearest to West Drive CA. This has a link with the CAs by virtue of affecting its setting. It has traditionally provided local convenience goods and services. It is worth noting that the London Plan states: 'Developing the capacity of District centres for convenience shopping is critical to ensure access to goods and services at the local level, particularly for people without access to cars' (London Plan Annex 1, para 3).

4.1.41 It is part of the rural nature of the CAs themselves that they do not contain retail uses but instead any commercial activity is limited to a hotel use and some agricultural uses.



Picture 4.1 Town Centres

- **Employment Viability**

4.1.42 Harrow Weald employs a number of people via the shops and offices within the area, particularly the district centre. The Grimsdyke Hotel employs various people in the hotel and for its grounds, and is the largest single employer of either of the two CAs.

- **Tourism**

4.1.43 The conservation areas have both current and potential tourism benefits due to their concentration of buildings of architectural and historic interest. For example, Grimsdyke Hotel provides a draws people from all over to experience and learn about the interesting and significant architecture and history to the area for example via the Gilbert and Sullivan Society who have organised events and walks here. This matter is considered further within the later section entitled 'Promotion Methods'.

- **Crime and Fear of Crime**

4.1.44 Although Harrow Weald can be regarded as a relatively safe area within the Harrow and London context, there is still public perception regarding the threat and fear of crime. The relative affluence of the conservation areas is likely to contribute to this.

4.1.45 There is danger that overly reactive measures could be implemented to safeguard security, and there are already examples within Harrow Weald of CCTV camera installations. Whilst crime and safety are important issues, the need to preserve and enhance the character and appearance of Harrow Weald's conservation areas must not be lost through the provision of inappropriate and unsuitable security measures.

- **Health and Well Being**

4.1.46 The design quality of buildings, parks and streets to improve health and well being is important. Usable spaces that accommodate diverse needs and reinforce community identity through respect for historic context and heritage is critical. Harrow Arts Centre is therefore a valuable asset in providing arts and culture to Pinner and the wider borough as a whole including Harrow Weald. The Grimsdyke Hotel is of similar importance.

4.1.47 Improved health and well being can be derived from proper management and maintenance of the built environment. By creating clean, safe and green public places and achieving sustainable development, through the efficient use of resources and adaptability to respond to future change, the quality of life in Harrow Weald would be improved.

- **Education and Social Cohesion**

4.1.48 Promoting awareness and understanding of the conservation areas has significant potential to increase the enjoyment of these areas. Developing a sense of the background to the buildings within and their design quality can similarly improve social cohesion. This therefore highlights the importance of this SPD and any other measures with the potential to increase understanding of the conservation areas. This matter is considered further within the later section entitled 'Promotion Methods'.

4.2 Protection Measures

4.2.1 In addition to the management of development proposals, Harrow Council can implement a number of controls and regulations to preserve and enhance the character and appearance of the Harrow Weald conservation areas. These controls are normally connected with wider planning legislation and require public consultation before they are implemented. Such protection measures are discussed in the following paragraphs.

- **Article 4 Directions**

4.2.2 Small scale alterations to properties, such as replacement windows or the insertion of roof lights can have a cumulative harmful effect on the character and appearance of conservation areas. Harrow Council can implement Article 4 Directions to control such works under the General Permitted Development Order. There are two types of Article 4 Direction; Article 4(1) Directions require the approval of the Secretary of State and can cover all parts of a conservation area; Article 4(2) Directions can be implemented by the local planning authority without this approval, but this direction only controls elevations fronting onto a highway, waterway or open space. Article 4

Directions require householders to apply for planning permission for works that otherwise would not normally require consent. These are not designed to prevent change, but rather to ensure that alterations are carried out sympathetically.

4.2.3 Whereas parts of Brookshill Drive and Grimsdyke Estate CA are covered by Article 4 Directions, West Drive CA is not. There is scope to extend the coverage of Article 4 Directions to more of the Harrow Weald conservation areas and to increase the amount of works that would require planning permission. This is proposed within the CAAMS for both conservation areas in the form of new Article 4(2) Directions. This is subject to public consultation as part of the consultation on this SPD.

- **Areas of Special Advertising Control**

4.2.4 Under the Advertisement Regulations 1992 (as amended), local planning authorities can ask the Secretary of State to approve Areas of Special Advertising Control to restrain more obtrusive forms of advertisement in designated areas such as conservation areas. Approval will only be given if sufficient justification is made to the Secretary of State and adequate consultation is carried out with local businesses. At this time it is not considered that there is scope for such control within the conservation areas of West Drive and Brookshill Drive and Grimsdyke Estate CAs. Such control would be subject to research and analysis.

- **Enforcement Powers**

4.2.5 Despite the above development guidance and planning controls, there are instances within Harrow Weald's conservation areas of works or neglect that contravene planning legislation. Not all cases are deliberate and at times innocent mistakes can be made by landowners. The following sections discuss the different powers that the council has to deal with inappropriate development. Notably, English Heritage's recent expansion of its Heritage at Risk register to incorporate Conservation Areas at Risk should strongly support enforcement activity by the council.

4.2.6 Unauthorised development (i.e. development that should have obtained planning permission) can have a very negative impact on the character and appearance of Harrow Weald's conservation areas. Where necessary, reports of unauthorised development will be investigated by Harrow Council's planning enforcement officers and appropriate action taken. As unlawful small scale development can impact hugely on the character and appearance of a conservation area. Conservation area related enforcement cases are prioritised for action above others. Such action will range from requesting a retrospective planning permission to the serving of an enforcement notice to secure the removal of works that are considered to have a detrimental impact. Due to the sensitive nature of enforcement complaints, these are kept anonymous and the cases are treated as strictly confidential.

4.2.7 Where possible, the council will monitor Harrow Weald's conservation areas on a regular basis and note any unauthorised works. Within Article 4 Direction areas, frequent (3 yearly) photographic surveys will allow the council to maintain a snapshot of how properties look on a particular date, which can then assist enforcement

investigations. Many unauthorised works are often on a small scale (such as replacement windows or fencing), but they can still have a significant harmful impact on the character and appearance of Harrow Weald's conservation areas.

- Section 215 Notices

4.2.8 In addition to using enforcement powers against actual development, Harrow Council can also take action against land and properties that are suffering from neglect and dereliction. Under Section 215 of the 1990 Town and Country Planning Act, local planning authorities can require owners of derelict land and buildings to carry out repairs and improvements to improve the 'amenity' of the local area.

4.2.9 As part of the Section 215 process, the Council will initially try to negotiate with the landowner to bring about improvements, resorting to formal legal action if necessary. Harrow Council will need to be clear on exactly what requires improvement and will have to demonstrate that the current condition of any given site detracts from the amenity of the local area.

- Urgent Works Notices

4.2.10 Whilst Section 215 Notices can be effective and are relatively uncomplicated to apply, they have limited impact as can only apply to the exterior of a building or site and the surrounding land. There may be buildings that require more extensive repair to ensure that they are not lost altogether. Within conservation areas, it is possible to serve Urgent Works Notices on buildings to ensure that essential repairs are carried out to safeguard the structure. Such notices are broadly similar to powers that can be used on listed buildings, but they require approval from the Secretary of State before they can be served. Adequate justification would need to be made to obtain such approval and there are significant resource implications on the authority of so doing. Where appropriate, Harrow Council will use its planning enforcement powers to remedy breaches of planning control or take action against land and properties which are suffering from neglect.

4.3 Proactive measures

4.3.1 There are many proactive measures to help manage the Harrow Weald conservation areas:

- **Development/Design Briefs**

4.3.2 Harrow Council can encourage the redevelopment of problem or unsightly sites within the conservation areas of Pinner by publishing development and design briefs. These briefs could clearly state how the local planning authority intended a particular site to be redeveloped, by assessing the surrounding context and outlining overarching design guidelines that would be expected to be followed by a developer. This is a more positive approach than the punitive enforcement powers described in the previous chapter and could result in significant improvements to Pinner's conservation areas, or within their setting.

- **External Funding**

4.3.3 Organisations such as the Heritage Lottery Fund and English Heritage can offer substantial financial assistance to enable the regeneration and enhancement of specific historic areas. The most recent example for Harrow was the Heritage Economic Regeneration Scheme (HERS) that resulted in a number of improvements to the streetscape and the shop fronts of local businesses on Harrow on the Hill. By improving the streetscene, such schemes often continue to benefit the townscape by encouraging more investment and care in the local area from the local community. Applications for grant-aid schemes relevant to Harrow Weald's two conservation areas will be considered as and when necessary.

4.3.4 In addition to large grant schemes, there are smaller pots of money that can be utilised for small scale restoration projects. Other small grant bodies include the Harrow Heritage Trust, Heritage of London Trust, and other specialist organisations.

4.3.5 Whilst Harrow Council will continue to seek to obtain grant aid, it will also support local residents, businesses and other organisations in obtaining funding, and help ensure that the communities are aware they can apply for funding. This may only be in the form of advice and supporting letters, but Harrow Council is committed to ensuring the enhancement of Harrow Weald's conservation areas in all forms.

4.3.6 In addition to grant funding, the council can secure planning gain funds towards enhancements to conservation area. The Conservation Area Management Strategies set out opportunities for enhancement relevant to each conservation area and will be used as part of pre-application negotiations to secure the right level of contribution on a site by site basis.

- **Council-led Schemes**

4.3.7 Harrow Council conducts a number of capital programmes each year to bring about improvements to the physical environment of the borough. Public realm projects are led by Landscape, Highway, Traffic and Transport Teams in conjunction with the council's appointed contractors. Schemes can range from the repair of pavements to the implementation of traffic control measures. The Conservation Team will endeavour to influence and assist these projects where appropriate to ensure that the overall character and appearance of Pinner's conservation areas are preserved and enhanced.

- **Community Engagement**

4.3.8 There are local groups and organisations with an interest in the preservation and enhancement of Harrow Weald's conservation areas, in addition to the residents who live and work in Harrow Weald. Engagement with local people and businesses is critical at all stages, whether it relates to the production of new character appraisals or the promotion of environmental improvements. Some of the principal organisations include the West Drive Residents Association, the Harrow Heritage Trust and the Conservation Area Advisory Committee. There are also numerous schools, residents associations and businesses. Community engagement can take many forms; it can

include listening to the concerns of local people, holding specific workshops and exhibitions, or sending out letters and consultation leaflets. Engagement will follow the guidelines set out in Harrow Council's Statement of Community Involvement.

4.3.9 In addition to engagement at local level, it is important that regular and meaningful engagement is sought with statutory bodies, including English Heritage and national amenity societies such as the Victorian Society and the Society for the Protection of Ancient Buildings (SPAB). English Heritage have set up the HELM initiative (Historic Environment - Local Management) to provide local authorities with support and training on conservation matters. Notably, English Heritage's recent expansion of its Heritage at Risk Register to incorporate Conservation Areas at Risk should strongly support promotion and enhancement activities by the Borough by, among other things, helping to target grant funding appropriately. Sharing ideas and experiences with other councils and professional bodies will help Harrow Council to improve Harrow Weald's conservation areas.

- **Tourism and Education Initiatives**

4.3.10 Parts of Harrow Weald are well known for their historic and architectural qualities. The borough's historic environment forms a key part of Harrow Council's Tourism Strategy, elements of which regularly feature on promotional documents and initiatives. There are walking tours of Grimsdyke Estate and numerous leaflets and books to aid visitors. Grimsdyke Hotel also take part in the annual Open House London event, further promoting Harrow Weald as a visitor destination. The preservation and enhancement of Harrow Weald's conservation areas is therefore crucial to maintain and improve this important tourism function.

4.3.11 Linked to tourism is an opportunity to create educational initiatives within Harrow Weald that would benefit local schools and communities. Improving people's understanding and appreciation of Stanmore and Edgware's conservation areas will benefit everyone. An estate agents welcome pack could be developed with Harrow Heritage Trust to better inform new residents about the conservation areas. There is further opportunity for the council to work with the Harrow Heritage and the residents associations in the work that they do in caring for the heritage of Harrow Weald for the benefit of all.

4.4 Monitoring Measures

4.5 Monitoring Measures

4.5.1 The conservation areas require regular monitoring and therefore the following monitoring actions are proposed:

- Carry out a dated photo survey every three years.
- Refer unauthorised development to Planning Enforcement and ensure that action is taken where appropriate.

- Before new work is agreed in the area, ensure Conservation and Design carry out an on-site inspection.
- Create and maintain links with relevant stakeholders, property owners and interest groups for feedback on issues in the conservation area.

4.5.2 A set of indicators to identify which conservation areas are covered by an appraisal and which are covered by a management study, and also which of these are up to date, will be included each year within the Council's Annual Monitoring Report.

5.1 Introduction

5.1.1 The following overarching guidance notes will help ensure that development in Harrow Weald conservation areas preserve their special interest. The first guidance note is general, referring to all development affecting the conservation areas and their settings.

Overarching guidance note i

- All development will be expected to respect the special character and layout of Harrow Weald's conservation areas and their settings. Alongside this SPD, applications for development will be assessed against relevant policies and objectives contained within the forthcoming Local Development Framework and NPPF.

5.1.2 Guidance is otherwise grouped under four headings:

- **Maintaining townscape and built character**

Overarching guidance note ii

To ensure Harrow Weald's townscape is preserved or enhanced, the following guidance is applicable:

1. The demolition of buildings and structures that make a positive contribution to Harrow Weald's conservation areas should be discouraged.
2. Encourage the retention of visually important boundary treatments.
3. Development should ensure that views, as identified in the SPD and individual character appraisals, are not impeded either between buildings or into areas of open space.
4. Development should respect the existing layout and historic form of the townscape and street scene, especially its building lines and heights, and not diminish the gap between buildings.
5. Development should complement and respect existing properties and areas of open space in terms of bulk, scale and siting.
6. Development should respect and harmonise with existing buildings in terms of design, siting, detailing, scale and materials.

7. Development should retain original design features (as identified within the CAAMS), and where replacement is necessary the architectural detailing should closely match that of the original. Replacement features constructed of non-traditional materials will be discouraged.
8. Development should ensure material alterations to buildings protect the appearance of elevations, including alterations to chimneys and rooflines.
9. Microgeneration equipment should be carefully sited to protect streetscene views and historic built fabric.
10. Air conditioning units should be carefully sited to protect streetscene views and historic built fabric.

- 5.1.3** Buildings and structures within Harrow Weald's conservation areas form a vital part of their townscape character. This not only includes buildings but smaller features such as associated outbuildings and gate piers which make a positive contribution to the local streetscene. Whilst the preservation of conservation areas does not prevent any change from occurring, a very strong justification would need to be made to demolish any building or structure that makes a positive contribution to its character and appearance. The individual conservation area character appraisals identify which buildings are considered to have a positive or neutral impact. In order to avoid gap sites within conservation areas following demolition, an acceptable replacement building/scheme would normally have to be agreed before consent was granted for demolition. In this case reference would also be made to NPPF, and in particular, its tests for harm and loss of significance.
- 5.1.4** While it is acknowledged that the street scene is the most important viewpoint, other, more private viewpoints can also positively contribute to the amenity of the area. This is particularly the case where backs of properties can be seen from public viewpoints due to the topography of the area. This guidance is therefore applicable to all elevations of development irrespective of whether they face onto public areas.
- 5.1.5** New development is defined as being any form of development, from small scale household alterations to larger extensions or whole new build. New development within Harrow Weald's conservation areas is likely and need not be considered as universally negative. If handled correctly, new development can preserve the special character, appearance and setting of Harrow Weald's conservation areas and, in the right circumstances, lead to their enhancement. Proposals will be set against the NPPF, which sets out the need to consider the desirability of preserving or enhancing the character or appearance of a conservation area, as well as its setting, or views into or out of the area. They will also be considered against the CAAMS and will need to comply with policies in this SPD.
- 5.1.6** This SPD draws on the advice from the following guidance document which is considered particularly helpful. The CABI website for further reference is <http://www.cabe.org.uk>

Building in Context

- “Building in Context” (2001) is the published guidance document from English Heritage and the Commission for the Built Environment (CABE) which refers to achieving successful new development within historic areas. It should be referred to when considering new development within Pinner’s conservation areas. The document states that the right approach to building in an historic area is for developers to first understand the context for any proposed development in great detail and relating the new work to its surroundings through an informed appraisal (often in the form of a Design & Access Statement). This does not imply that any one architectural approach is, by its nature, more likely to succeed than any other, and there is no one formula to fit all solutions. According to the document, successful development projects will:
 - relate well to the geography and history of the place and the lie of the land;
 - sit happily in the pattern of existing development and routes through and around it;
 - respect important views;
 - respect the scale of neighbouring buildings;
 - use materials and building methods which are as high in quality as those used in existing buildings;
 - create new views and juxtapositions which add to the variety and texture of the setting.

5.1.7 It is likely that sustainability measures will lead to an increase in proposals involving the installation of solar panels and wind turbines on properties within conservation areas. If well designed and carefully integrated, these measures should be able to be accommodated without detriment to the character of the conservation area.

5.1.8 English Heritage has a range of guidance on the different considerations involved in the use of micro-generation technologies in conservation areas which can be accessed on their Historic Environment: Local management (HELM) website by entering energy efficiency into the search engine in the English Heritage section of the Guidance Library at www.helm.org.uk.

5.1.9 The importance of undertaking basic energy efficiency works prior to opting for the installation of micro-generation equipment should be encouraged. Such works include appropriate loft and wall insulation and draught proofing.

5.1.10 The installation of air conditioning units can be visually obtrusive. Therefore it is important that these are only installed where they are carefully sited and integrated so they can be accommodated without detriment to the character of the conservation areas.

- **Maintaining greenery and open spaces**

Overarching guidance note iii

To ensure that the soft and open character of the conservation areas and their setting is both preserved and enhanced, the Council will:

1. Encourage the retention and improvement of both public and private green spaces, including trees and hedgerows.
2. Discourage the removal of grass verges and green open land.
3. Discourage development on existing areas of open land that have been defined as contributing to the character of the conservation area.
4. Further protect trees, and groups of private trees, by creating additional tree preservation orders where appropriate.
5. Discourage development that adversely affects significant trees or is likely to lead to pressure for excessive pruning or felling.
6. Seek to retain, or where necessary, replace street trees.

5.1.11 Works affecting the green and open spaces within Harrow Weald need to be carefully considered to avoid detracting from the character and appearance of the conservation areas, or their setting. This applies to both hard and soft landscaping in the streetscene. Private spaces such as front and rear gardens are also included as they contribute to the overall feel of the area. Works to the public realm and green spaces will require negotiations between various departments within Harrow Council, as well as private landowners, statutory bodies and local residents.

5.1.12 Trees make a significant contribution to Harrow Weald and are protected by virtue of being within conservation areas. Therefore Tree Preservation Orders (TPOs) are usually only created within conservation areas where a clear need arises, such as:

- there is a threat of development; or
- the tree is badly managed; or
- there is a change of ownership of the tree, which can often lead to pressure for works

- **Protecting Harrow Weald's archaeology**

5.1.13 The nearest Archaeological Priority Area (APAs) is that of the possible site of medieval Bentley Priory and areas along Grims Dyke. There are currently none within the Harrow Weald CAs. However, this is to remain under review since they represent a finite and important resource and record of Harrow Weald's history. Development proposals can damage or destroy these remains and require careful monitoring and mitigation measures to avoid or limit damage. Even outside an APA, the Council can chose to consult with GLAAS if it is felt that there may be archaeological issues. The Greater London Sites and Monument Record (GLSMR) can also be consulted to identify whether there is likely to be any archaeological or historic interest within any given site in Pinner. The NPPF would need to be referred to as part of any proposal that could potentially affect the area's archaeology. The following guidance notes are designed with the above in mind:

Overarching guidance note iv

1. Harrow Council recognises the archaeological importance of Harrow Weald's conservation areas and their settings, and will help to protect these by continuing to consult with English Heritage to ensure the appropriate action or work, such as surveys are carried out before development commences.
2. Where appropriate, and in discussion with English Heritage, new Archaeological Priority Areas will be created/extended, to safeguard Harrow Weald's archaeological remains.

5.1.14 Grim's Dyke is a Scheduled Monument that constitutes an important part of Harrow Weald's heritage. It is therefore essential that it is preserved for future generations. Grim's Dyke, in particular, has suffered considerably from unwelcome attention over the last two centuries. Nineteenth century searches for brickearth and gravel led to the destruction of parts of the earthwork, and considerable damage was caused by construction work in the 1930s. Today it is under threat from motorcycle scrambling and illegal rubbish dumping. In addition, where this forms garden land harm may be caused when digging occurs.

5.1.15 The scheduling of a monument means that permission is required for works to the monument. This consent is termed 'Scheduled Monument Consent'. All activities that will change the site above or below ground need consent. For example, activities that would need this consent include construction, demolition, removal of earth, repairs, any alteration, and tipping. Normal agricultural or domestic gardening works would not usually be affected by this designation, for example, weeding. However consent is necessary for deeper excavations (300 mm or more) such as might be required for swimming pools or tree planting. It is a criminal offence to use metal detecting on a Scheduled Monument.

- **Protecting Harrow Weald's streetscene**

5.1.16 When assessing proposals for telecommunication developments and other tall structures, such as wind turbines, utility poles or lampposts, the preservation of the conservation area should be considered. The design and height of such tall structures could harm the appearance of the area or serve to clutter the streetscene. Where possible streetscene clutter should be avoided and reduced in number or consolidated. For example, certain signage could be removed where it is not essential to public safety.

5.1.17 It is likely that Harrow Council or local residents given some of the roads are unadopted will want to alter the floorscapes in Harrow Weald's conservation areas. If materials are sympathetic to the area and traditional floorscapes are retained, these measures should be able to be accommodated without detriment to the character of the conservation area.

Overarching guidance note v

To limit Harrow Weald's conservation areas from visually and physically obtrusive street clutter, the council will ensure that the character of the street scene is both preserved and enhanced by reference to the following guidance:

1. Refer to existing policy on tall structures where telecommunications or wind mills are proposed.
2. Encourage utility companies to install the minimum amount of new and replacement street furniture and to locate this sensitively in suitable locations.
3. Encourage the retention, or reinstatement, of traditionally designed street furniture and materials, such as street lamps.
4. Encourage street furniture to be well sited and designed. Redundant and unsightly street furniture and signage will be removed where opportunities occur.
5. The retention of original floorscapes, such as gravel driveways, will be encouraged.
6. Wherever practicable, replacement floorscapes should be of traditional materials.

6.0.1 This SPD has so far provided overarching guidance for Harrow Weald's two conservation areas. The following two Conservation Area Appraisal and Management Strategies (CAAMS) provide specific guidance to explain the special interest of each of these conservation areas in turn and to help help preserve and enhance them.

1.1 Introduction to the Conservation Area

1.1.1 Introduction

1.1 The Brookshill Drive and Grimsdyke Conservation Area was designated in 1978 with a view to preserving and enhancing the area's rich semi-rural character and historic qualities. The layout of vernacular agricultural buildings and Tudor style estate properties are essential to this. The essence of the area is also derived from long views over open landscapes, creating a popular outdoor retreat, easily accessible from London.

This page is intentionally left blank

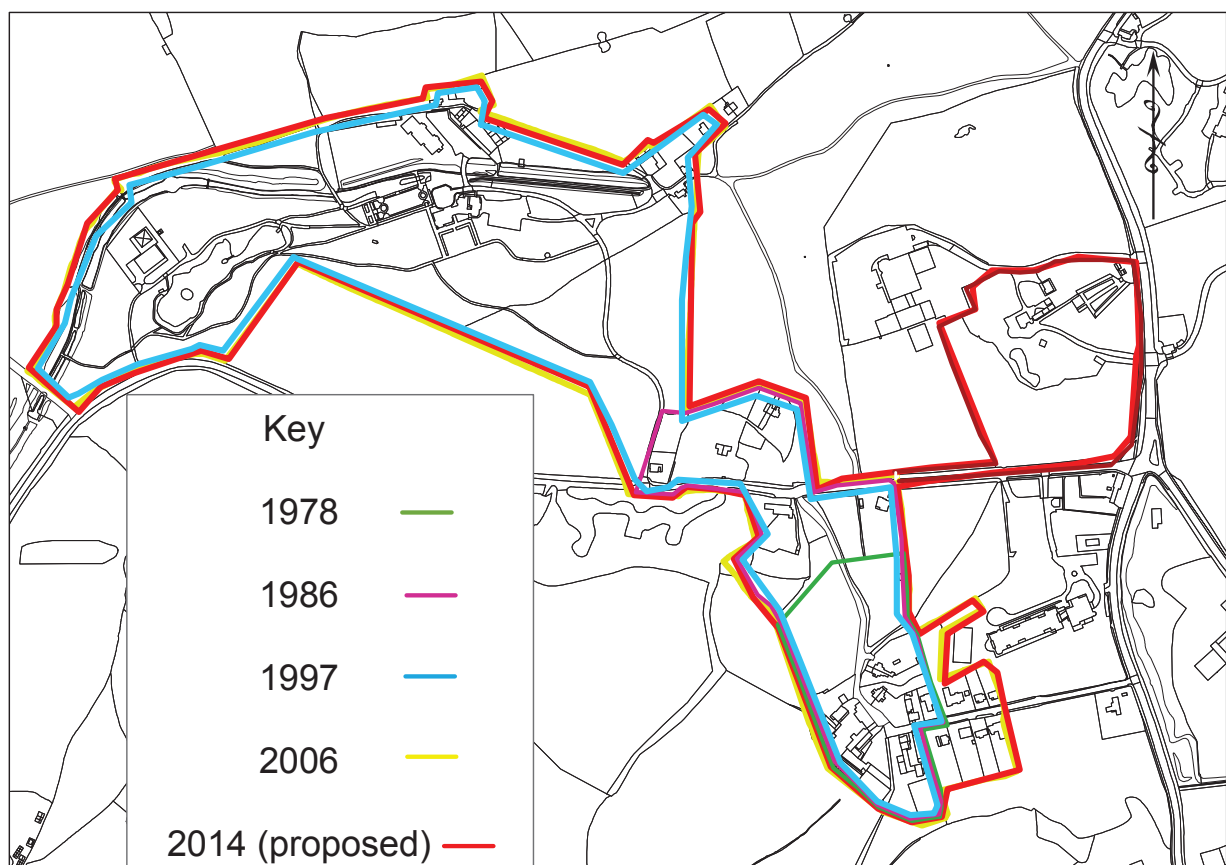
1. Brookshill Drive and Grimsdyke Estate Conservation Area Appraisal and Management Strategy	2
1.1 Introduction to the Conservation Area	2
1.1.1 Introduction	2
1.1.2 Planning Policy Context	4
1.1.3 Summary of Special Interest	5
1.1.4 Short History	6
1.1.5 Archaeology and geology	12
1.2 The Character of the Conservation Area Today	12
1.2.1 Density of Development, Topography and Plan Form	12
1.2.2 Townscape Character	14
1.2.3 Activity and Uses Within the Area	17
1.2.4 Key Views and Vistas	18
1.2.5 Architectural Qualities	20
1.2.6 Streetscape	29
1.2.7 Green Spaces and Ecology	33
1.3 Summary of Conservation Area	35
1.3.1 Summary and Main Assets	35
1.3.2 Problems, Pressures and Potential for Enhancement	36
1.3.3 Public Consultation	40
1.4 Conservation Area Management Strategy	40
1.4.1 Purpose of the Strategy	40
1.4.2 Management Proposals	40
1.4.3 Reviewing the Conservation Area's Boundaries	43
1.4.4 Article 4 Directions	45
1.4.5 Support	48
1.4.6 Guidance	48

1.1 Introduction to the Conservation Area

1.1.1 Introduction

1.1 The Brookshill and Grimsdyke Estate Conservation Area lies in the north of the borough and (including its proposed extension) is made up of three character areas - Brookshill Drive, the Kiln, and Grimsdyke Estate. Old Redding (formerly Wealdwood Road) links Oxhey Lane with Brookshill High Road and divides the three areas, which are linked by their rich rural characters and limited modern development. Brookshill Drive is largely bounded by fields, whilst the Kiln site on Brookshill is surrounded by dense vegetation and Grimsdyke Estate is sandwiched between Harrow Weald Common land, with Scheduled Ancient Monument Grim's Dyke framing the north and east. The layout of vernacular agricultural, domestic and brick production buildings and structures and Tudor style estate properties is essential to the special character of the whole area, which is also derived from its woodland, open spaces and long views over open landscapes. The area is a popular outdoor retreat easily accessible from the city.

1.2 The Conservation Area was first designated in 1978 and the boundary was extended in 1986, 1997, 2006 and it is proposed to extend it again in 2014 to incorporate the Kiln Site. The boundary is drawn with regard to protecting the historic layout and buildings of the area, and their informal, green and rural setting. Surrounding openness, whether this be private land or public space, is very important as it serves to provide a significant reminder of the area's rural and agricultural roots.

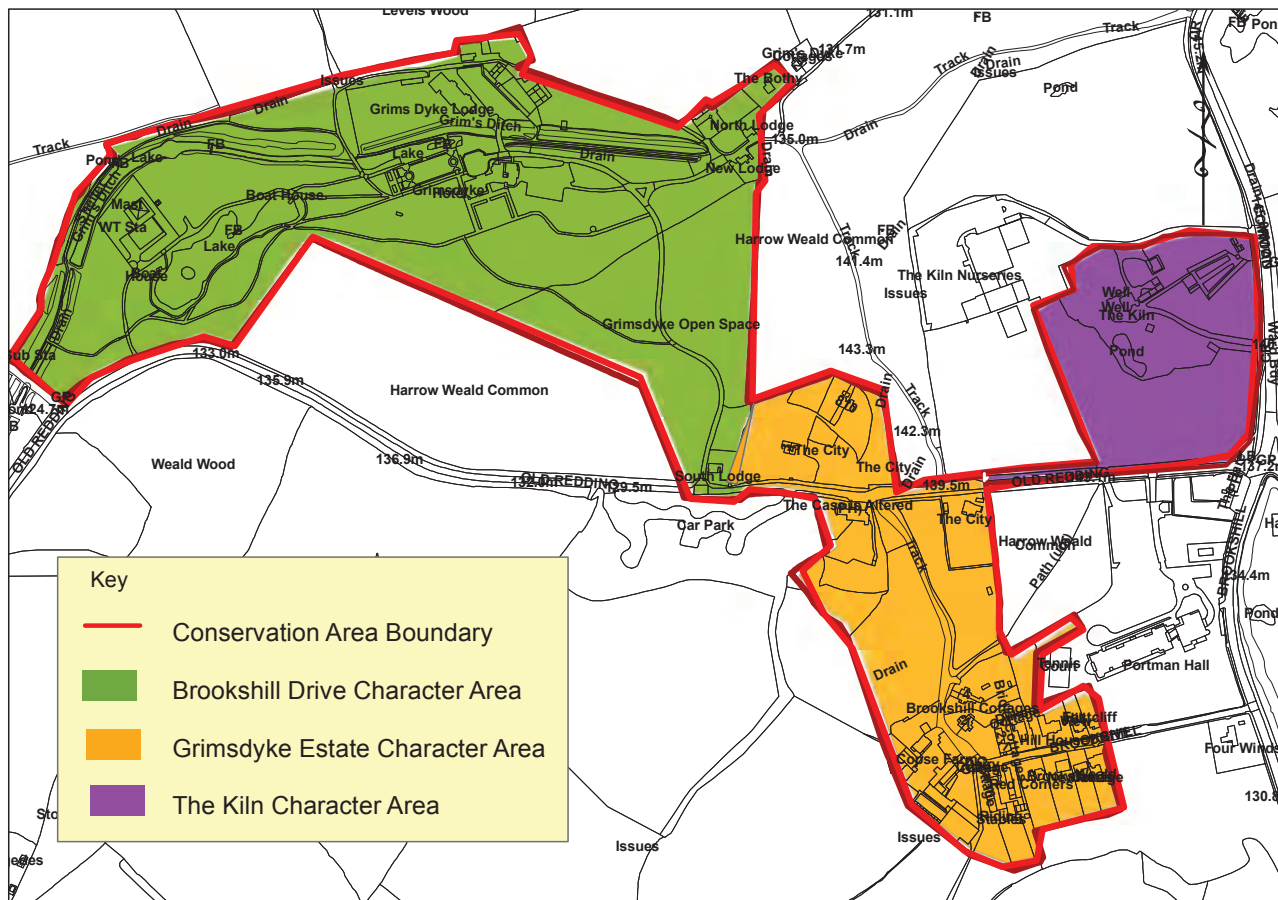


Picture 1.1 Changing boundary of the Conservation Area including current proposed extension LBH LA.100019206.2014



Picture 1.2 Aerial Overview of the Conservation Area LBH LA.100019206.2013

1.1.3 Summary of Special Interest



Picture 1.4 Character Areas LBH LA.100019206.2013

1.5 The special interest of the conservation area relates to its high architectural quality and historic interest in a rural setting, with the low density of development and plentiful surrounding landscaping and greenery. With the exception of Old Redding's traffic, there is a largely peaceful and tranquil air. There has been few new developments with little change which has assisted in the continuation of a rural character throughout routed in history. Two character areas can be identified. The Brookshill Drive area's special historic architectural character is largely derived from rural vernacular agricultural building and domestic Victorian dwellings within a farmyard context and historic buildings and structures associated with brick production, one of which dates back to the 17th century. It includes the rural context, layout and setting of these buildings, the spaces between them, and the surrounding openness and key views, particularly notable given Brookshill Drive is set atop a 400 foot contour. The Kiln site's special interest relates to its history as a brick making site which provided bricks for the workers cottages and other houses in the conservation area, and the associated rural qualities of the site that link in with the remaining conservation area. The special character of the Grimsdyke Estate area is derived mainly from the late 19th century planned form of William S Gilbert's estate (of Gilbert and Sullivan fame) including its integral buildings, elements of grandeur, the relationship between and architectural qualities of these, and the intimate character created by the lush landscaping and neighbouring woodland.



Picture 1.6 Rural setting and Open Spaces

1.1.4 Short History

Brookshill Drive and the Kiln Site Character Areas



Picture 1.5 Wooded and Secluded Estate Buildings

•

1.6 The Brookshill Drive area once belonged to the Lord of the Manor and those with farming rights were able to lease acres from his estate for small farms. Sir Edward North was Lord of the Manor during the 16th century. At this time extensive Weald woodlands were heavily coppiced for fuel and timber. During the 17th century there was a move to full-scale clearance in order to provide land on which to graze livestock, and the area adapted to a more arable and livestock-based economy.

1.7 Brookshill Drive marks a field boundary to the south, as does the hedgerow of White Cottage and the northern part of Hill House's garden wall. Copse Farm, historically Weald Copse Farm, dates from the 17th century, and was developed as a result of cleared coppiced woodland, hence its name.

1.8 Brookshill Farm sits adjacent to Copse Farm but was developed much later, during the 19th century, when farming began to intensify within the area. The brick kilns owned by Brookshill Farm, and sited north and east of Copse Farm, were built and run by the Bodimeade family in the 17th century, then taken over and adapted by the Blackwell family from 1899 after the marriage of Mary-Anne Bodimeade to Charles Blackwell, remaining in their family until the 1930s. Their son Thomas (1804-1879), was the co-founder in 1829 of the firm of Crosse & Blackwell, food manufacturers.

1.9 By the mid-C18 these brick kilns had become one of the most significant industrial enterprises in North Middlesex. A 1767 inventory of the works, owned by William Bodimeade (d.1777) in partnership with his son, John, lists 380,000 burnt bricks, 20,000 moulded bricks, 150,000 moulded bricks standing in clamps, as well as 135,000 tiles and 25,000 paving bricks. In 1777 John Bodimeade set up 50 kilns to supply bricks for the mansion being built at Gorhambury, Hertfordshire for the Third Viscount Grimston. The brickworks eventually ceased production in 1912.



Picture 1.7 The surviving grade II listed kiln, Brookshill

1.10 The brickworks had a key impact on the landscape within the conservation area under the ownership of father and son, Samuel and Charles Blackwell. A collection of semi-detached cottages was built for the brick kiln workers in the early 19th century, which became known as the City. By 1831 there were fourteen cottages inhabited by 120 people. However by the mid 1960s, many had been demolished, leaving Nos 1&2, 3&4, 8,9&10 and the City Cottage to the south of Old Redding. Today, only 3&4 remain, amalgamated as one house. In 2012 this suffered fire damage but the shell remains in place ready for repair and restoration. Also, Charles Blackwell later built a number of decorative buildings, including Farm Cottage, Dairy Cottage, and Nos 1 and 2 The Bungalows, now Bridle Cottages, at Brookshill in c.1890, all of which remain.



Picture 1.8 3&4 The City, Old Redding before a recent fire which part destroyed the building

1.11 Importantly the historic buildings within the conservation area were built using clays from a site just to the north of the Kiln site (shown on the 1877 Ordnance Survey map as a brick field) which was in turn was used in brick making from the Kiln site. So, many of the bricks and materials for buildings within the conservation area are likely to have been produced from the Kiln site.

1.12 The former brick business remains clear today within the site of the Kiln, as the Kiln house (dating back to the 17th century), one kiln (the only survivor of 3 which were in operation between 1795 and 1895), drying sheds (rebuilt in the 1980s to replicate the 18th century ones) and an associated pond and two wells remain today. The formal gardens marked by brick walls within the

grounds of the Kiln date back to the 18th century. They are shown as a trapezoid walled garden with a summer house in the north-eastern wall on the 1877 OS map. The summer house dates back to the 19th century and remains today.

1.13 From just after the 2nd World War, Alan Dalton tenanted Copse Farm, which his brother in law John Rogers managed from June 1954. The farm held some arable land at this time, including wheat and barley. A silage pit, for feeding a small dairy herd of Guernsey cattle, was located on the site that was later used as a car park for Suzanne's Riding School. Livestock also included pigs, and a flock of 80 sheep introduced in 1959 and increased to 200 by 1965, when the tenancy of the farm ceased, as a result of Alan Dalton's death, and the farm gradually closed down.

1.14 Brookshill Farm was run as a dairy farm from 1939 until the mid fifties by Express Dairies, from where horse-drawn floats would deliver milk to the surrounding area. Dairy Cottages were used to house workers at this time and for many years after the company had vacated the yard. This farm was taken over by Suzanne's Riding School in 1957.

1.15 Brookshill and Copse Farm tended to be linked by a common owner and leased as separate concerns. They fully amalgamated in September 1967, as Suzanne's Riding Stables. This was the country's longest-running riding school under the same owners when it closed in 2004. A number of structures were built at the farms to enable the schooling of horses and to provide additional stabling and tack facilities. Some of these are large and industrial in style to enable indoor schooling. Since then, a number of buildings have fallen into severe disrepair from lack of occupancy or use and lack of appropriate maintenance, including the locally listed Copse Farm barn which dates back to the late 18th century or earlier. English Heritage have commented on Copse Farm Barn, that although it is too altered to be listed, it is an interesting building that sits well on the lane and is the visual focal point of the group. The restoration of this site has a strong local backing.



Picture 1.9 Copse Farm Barn sits well on the lane



Picture 1.10 Copse Farm Barn is in need of restoration

- **Grimsdyke Estate Character Area**

1.16 Grim's Dyke, or Ditch, runs through the north and east of this area, and is a Scheduled Ancient Monument. It was probably a defence line or boundary marker. Grim is the Saxon word for devil or goblin and it is likely that the name dates from the 5th century Saxon period, however

the linear earthwork is thought to date from before the Roman invasion of England. A fire hearth from the 1st century or earlier was found during 1979 archaeological excavations at Grim's Dyke Hotel.

1.17 The soils of the area supported gravels and sands, which overlay clay. For centuries, materials were removed to the nearby Brick Kilns for brick production, and used for the construction and surfacing of local roads. This produced gravel pits, and caused the destruction of parts of the Dyke.

1.18 Grimsdyke House, statutorily listed grade II*, was built in 1872 for the painter Frederik Goodall by architect Richard Norman Shaw. He was popular for his organic and modern version of the Tudor style, and here designed a grand, irregular and rambling house to fill the site built in red brick and limestone, with timber framed gables and a tiles roof. The gravel pits to the north of the estate were reused as small lakes, and a moat was constructed along the line of Grim's Dyke.



Picture 1.11 Grim's Dyke Hotel 1891



Picture 1.12 Grim's Dyke Hotel 2013

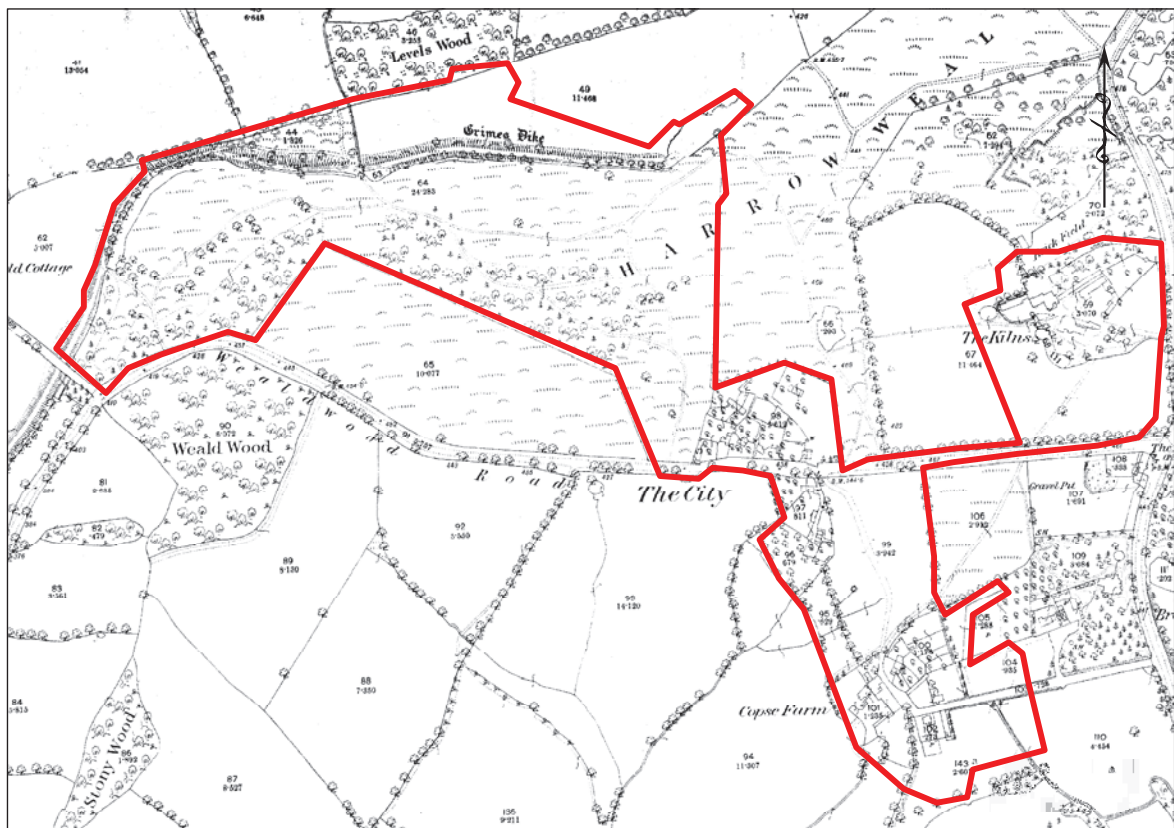
1.19 During the 16 years between buying the land and building Grimsdyke House, a delay caused by a previous lease taken out on the land, Goodall landscaped the woodland area with trees and shrubs. He left the area adjacent to Grim's Dyke unplanted to allow for the house and landscaped gardens to be built at a later stage. The landscaped area that he created has now been included in the Register of Parks and Gardens as a heritage asset.

1.20 The Grimsdyke Estate layout was carefully planned around the principal house, and as such those buildings which are historically contextual are considered to be curtilage-listed buildings, due to their integral relationship with the house and setting.

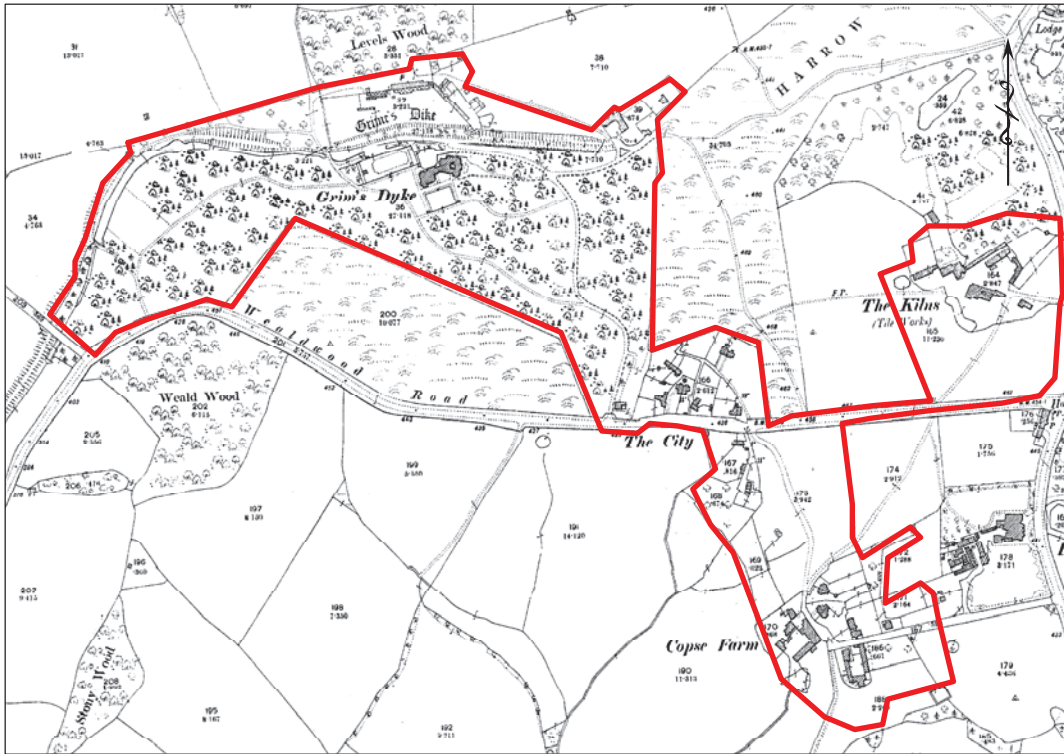
1.21 Norman Shaw also designed the grade II listed South Lodge, which forms the gatehouse to the estate and was built at the same time as the main house. He almost certainly also built the stable block which now provides staff accommodation. It has always been an ancillary building to the main house and is therefore curtilage-listed. This building was developed as part of a group of three, with two other buildings - The Bothy and North Lodge, which provided staff accommodation – between 1870 and 1896. New Lodge was a later addition to the group, in c.1896-1911, but is virtually identical to North Lodge. As such these buildings are all an integral part of the historical layout of the site.

1.22 In 1890, William Schwenck Gilbert, of Gilbert and Sullivan fame, bought the house. Gilbert planted additional trees and introduced the rhododendrons which famously line the driveway, creating a tunnelling effect. He developed the model farm, a kitchen garden, orchard and viney. He altered the stable block to accommodate his motor car collection. Lady Gilbert cultivated a sunken rose garden and the larger lake was excavated to create a central island on which to site a boathouse. Gilbert enjoyed many hours swimming in the lake, and it was here on the 11th May 1911 that he lost his life trying to save a local girl from drowning. Lady Gilbert continued to live in the house until her death in 1936.

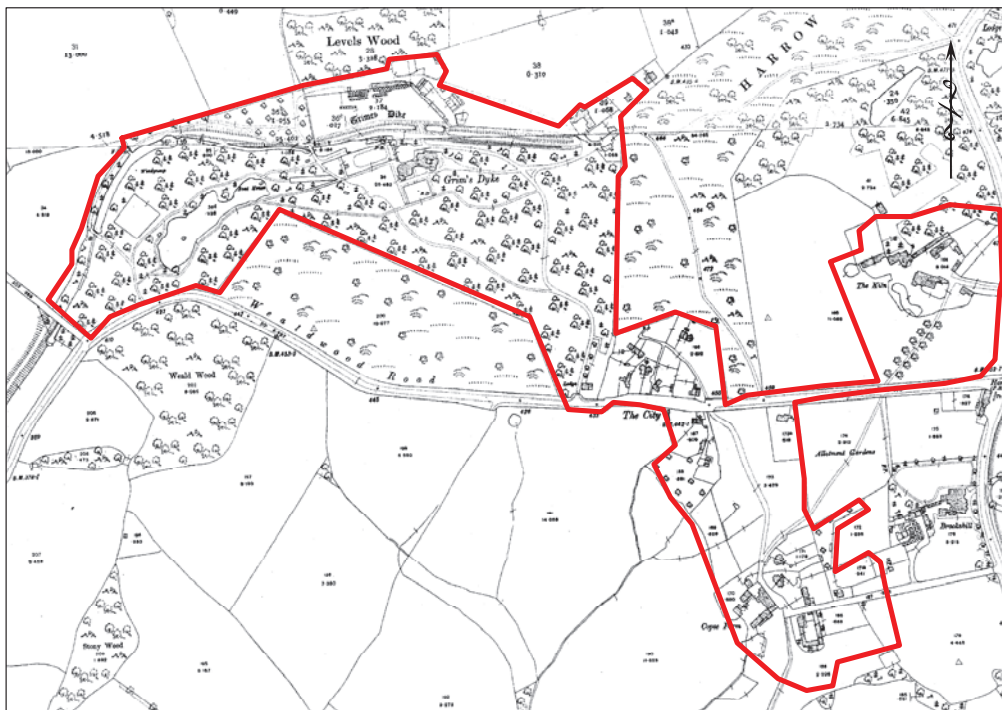
1.23 The house was purchased a year later by Middlesex County Council and Harrow Urban District Council and leased to the North West Metropolitan Hospital Board for use as a T.B. Rehabilitation Centre until 1963. The house then stood empty, used occasionally as a film location, until 1971 when it was opened as a hotel after undergoing extensive restoration and refurbishment. A hotel annex was built within the walled kitchen garden in 1983. Further restoration followed a change of ownership in the 1990s.



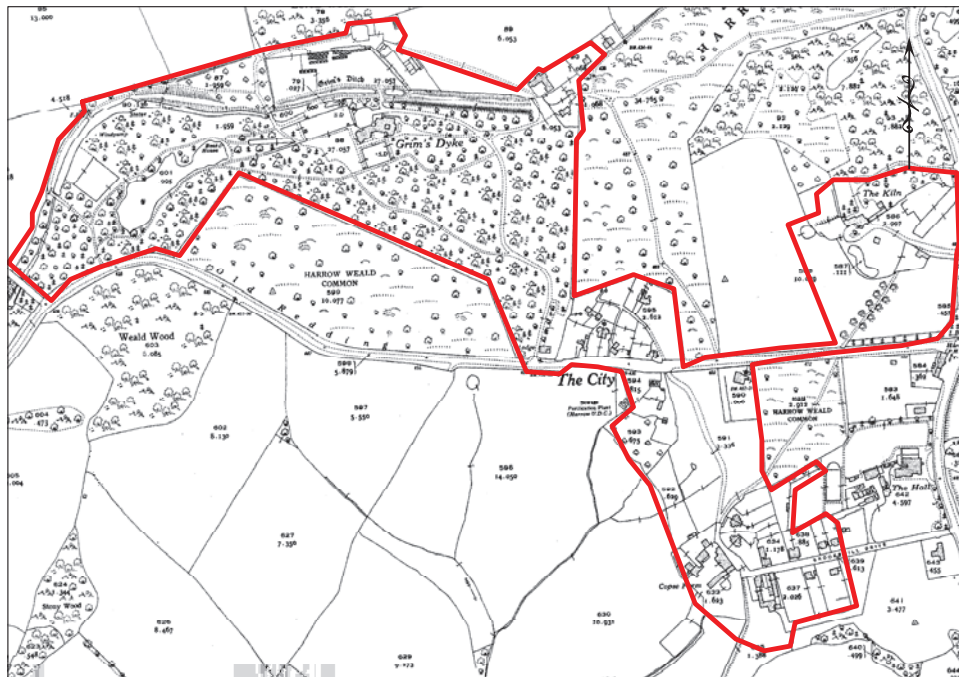
Picture 1.13 OS map of 1864 LBH LA.100019206.2013



Picture 1.14 OS map of 1896 LBH LA.100019206.2013



Picture 1.15 OS map of 1913 LBH LA.100019206.2013



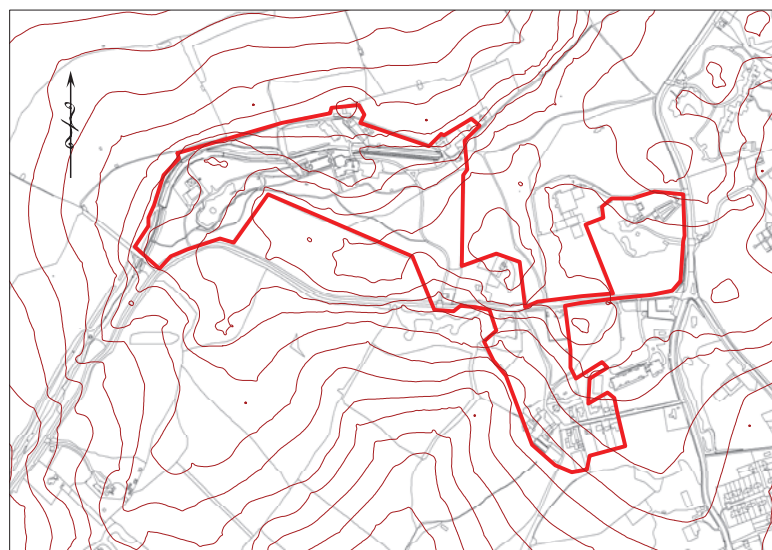
Picture 1.16 OS map of 1932-1941 LBH LA.100019206.2013

1.1.5 Archaeology and geology

1.24 Archaeology and geology for the conservation area is considered within the associated document 'Harrow Weald Conservation Areas: Supplementary Planning Document', in consultation with English Heritage.

1.2 The Character of the Conservation Area Today

1.2.1 Density of Development, Topography and Plan Form



Picture 1.17 Topographic context LBH LA.100019206.2013

1.25 There is very low density of development to the area and its surroundings. The rural context of open fields and woodland, and the gaps between buildings are crucial to its character.

1.26 The topography adds to the rural character. Brookshill Drive is situated atop a 400ft contour, surrounded by fields and woodland and lies to the south of Harrow Weald Common. The land falls away to the south, providing uninterrupted views over Harrow. Grimsdyke Estate backs onto open fields but is otherwise in dense landscaped and wooded environs. The Grimsdyke woodland's undulated floor is an important characteristic of the area. It is a result of gravel extraction and tree clearance.

1.27 The plan form of the Brookshill area consists of traditional farmyard groupings of buildings surrounding, or in a horse-shoe shape around a central courtyard with ancillary domestic buildings such as labourers' cottages close by and within the farmyard context. Their layout is reminiscent of the original purpose and functionality of the farms. The road leading to Copse Farm from Old Redding was originally a field boundary. 20th century buildings are positioned in a linear, more suburban, layout.



**Picture 1.18 Brookshill Farmyard,
Dairy Cottage to right**

1.28 Within the Kiln character area the rural character of Brookshill is replicated except the layout follows the character of the brick making business, with one associated house in a large open plot with associated ancillary former brick making buildings and structures and brick walls to a small formal garden.

1.29 The layout of Grimsdyke Estate's buildings and land is of a late 19th century planned estate, and this form is largely preserved as there have been very few new developments. Footpaths wind through the woodland and linearly along the line of Grim's Dyke.



Picture 1.20 Footpath from Old Redding to Brookshill



Picture 1.19 Woodland paths, Grimsdyke

1.2.2 Townscape Character

1.30 The key characteristics of these character areas are summarised under the summary of special interest heading above and expanded upon below.

- Brookshill Drive character area

1.31 There is an integral peaceful, open and rural quality to this area. This is because with the exception of Old Redding, the Brookshill area is quiet with limited traffic, and due to the rough terrain, what traffic there is tends to be slow and considerate to the character of the area. This encourages walkers and joggers to utilize the area's routes. The farm road whilst private is also a public footpath, part of the Harrow Circular Walk, and a public bridleway.

1.32 Also, it is because Brookshill Drive is situated atop a 400ft contour, surrounded by fields and woodland and lies to the south of Harrow Weald Common. Firmly within the Green Belt, the area provides a rare glimpse of the area's rural past. The changing levels of topography throughout the area cause the land to fall away on approach to the farm and provide uninterrupted views over Harrow. The road leading to Copse Farm from Old Redding was originally a field boundary and today narrows and turns to provide different viewpoints and glimpses of barns and cottages. Vistas are created in the spaces between agricultural buildings or through archways built into the vernacular architecture. The unadopted gravel road is rough and potholed, and sits between two fields, bounded by open post and rail fencing on either side, with grass verges covered in brambles furnishing a particularly rural feel. The limited housing, greenery and open space within the character area helps to protect this atmosphere and sense of openness.

1.33 The area's high quality historic architectural character is largely derived from vernacular agricultural buildings and domestic Victorian dwellings within a farmyard context. Their character, layout, spaces between them and significance relate directly to their agricultural heritage and accompanying industry and the rural vernacular. Bridle Cottages were built to serve Copse Farm, and are grade II listed. Copse Farmhouse and Copse Farm Barn (with adjoining stables) are both

locally listed and, dating from the eighteenth century, are the oldest buildings within the conservation area. Dairy Cottage and Farm Cottage, with the adjoining and surrounding stables, are also locally listed for their group value.

1.34 The 20th century buildings incorporated within the character area are noticeably modern in comparison and are therefore considered to be of neutral character, neither found to detract from, nor to enhance, the conservation area. However importantly the streetscape remains characteristically rural, softening the linear layout, as there is no pavement and the road remains unbounded and without tarmac until east of the 20th century houses and there is a medium to low density of development.

1.35 Brookshill Drive marks the original field boundary to the south, as does the hedgerow of White Cottage and the northern part of Hill House's garden wall. The garden wall, in part, forms the western boundary of Portman Hall. The red brick wall, which is approximately 2.5 metres in height, includes an interestingly angled gothic style gateway with stone surround and wood panelled door. Research indicates that the wall formed part of the garden to 'Brookshill', a large, early Victorian house built by Thomas Blackwell and originally located on the site of Portman Hall, and as such this stretch is included within the conservation area for historic interest.

- The Kiln character area

1.36 There is a similar peaceful, open and rural character to this site. This is because the site has not been subdivided and is set away from the main road by a dense boundary of plentiful greenery and is its own oasis of sweeping garden greenery and pond. Its historic origins and character as a brick making business is clear as the brick kiln remains with the associated pond, two wells and replica drying sheds. The value and supply of bricks to the site is also indicated by the former formal garden remains within the site comprising tall sections of red brickwork to the north-west and north-east and on the south-west and a summer house partly of decoratively laid brickwork and other surrounding historic garden walls.

1.37 The striking Georgian appearance of the Kiln house provides an architectural focal point for the site as this house with 16th century origins was remodelled then to create a dwelling of greater architectural pretension, the external walls rebuilt in brick and a new wing added on the west side. The large 1980s east wing and classically inspired porch further increases the intended grandeur of the house. Nevertheless, the original elegant rural vernacular medium scale villa character remains apparent. Similarly the listed Kiln opposite, the pond and the adjacent wells and replica drying sheds to the Kiln house add architectural qualities and historic character of the site as a historic brick making area.



Picture 1.21 The Kiln house provides an architectural focal point

- Grimsdyke Estate character area

1.38 As a result of Grimsdyke's setting and especially the landscaping carried out by Gilbert, the overall character of the estate is rural, dominated by dense trees and shrub planting. The groups of mature trees are important in defining the spaces and settings for the main buildings and lining the main paths and roads. Most of the buildings on the estate are not visible from the mansion house and are only encountered on turning a bend or entering a driveway, such is the extent of the dense tree cover which contributes to the feeling of a low density of development and the hidden character. The single road leading to the principal house is famously lined with rhododendrons, which creates a tunnelling effect again contributing to the intimate character. William S Gilbert, of Gilbert and Sullivan fame, planted these during his period as custodian of the estate at the turn of the 20th century. The carriageway/driveway is half a mile long and leads through copses of pine and silver birch, bordered by these rhododendron.

1.39 South Lodge marks the estate entrance, through an elaborately decorated cast iron gate with brick piers framing either side, which is suggestive of the initial intended grandeur. From here the estate road curves up to a fork, giving way to routes to Grimsdyke House or to a cluster of ancillary buildings. The Mansion House which suddenly appears in a clearing set on two sides by small, well-tended lawns. It is this build up that contributes to the intended impressive impact of the mansion and its grounds.

1.40 The planned layout of estate buildings is important to the character of the area and as such those buildings, which are historically part of the original estate plan, are considered to be curtilage-listed. The integral estate buildings mostly follow the Tudor Revival style of the main house, although subservient in scale and detail.

1.41 To the north of the main house a more recent hotel annex and the earlier farm are located; to the east are the Bothy, North Lodge, New Lodge, and the stable block. The stable block and the Bothy are set back from the dense tree cover and together with the model farm built by Gilbert, offer attractive views across the open farmland to the north. The two lodges are bordered to the south by dense tree cover and offer glimpses across the open farmland through the tree cover to the north. New Lodge, North Lodge and the Stable Block and Bothy are situated at the end of a single un-laid track, which is reminiscent of past gravel roads and indicative of past uses off the area.

1.42 The whole area has suffered little change with very few new developments, which has assisted in the continuation of an intimate and hidden atmosphere.

1.43 Grimsdyke Estate backs onto open fields but is otherwise surrounded by dense landscaped and wooded environs. Tree clearings and spaces left between clusters of estate buildings provide surprising glimpses out over Harrow, which offer a pleasant contrast to the feeling of enclosure created by rhododendrons and woodland. Undulating pathways guide visitors through Harrow Weald Common. Some routes deliberately follow the linear earthwork known as Grim's Dyke which bounds the northeast of the character area and frames this part of the conservation area. The estate takes its name from the ancient earthwork. This adds greatly to the historic importance of the area.

1.2.3 Activity and Uses Within the Area

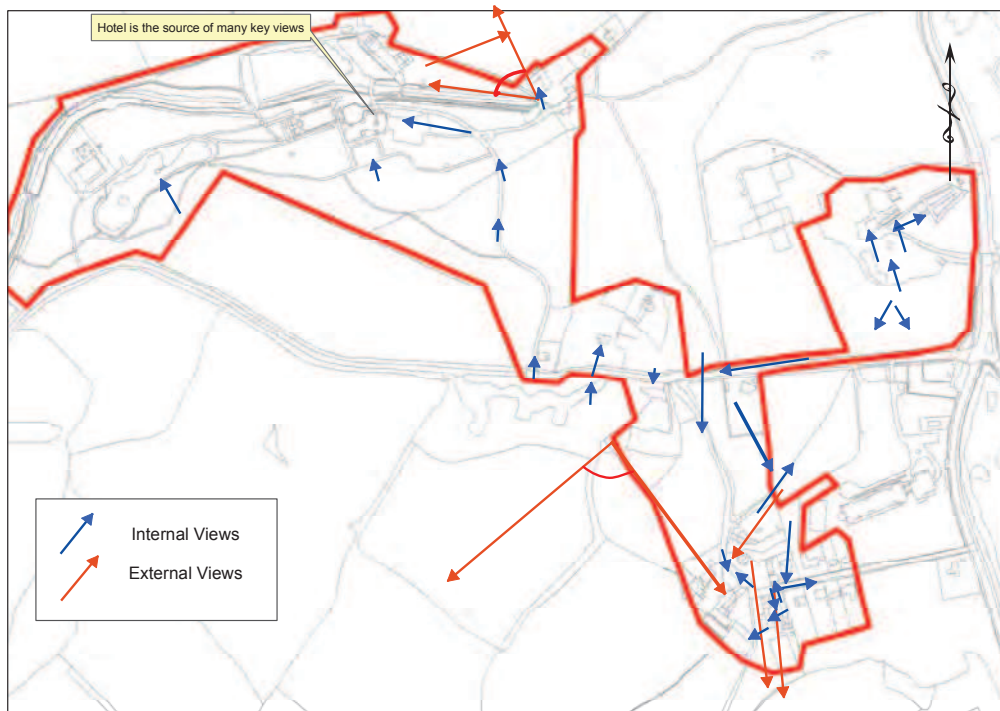
1.44 Architecture at Brookshill and Copse Farm has developed in response to the changing needs of the agriculture industry. Both farms were adapted to provide additional accommodation for horses, as well as an indoor and outdoor arena for schooling. Although Dairy Cottage and Copse Farmhouse are both occupied, since the former Riding Stables closed the stable buildings and barn have fallen into severe disrepair and require extensive repair, better maintenance and a sympathetic reuse. The ideal use would be the agricultural uses for which each building was designed or relevant rural uses. It is vital that each retains its integral qualities and its future is secured as valuable heritage assets and essential elements of the conservation area.

1.45 Similarly some of the buildings within Gilbert's model farm appear disused and in need of some repair and maintenance works. Again rural and agricultural uses are most suitable for these heritage assets.

1.46 The conservation area is set within the Green Belt, where agricultural and outdoor recreation uses are considered central. Tourism generates a large part of the area's income. The hotel, including its restaurant and bar, and its environs are attractive to a great number of visitors. The Case Is Altered pub caters for those who utilize major walking routes through this part of the borough, and visitors to Harrow Viewpoint. The area is well known and is much loved by locals and visitors alike. Walkers enjoy discovering routes through the tree-covered areas. The woodland entrance is sited opposite the Case Is Altered Public House and is marked by a five bar gate. Where Harrow Weald Common abuts Old Redding there are signs to indicate which woodland pathways to take. Otherwise the area is in single family dwelling house use which adds to its peaceful character which helps attract visitors.

1.47 There are concerns over possible pressure for changes of use in the conservation area, and associated alterations and extensions, particularly in the farm /former agricultural areas which could cause damage to the area, particularly on cherished views.

1.2.4 Key Views and Vistas



Picture 1.22 Examples of key views LBH LA.100019206.2013

1.48 This section (including the above map) is not exhaustive but indicates the types of views that are important to the conservation area. Firmly embedded within the Green Belt, the conservation area provides a rare glimpse into the area's rural past which gives rise to many key views.

1.49 The land falls away to the south, providing uninterrupted views over Harrow. The Case Is Altered Public House sits on Old Redding. The ground falls away from the garden at the property's rear, giving way to fabulous views over Harrow. Copse Farm forms a clear part of the vista from Harrow Viewpoint, which adjoins the conservation area.



Picture 1.23 Looking from Old Redding Viewpoint towards Harrow in the distance

1.50 The road leading to Copse Farm from Old Redding was originally a field boundary and today narrows and turns to provide different viewpoints and glimpses of barns and cottages. The road is rough and sits between two fields, bounded by open post and rail fencing on either side, with grass verges covered in brambles furnishing a particularly rural feel. Roofscape glimpses give way to pitched roofs with interestingly hip-bevel features on gabled elevations and tall angular chimney-stacks. Glimpses of the farmyard at Brookshill can be seen as the road turns the corner away from Copse Farm.



Picture 1.24 Roofscape glimpses 1



Picture 1.25 Roofscape glimpses 2

1.51 Vistas are created in the spaces between buildings or through archways built into the vernacular architecture. These vistas, and the surrounding land, are of great scenic importance and provide the farmstead with a rural context.

1.52 The Kiln site's attractive and historic buildings associated with brick making and the sweeping open garden space provides the source of many key views. The formal walled garden and summer house to the east similarly provides the source of good short distance views.

1.53 Grimsdyke Estate backs onto open fields but is otherwise surrounded by dense landscaped and wooded environs. Tree clearings and spaces left between clusters of estate buildings provide surprising glimpses out, which offer a pleasant contrast to the feeling of enclosure created by rhododendrons and woodland.



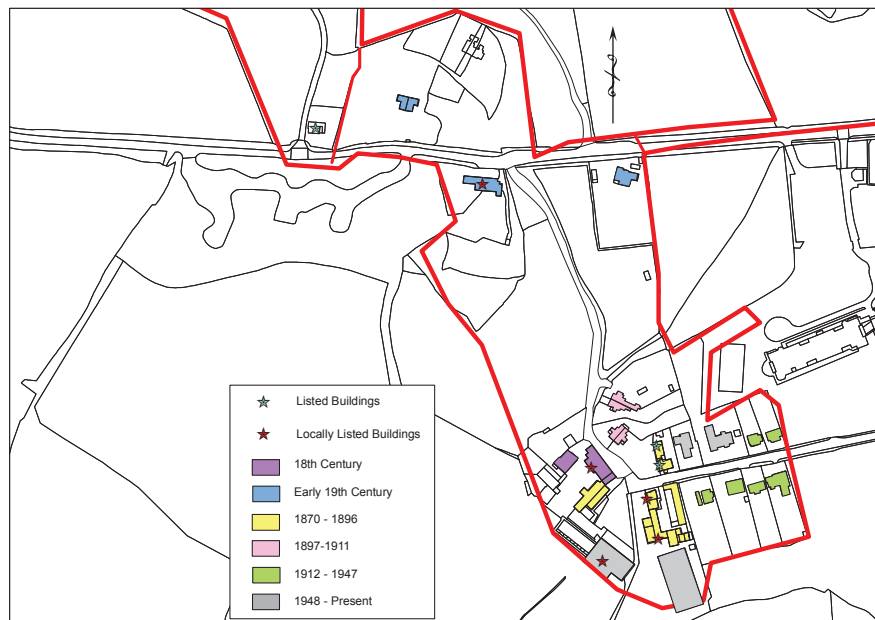
Picture 1.26 Views across Harrow from Copse Farm



Picture 1.27 Open view from the Stables, Grimsdyke

1.2.5 Architectural Qualities

- Brookshill Drive Character Area



Picture 1.28 Brookshill Drive Character Area Listed Buildings and Age of Buildings NB All buildings make a positive contribution to the character of the area with the exception of those at the entrance to Brookshill Drive from Brookshill which make a neutral contribution LBH LA.100019206.2013

1.54 The historically and architecturally significant buildings relate directly to the agricultural industry, which is often reinforced by their local or statutory listed status. These houses (Bridle Cottages, Copse Farmhouse, Copse Farm Barn (with adjoining stables), Dairy Cottage and Farm Cottage) were built to house farm labourers and brick kiln workers, and have a visual and social relationship with the farms.

1.55 Copse Farm's courtyard and Brookshill's horse shoe shape layout are integral forms, essential to the area's character. They are well constructed vernacular buildings, similar in scale, style and materials, giving the area a cohesive character. The detailing is characteristic of Victorian rural domestic architecture, especially the chimney-stacks and bargeboarding. Small paned windows, pitched tiled roofs and timber doors are also key features. The historic buildings were built using local resources. Clays to the north of the area were used in brick making from the 17th century onwards.

1.56 On entering the area from Old Redding, the road meanders round to reveal four two-storey semi-detached late 19th century cottages, Brookshill Cottages. The first of these have been rendered white, whilst the other two remain plain brick. However, much of the remaining detailing is very similar. The houses are of red brick in an Arts and Crafts style with brick decorative banding, and brick edge detailing to surround windows and doors. The roofscape is key, consisting of pitched roofs with interesting hip-bevel features on gabled elevations and tall angular chimney-stacks. Much of the facades are concealed behind high hedgerows, which contribute to an intimate character.



**Picture 1.29 Brookshill Cottage LBH
LA.100019206.2013**

1.57 Copse Farmhouse sits opposite Brookshill Cottages. It is locally listed. With early 18th century origins, it was re-faced in brick during the 19th century and given Victorian domestic detailing at this time. Central to the conservation area, it was designed as the principal house within the farmstead, facing in towards the courtyard.

1.58 Copse Farm Barn frames part of the courtyard and sits parallel to the road; it is a key feature of the conservation area, and is locally listed along with the adjoining stables. It is an 18th century, three-bay timber-framed barn with queen posts and strutted tie beam, built to store and thresh grain. The grain was threshed with wooden flails in the central bay; the doors at either side of the barn were then opened to create a through draft to sweep any remaining chaff away. Like other threshing barns of this kind, Copse Farm Barn faces the direction of the prevailing south-westerly wind. The barn is unused and is falling into poor repair from lack of maintenance.

1.59 The rectangle of buildings forming the former riding stables were added in the 19th century and, with the picturesque cottages Dairy Cottage and Farm Cottage, form a very attractive group. The courtyard space created between Copse Farm Barn and the Farmhouse is as important as the buildings themselves. The group value of these buildings and the spaces they create is highly significant, and essential to the area's character.

1.60 Glimpses of the farmyard at Brookshill can be seen as the road turns the corner away from Copse Farm. Like Copse Farm, the farm layout has remained virtually unaltered since it was built and is an essential characteristic of the area. Brookshill was designed in a horseshoe shape, which is a common feature of farmsteads throughout the UK. The surrounding land is of great scenic importance and provides the farmstead with a rural context. Vistas are created via gaps in the traditional formation of buildings and wide views are provided over Harrow as the land falls away. Long views can also be seen over the stable roofs at Brookshill.

1.61 Brookshill Farm includes Dairy and Farm Cottages, which are both locally listed. The late 19th century semi-detached dwellings were built in a Victorian rural vernacular, in a flamboyant and inventive Gothic manner, which complements the smaller Bridle Cottages sited opposite. It is of a similar period and built by the same family. Dairy Cottage sits on the corner of the farmstead and this significant location and locally historic value makes it a fundamental part of the conservation area. These cottages were built to house farm labourers and brick kiln workers, and their social as well as visual relationship with the farms adds to their significance within the conservation area.

1.62 Statutorily listed grade II, Bridle Cottages, formally called the Bungalows, were built by Samuel John Blackwell in 1890 to serve Copse Farm. Constructed from Blackwell Kiln brick, the cottages were built by local bricklayer's apprentices as a testing ground for their techniques. As a result, unusual examples of tuck pointing, face bedded bricks, and alternate bands of yellow and red stock brick decorate the properties. Shaped and coloured tiles have also been woven into the roof design.



Picture 1.31 Bridge Cottages LBH LA.100019206.2013



Picture 1.30 Dairy Cottage, Brookshill Farm LBH LA.100019206.2013

1.63 There are nine 20th century buildings on Brookshill Drive incorporated within the conservation area, the earliest of which were built during the 1930s. This encompasses Four Winds, Eastcliff and Hill View. Red Corners, Brookslee, Newlands and Weald Cottage are all post war development. Hill House and Dukes Cottage replaced Liberty Hall in the 1980s, which was a former Victorian building built by the Blackwell family. Hill House's 2.5m high red brick garden wall includes an

interestingly angled gothic style gateway with stone surround and wood panelled door. This wall formed part of the garden to 'Brookshill', an early Victorian house built by Thomas Blackwell, located on the site of Portman Hall. This stretch is therefore included in the conservation area partially for historic interest.



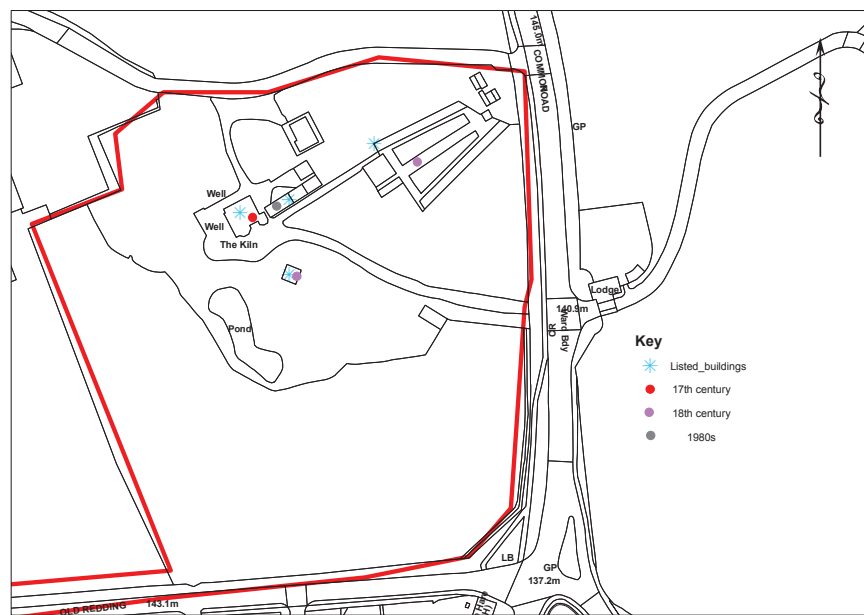
**Picture 1.32 Red Corners LBH
LA.100019206.2013**

1.64 The 20th century residential buildings are unrelated to and distinct from the farms, and are positioned in a more suburban, linear pattern on either side of Brookshill Drive. However the architectural characteristics of the buildings broadly reinforce, and do not detract from, the character of the area. Although they are of mixed quality and no uniform architecture exists, a number are of an Arts and Crafts style, which helps to define the area's character. The dwellings tend to be one and a half to two-storeys in height, with simple angles, steep pitched roofs and brick edging.

1.65 The remaining houses in the character area are widely spread. The City sits just south of Old Redding, and No 3&4 sit almost diagonally opposite. The latter is early 19th century and is set within extensive mature gardens that contribute to the character of the conservation area. 'T' shaped, with a molded brick stringcourse, decorative bargeboards and large prominent chimneystacks to the front and east elevations, the house is constructed in red brick, with a timber framed pitched roof covered with clay tiles. There is pedestrian access to the front of the properties via a woodland trail, and vehicular access from Grimsdyke Estate Road, the position of which - tucked away behind South Lodge – helps to preserve the area's countryside character.

1.66 The Case Is Altered Public House on Old Redding was originally a cottage. It is one of three Public Houses within the West Middlesex area that share the same obscure name, and is a simple early 19th century vernacular building with spectacular views over Harrow.

- Kiln site



Picture 1.33 Kiln Site Character Area Listed Buildings and Age of Buildings NB LBH LA.100019206.2013

1.67 Contributing to the architectural qualities of the conservation area, many of the historic buildings within the conservation area were built using clays from a site just to the north of the Kiln site (shown on the 1877 Ordnance Survey map as a brick field) which was in turn used in brick making from this site. So, many of the bricks and materials for buildings within the conservation area are likely to have been produced from the Kiln site.

1.68 The two storey vernacular rural villa style Kiln house (dating back to the 17th century) provides an architectural focal point given its 18th century remodelling. This is apparent in the red brick laid in Flemish bond with some contrasting burnt bricks, dentilling to the parapet and clay tile roof, a canted west wing and windows are timber multi-pane sash windows with gauged brick arches above, some tripartate, most replaced in 1984. The east wing is an addition from 1984 which increases the intended grandeur of the house.

1.69 This house is also the focal point given its nature as the principal dwelling to the associated ancillary buildings and structures ie the brick wells, Kiln and re-built in the 1980s drying sheds. Their design and presence is important for illustrating the history of the site as brickworks.

1.70 The kiln itself is important architecturally as the only survivor of three which were in operation between 1795 and 1895 and a good indicator of its type. They were coal-fired and probably built by John Bodimeade to replace an earlier wood-fired kiln. Historic map evidence and a painting by Frederick Goodall RA from c1889 show that the kiln was surrounded by lean-to buildings which were probably removed soon after the kiln closed. It is estimated that the kiln would have had a capacity of around 13,500 bricks. They were coal-fired and probably built by John Bodimeade to replace an earlier wood-fired kiln.

1.71 It stands on a grassed mound and is square in plan. It is built of soft red brick set in lime mortar with an inner lining of bricks set in loam. The walls survive to a height of 5.5m and were topped by a conical stack, taken down in the mid-C20, to give an original height of c11m. The kiln is set on a high thick brick plinth which has relieving arches on the south-west and north-west. The corners are strengthened with angle buttresses. The walls of the kiln have brick relieving

arches which supported the weight of the conical chimney and allowed for the necessary repair of the chamber walls. The arch on the north-west elevation has been opened up. On the north-east elevation is a narrow segmental-headed wicket entrance. The solid brick and tile floor is a later replacement. The original floor would have had slots to allow the flames from the below ground fire tunnels.

1.72 The original drying sheds were thought to be 18th century in origin and were replicated in the 1980s re-using some of the original clay pantiles. For this reason it is a single storey, elongated building. Both the north-east and south-west long elevations have open-work brick panels with timber-framing. These refer to the construction of the original drying sheds where the open-work allowed airflow through the sheds but the rebuilt panels are purely cosmetic as they are backed by solid brickwork.



Picture 1.34 Replica drying sheds within the Kiln site, Brookshill re-using original clay pantiles

1.73 The garden walls are historically and architecturally important for consisting of tall sections red brickwork to the north-west and north-east, laid in Flemish bond with some blue headers and probably of C18 date. A further section, with several internal buttresses, survives on the south-west side where the majority of the C18 wall has been demolished and replaced with low open-work walls to create a fore-garden. These walls are of C20 date and have soldier-course capping and square piers with stone caps.



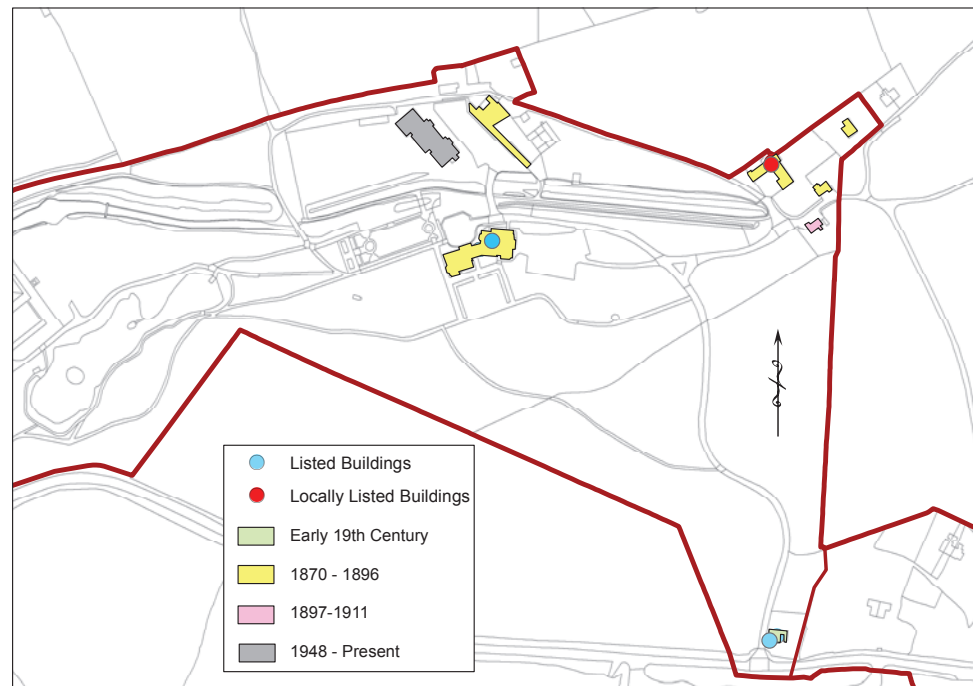
Picture 1.35 18th century brick walls to formal garden at the Kin, Brookshill with 20th century additions to the front

1.74 The small arbour or summer house is incorporated at angle to the north-east wall of probable late-C19 date. This has two faces of solid brickwork, and two of open-brick work which have entrances framed with rustic timberwork. It has a pitched roof with clay pantiles. It provides a good and unusual focal point at the end of the formal walled garden.



Picture 1.36 Summer house within the garden to the Kiln, Brookshill

- Grimsdyke Estate



Picture 1.37 Grimsdyke Character Area Listed Buildings and Age of Buildings NB All buildings make a positive contribution to the character of the area LBH LA.100019206.2013 LBH LA.100019206.2013

1.75 The estate architecture was carefully planned by Norman Shaw in a Tudor style, with the smaller ancillary buildings imitating the design of the main house. The ancillary service buildings, stables and model farm were designed around an imposing principal house and surrounding formal gardens. The layout of the estate buildings defines the area's architectural character and context and is key to the conservation area.

1.76 Each building had a specific role within the estate and as such there is a strong architectural, social and historic relationship between them. Statutorily Listed Grade II* Grimsdyke House is the most important estate building. The house is large and irregular, of two and three storeys in a modified Tudor style, built in red brick and stone with timber framed gables and pitched tiled roofs with tall prominent chimneys. As the principal house it is significantly grander than its ancillary buildings. The house is large and irregular, of two and three storeys in a modified Tudor style, built in red brick and stone with timber-framed gables and pitched tiled roofs with tall prominent chimneys.

1.77 South Lodge is a gatehouse marking the estate entrance. Although it has lost its original purpose of meeting and greeting, it has survived as an architectural introduction to the grandeur of the main house. It is two-storeys in red brick similar to that of the principal house. It is much smaller, indicating its subservient status but echoes much detailing of the main house, demonstrating the unity within the estate. The lodge has tile-hung gables and stone dressings, with a pitched tile roof and crested ridge on which is sited a prominent chimneystack. Mullioned windows and door beneath a pointed arch under a cat slide roof also shape the dwelling. It is subservient to, but echoes much detailing of the main house, demonstrating the design unity within the estate.



**Picture 1.38 South Lodge,
Entrance to Grimsdyke
Estate LBH
LA.100019206.2013**

1.78 Grimsdyke House is centrally situated within extensive gardens. A cluster of ancillary buildings is sited about 200 meters to the east of Grimsdyke House. Architecturally they reflect their original functions as small domestic buildings to house staff and horses. They were built in a similar architectural style to that of Grimsdyke House and as such have historical and architectural importance, and again demonstrate the design unity within the estate.

1.79 As its name suggests, the Stable Block originally housed horses. The 'L' shaped building facing two sides of a courtyard now houses hotel staff. Different brick bonding suggests where original arches have been in-filled. The building is of one storey with rooms in the roof, constructed of red brick with leaded casement windows, decorative tile-hanging, a tiled roof with tall brick chimneys, and numerous dormers with tile-hung gable ends. The Stables form an integral part of the estate's portfolio of buildings, and make a positive contribution to the conservation area. However, some timber windows have been unsympathetically replaced with aluminium and as such there is opportunity for enhancement here.

1.80 Like the Stable Block, The Bothy and New Lodge are part of the originally planned layout for the estate, built in 1874. They are both of roughly the same scale and are both two-storey dwelling houses, with red brick on the ground floor and rough cast and mock timber framing on the first floor under a clay tile roof. The mock Tudor style mullioned windows and heavy front doors complement the style of the main house, as well as contributing to the rural feel of the area. New Lodge is a later addition to the grouping but because it matches the architectural qualities of those initially laid out it appropriately blends in with its neighbours.

1.81 North Lodge is a picturesque cottage of two storeys with rooms in the roof, with two gabled dormers. It is brick, roughcast, and half-timbering with leaded light windows. The first floor is jettied. The houses pick up on the detailing of Grimsdyke in a greatly simplified and restrained way, appropriate to their scale.



**Picture 1.40 The Bothy LBH
LA.100019206.2013**



**Picture 1.39 North Lodge LBH
LA.100019206.2013**

1.82 Open fields bound the cluster of buildings on one side, with Harrow Weald Common on the other.

1.83 The walled compound of Gilbert's model farm still stands along with some of the buildings beyond. The wall is in relatively good condition and should be retained. Similarly a number of the barns and outbuildings/farm buildings survive in good condition looking out over open farmland. The agricultural grouping contributes to the area's semi-rural character and links with the Brookshill character area.



Picture 1.41 Gilbert's Model Farm

1.84 Behind the model farm wall is a car park for Grim's Dyke Lodge. A late 20th century building sits to the north of the main hotel. Its design has assimilated the characteristics of the integral estate buildings with some success, although it is still noticeably modern in design and is therefore considered to be a neutral development within the estate.

1.2.6 Streetscape

1.2.6.1 Floorscape and Boundary Treatment

- Brookshill character area

1.85 The streetscape is noticeably rural and semi-rural in terms of road surfacing, boundary treatment, and street furniture. Grass verges and hedgerows bound the roads; Old Redding additionally has limited pavement running alongside. The road leading to Copse Farm is not bound and is still very much a farm track, which emphasises the area's integral agricultural character. This continues until it meets Brookshill Drive where it becomes more solid and finally turns to tarmac after the houses. There are no kerbs throughout though which emphasises the countryside appearance. Where repairs to the road are deemed necessary, the existing character should be retained.

1.86 The ground covering of each farm courtyard is a mixture of semi-hard and soft landscaping, with lush field boundaries. These materials are continued through much of the Brookshill character area; however some of the 20th century properties on Brookshill Drive have hardstanding driveways, which are too harsh for the semi-rural location and are often detrimental to built fabric by increasing erosion at base level brick. Gravel is a good alternative, allowing water to percolate freely through the ground rather than being absorbed into the built fabric. Many houses are bounded by mature hedgerows and gates, which tend to be timber 5 bar gates, the natural material and design of which appropriately preserves the character of the area.



Picture 1.42 Informal boundary treatment along Brookshill Drive LBH LA.100019206.2013



Picture 1.43 Brookshill Drive informal floorscape and dense green boundary treatments

- Kiln site character area

1.87 Since this is a single domestic site it comprises a single tarmac driveway with plentiful surrounding garden greenery. The spacious garden greenery surrounded by dense vegetation as the boundary contributes to the intimate rural character.



Picture 1.44 Dense garden greenery provides a semi-rural character to the Kiln



Picture 1.45 Historic brick wall and plentiful greenery bounds the Kiln site

- Grimsdyke character area

1.88 There are no pavements, kerbs or road signs alongside, however the roads are tarmac and as such are more formal than those in the Brookshill character area. The softening of these would be much more in context with the lush woodland surrounding. The original gravel style road surfacing does exist surrounding the cluster of ancillary buildings.

1.89 Gardens and soft boundary treatments complement the open landscapes and woodland surrounds. The similarity of boundary treatment helps to tie the estate together. Cars tend to sit on planned gravel roads or in small drives to the side of houses. There is opportunity to enhance the hard surfaced entrance into the Stable block, which could be improved by some soft landscaping or more appropriate surfaces. The tarmac car park to the side of Grimsdyke House could also be enhanced. There is already evidence of brick erosion caused by the impermeable material.

1.90 The car park at Grim's Dyke Lodge is a neutral feature since it is situated with the post war development and does not significantly affect the overall character. However the hard surfaced pavements which surround would be better as a pathway through a grass verge. Similarly, timber would be more in keeping with the semi-rural character of the area than the existing metal bollards.



Picture 1.46 Grimsdyke Rhododendrons LBH LA.100019206.2013

1.2.6.2 Street Furniture

- Brookshill Drive

1.91 The Brookshill area's few municipal street lamps and wooden telegraph posts are relatively discreet, and the lack of road signs and markings preserves the countryside atmosphere and character of the area. Any tall and intrusive equipment such as telecommunications or wind turbines would not be appropriate.

1.92 The Case Is Altered Public House is advertised by wooden signage in the front garden. The signage is relatively sympathetic to the area and should be kept to this appropriate size, style and avoid excessive illumination.



Picture 1.47 The Case Is Altered PH signage LBH LA.100019206.2013

- Grimsdyke Estate

1.93 The Grimsdyke area has limited street furniture. The streetlights and wooden telegraph poles are not overly obtrusive and do not visually clutter the area. However, some overhead cables for lighting are intrusive, especially where they hang across the road; subtler placement would be welcomed.

1.94 Due to woodland surroundings and the tunnel effect created by rhododendrons and trees, the area is naturally dark after nightfall, contributing to its rural hidden character. Driveway lighting attached to trees detracts from this, but does not harm the overall character.

1.95 There are a number of signs to indicate which path to take through the woodland. There are also large signs on the entrance gates indicating forthcoming events at the hotel. These tend to be timber with a sympathetic font size and style and as such preserve the character of the area. The decorative entrance gates and piers have been repaired and restored. There is also an original gate pier remaining at the entrance to the field adjoining the Stable block, the restoration of which would also be welcomed. These items are curtilage listed.



Picture 1.48 Curtilage listed entrance pier to the stable block

1.96 Towards the north east of the Grimsdyke Estate area is a telecommunications installation. This is screened by the dense tree cover for the most part, but occasional glimpses of the mast and associated antenna are seen.

1.97 Unfortunately a number of overhead cables and lights have recently been installed wrapped around trees along the main driveway to the mansion. These would benefit from being more sensitively designed to protect the trees and preserve the special character of the conservation area.

1.2.7 Green Spaces and Ecology

1.98 With large areas of open land, formal planting and significant trees, the conservation area has much biodiversity and landscape value. Weald Common is densely covered in woodland. The word weald is thought to derive from the Old English for forest indicating the nature of the area. The wood's undulating terrain is a reminder of the history of gravel extraction here. The ridges and hollows that gravel extraction has helped to create have increased the habitat diversity of the site since operations ceased at the turn of the 20th century. Much of Harrow Weald Common is covered with Oak Birch woodland, although Aspen, Beech and Rowan also occur. Typical woodland birds include redpolls, bullfinches and goldfinches, as well as three species of woodpecker, among

a number of others. Mammals include grey squirrels, foxes, and hedgehogs. Weasels are also likely to be seen. Harrow Weald Common is Council owned and is freely accessible to the public; however the grounds to Grimsdyke House are private. They are also included on the Register of Historic Parks and Gardens.



Picture 1.49 Harrow Weald Common

1.99 Opportunities exist to repair and reinstate elements of the original designed landscape, such as Gilbert's lake, which is silted up and is therefore currently derelict. There have been proposals to reinstate this and as such there is possibility for enhancement here. Gilbert reputedly planted many of the plants growing in and around the lake, such as the great spearwort.

1.100 Some of the great rhododendrons have been cleared from surrounding Grim's Dyke as the roots were thought to be disturbing archaeological remains. In consultation with English Heritage, the earthwork was opened up and flooded to help preserve the site, whilst providing a niche for species preferring wet conditions, such as rushes and sedges.

1.101 Situated atop a 400ft contour, and lying to the south of Harrow Weald Common, Brookshill Drive is surrounded by woodlands and fields, providing the farmsteads with a rural context. High hedgerows contribute to the intimate character. The road leading to Copse Farm from Old Redding sits between two fields, bounded by open post and rail fencing on either side, with grass verges covered in brambles furnishing a particularly rural feel.



Picture 1.50 The conservation area has a particularly rural feel LBH LA.100019206.2013

1.102 The Kiln site contains biodiversity value given its large pond and plentiful vegetation including many mature trees.

1.103 All trees within the conservation area are safeguarded by its designation (under Section 211 of the Town and Country Planning Act 1990), which is strengthened by Tree Preservation Orders (TPOs) served in the area (under Section 197 and 199 of the Town and Country Planning Act 1990). Further TPOs may be required where trees are threatened or their future retention is prejudiced. Harrow Council will also consider making orders under any new power that may emerge with respect to important hedgerows.

1.3 Summary of Conservation Area

1.3.1 Summary and Main Assets

1.104 The whole area is of great scenic value, with a rich rural character. It stands high on a shoulder of the hill in the Green Belt which separates Harrow from Bushey. The open land, woodland, and views contribute greatly to the character of the area; both private land and public space are significant as a rare survival of the area's rural and agricultural roots.

1.105 The architectural qualities of the buildings, their agricultural or estate groupings and their historic interest make them well worth preserving in their rural setting; they should be carefully maintained, their idiosyncrasies respected. In general, change, whether by replacement buildings, infilling, or change of detail, should be carefully managed and may be best avoided. The conservation area was designated with regard to protecting the historic layout and buildings of the area, and their informal, green and rural setting.

1.106 Copse Farm is a main asset of the conservation area, and key to the Brookshill character area. It is one of the original farm units. The farmhouse and barn are 18th century, the rectangle of buildings was added in the 19th, and, with the picturesque cottages Dairy Cottage and Farm Cottage, form a very attractive group. Other cottages to the north were built in the mid-to-late-19th century in a flamboyant and inventive Victorian gothic manner.

1.107 The important local history of brickmaking mainly apparent in the Kiln site provides historic and architectural significance with bricks for other buildings throughout the conservation area likely to have been produced from this site.

1.108 The Grimsdyke Estate is an area of architectural, historic, and scenic importance. The estate contains important listed buildings by the noted architect Richard Norman Shaw, a rich and varied landscape setting incorporating informal and formal gardens, extensive woodland, and a surviving section of Grim’s Dyke. The estate layout, and the buildings such as the farm, kitchen garden, stable block and lodges have remained little changed and are reminders of the grandeur of the estate as developed by W.S. Gilbert in his role as country squire.



Picture 1.51 Architecture by Norman Shaw

1.3.2 Problems, Pressures and Potential for Enhancement

1.109 Pressures and issues have been touched upon in the previous sections and are comprehensively outlined in the following table. The table includes elements that are found to put pressure on the special character of the area as well as identifying areas where there is opportunity for enhancement. The section below, entitled ‘Management Proposals’ addresses any issues raised. In dealing with development proposals within the area Harrow Council will be mindful of securing opportunities to address or overcome such issues or any subsequent pressures.

Pressures, Issues or Opportunity for Enhancement:	Location:	Description:
Pressure for further development/extensions	All buildings, throughout	New buildings, extensions and alterations to buildings may affect the area’s open character, the vernacular appearance of buildings, and/or the significant groupings or layouts of the buildings. There may be pressure for additional space for the hotel e.g. Function/conference space.
Pressure for telecommunication masts and other tall structures	Throughout	Pressures may derive from telecommunications masts or other tall structures such as wind turbines due to the height and/or openness of the land.

Pressures, Issues or Opportunity for Enhancement:	Location:	Description:
Views of the Radio Mast from the conservation area	Grimsdyke Estate	Although surrounded by mature trees the 110ft tall transmitter tower can be viewed from certain areas including the gardens of Grimsdyke House. It is also in an obtrusive location bordering Grim’s Ditch.
Protection of natural and archaeological treasures from the impact of tourism and planting	Grim's Dyke; Harrow Weald Common	The area is a popular destination for walkers, including paths running along Grim’s Dyke, which may suffer erosion and wear from use. Motorbike use has also harmed the structure of the delicate earthwork. They disturb soil and endanger the linear earthwork and its archaeological properties. Rhododendron roots have previously disturbed the archaeology and have been removed – this situation should be monitored.
Overhead cables along trees along entrance driveway to Grimsdyke Hotel	Grimsdyke Hotel	There is limited street furniture, and the standing streetlights and wooden telegraph poles do not visually clutter the area. However some overhead cables for lighting are obtrusive, especially where they hang across the road. There is also an issue with placement or these cables, where some trees appear to be being damaged by tight cables. Subtler, more sympathetic placement would be welcomed.
Car park to Grimsdyke Hotel	Grimsdyke Hotel	The car park tarmac has a deadening effect and has increased erosion to base level bricks at Grimsyke Hotel.
Gate pier repair and maintenance	Grimsdyke Estate	The decorative entrance gate pier to the stable block would benefit from repair.
Elements of Gilbert's planned landscape could benefit from repair, maintenance or restoration, including lake, buildings/structures and pathways	Grimsdyke Estate	<p>Opportunities exist to repair and reinstate elements of the original designed landscape, such as:</p> <ol style="list-style-type: none"> 1) the roads to Grimsdyke Estate have no pavements, kerbs or road signs, which is appropriate for how informal they were intended to be, but these roads were originally all graveled. The softening of these would be much more in context with the lush woodland surrounding otherwise they appear too harsh; the original style of surfacing exists surrounding the ancillary estate buildings. 2) The tarmac car park to the side of Grimsdyke House has a deadening effect and could be enhanced with a more appropriate surface as there is already evidence of brick erosion caused by the impermeable material.

Pressures, Issues or Opportunity for Enhancement:	Location:	Description:
		<p>3) the original gate pier remaining at the entrance to the field adjoining the Stable bloc, the restoration of which would also be desirable.</p> <p>4) Listed walls to the kitchen garden and lean to greenhouse could benefit from repair.</p> <p>5) Some timber windows to the stable block have been inappropriately replaced with aluminium. As such there is opportunity for enhancement here.</p> <p>6) Elements of Gilbert's model farm remain and require repair and reuse.</p> <p>7) Gilbert's lake, which is silted up and is therefore currently derelict. There have been proposals to reinstate this and as such there is possibility for enhancement here.</p> <p>The planned 'natural' landscaping is as integral as the buildings to the conservation area, and as such the restoration and retention of this is an important objective.</p>
Car park/viewpoint overlooking Harrow	Harrow Weald Common, adjacent to the conservation area	Clear uninterrupted views look out over Harrow and as such the viewpoint is highly popular. There is opportunity for general enhancement of this highly popular viewpoint.
Lighting and signage	The Case Is Altered Public House	There is currently wooden signage sympathetic to the character of the area, and some sympathetic illumination. Excessive signage and lighting would visually clutter the area and be inappropriate.
Vacancy, disrepair and neglect of some buildings and the need to secure their long term future and reuse	Copse Farm	Since the closure of the riding school in 2004, there have been a number of vacant agricultural buildings which have fallen into disrepair, and are increasingly at risk. They require repair, in some cases urgent and extensive, sympathetic re-use, and better ongoing maintenance. These buildings have a strong architectural presence and layout, and as such are

Pressures, Issues or Opportunity for Enhancement:	Location:	Description:
		<p>essential to the area's character/ Their loss would have a severe detrimental impact on the essential characteristics of the area.</p> <p>There are is a great public interest in ensuring the sympathetic reuse of these buildings and avoiding inappropriate alterations and extensions in this sensitive location.</p>
Fly tipping	Road leading from Old Redding to Copse Farm	Fly tipping is an ongoing problem. It is visually cluttering, often dangerously sited, and may block access for residents and emergency vehicles.
Security equipment	Copse Farm	As a result of fly tipping there have been increased pressures for CCTV and security fencing.
Streetscape/ road maintenance	Brookshill area	This is a quiet area with limited, slow traffic, in part due to the rough terrain. The streetscape is rural, and should remain so. Necessary repairs should be sympathetic. Tarmac should not be extended westwards along Brookshill Drive.
Front gardens	Brookshill Drive	Some 20th century properties have hardstanding driveways, which are too harsh for the rural streetscape (and often increase erosion of base level brick). Softening would be welcomed.
The Kiln house, the kiln, the garden walls, summer house, and replica drying sheds	The Kiln house site, Brookshill	These are currently all grade II listed for their national historic and architectural importance. However, an application has recently been made to de-list them so that their heritage significance can be reconsidered. If not of national significance, their local interest to the borough remains and has been clearly outlined by this appraisal. Protection for these buildings would be reduced by a lack of national listing.
Pressure for sustainability measures	Throughout	It is likely that sustainability measures will lead to an increase in proposals involving solar panels and wind turbines. If well designed and integrated these should be able to be accommodated without disrupting local character. However, the sloping land in places and the great deal of openness and clear views makes this area particularly sensitive to such installations.



**Picture 1.52 Cope Farm Yard LBH
LA.100019206.2013**

1.3.3 Public Consultation

1.110 This document and the following management strategy have been the subject of public consultation. Views were sought from local residents, councillors, the Conservation Area Advisory Committee, Harrow Heritage Trust, the Stanmore & Harrow Historical Society and English Heritage. Notification was sent to each resident and it was available for viewing on the Harrow Council website and at the Planning Department offices at the Civic Centre on Station Road in Harrow. This document was subsequently amended to reflect the responses received from the consultation exercise and was adopted in due course as part of the Harrow Weald Conservation Area Supplementary Planning Document (SPD), as part of the Council's Local Development Framework (LDF).

1.4 Conservation Area Management Strategy

1.4.1 Purpose of the Strategy

1.111 Conservation Area Appraisals provide an analysis of the character and appearance of the conservation area in order to identify those elements that should be protected, as well as opportunities for change, improvement or enhancement. The Management Strategy uses the analysis to look forward and set out how the area's character will be preserved or enhanced. It sets out guidance and controls to protect and preserve the area and actions to enhance it. The following proposal statement provides a list of actions, related to pressures, issues or opportunities identified in the previous section.

1.112 Unless otherwise stated, the following should be regarded as a statement of intent. There are no set time limits. However, it is important to note that Conservation Area Appraisals and Management Strategies will be reviewed every 5 years.

1.4.2 Management Proposals

1.113 Pressures, issues and opportunities for enhancement are outlined in the above Conservation Area Appraisal and are addressed in the following table.

Pressures, Issues or Opportunity for Enhancement:	Location:	Action:
Pressure for further development/extensions	All buildings, throughout	An Article 4 direction has been implemented to help manage minor works. Any applications for development should demonstrate in sufficient detail how they comply with the guidance in section 4. There is a presumption against the demolition of buildings within the conservation area.
Pressure for telecommunication masts and other tall structures	Throughout	Due to the height and openness of the land, there may be forthcoming pressure, however, proposals from telecommunications masts and other tall structures such as wind turbines are unlikely to preserve the special interest of the conservation area.
Views of the Radio Mast from the conservation area	Grimsdyke Estate	Encourage further landscaping and tree planting to conceal the radio mast where there is opportunity to do so.
Protection of natural and archaeological treasures from the impact of tourism and planting	Grim's Dyke; Harrow Weald Common	Work with English Heritage and the hotel management to help resolve this.
Overhead cables along trees along entrance driveway to Grimsdyke Hotel	Grimsdyke Estate	Discuss with Grimsdyke Hotel the overhead cables
Car park to Grimsdyke Hotel	Grimsdyke Hotel	This could be improved by some soft landscaping or more appropriate surface.
Gate pier repair and maintenance	Gate pier by the Stable	This would benefit from repair and maintenance.
Elements of Gilbert's planned landscape could benefit from repair, maintenance or restoration, including lake, buildings/structures and pathways	Grimsdyke Estate	Work with the hotel management and other relevant stakeholders to develop an overall strategy for repairs, restoration and maintenance for the area, particularly regarding: estate roads, lake, gate pier, walls to kitchen garden and lean to greenhouse and the model farm.
Car park/Viewpoint overlooking Harrow	Harrow Weal Common, adjacent to the	Work with Parks to develop an enhancement scheme for the area overlooking Harrow.

Pressures, Issues or Opportunity for Enhancement:	Location:	Action:
	conservation area	
Lighting and signage	The Case Is Altered Public House, Old Redding	Lighting and signage should be kept to the current appropriate size and style, kept to a minimum and in sympathetic material. Most illuminated signage will not be found acceptable. Internally illuminated signage would be inappropriate.
Vacancy, disrepair and neglect of some buildings and the need to secure their long term future and reuse	Copse Farm	<p>The situation will be monitored by the Council and action will be taken if repairs and maintenance are not forthcoming.</p> <p>Any future proposals for re-use of the site will be expected to exhibit extreme sensitivity to the special character of the site.</p>
Fly tipping	Road leading from Old Redding to Copse Farm	Work with Highway teams to resolve the fly tipping e.g. installing a timber height restriction barrier at the junction with Old Redding.
Security equipment	Copse Farm	Refer unauthorised security equipment, lighting, CCTV and fencing which impacts on the conservation area's character to planning enforcement.
Streetscape/ road maintenance	Brookshill area	Should be maintained as a traditional gravel farm track, and potholes filled in with scalplings gravel and packed down hard, to ensure a rural personality is kept.
Front gardens	Brookshill Drive	Gravel is a good alternative to hardstanding for driveways. It is more sympathetic to the character of the area and by allowing water to percolate freely through the ground limits erosion to built fabric. Similarly, any increase in soft landscaping would be welcomed.
The Kiln house, the kiln, the garden walls, summer house, and replica drying sheds	The Kiln house site, Brookshill	These are being proposed for incorporation into the conservation area. If de-listed these will be recommended for local listing and public consultation in relation to the criteria for local listing will take place. Introduce an Article 4

Pressures, Issues or Opportunity for Enhancement:	Location:	Action:
		direction to provide appropriate protection from inappropriate development to the building and within the site.
Pressure for sustainability measures	Throughout	These should therefore be carefully sited to protect streetscene views and historic built fabric. English Heritage has a range of guidance on the different considerations involved in the use of micro-generation technologies in CAs which can be accessed on their Historic Environment: Local management (HELM) website by entering energy efficiency into the search engine in the English Heritage section of the Guidance Library at www.helm.org.uk .

1.4.3 Reviewing the Conservation Area's Boundaries

1.114 Local Planning Authorities have a continuing duty under the Planning (Listed Buildings and Conservation Areas) Act (section 69 part 2 and section 70 part 1) to consider whether it should designate new conservation areas, or extend existing ones. Criteria for conservation area status is outlined within the overarching Harrow Weald Conservation Areas SPD. It is appropriate that the conservation area boundary is proposed to be amended to include the Kiln site and grounds on Common Road as shown on the map in the introduction. This is because the Kiln house site, including the Kiln, two wells, pond, drying sheds and garden walls, has strong local architectural and historic significance that is associated with, and forms part of, the existing conservation area.

1.115 The Kiln site comprises the former core of the brick making business which from the mid-17th century to the 1930s was owned by the owners of Brookshill Farm ie the Bodimeade family and then the Blackwell family. The core of the Kiln dates to the 17th century and still retains much of its attractive original later 18th century design and fabric and associated gardens comprising brickwork from the kilns. In the later Georgian period, the old house was remodelled to create a dwelling of greater architectural pretension, the external walls rebuilt in brick and a new wing added on the west side. The Kiln house was the main house associated with the kilns used to burn brick, tile and lime and the associated drying sheds. The current kiln is the only survivor of three which were in operation between 1795 and 1895 according to a report in the Greater London Industrial Archaeology Society newsletter No. 2 (June 1969). This replaced earlier 17th century kilns on the site. Replica drying sheds remain, being rebuilt in the 1980s to a similar design and scale to the early 18th century ones. An associated well remains in place.

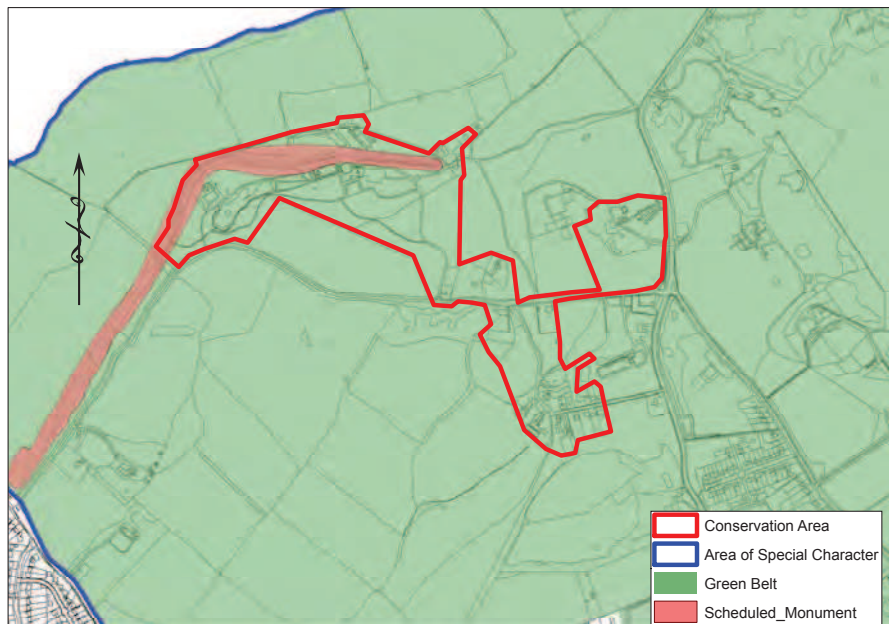
1.116 By the mid-C18 the Bodimeades' brick kilns had become one of the most significant industrial enterprises in North Middlesex. A 1767 inventory of the works, owned by William Bodimeade (d.1777) in partnership with his son, John, lists 380,000 burnt bricks, 20,000 moulded bricks, 150,000 moulded bricks standing in clamps, as well as 135,000 tiles and 25,000 paving bricks. In 1777 John Bodimeade set up 50 kilns to supply bricks for the mansion being built at Gorhambury, Hertfordshire for the Third Viscount Grimston.

1.117 Another key connection between the Kiln site and the special interest of the existing conservation area is that the historic buildings within the conservation area were built using clays from a site just to the north of the Kiln site (shown on the 1877 Ordnance Survey map as a brick field) which was in turn used in brick making from the Kiln site. So, many of the bricks and materials for buildings within the conservation area are likely to have been produced from this site.

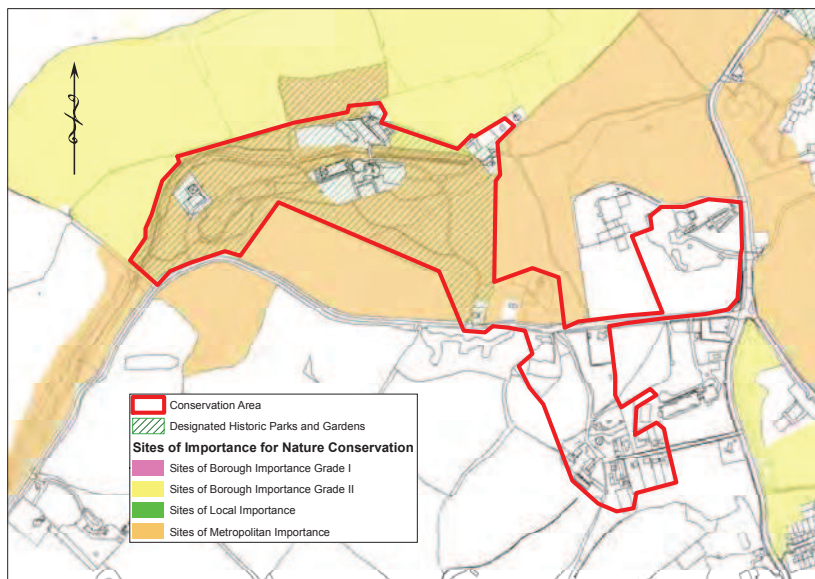
1.118 Indeed, Charles Blackwell who later owned the Kiln site built a number of decorative buildings within the conservation area including Farm Cottage, Dairy Cottage, and Nos 1 and 2 The Bungalows, now Bridle Cottages at Brookshill in c1890, all of which remain. Similarly, he built a collection of semi-detached cottages for brick kiln workers only one of which remains and is sited within the conservation area as 3 and 4 the City, Old Redding. The Blackwell family later owned the site during the later 18th and 19th centuries, after the marriage of Mary-Anne Bodimeade (1771-1862) to Charles Blackwell (1769-1849). Their son Thomas (1804-1879), was the co-founder in 1829 of the firm of Crosse & Blackwell, food manufacturers. The brickworks ceased production in 1912. The Blackwell family acquired the freehold in 1899, and the Kiln property remained in their family until 1933.

1.119 The characteristic greenery, open and peaceful character of the conservation area is also present in the Kiln site given the large open garden space and its set away from the road by vegetation and tall brick wall.

1.120 Otherwise the area surrounding the Conservation Area makes an important contribution to its character as it almost entirely comprises wooded land, open fields and Harrow Weald Common, which is very important in retaining the rural and semi-rural character of this conservation area. These surrounding areas are protected separately though as they are in the setting of the Conservation Area, and development proposed within the setting of Conservation Areas will be considered with its effect on the Conservation Area in mind and the need to preserve those elements within its setting which help preserve its special interest. The area to the south-west of the Grimsdyke part of the conservation area also contains Grim's Ditch, which is separately protected as a Scheduled Ancient Monument. The Conservation Area is also entirely situated within Green Belt land and a designated Area of Special Character whose boundaries extend much further. There is a designated Historic Park and Garden, and several Sites of Nature Conservation Importance adjacent to and overlapping the Conservation Area. This separate and existing protection helps preserve those elements of the setting of the conservation area which are important to it.



**Picture 1.53 Surrounding designations 1 LBH
LA.100019206.2013**

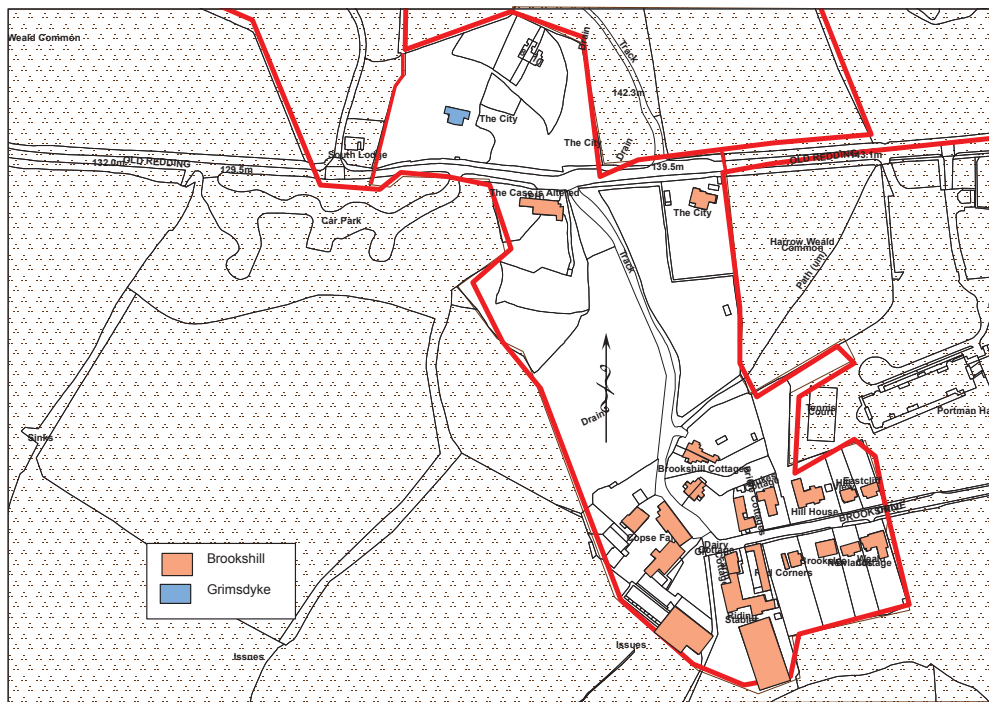


**Picture 1.54 Surrounding designations 2 LBH
LA.100019206.2013**

1.4.4 Article 4 Directions

1.121 Permitted developments are already restricted nationally for any CA (see the Harrow Council’s Conservation Areas Residential Planning Guidelines – Do I Need Planning Permission? leaflet available on the Council’s webpage from: www.harrow.gov.uk/conservation).

1.122 A detailed review of the area and of the development trends suggested that there would be benefits to the character and appearance of the area if Article 4 directions were introduced. They require planning permission for some aspects of development normally classed as 'permitted development'. This gives greater control over proposals for development, alterations and aspects of design and materials in sensitive areas. There are 3 sets of Article 4 Directions within the Brookshill and Grimsdyke Estate Conservation Area that help preserve the semi-rural character of the area and key aspects of historic and good quality design.



Picture 1.55 Brookshill Character Area Article 4 Directions LBH LA.100019206.2014

- Brookshill Drive: The City, Brookshill Cottages 1&2, White Cottage, Copse Farm House, Dairy Cottage, Farm Cottage, The Hollies, Dukes, Bridle Cottages, Hill View, Eastcliff, Red Corners, Brookslee, Newlands, Weald Lodge.

Article 4 Direction confirmed on 9th November 2006. The direction withdraws permitted development rights for the following types of development, where such development would front a highway, waterway or open space.

1. The enlargement, improvement or other alteration of a dwellinghouse.
2. Any other alteration to the roof of a dwellinghouse.
3. The erection or construction of a porch outside any external door of a dwellinghouse.
4. The provision within the curtilage of a dwellinghouse of a hard surface.
5. The installation, alteration or replacement of a satellite antenna on a dwellinghouse or within the curtilage of a dwellinghouse.

- Old Redding: Nos. 3 & 4 The City.

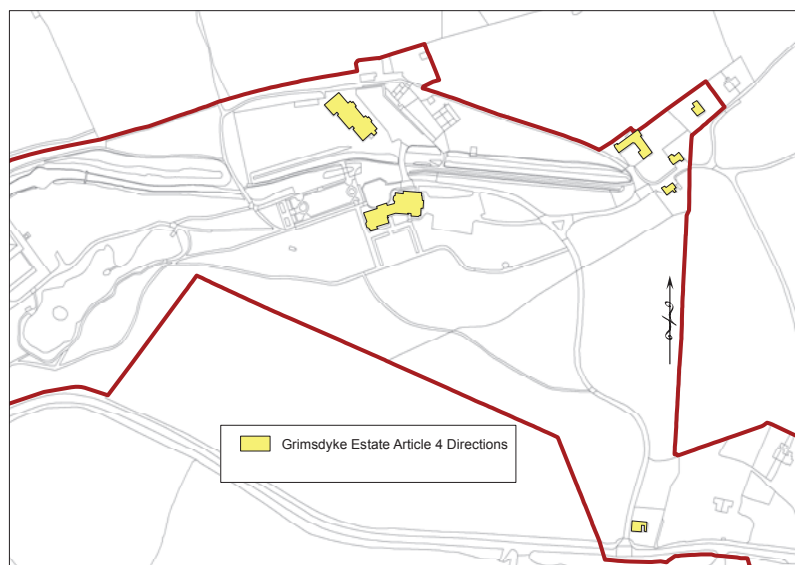
Article 4 Direction confirmed 8th August 1986. Classes of permitted development controlled:

Class I

1. The enlargement, improvement or alteration of a dwellinghouse.
2. The erection of a porch.
3. The erection, construction or placing, and the maintenance, improvement or other alteration of a building within the curtilage.
4. The construction of hardsurfacing within the curtilage.
5. The erection or placing of an oil storage tank within the curtilage.

Class II

1. The erection of a means of enclosure.
2. The formation, laying out and construction of a means of access to the highway.
3. The painting of the exterior.



Picture 1.56 Grimsdyke Character Area Article 4 Directions LBH LA.100019206.2014

- Grimsdyke Estate, relating to: The Bothy, New Lodge, North Lodge.

Article 4 Direction confirmed on 9th November 2006. The direction withdraws permitted development rights for the following types of development, where such development would front a highway, waterway or open space.

1. The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure.
2. The provision within the curtilage of a dwellinghouse of a hard surface.

Article 4 Direction confirmed on 9th November 2006. The direction withdraws permitted development rights for the following types of development, where such development would front a highway, waterway or open space.
3. The installation, alteration or replacement of a satellite antenna on a dwellinghouse or within the curtilage of a dwellinghouse.

1.123 It is proposed to introduce an Article 4 direction for the Kiln relating to the following:

Article 4 Direction proposed to withdraw permitted development rights for the following

Class I

1. The enlargement, improvement or alteration of a dwellinghouse.
2. The erection of a porch.
3. The erection, construction or placing, and the maintenance, improvement or other alteration of a building within the curtilage.
4. The construction of hardsurfacing within the curtilage.

Class II

1. The erection of a means of enclosure.
2. The formation, laying out and construction of a means of access to the highway.
3. The painting of the exterior.

1.4.5 Support

1.124 Relevant parties can contribute to the preservation and enhancement of the Conservation Area. These include local residents, property owners, and local societies. They should be involved in all stages of devising ideas, management, and enhancement of the area.

1.125 The above enhancement and improvement proposals and other possible future schemes require funding. Some can be managed within existing council budgets but much of the works would need to be completed by private owners. For the public realm works, the Council will continue to pursue funding for high quality conservation grade materials. The Council will continue to apply for grants wherever possible.

1.126 In line with English Heritage’s guidance, it is essential when planning works within Conservation Areas that a considered approach which preserves or enhances the area’s character or appearance is adopted. Where a conflict with general planning and highways policies occur, special care must be taken to find a solution that meets both the needs of the local community and the historic environment.

1.4.6 Guidance

1.127 To ensure consistent decision making, the following guidance has been identified as being of key relevance to this area with reference to the Conservation Area Appraisal.

Maintaining Brookshill Drive and Grimsdyke Estate's Townscape and Built Character

To ensure that the character of the Conservation Area and its setting is both preserved and enhanced, all new development should:

- a) Respect the existing layout and historic form of the settlement and estate, especially its farmyard layouts, building lines and heights, and not diminish the gap between buildings.
- b) Complement existing buildings and areas of open space in terms of bulk, design, siting, detailing, scale, materials and use. Any extensions will be encouraged to be at the property's rear and subservient in scale to the original property, as well as match the existing house in design and materials.
- c) Not entail side extensions that significantly reduce the gap between buildings or diminish the architectural balance or details of the main building.
- d) Avoid impeding views between buildings or into areas of open space.
- e) Retain original design features (as identified within the character appraisal) and where replacement is necessary, the architectural detailing should closely match that of the original, in traditional materials.
- f) Not involve the painting of unpainted brick surfaces.
- g) Ensure material alterations to buildings protect the appearance of elevations that face onto a highway, including alterations to chimneys and rooflines. Dormers and rooflights on front and side roof slopes will be discouraged.
- h) Not entail the positioning of satellite dishes and aerials in prominent positions.
- i) Usually avoid change of use to flats and other institutional uses.
- j) Ensure microgeneration equipment is carefully sited to protect streetscene views and historic built fabric.

Maintaining Brookshill Drive and Grimsdyke Estate's Greenery and Open Spaces

To ensure that the soft character of the Conservation Area and its setting is both preserved and enhanced, Harrow Council will:

- a) Encourage the retention and improvement of both public and private green spaces and open land, including trees, hedgerows and grass verges.
- b) Discourage development on existing areas of open land that have been defined as contributing to the character of the Conservation Area.
- c) Further protect trees, and groups of trees, by creating additional Tree Protection Orders (TPOs) where appropriate.
- d) Discourage development that adversely affects significant trees.

Maintaining Brookshill Drive and Grimsdyke Estate's Archaeology

a) Harrow Council recognises the archaeological importance of Harrow Weald's Conservation Areas and their settings, and will help to protect these by continuing to consult with English Heritage to ensure the appropriate action or works such as surveys are carried out before development commences.

b) Where appropriate, and in discussion with English Heritage, new Archaeological Priority Areas will be created and/or existing Archaeological Priority Areas revised, to safeguard Harrow Weald's archaeological remains.

Maintaining Brookshill Drive and Grimsdyke Estate's Streetscene

To ensure that the character of the streetscene is both preserved and enhanced, Harrow Council will:

- a) Refer to existing policy on tall structures where telecommunications equipment or wind turbines are proposed.
- b) Encourage the utility companies to install the minimum amount of new and replacement street furniture and to locate this sensitively in suitable locations.
- c) Encourage street furniture to be well designed, and for redundant and unsightly street furniture and signage to be removed where opportunities occur.
- d) Encourage the retention of original floorscape materials, and wherever practicable, replacement floorscapes of appropriate traditional materials.

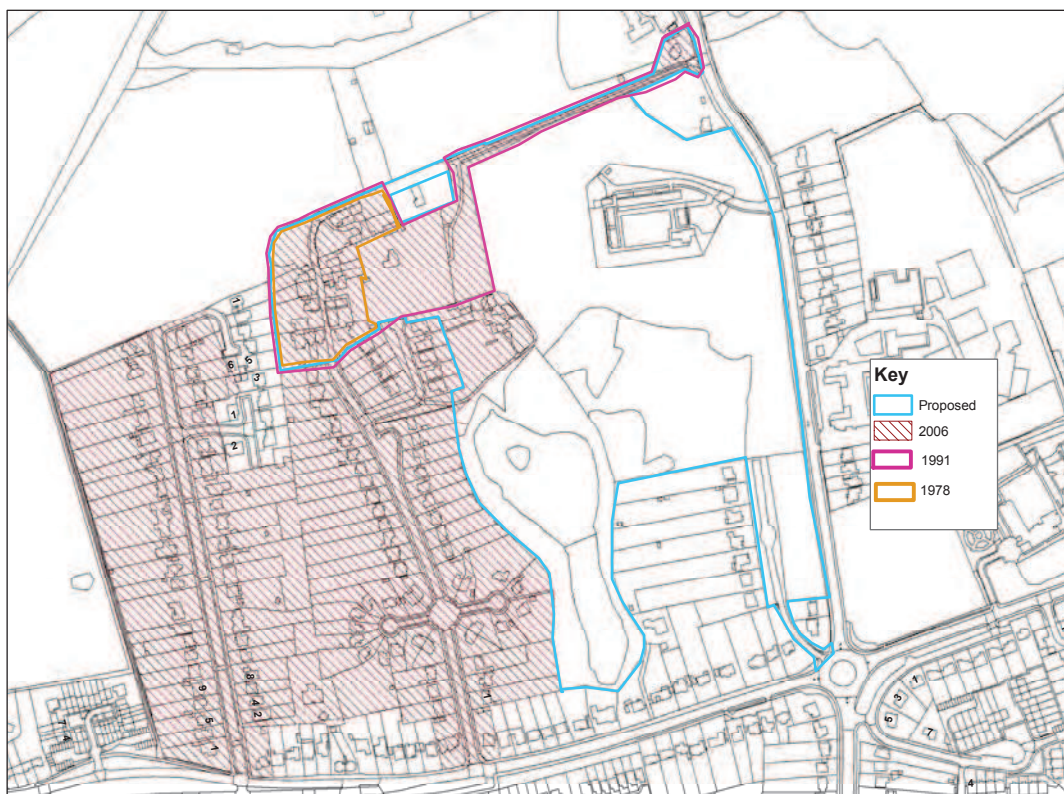
1. West Drive	2
1.1 Introduction to the Conservation Area	2
1.1.1 Introduction	2
1.1.2 Planning Policy Context	4
1.1.3 Summary of Special Interest	4
1.1.4 Short History	4
1.1.5 Archaeology and geology	12
1.2 The Character of the Conservation Area Today	12
1.2.1 Density of Development, Topography and Plan Form	12
1.2.2 Townscape Character	13
1.2.3 Activity and Uses Within the Area	14
1.2.4 Key Views and Vistas	15
1.2.5 Architectural Qualities	17
1.2.6 Streetscape	30
1.2.7 Landscaping, Green Spaces and Ecology	33
1.3 Summary of Conservation Area	38
1.3.1 Summary and Main Assets	38
1.3.2 Problems, Pressures and Potential for Enhancement	39
1.3.3 Public Consultation	41
1.4 Conservation Area Management Strategy	41
1.4.1 Purpose of the Strategy	41
1.4.2 Management Proposals	42
1.4.3 Reviewing the Conservation Area's Boundaries	44
1.4.4 Setting of the Conservation Area	45
1.4.5 Article 4 Directions	46
1.4.6 Support	47
1.4.7 Guidance	47

1.1 Introduction to the Conservation Area

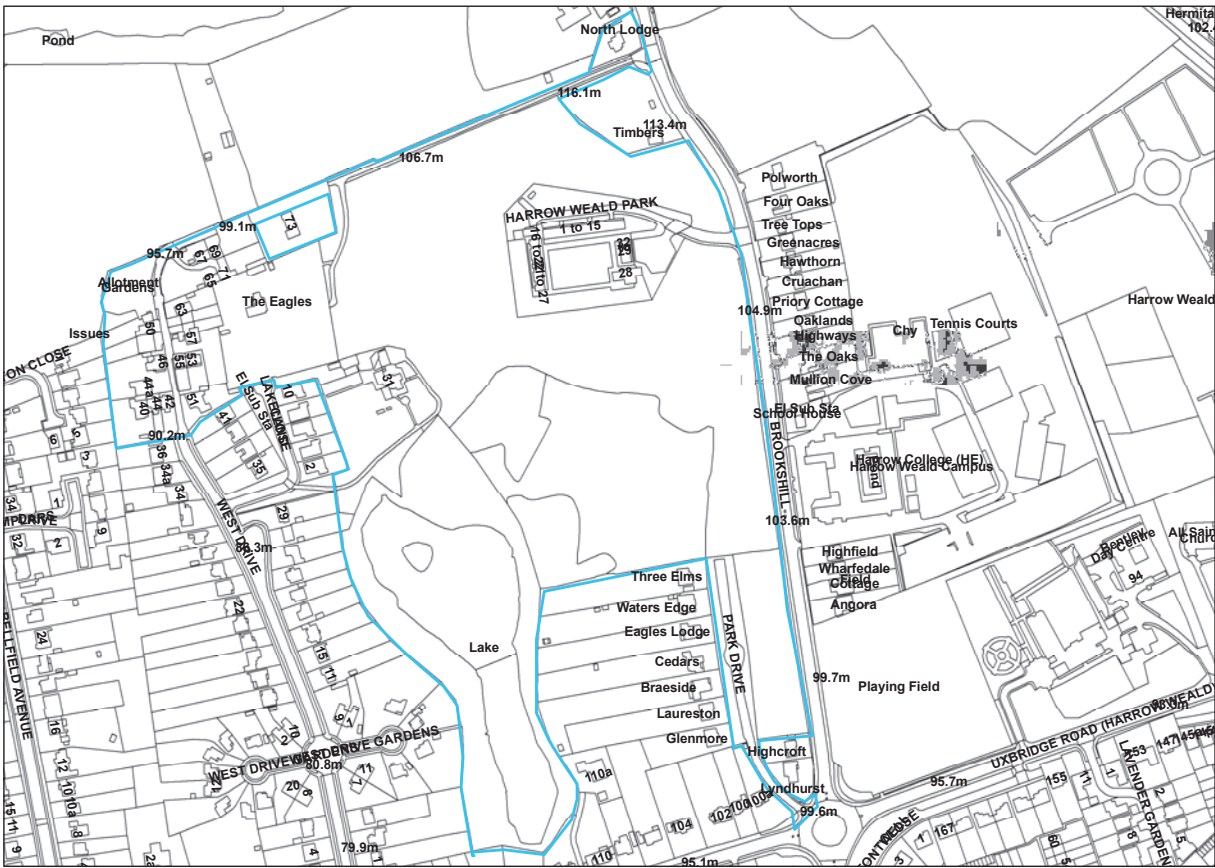
1.1.1 Introduction

1.1 West Drive Conservation Area (CA) lies in the north of the borough to the south of Brookhill Drive and Grimsdyke Estate CA. As it forms the remains of a country estate it has a rich rural character and designed country estate landscaping with limited modern development. The area is largely bounded by fields and open space to the north, east and partly to the west which is essential to preserving the special semi-rural character of the whole area.

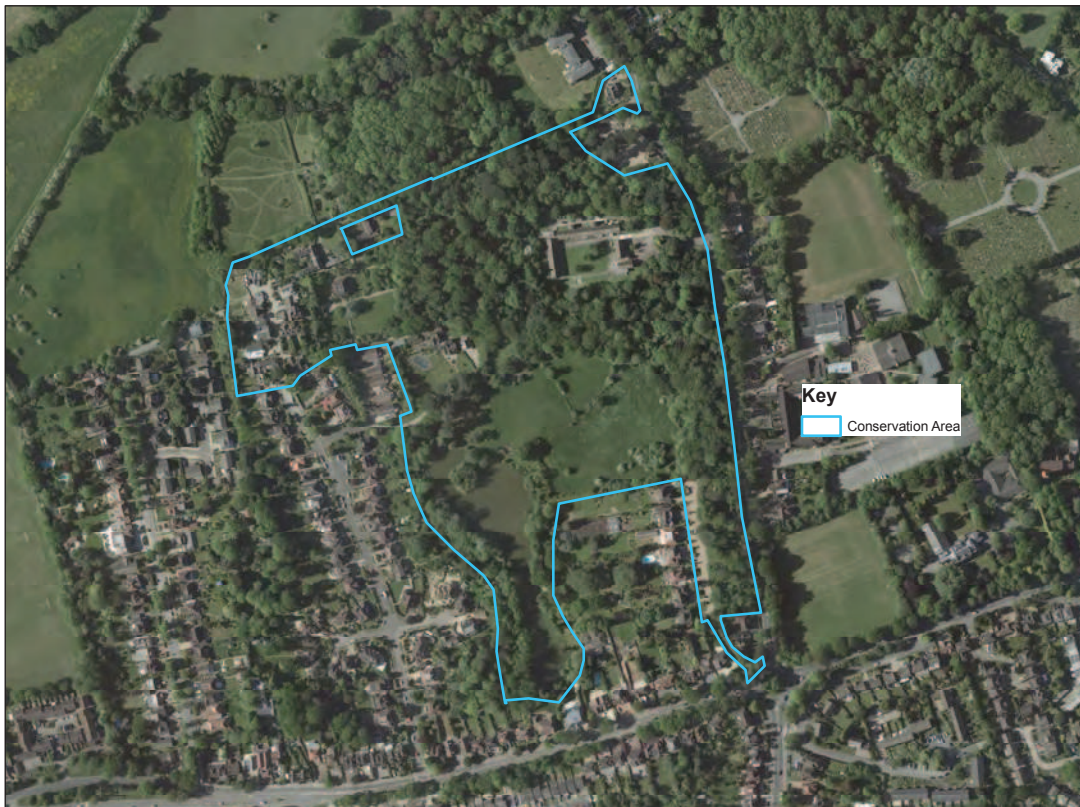
1.2 The West Drive Conservation Area was first designated in 1978 and the boundary was extended in 1991 and 2006 and proposed to be amended in 2014. The boundary is drawn tightly with regard to protecting the special interest of the area including its historic layout, buildings, and their informal, green and rural setting. Surrounding openness, whether this be private land or public space, is very important as it serves to provide a significant reminder and evidence of the area's roots as a country estate.



**Picture 1.1 Changes to the Conservation Area boundary LBH
LA.100019206.2014**



Picture 1.2 Conservation Area boundary LBH LA.100019206.2014



Picture 1.3 Aerial overview of the Conservation Area LBH LA.100019206.2014

1.1.2 Planning Policy Context

1.3 Section 69 of the Planning (Listed Building and Conservation Areas) Act 1990 requires local authorities to determine those areas the environment of which is considered worthy of preservation and enhancement and to make these CAs. A CA is defined as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Local Authorities are further obliged to formulate guidance and proposals for the preservation and enhancement of these CAs, and to pay due regard to the views of the residents and public in the formulation of guidance and proposals. These principles are reinforced by the National Planning Policy Framework. The purpose of this Conservation Area Appraisal and Management Strategy (CAAMS) is to provide clear analysis of the architectural importance, character and appearance of the area, to help form the basis for making sustainable decisions about the area's future. It also identifies opportunities for enhancement along with guidance to protect the area's character.

1.4 1.7 It is now subject to public consultation and when adopted will carry weight as a material planning consideration for assessing all development proposals. This CAAMS forms an appendix to the Harrow Weald Conservation Areas SPD. It is set within the broader context of CA policy guidance for Harrow contained within the Local Plan. It is also set within the National Planning Policy Framework particularly pages 30-32. It is important to note that: no appraisal can be completely comprehensive and that the omission of a particular building, feature or open space should not be taken to imply that it is of little or no interest.

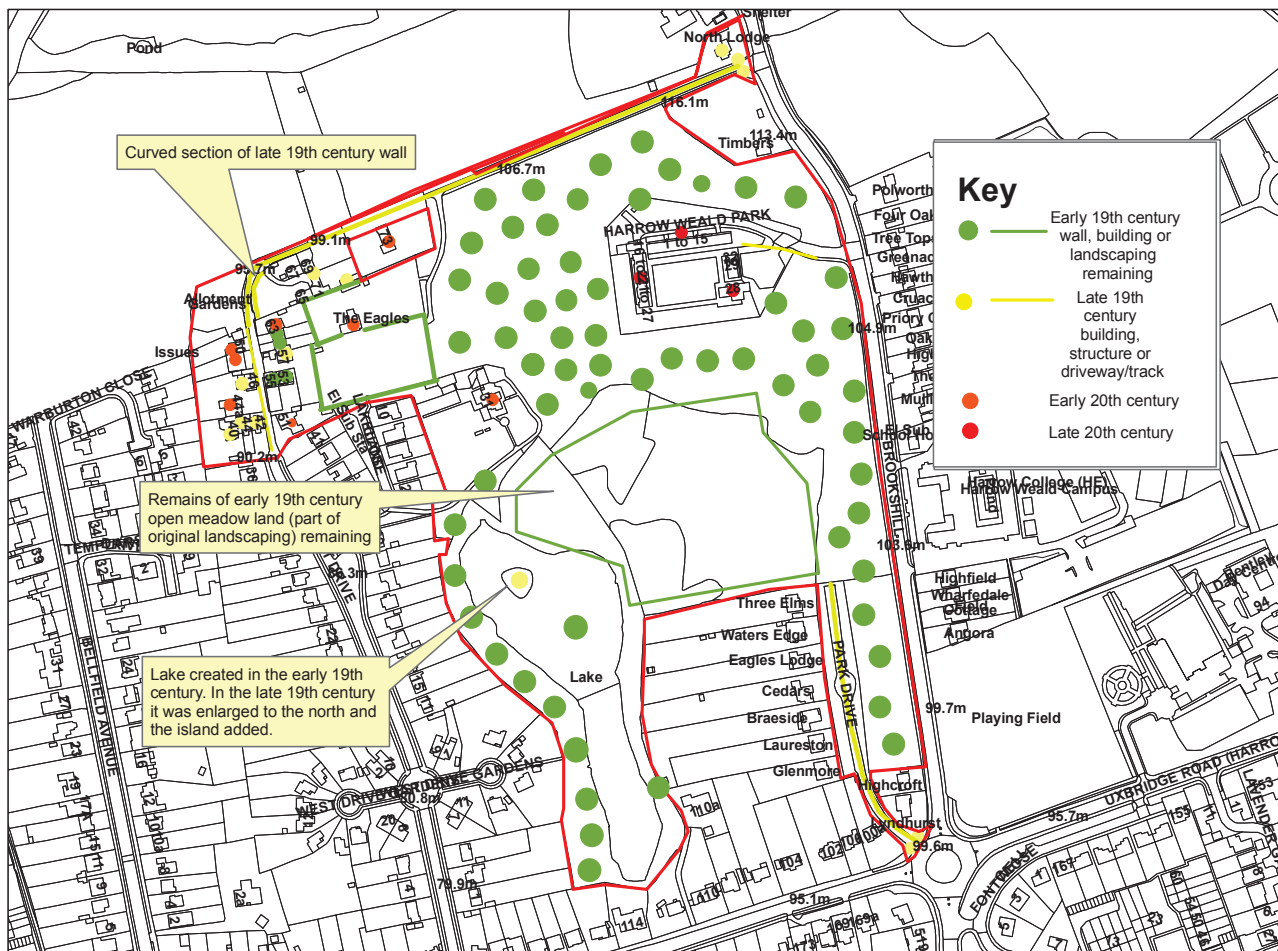
1.1.3 Summary of Special Interest

1.5 The special interest of the conservation area relates to it being a well-defined fragment of the original Harrow Weald Park, a large Victorian country estate, now surviving as a semi-rural enclave along an unmade track along with surrounding remnants of the original estate landscaping. It comprises: the workers' cottages, a former coachhouse, stables, entrance lodge and two sets of gate piers for the former mansion house (now demolished), former home farm buildings, former carriage driveways, numerous mature trees, much open green space, a large elongated lake feature, coupled with a small amount of later modest infill. The area grew up around a mansion house (now demolished) by William Winsdale in 1805 and later modified/rebuilt in the Gothic style by Alexander Sim to designs of Robert Frere in the late 1800s.

1.6 Its distinctive character relates to its integral historic architectural qualities, and intimate and informal semi-rural character given its low density of development, peaceful and tranquil air, the unmade gravel track, and plentiful surrounding soft landscaping, greenery and open spaces (including the lake) in and around the conservation area, much of which is part of the original designed landscaped for the estate. The open fields and woodland that bound the conservation area to the north, east and partly to the south with fields covering historic field boundaries give rise to important views towards woodland and long views over open landscapes which are vital for preserving the rural character of the area. This is preserved in the wider area by green belt and sites of importance for nature conservation designations. There have been few new developments, extensions/alterations and infill over the years which has assisted in the continuation of the prevailing semi-rural character, rooted in history.

1.1.4 Short History

1.7 To understand an area's character, it is important to consider its history. The following map indicates the earliest known part of any building or landscaping.



Picture 1.4 Age of buildings and landscaping LBH LA.100019206.2014

- **16th and 17th centuries**

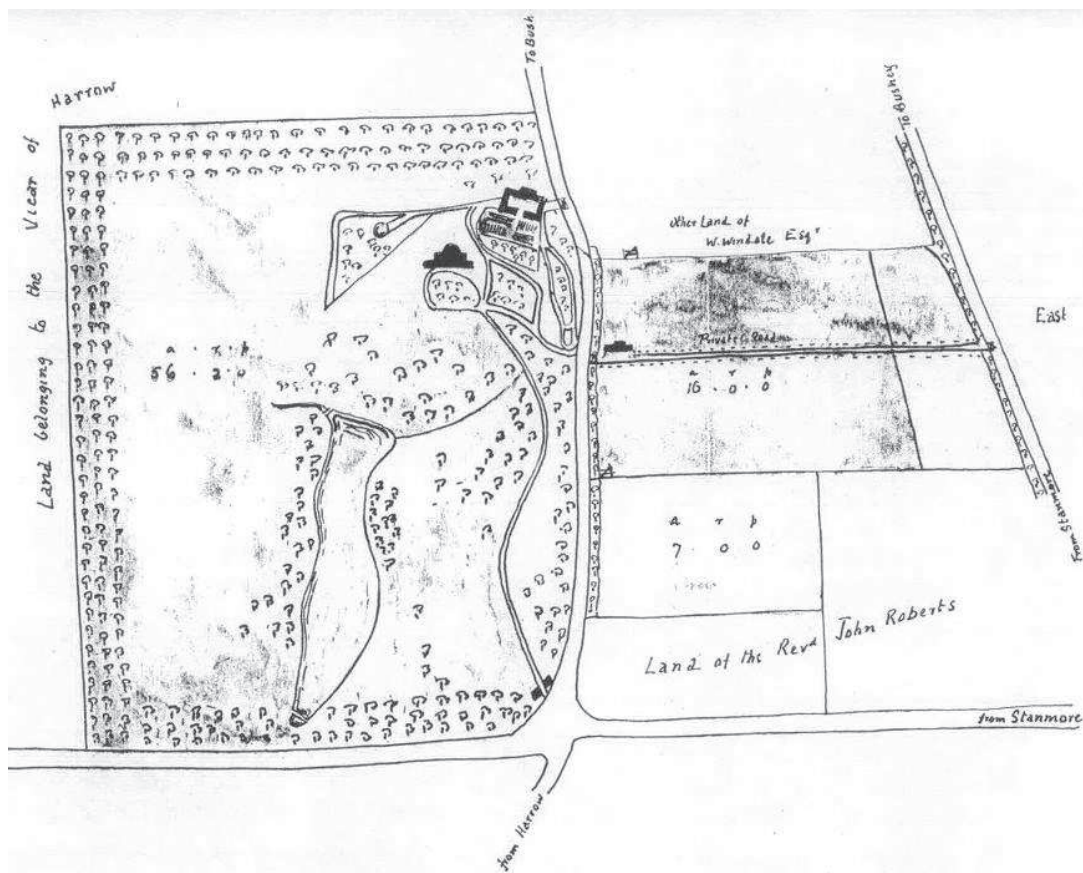
1.8 The original settlement known as Harrow Weald Park was sited on Brookshill in extensive grounds which before the enclosure was part of the common. The settlement grew up through the sixteenth and seventeenth centuries when a manor house, barns and a mill are recorded.

- **Early 19th century**

1.9 The origins of the remnants of the current estate relate to the early 19th century. William Winsdale of Mayor's Court Office, London, purchased 26 acres, bounded by Brookshill and the Uxbridge Road, from the enclosure commissioners in 1805. The estate is named Weald Park on the first edition of the OS in 1822 and the house and at least two lodges one on Brookshill and one or two on the Uxbridge Road are shown. He built a main house in the Georgian style on the highest land where the residential development of Harrow Weald Park is now sited, an informal track driveway running where Park Drive now is and north of this, and created an elongated 2 acre lake to the south-west of the main house to form part of key views. Today this lake remains as an important landscape feature in the south of the conservation area, sandwiched between the remainder of West Drive outside of the conservation area and Park Drive. Some of the original

meadows in front (to the south) of the house which were also part of the view that the house commanded remain today. The entrance from Park Drive was set adjacent an entrance gate lodge and pillars (both now demolished).

1.10 In 1822 William Windale added 27 acres to his grounds in a deed of exchange with the vicar of Harrow who had tithe land and built a small enclave of farm buildings and cottages to the north west of the main house. These form the core of some buildings that remain are today as well as a large walled garden - most of the walls of which remain today. It is considered that the cow sheds (53-55) and piggery (59 and 61) date to this time. Today the boundaries of the estate and some of the estate landscaping and informal track pathways remain.

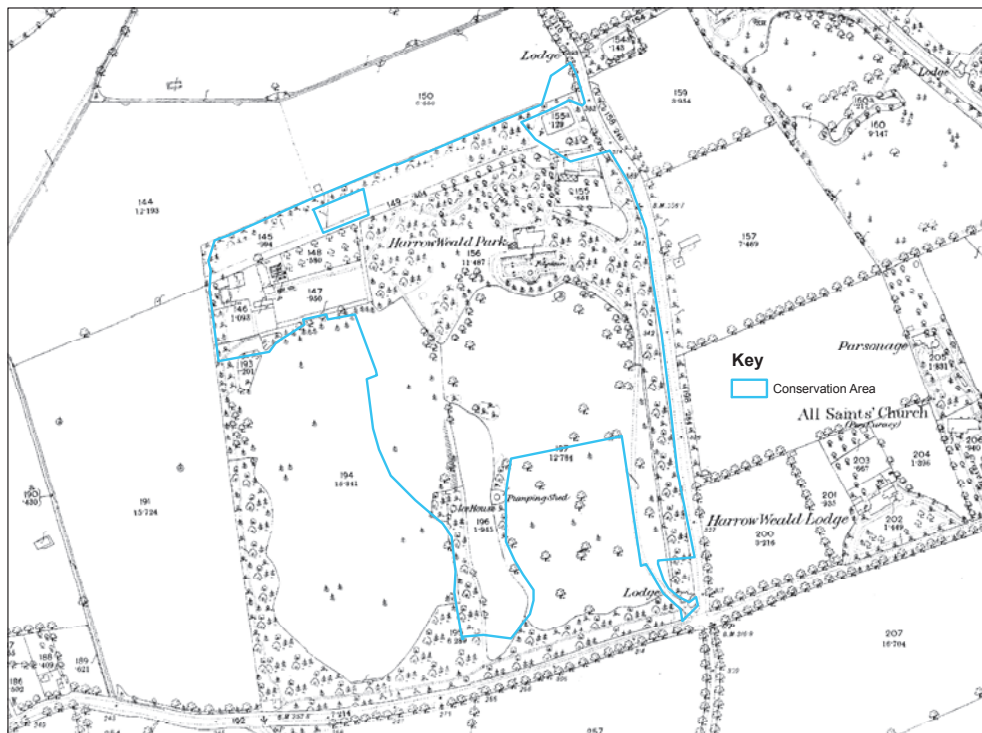


Picture 1.5 Early 1800s map of Harrow Weald Park LBH LA.100019206.2014

1.11 William Crockford (1775-1844), a fishmonger who founded Crockford's club in 1827 and quickly became a millionaire, lived in Harrow Weald Park for the last four years of his life. The estate was sold by auction in 1858 to Robert Smith an East India and China merchant.



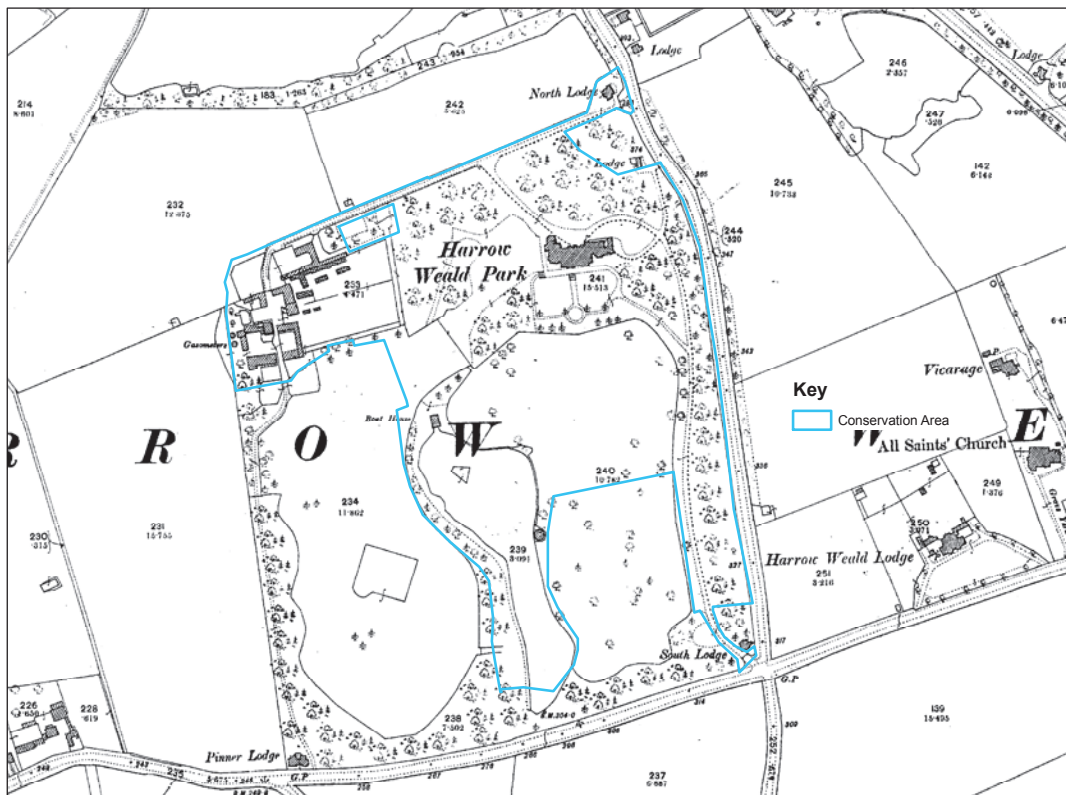
Picture 1.6 Auction map for sale of estate in 1858. Source: Local history library.



Picture 1.7 1864 OS map LBH LA.100019206.2014

- Late 19th century

1.12 In 1867 Alexander Sim, a wealthy timber merchant, purchased the house and the estate. Harrow Weald Park's main house was enlarged and remodelled in a Gothic style to create a castellated effect, to the designs of Robert Frere. The architect, if not a pupil, was largely under the influence of Sir Charles Barry, the architect of the Houses of Parliament. Whilst now demolished its Gothic style can be seen in buildings and structures that remain. This is because it was likely this time that the Gothic style entrance lodges, entrance gate pillars (at junction with Park Drive and by North Lodge, Brookshill), coach house (65-71) and stables developed. The north lodge remains today within the conservation area as do both sets of original flanking stone entrance gate piers. Most of the estate buildings which remain today all date largely to his time. As well as the aforementioned, this includes the , gardener's cottage (57), cottage farmhouse (46), 40-44 (ancillary service buildings), north lodge and 148-150 Uxbridge Road (the gamekeeper's lodge, also known as Pinner Lodge). The gamekeeper's lodge marked another entrance to the estate. North from here run an unmade track directly to the enclave of buildings just mentioned that now form the core of West Drive conservation area.



Picture 1.8 1896 LBH LA.100019206.2014



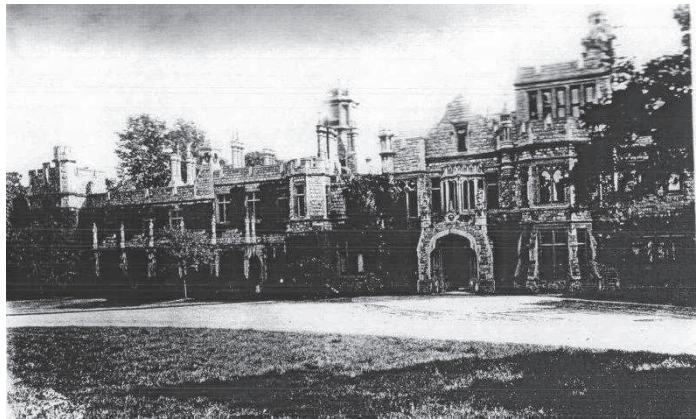
Picture 1.9 19th century photograph of the former mansion house with slope in front part of the landscaping - still in place. Source: local history library.



Picture 1.10 19th century photograph of the mansion



Picture 1.11 Early 20th century photograph of the mansion. Source: Harrow Observer 1980.



Picture 1.12 19th century photograph of the mansion. Source: Local history library.



Picture 1.13 19th century photograph of the mansion with landscaping and driveway in front. Source: Local history library.

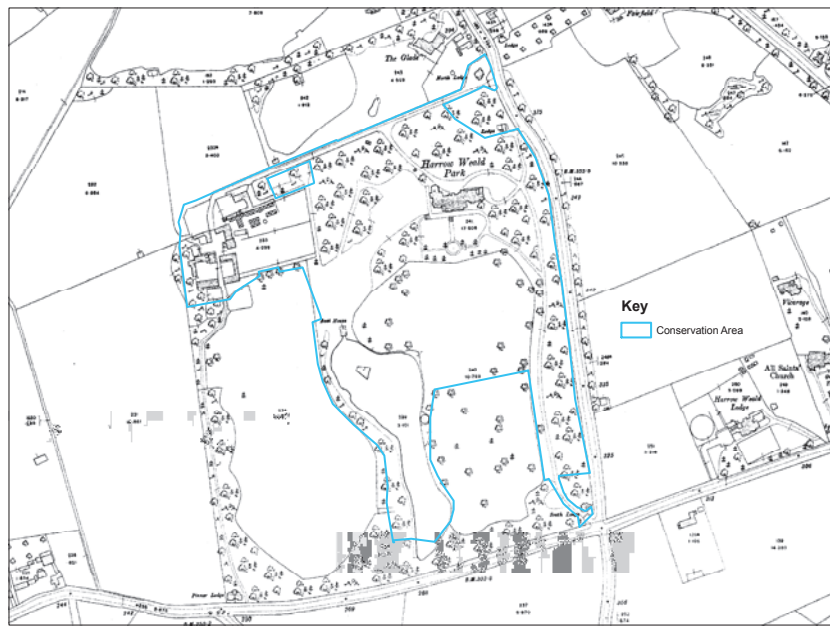
1.13 In Mr Sim's time the lake was remodelled. He widened the north end and created an island. It became a bird sanctuary sustaining many a different kinds of species of birds and he also collected and planted in the grounds forest trees from many different countries. Since that time these have grown to magnificent maturity. He built a decorative lake shelter unfortunately now gone. He also created the straight tunnelled carriage driveway entrance which remains running east to west from Brookshill Drive.



Picture 1.14 19th century photograph of the former decorative shelter by the lake

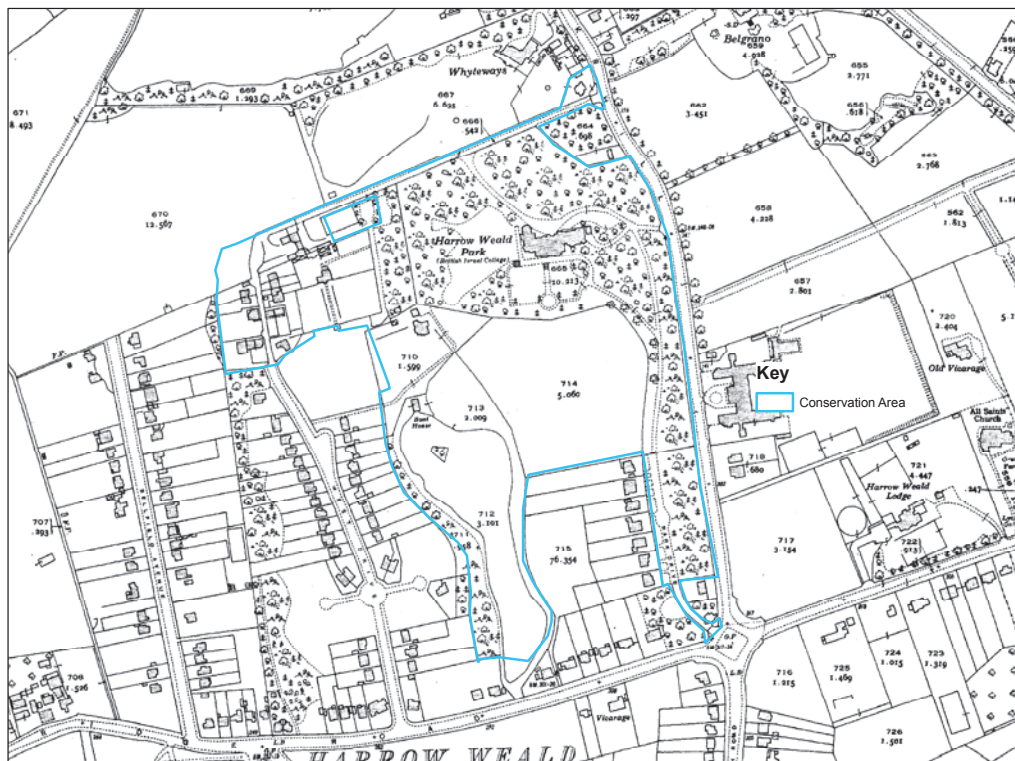
- **Early 20th century to the present day**

1.14 Mr Sim was succeeded by Mr Hughes but after his death the house was empty for seven years. It was on the point of being sold to a housebreaker. Mr Walker purchased the house and part of the estate in 1927 to try to save the mansion from threatened destruction. However, following ownership by the British Israel Society in the 1930s and use by the Post Office during World War II, the house was demolished in 1956.



Picture 1.15 1914 OS map LBH LA.100019206.2014

1.15 The land was part divided up, such that the Eagles and 31 West Drive, later developed as large single houses or developments in the case of the Harrow Weald Park residential care home estate, within a large plot of land each, thereby helping to retain the characteristic openness of the area, along with much of the landscaping of the estate. Much of the open landscaped space of the country estate remains as open fields, meadow land and mature trees thereby retaining the characteristic semi-rural feel.



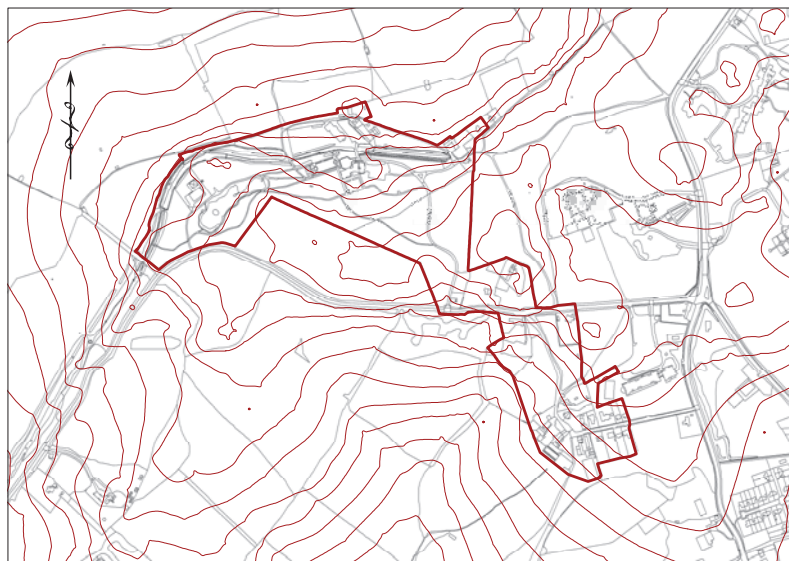
Picture 1.16 1941 OS map LBH LA.100019206.2014

1.1.5 Archaeology and geology

1.16 Archaeology and geology for the conservation area is considered within the associated document 'Harrow Weald Conservation Areas: Supplementary Planning Document', in consultation with English Heritage.

1.2 The Character of the Conservation Area Today

1.2.1 Density of Development, Topography and Plan Form



**Picture 1.17 Topographic context LBH
LA.100019206.2013**

1.17 The very low density of development to the area, gaps between buildings and its rural context of woodland and open fields in and around the conservation area is vital to its special interest as the remains of a country estate. The low density of development is not only protected by the conservation area status, but also covenants imposed when plots on the estate were sold in the 1920s as well as planning decisions in the past against greater density. The relatively flat topography adds to the rural feel at times by allowing long distance views out across the open green fields.

1.18 The plan form of the area is an important characteristic given the intimate and informal layout of a small group of buildings on an unmade track providing a semi-rural layout. This is quite a distinct plan form from the regular, linear and medium density suburban layout along the remainder of West Drive and adjacent streets, Park Drive and Bellfield Avenue. It is reminiscent of the original purpose and functionality of the route as one leading from a single, isolated entrance gate lodge (North Lodge) to the intimate enclave of labourers cottages, laundry and stables associated with the main house of the country estate, and the mansion house itself.

1.19 Significantly the plan form of the area as a whole relates strongly to the historic landscaping and layout of the Harrow Weald Park estate. Effectively a large part of the open landscaping remains as an integral part of the conservation area and its setting. The field boundaries and layout of trees, the lake, fields and open spaces shown on current maps of Harrow is highly similar to

the historic OS maps of this estate as outlined in the 'landscaping, green spaces and ecology' section. Such development that there has been has largely observed the original boundaries of the estate thereby preserving the unity of the Estate intact as a distinct neighbourhood.

1.20 The fact with the exception of 73 West Drive there is no development and woodland east of the enclave of buildings within the conservation area, between it and the former main house (where Harrow Weald Park retirement estate is sited) is important. This woodland is part of the desired former landscaping buffer to ensure the workers cottages are tucked away, concealed from view from the mansion house. It is historically important that the coach house and stables was the first building off the unmade track leading from Brookshill Drive since it was always directly and immediately accessible to the mansion house. Whilst 73 West Drive just outside the conservation area disrupts this slightly, this is just one building and the track still continues through.

1.2.2 Townscape Character

1.21 There is an integral semi-rural and peaceful character to this conservation area. This is due to the extensive greenery and open spaces including gardens and fields, unmade and gravel tracks and because the area is quiet with limited traffic. Also, due to the rough terrain and private nature of this part of West Drive, what traffic there is tends to be slow and considerate to the character of the area. It is also quiet due to the low intensity of uses of the area.

1.22 There is a keen sense of history throughout as such a large degree of historic landscaping, both built and 'natural' remains. This is true of the carriage driveways, multiple mature trees laid out or retained as part of the estate design and the locally listed gate lodge and the listed and locally listed gate piers. Whilst some of this landscaping is sited on private land this does not undermine its value: its presence is integral part of the historic estate such as the former meadow land in south of where the former mansion house was sited ie the residential care home, and the large lake.

1.23 The enclave of buildings comprising former home farm, coachhouse and stables and workers cottages and limited later development at the top of the unmade track forms the core of the area. Their small scale and low density acts as an important a reminder of their origins as ancillary semi-rural buildings related to the main mansion house. That the whole area has suffered little change with very few new developments, has assisted in the continuation of an intimate and distinct atmosphere from surrounding suburban sprawl.

1.24 Whilst many of the buildings are simply designed, given they were functional home farm buildings, the other former cottages and the coachhouse have good decorative qualities as they were designed to reflect the relative grandeur of their use and as part of the estate which they formed part of. Their design includes decorative Victorian Arts and Crafts rural vernacular style and for the gate piers, lodge and Coachhouse a Gothic style mimicking in simpler form that of the remodelled mansion that Sim created in the 1870s.

1.25 Approaching via the main entrance to the conservation area from Brookshill, there is a strong sense of entering a country estate given the tunnelled greenery along the unmade track beyond an entrance which is marked by impressive North Lodge and listed gate piers. The unbroken length of track in dark greenery still provides the intended sense of drama that was desired upon approaching the mansion house (now demolished).

1.26 The direct link to the former coachhouse and other ancillary buildings remains as does much surrounding greenery which was intended to conceal them from view from the mansion. There is a much more open, semi-rural character beyond the track from Brookshill Drive once you reach the small enclave of former ancillary buildings to the mansion. This is due to the spaces between buildings, the gardens and the many surrounding open fields providing excellent views. This openness is part of their character as part of the former home farm setting.

1.27 There is a key informal character given the layout and small scale of the buildings and the way boundary treatments are usually absent, hardsurfacing is usually limited and there is no street furniture. The informal character also relates to the rural Vernacular style of some cottages and simple, functional design of others. It is important that any future development respects these characteristics and so for this reason some Article 4 directions are recommended.

1.28 The dense greenery and open landscaping by the lake and around where the former mansion was sited gives a good indication of that grand landscaping intended to be seen in commanding views from the mansion. Like the grand Gothic style of the coachhouse, lodge and gate pillars, it provides another indication of the former grandeur of the estate.

1.29 The tall and very old brick walls to the rear of numbers 57-63 West Drive and in the grounds of the Eagles where the former kitchen gardens were largely remain in tact and provide a key reminder that the whole area formed part of the extent of the estate, that such large gardens were used to sustain it. They are also of importance for marking the boundaries of the former estate.

1.2.3 Activity and Uses Within the Area

1.30 The conservation area's special character relates partly to its origins and uses as an enclave of ancillary buildings associated with the main house being readily apparent. This is most obvious for the former coach house and stables, as although now subdivided into separate houses there are integral reminders of its former use including: its grand architectural features to mirror that of the main house, its large window openings where there used to be stable doors and its upper windows where there was a hay loft.

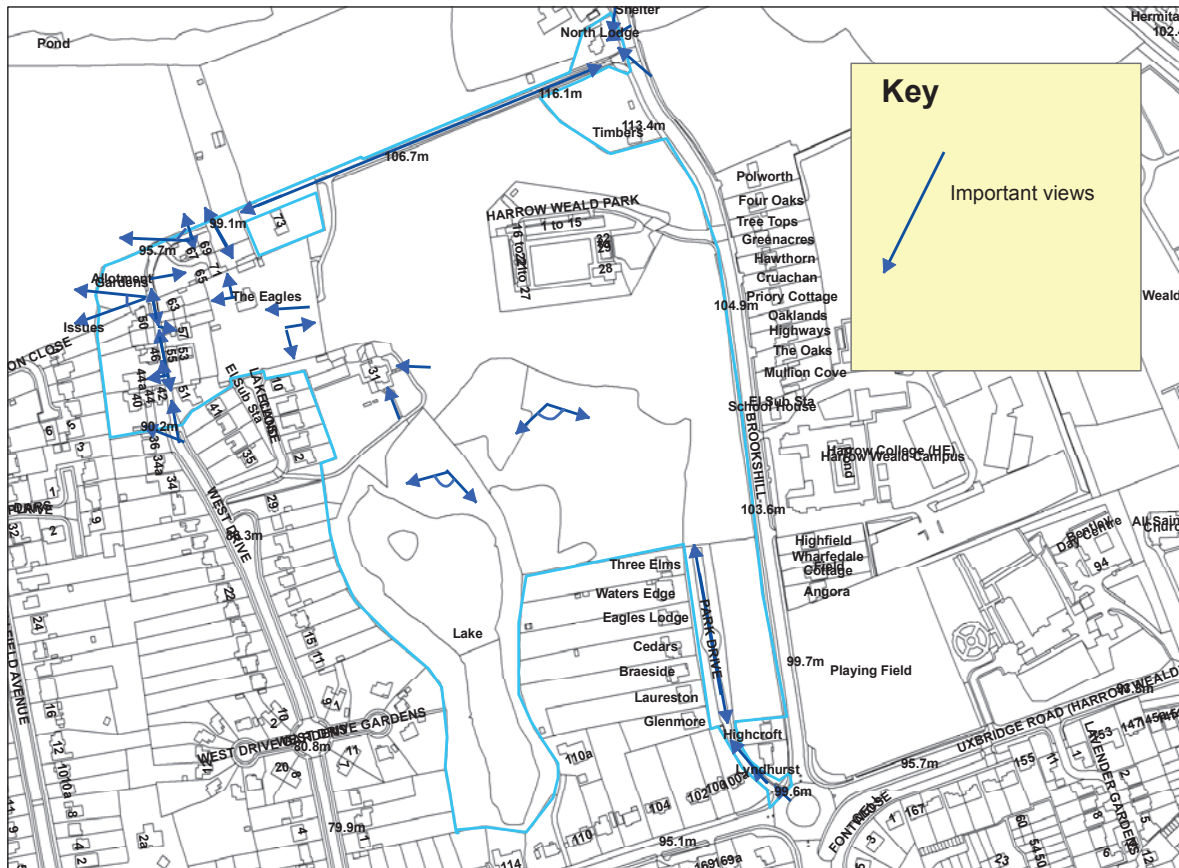
1.31 The cottage character and scale of the houses (with the exception of the Eagles and 31 West Drive) is in keeping with their long-established uses as, for example former piggery and workers' cottages associated with the main house. The grandest of the houses, number 57, with distinctive tall chimneys and patterned roof tiles is reflective of it having been the former gardener's house who had a relatively high status.

1.32 The use of all buildings now as single family dwelling houses is important since it contributes to the characteristic low density of development and intensity of use that uses such as flats or many commercial uses would not provide. It also contributes towards its quiet, semi-rural character that is reminiscent of its former use as a workers' enclave associated with a country house estate. Given this conservation area's character is rooted in its history, residential uses or low intensity agricultural uses are most appropriate.

1.33 The agricultural uses of fields to the north are vital in preserving the important semi-rural qualities of the conservation area. They help retain an undeveloped feel that distinguishes this conservation area from the surrounding suburbs. Since these are protected by green belt and nature conservation designations, the conservation area boundary is more tightly drawn around the buildings. Similarly, the playing fields to the west are important in retaining the characteristic surrounding openness and but positively such non-agricultural uses are shielded from view.

1.34 The use of the former site of the mansion house as a retirement estate is suitable as it helps preserve the special interest of the conservation area since it ensures the historic open meadow land landscaping to the south (in front of where it was) and plentiful planted woodland of Winsdale's and Sim's landscaping remains in place. Certainly any use which was more intensive, or sited outside of the general historic siting of the mansion (now demolished), would likely risk compromising this historically significant landscaping, which also has biodiversity value.

1.2.4 Key Views and Vistas

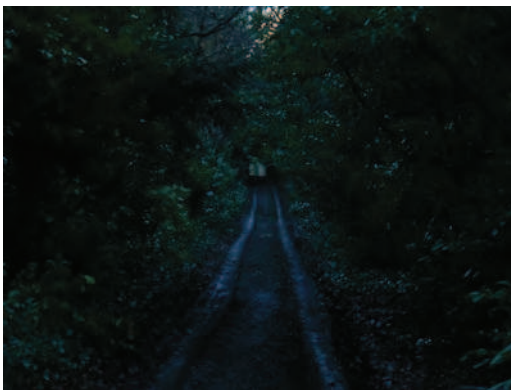


Picture 1.18 Key Views LBH LA.100019206.2014

1.35 This section (including the above map) is not exhaustive but indicates the types of views that are important to the conservation area. Key views are those towards the features that contribute towards its special interest as a semi-rural enclave tucked away from surrounding suburban development. This includes its:

1. interesting, attractive and historic architectural details e.g. the interesting roofscape of 57 West Drive (with its decorative tall chimneys and banded, patterned, tiled roof), 46 West Drive with its decorative features, the bell tower atop the former coach house and stables, details of the grand Tudor Revival style of 31 West Drive and good tall chimneys at 40-44 West Drive.
2. informal groupings of buildings and spaces between them reflecting the historic layout of the home farm and associated ancillary buildings to the mansion.

3. plentiful dense landscaped and woodland environs that part-encloses the area as it was originally intended to conceal the area from the view of the mansion house and has always helped provide the intimate area's intimate and hidden character.
4. the view towards the lake feature south of 31 West Drive and surrounding trees planted by the owner of the estate Mr Sim in the late 1800s
5. sweeping long distant views and vistas out across the open surrounding fields as the area is firmly embedded within the Green Belt and so provides a rare glimpse into the area' rural, country estate past.
6. the sheltered tunnel of trees along the unmade track leading past North Lodge and the gate pillars leading to the enclave of buildings in the conservation area adds suspense, and a sense of grandeur, as a remnant of the original driveway and associated landscaping leading to the main house.
7. Informal track routes of the conservation area



Picture 1.19 Tunnel of trees past North Lodge



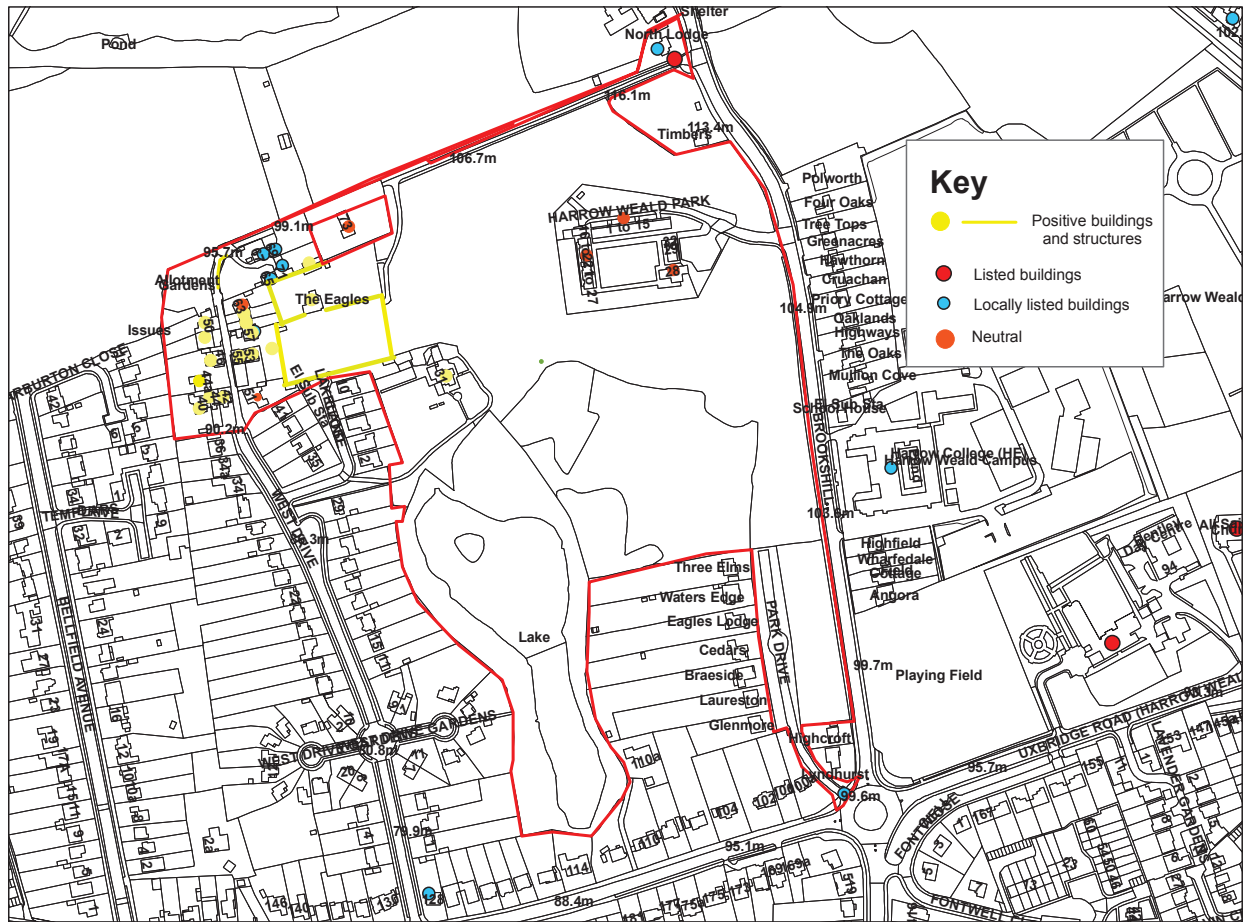
Picture 1.20 Important long distance view out over greenery from adjacent number 50 West Drive



Picture 1.21 Good view towards chimneys and pots of numbers 40-44 West Drive from just outside the Conservation Area

1.2.5 Architectural Qualities

1.36 The historical and architectural significance of the buildings within the conservation area relates directly to the remains of the 19th century country house estate with limited later infill. Buildings that make a positive contribution to the conservation area are highlighted on the next map.



Picture 1.22 Positive and neutral buildings or structures LBH LA.100019206.2014

- **19th Century Buildings**

1.37 Most of these date to 1870 having either been built, or remodelled then, under Alexander Sim's ownership.

1.38 There is a sense of grandeur in the architecture of the buildings that had the higher status uses e.g. the gate house lodge and associated pillars, the former coach house and stables and the farmhouse and coachman'/gardener's cottage. This is due to the high decorative qualities of these buildings.

- **Coach house/stables**

1.39 As per when the mansion house which was remodelled in 1867 to a Gothic design, this was designed by Robert Frere. The Gothic style of the yellow stock brick coach house is significant since this was intended to echo, in a simpler form, the style of the main house to show that it was associated with it and to provide an indication of the grandeur of the estate. Key elements of this design include its Tudor style timber windows with flat stone lintels above and below, steeply pitched roof (partly undermined now by later dormers on the north and south sides), four pairs of evenly placed decorative tall chimneys (one pair of which has been removed /and another simplified

over time), castellations including castellated gable ends both large and small, decorative finials to the gable ends, and pointed arches picked out with gauged red brick for the central opening for the coaches and horses through to the central courtyard.



Picture 1.23 Locally listed coach house

1.40 The original main U-shaped plan form of the former coach house is very important since it is fundamental to its former use. A few incremental extensions over the years have begun to undermine this, and its original symmetrical design, so it is important that any future alterations / extensions do not prejudice this feature further. Likewise, the central cupola is an integral feature in the centre of the roof, housing the clock with white hands on a blue face, and the bell with decorative metal bracket on its west side. A central cupola was a key feature of many coach houses from this time. Similarly the former entrances to the hay loft remain. A key remaining feature are the three decorative painted timber arches, including dentil courses, either side of the courtyard which mark where the double timber bracketed doors for the coaches were. The dentil courses extend below the castellated corners within the U- shaped courtyard which mark the former entrance doors here too. Another integral feature is the central courtyard tiled area which is in keeping with the original floorscape here.



Picture 1.24 U-shape of the former coach house



Picture 1.25 Three arches mark where the coach house doors were



Picture 1.26 Arches mirrored on the other side

1.41 Unfortunately the former characteristic air vents that flanked the central cupola have been removed at some point when the building was re-roofed. It would be a positive form of restoration to put these back to match for decorative reasons and to emphasise the symmetry of the design. The two single recessed entrance doors to the coach house sited opposite one another on either side of the central courtyard, and topped by gauged brick arches (ie soft red brick), remain adding to the symmetry.



Picture 1.27 Original recessed doorway with gauged brick arch above - mirrored on the other side

1.42 To the rear of the coach house are the former single storey elongated attached integral associated stables. This character has been retained as it is used partly to house cars. Horses would likely have gone through the centre of the coach house where the central red brick arch is through to the stables where the same red brick arch is on the other side and vice versa.



Picture 1.28 Central gauged red brick arch



Picture 1.29 View towards former stables adjoining coachhouse

1.43 Whilst the coach house and stables has been divided into four units the garden area in the central courtyard has only been divided by a very low brick wall. This is important in retaining the characteristic openness. It would be an enhancement though to remove any dividing wall here.

- **Gardener's Cottage (number 57 West Drive)**

1.44 This late 19th century cottage is most recognisable within the conservation area by its distinctive roofscape and is of recognised significance in its own right given its locally listed status. It has a highly decorative Victorian Arts and Crafts rural vernacular style and is very much akin to those similar cottages within the Brookshill Drive character area of the Brookshill Drive and Grimsdyke Estate Conservation Area. The detailing is characteristic of Victorian domestic architecture, particularly in terms of the tall angular chimneys and chimney-stacks and barge-boarding. Small paned timber windows, the pitched tile roof and timber doors are all typical

features. However, the particularly highly decorative qualities make this building stand out through for example the very intricate shaped soft bricks on the multiple chimney stacks and the shaped and coloured tiles woven into the roof design. The chimneys and roof tiles suggest that, like at the Brookshill Drive cottages, this cottage was used as a testing ground for local bricklayer's apprentices techniques as there were many brick kilns nearby just to the north. Again there are Gothic and Tudor Revival elements to this cottage with castellated detail to the top of the multiple chimney stacks, the black timber beams against yellow rendered background, the pointed red brick arches and the pointed windows.



Picture 1.30 19th century photograph of the rear of the Gardener's Cottage with associated wall to the kitchen garden. Source: Local history library.



Picture 1.31 View towards attractive roofscape of locally listed 57 West Drive

1.45 Whilst there have been many alterations to this building which have damaged some of its original form and decorative features, luckily these have been single storey and most of the attractive original form and features remain in place.

- **North Lodge and gate piers**

1.46 As with the coach house and stables, the Gothic style is highly apparent and important in these as it was intended to echo the Gothic style of the mansion house and to signal the grandeur beyond. The Gothic style of the architect Robert Frere had been influenced by Charles Barry who worked on the Gothic Houses of Parliament.



Picture 1.32 Two of the listed gate piers and the locally listed North Lodge

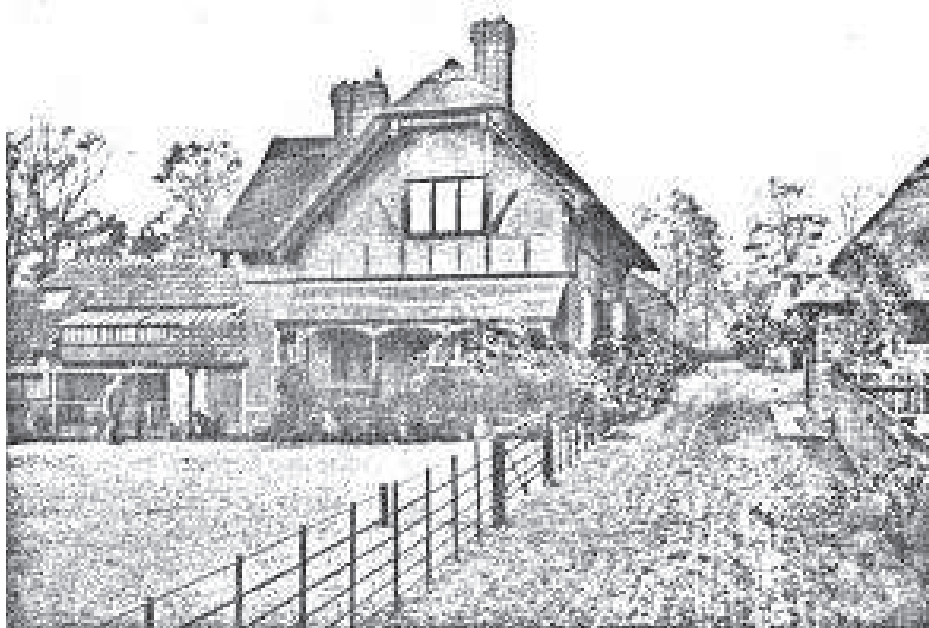
1.47 The Gothic style in the lodge features prominently in its castellations and the massive stone facing which also produce a castellated effect, 'arrow' slits, Tudor style windows including pointed ones and diamond leaded lights and the tall heavy stone chimney. The stone gate piers' Gothic style is apparent given their castellations and plain domed cap. These used to feature spread eagles, as mentioned in their list description of 1983 but unfortunately these were removed at some point. Any record of these would be useful so that they might be restored.

1.48 Grouped with the lodge the gate piers are a real feature since they mark the formal carriage entrance and driveway to the former Harrow Weald Park estate which was an unmade country track in keeping with the semi-rural character of the area.

1.49 The single storey character of the lodge is important since this lodge was intended as just that, a simple entrance gate lodge of no great scale associated with the main house.

- **Former Farmhouse**

1.50 Number 46 (the former Farmhouse) dates to approximately 1880. It has very similar design qualities to the former coachman's / gardener's cottage. It similarly has a decorative Victorian Arts and Crafts rural vernacular style, similar to cottages in the Brookshill Drive character area of the Brookshill Drive and Grimsdyke Estate Conservation Area. Its detailing is also characteristic of Victorian domestic architecture, particularly in terms of the tall angular chimneys and chimney-stacks and barge-boarding. Its front elongated porch is a very attractive and integral feature marking the main entrance with the sloping tiled roof and decorative timber framing in keeping with the bargeboard. The red and black encaustic tile floor to the porch is an important and characteristic Victorian feature. Again there are Tudor Revival elements to this cottage with the black timber beams against white rendered background. The intricate shaped soft bricks on the chimney stack help ensure this building stands out but unfortunately another similar original chimney has been removed at some stage. In keeping with its rural farmhouse character this cottage once had a thatched roof but this has been replaced with traditional clay tiles.



Picture 1.33 19th century photograph of the farmhouse



Picture 1.34 The former farmhouse - 47 West Drive



Picture 1.35 View looking south towards 47 West Drive

1.51 This building once had a single storey side extension which formed an agricultural outbuilding. Whilst this has now been removed a single storey addition remains in roughly the same location as shown in the above photograph on the left.

- **Former Piggery**

1.52 59 and 61 West Drive are characteristically single storey, very simple, with elongated shape and small windows since these were once the piggery to the home farm. These date to the early 1800s. Now two dwellings it retains its simple historic character adding to the architectural qualities of the area. This is partly retained as the building does not have a boundary dividing the two buildings.



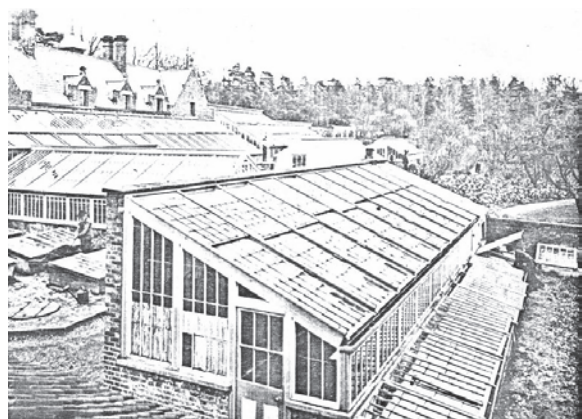
Picture 1.36 59 and 61 West Drive

- **Historic walls to the Estate**

1.53 These remain in places throughout. Their age in itself makes these of interest, they date to the early 1800s, but their significance also relates to their practical value since they mark out the layout of the former estate. The architectural qualities map for example indicates the tall brick walls to the walled gardens that are known to remain. They can be seen for example in the grounds of the locally listed Gardener's Cottage (57), the Eagles and to the rear of the former coachhouse. Historic photographs of these walls are shown below. They often marked the edges of the multiple greenhouses that were in place. These are shown hatched on the historic OS maps. Also, there are some lower historic boundary walls remaining marking the edges of fields or as in the case of the section of stone walling adjacent the corner of track leading to the coach house, they mark historic tracks.



Picture 1.37 19th century photograph of kitchen garden walls and the rear of the Gardener's cottage (57 West Drive). Source: local history library.



Picture 1.38 19th century photograph of the walls to the kitchen garden to the side of the coach house



Picture 1.39 Early 1800s walls to the former kitchen garden in the grounds of the Eagles



Picture 1.40 View towards the walls to the former kitchen garden

- **40-44 West Drive**

1.54 These are yellow brick former ancillary service buildings to the Harrow Weald home farm and date to approximately 1870. In keeping with this these are simple and single storey. Characteristic features include their tall brick chimneys with stepped red brick upper banding, shaped bricks, tall chimney pots, decorative bargeboarding and black timber cladding to gable ends. The original tiles are an interesting feature. Importantly on some of the elevations, the original timber vent in the timber cladding to the gable ends remain which would have been a feature functional of the original use of the building. These could be retained but simply boarded up on the inside rather than removed and restoration where they have been removed.



Picture 1.41 42 West Drive



Picture 1.42 Original vents and bargeboarding to 40 West Drive

- **Former Cowsheds (53 and 55 West Drive)**

1.55 These date to the early 1800s or before and formed part of ancillary cowsheds buildings for the estate as part of the home farm complex. It is therefore characteristically simple and of single storey design with small windows. At one stage this formed part of a U-shaped complex

forming a farm courtyard. It retains its predominantly elongated shape running west to east that formed part of this U-shape, although it has now been extended and the remaining part of the building forming the rest of the U-shape have been demolished. This was once thatched too like the farmhouse opposite which explains the steeply pitched roof.

- **Four brick pillars to Park Drive**

1.56 These are the gate pillars that originally flanked the former south drive entrance to Harrow Weald Park estate. They therefore have local historical importance due to their association and construction as part of the former Harrow Weald Park estate. A south gate lodge was built alongside which has now been demolished. As per the design of the pillars on the junction of West Drive and Brookshill which marked the northern entrance to the estate, the design of these is Gothic, but the specific design differs from that of those on Brookshill since these have a brick base and a decorative stone cap. The gate piers consist of an inner pair either side of the carriage drive with piers flanking these for two pedestrian entrances. All the piers are of yellow stock brick, with darker bricks laid at the corners to give a quoin effect, and have stone caps. The inner piers have domed caps decorated on two sides with a wreath design in relief. These caps originally had acorn finials which are now lost but would benefit from restoration. The outer piers are more slender and have plain domed caps. As with the piers to the northern gate they would appear to date from the later C19, possibly when the house was remodelled in 1867.



Picture 1.43 19th century photograph of the locally listed gate piers to Park Drive and the lodge (now demolished)



Picture 1.44 19th century photograph of the gate piers, carriage driveway and lodge from the other side



Picture 1.45 Late 19th century pillars to the former carriage driveway, now Park Drive



Picture 1.46 Pillars to Park Drive

- **148 and 150 Uxbridge Road (also known as the Gamekeeper's Lodge or Pinner Lodge)**

1.57 These are very significant buildings in the setting of the conservation area since they are the former gamekeepers cottages that formed part of the Harrow Weald Park estate. These are protected via a grade II listing which recognises them as being of national architectural and historic importance. Many of its design features are in keeping with the decorative Arts and Crafts rural vernacular features of the Gardener's Cottage and Farmhouse such as the tall, angled conjoined chimneys, shaped tiles, gable ends and bargeboards. The list description reads: 'Circa 1880. Red brick asymmetrically designed pair with tiled roof. Two-storeys with tile hung bargeboarded gable to each house with single-storey link. Right hand house has entrance under pointed arched porch set at 45° to main facade. Left hand house has porch formed in extended roof slope. End wings gabled and tile hung. Casement windows.'



Picture 1.47 19th century view of the Gamekeeper's cottages. Source: Local history library.



Picture 1.48 148 and 150 Uxbridge Road (former Gamekeeper's lodge)

- **Early to Mid-20th Century Buildings**

1.58 This has largely respected the scale and informal layout of the earlier buildings they replaced. This is particularly the case for number **63 West Drive** and **number 44a West Drive**. Although the latter disrupts some of the farmyard frontage to number 46 (the Farmhouse) in front, this has been as sensitively designed as possible by being set well back from the track so views towards number 46 are maintained as well as a large part of the former farmyard/front garden frontage. Also, its single storey, very small scale helps maintain the prominence of surrounding historic home farm buildings. The Modernist design with strong lines is interesting in itself.



Picture 1.49 44a West Drive

1.59 Whilst numbers **51 West Drive** and **48 and 50 West Drive** do not wholly respect the original siting of buildings within this enclave buildings relating to Harrow Weald Park estate, their informal siting, simple style and reasonably small scale does. The symmetrical relatively plain Arts and Crafts style of 48 and 50 is also attractive in itself with good bay windows, interesting roof profile and tall chimneys with stepped banding at their top, helping respect the quality and the traditional character of development in the conservation area. However, their design is more reminiscent of other more typical suburban development in the conservation area. Unfortunately the single storey flat roof addition to the north of number 50 does not enhance the character of these houses but being single storey helps retain characteristic openness.



Picture 1.50 51 West Drive



Picture 1.51 48 and 50 West Drive

1.60 31 West Drive (the Squirrels) is a large late 19th or early 20th century house designed in a competent neo-Tudor style with close studding and decorative bargeboards. It is very attractively sited at the head of the lake with woodland bounding on three sides and is one of the few surviving large houses in Harrow Weald.

1.61 The Eagles is an attractive, early 20th century Arts and Crafts style detached house of medium scale. It features angular chimneys, projecting chimney stacks, steeply tiled roof, bracketed eaves, and white render with red brick corners. The Eagles may be a reference to the Eagles that were once on the listed gate piers adjacent North Lodge. It retains the historic walls to the walled garden that are an important remnant of its estate.



Picture 1.52 View towards The Eagles

1.2.6 Streetscape

1.2.6.1 Floorscape and Boundary Treatment

1.62 It is clear where the conservation area begins along West Drive since the streetscape becomes noticeably rural in terms of road surfacing, boundary treatment, and street furniture. Grass verges, hedgerows, and open timber fences bound the roads and tracks - there are no pavements or kerbs throughout. The road is not bound which emphasises the area's integral semi-rural, countryside character. Where repairs to the road are deemed necessary, the existing character should be retained.



Picture 1.53 Informal track pathway of the conservation area with plentiful greenery



Picture 1.54 Unmade track route with plentiful hedging provides a rural character

1.63 With the exception of the former coachhouse and 57 the Lodge (the former coachhouse or gardener's cottage), houses do not have any front boundary treatments of gates which is important as it retains the informal, semi-rural style of the conservation area. The front boundary treatment to the coachhouse is informal and semi-rural in character being timber, permeable and less than a metre in height. Number 57 is an exception with a formal front boundary treatment reflecting the relatively grand status of this house, but still it has a characteristically permeable, informal style timber gate. The brick pillars with banding and stone caps are a good historic feature.



Picture 1.55 Absence of front boundary treatments helps preserve the informal, semi-rural character



Picture 1.56 Lack of front boundary treatments



Picture 1.57 Permeable and low front boundary to the former coach house



Picture 1.58 Front boundary to 57 West Drive is an exception

1.64 Where boundary treatments exist to fields adjacent the farm track these are hedging or as low, permeable and simple timber design allowing for important through views. Otherwise where boundary walls exist these are usually the historic former masonry boundary walls to the estate. Those that were the walls to the former extensive walled gardens are simple, tall brick walls (see photographs in the 'architectural qualities' section). These are of historic importance in themselves and of importance for marking the boundaries of the estate. They are mainly in the grounds of the Eagles, but also to the rear of the Coach house and stables and in the garden of the Gardener's Cottage. Also, at the top of the track by the Coach house/stables the is in a dry stone wall design typical of farm walls.



Picture 1.59 Characteristic hedging as boundary to the fields



Picture 1.60 Dry stone wall along the top of West Drive

1.65 In terms of front gardens these are similarly in keeping with the semi-rural character as they are of grass or on occasion unbound gravel. Gravel is also a good alternative to hardsurfacing since it allows water to percolate freely through the ground rather than being absorbed into the built fabric. 59 and 60 and the front and side garden of number 50 have a great deal of more formal hardsurfacing which would all benefit from softening either with gravel or a softer style of hardsurfacing. This is partly the case at numbers 63 and 48 but this is offset by a fair amount of soft landscaping too and the driveway tends to be set to one side which ensures the cars can sit to the side of houses to retain the open, uncluttered feel and views towards the houses.

1.66 The floorscape of the conservation area also adds to the historic character of the area as the courtyard of the former coachhouse has the typical historic tiled flooring. Also, the encaustic tiles within the porch to number 46 adds to the decorative Victorian character of the house.

1.67 A timber 5 bar gate is used at the junction of 73 with the drive to the North Lodge, the natural material and open design of which appropriately preserves the character of the area.



Picture 1.61 Timber 5 bar gate at the junction with 73 West Drive

1.68 Gardens, the absence of boundary treatments and the presence of informal, low and open boundary treatments otherwise, complement the open landscapes and woodland surrounds.

1.2.6.2 Street Furniture

1.69 Since this is a private road there are very few street lamps. The streetlights and wooden telegraph poles are not overly obtrusive and do not visually clutter the area. The lack of road signs and markings preserves the countryside atmosphere and character of the area. Any tall and intrusive equipment such as telecommunications or wind turbines would not be appropriate. Due to semi-rural open and woodland surroundings the area is naturally dark after nightfall, contributing to its rural hidden character.

1.2.7 Landscaping, Green Spaces and Ecology

1.70 There is much historic landscape importance to the conservation area and surroundings since it forms the former historic grounds to the Harrow Weald Park estate. This is clear when comparing current OS maps with historic ones. Effectively a large part of the grounds remain either as open ground, fields, woodland, the lake or as gardens with mature trees and shrubs. The limited extent of development since the Harrow Weald Park Estate broke up has to a high degree retained the essential rural character of the original estate.

1.71 Many of the historic boundaries and features remain in place. Thus for example the fields to the north of the conservation area respect and follow the **historic field boundaries**. Similarly it is clear that there are many historic long-standing trees.

1.72 Many of the open spaces and tracks in and around the conservation area are of value as they formed part of the former picturesque landscaped gardens to Harrow Weald Park estate mansion. The Council owned **heavily tree tunnelled straight unmade track adjacent North Lodge** leading towards West Drive for example is the former north carriage driveway to the estate constructed under Sim's ownership - intended to present a sense of anticipation and drama as visitors approached the mansion. It is important that this is not undermined by offshoot roots from it or near it since it would take away from the intended significance of this as a main route to the estate. Similarly, the **gravelled, slightly curved track along Park Drive** adjoining Uxbridge Road and within the grounds of the residential care home of Harrow Weald is the remnants of the other earlier main carriage driveway constructed under Winsdale's ownership to the mansion house. It is typical that the house was approached by a sweeping, curvilinear drive – such grounds were meant to be experienced in motion – allowing the carriage-borne visitor to catch varied glimpses of the lake and house between the parkland clumps and plantations to build a sense of grandeur. The well-planted spinney of trees on the east side of Park Drive, focusing views towards the lake and to the north is shown in historic OS maps and remains.

1.73 The **large lake** to the south of 31 West Drive forms the source of key private views being semi-wild with a small island to the north. This was once intended to form part of the main vista from the mansion house and over the years has housed a boat shed, ice house and pumping shed. It was constructed under Winsdale's ownership and remodelled (enlarged and an island added) and many more trees planted on its west side by Alexander Sim from 1867 to 1895 when it became of great ecological value, particularly as a bird sanctuary. This is explained further below.

1.74 The large open space to the south of the former mansion is significant as the remains of the **original meadows** intended to form part of the open vista for commanding views from the mansion. Importantly this character remains today, now relating to the retirement estate.

1.75 The former **walled gardens** to the rear of the Gardener's cottage, 53 and 55 West Drive and in the grounds of the Eagles are significant as they relate to the earliest part of the estate (early 1800s) and the related open green spaces remain largely in place as the gardens to rear of the numbers 57-63 and particularly the Eagles. These were the kitchen gardens to the mansion house. Otherwise, within the conservation area hedges, shrubbery and low walls mark the boundaries of the estate (see the 'floodscape and boundary treatment' section).

1.76 The large extent and range of **mature trees** forms part of the remains of the intended landscaped grounds to Harrow Weald Park mansion particularly from Winsdale's and Sim's times. These for example shelter the semi-rural enclave of former workers cottages and home farm from views from the mansion. They also line the former driveways to the house for example along Park Drive and to the north of this and surround the lake - those on the west side of the lake are part of the historic landscaping. The variety of trees in the conservation area is of special interest and dates from Mr Sim's time as he collected and planted trees from many lands - Scotch and Corsican pines, cypresses, Lebanon and Mount Atlas cedars, a locust acacia, and also planted additional elms, oaks, Norway spruce, chestnuts, graceful beeches and Irish yews, and a weeping willow from a sprig plucked from Napoleon's grave at St Helena. Other notable trees include a Californian redwood, an arbutus or strawberry tree of unusual size and one of the largest sea-buckthornes in the country. There is a wonderful collection of smaller trees and shrubs.

1.77 Many of the **historic buildings** that formed part of the landscaped estate such as the coach house and North Lodge and the listed and locally listed gate pillars form part of the historic landscaping but are described further in the 'architectural qualities' section.

1.78 In recognition of the local historic landscape significance the area is already on the London Inventory of Historic Green Spaces. It is recommended that a large part of the conservation area, as shown on the next map, is also designated as a **locally listed park and garden** ie a designed garden, ground or other historic open space of local architectural and/or historic importance. Local designation is intended to increase awareness of its landscape value and encourage suitable protection and due care by owners and those who otherwise have a role in its protection and future. It allows for the management of its local heritage through the planning system and provides an opportunity to engage with local communities. The National Planning Policy Framework also highlights the contribution of local listing to the development of the evidence base used to support local plan making.

1.79 Criteria for locally listed parks and gardens was agreed by the unitary development panel in 2002 and follows that for nationally listed parks and gardens but with additional local criteria outlined below in relation to how West Drive Park and Garden meets this criteria:

- Age e.g. sites with a main phase of development between 1820 and 1880 which is of local historic or landscape significance and survives intact or relatively intact.

1.80 The area is of local significance for retaining much of the designed park and garden landscaping of the former Harrow Weald Park Estate which was laid out between 1817 and the 1880s, in two main phases: one after William Winsdale purchased the land in a more 'natural' landscaped style and the second in the 1880s when Mr Sim purchased the estate and remodelled elements in a more formal landscaped style. Winsdale laid out the lake and meadow land which were intended to form part of commanding views from the main house and the south carriage driveway (along Park Drive and into the ground of the residential care home). He also built the kitchen gardens and commenced home farm buildings and which Mr Sim added to and remodelled and today form the core enclave of buildings up the semi-rural track. Mr Sim added or remodelled the lodges, gate posts, coach house and stables and north carriage driveway that remain today and remodelled the lake and added many trees from all over the world which largely remain today. For example they shelter the lake (providing a bird sanctuary) and the former grounds of the mansion.

- Sites which are early or representative examples of a style of layout, or type of site, or the work of a designer (amateur or professional) of local or national importance

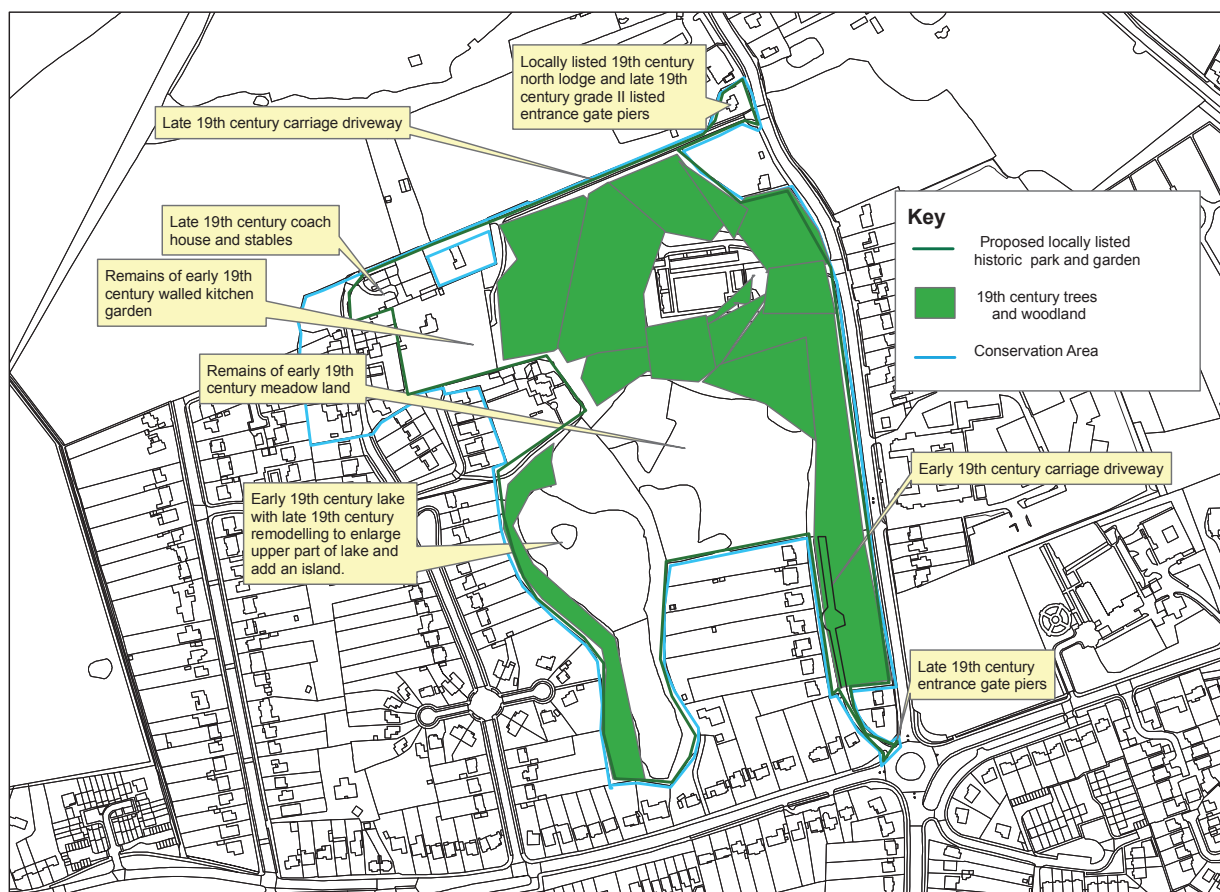
1.81 The style is a representative example of two phases of development, the first being the 'natural' Picturesque style and later slightly more formal Victorian landscape style of layout, still retaining a Picturesque quality.

- Sites having an association with significant local persons or historical events

1.82 Whilst the designer for the landscaping is unknown, the owners over time have some local and national significance. The initial owner William Winsdale was an East India and China trade merchant and William Crockford (1775-1844) founded Crockford's club in 1827 and quickly became

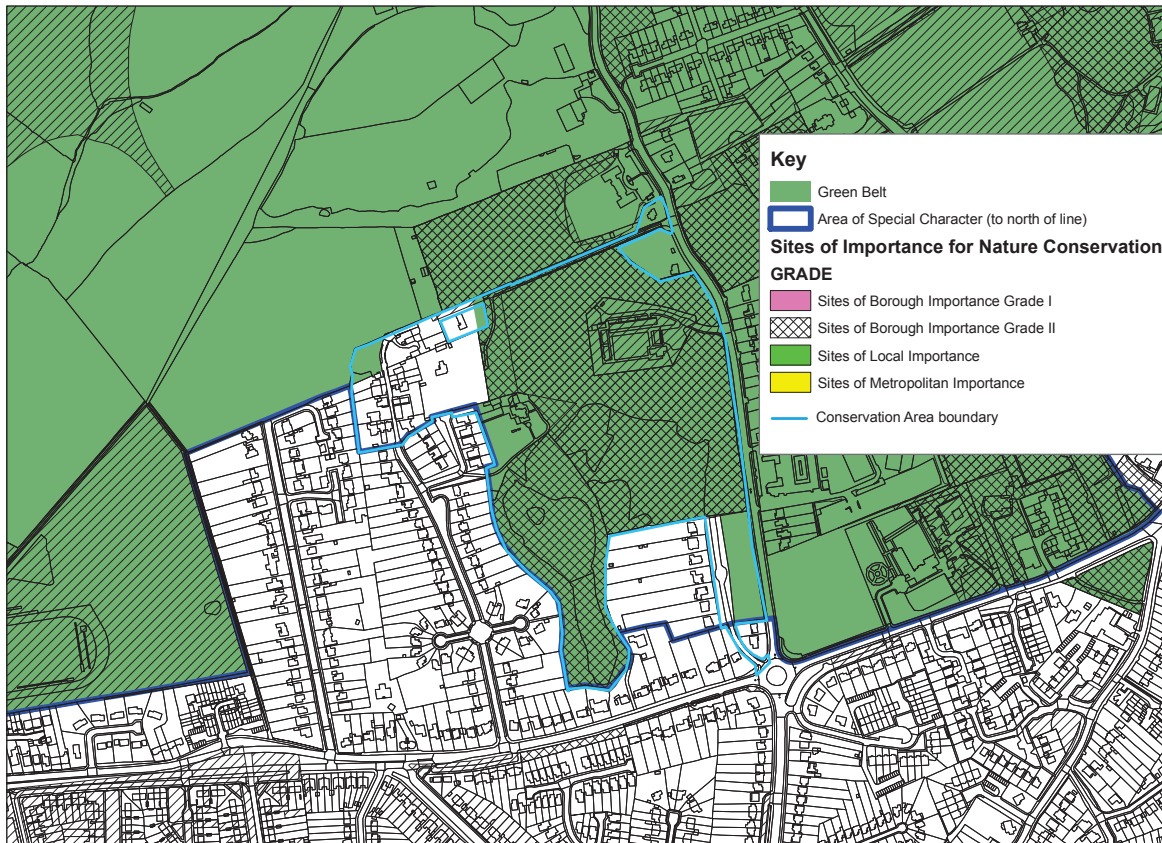
a millionaire. The designer of the mansion and some of the remaining Gothic style estate buildings was Robert Frere who was, if not a pupil, largely under the influence of Sir Charles Barry, the architect of the Houses of Parliament.

1.83 This consultation therefore also concerns the proposal to locally listed this park and garden.



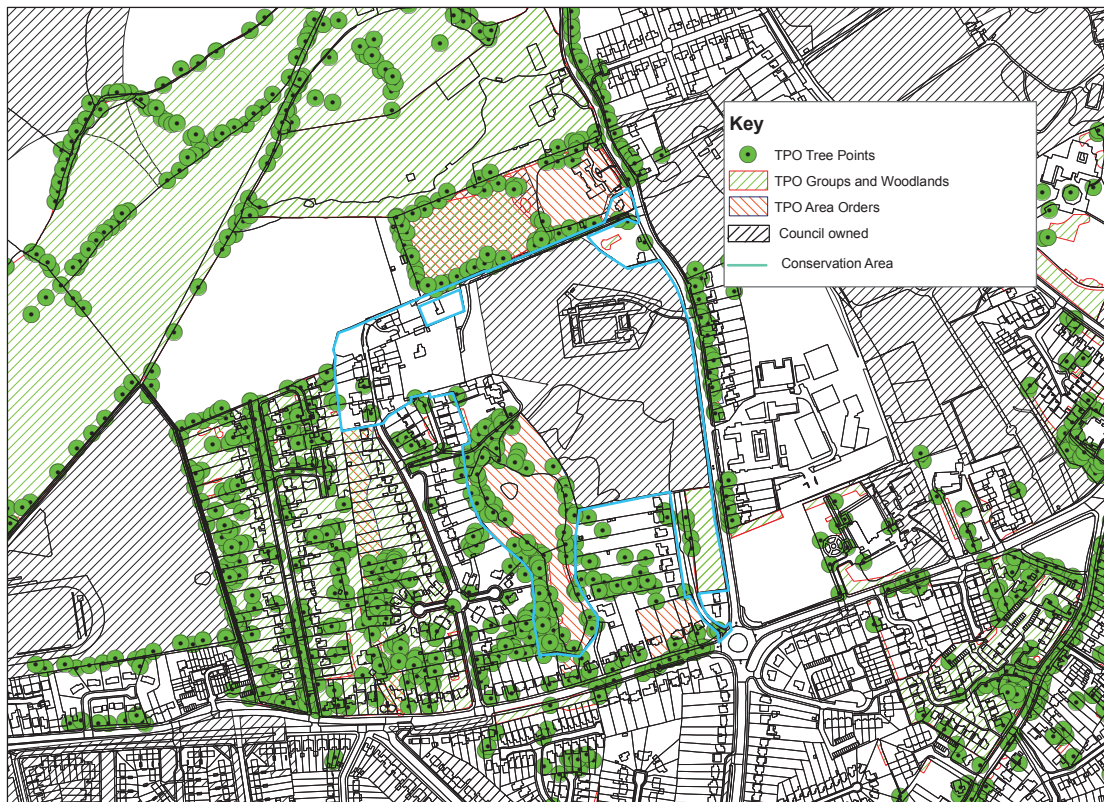
Picture 1.62 Proposed locally listed historic park and garden LBH LA.100019206.2014

1.84 With large areas of open land, landscaping, significant trees and a very large lake, the conservation area has much biodiversity and landscape value. Much of the area is designated as an area of special character and much of the non-built up parts and surrounding areas are designated green belt land as shown on the next map. Harrow Weald Park is an area of borough importance grade II for nature conservation. As a former landscaped garden it includes Sequoias, secondary woodland with scrub ie major decaying timber elements which provides great habitats. The Squirrels Lake in the grounds to 31 West Drive is also part of the area of borough importance grade II for nature conservation. The lake is a large semi-wild lake with small Island in the middle. It comprises emergent and floating vegetation. It has good roughland riparian and marginal habitats, scattered trees, including Sessile oak plus fruit trees. The lake now contain herons, wild ducks, moorhens, wandering sawns, the kingfisher, woodpecker, tits, the nut-hatch and many other birds that find peace and security there. Adjacent there are horse-grazed meadows with rough grassland, scrub and woodland edge.



Picture 1.63 Green Belt, Sites of Borough Importance for Nature Conservation Grade II and Area of Special Character LBH LA.100019206.2014

1.85 All trees within the conservation area are safeguarded by its designation (under Section 211 of the Town and Country Planning Act 1990), which is strengthened by Tree Preservation Orders (TPOs) served in the area (under Section 197 and 199 of the Town and Country Planning Act 1990). Further TPOs may be required where trees are threatened or their future retention is prejudiced. TPOs are not served on council owned land but it is important to note that many significant trees exist in the grounds of Harrow Weald Park residential estate.



**Picture 1.64 Tree Preservation Orders and Council Owned Land LBH
LA.100019206.2014**

1.3 Summary of Conservation Area

1.3.1 Summary and Main Assets

1.86 In summary, key assets include:

1. Historic landscaping of the Harrow Weald Park estate including the tracks, trees, former meadows, lake, field boundaries and open green spaces including gardens, meadow land and fields. It includes woodland and the sheltered tunnel of trees along the unmade track leading past North Lodge and trees alongside the lake.
2. High architectural quality reflecting the area's historic roots.
3. Informal historic layout and low density of development of the semi-rural enclave of ancillary buildings associated with the Harrow Weald Park Estate mansion with limited and small scale of later development.
4. Unmade tracks throughout, without pavements, and limited street furniture reinforces semi-rural character.
5. All the above which provides an area of great scenic value with a rich rural character. There are long and medium distance views across surrounding open spaces and trees and the lake, and other views towards good quality architecture including good details such as chimneys.

1.3.2 Problems, Pressures and Potential for Enhancement

1.87 Pressures and issues have been touched upon in the previous sections and are comprehensively outlined in the following table. The table includes elements that are found to put pressure on the special character of the area as well as identifying areas where there is opportunity for enhancement. The section below, entitled 'Management Proposals' addresses any issues raised. In dealing with development proposals within the area Harrow Council will be mindful of securing opportunities to address or overcome such issues or any subsequent pressures.

Pressures, Issues or Opportunity for Enhancement:	Location:	Description:
Listed gate piers	Junction of Brookshill and West Drive	These are missing the eagles that are described in their grade II list description.
Pressure for more development including alterations, extensions and outbuildings	Throughout	The special interest of this conservation area makes it a very desirable place to live. This brings pressure for development which could conflict with preserving the special interest of the area since it relies so much on the low density of development, openness, key views and semi-rural character in and around the conservation area boundary which is rooted in its history.
Existing ad hoc extensions and outbuildings	Intermittent	In the past, extensions have occasionally been built in an apparent ad hoc manner, and could have benefited from greater consideration of the special interest of the building to which they were attached and the wider conservation area, with a view to preserving this. For example, the various extensions to number 57 have somewhat compromised its original design and engulfed it, but fortunately it remains worthy of its locally listed status given the remaining apparent high quality features of interest. Similarly, the single storey extension to number 50 bears little relationship to the design of the main house. Whilst it retains the openness, it may be beneficial for a redesign that is more sympathetic to the character of the main house. Extensions to the coachhouse have likewise to some extent been ad hoc and not respected its original form, layout and design features.
Hardsurfacing	Throughout	In places this has been excessive detracting from the characteristic informal, green and semi-rural character of the area. If carried out too close to houses it can also contribute to decay.

Pressures, Issues or Opportunity for Enhancement:	Location:	Description:
Architectural features of interest	Throughout	The houses in the conservation area feature many architectural qualities. These include original or historic windows and doors, timber bargeboards, decorative tiled roofs, tall decorative chimneys and porches. Whilst these add value to the houses, there is a danger that these could be removed and not replaced or replaced in such a way that the special interest of the building was harmed, for example, replacing timber windows with UPVC or aluminium.
Boundary treatments	Throughout	Currently the approach to boundary treatments in the conservation area preserves its special interest as they either absent or they are very low with an informal, open character and made of timber.
Pressure for new formation, laying out and construction of a means of access to a highway, a new driveway and alterations to the boundary treatment	Timbers, Brookshill	<p>Permission was approved in 2011 for a new house on this site. In making this decision, from a heritage perspective it was considered important that the dense landscaping was retained as far as possible, particularly on the north boundary, and that there are no driveways placed through here or anywhere near the conservation area on the east boundary. This is important since the unmade track from Brookshill is an original main entrance way to the conservation area which characteristically does not have routes leading off it or near it, thereby helping to signify its historic importance as a single route through to the estate. It is the original carriage driveway to the estate and the tunnel of greenery lining it is part of the historic landscaping helping to retain a semi-rural character. It helps to preserve the setting of the locally listed gate house and listed gate piers.</p> <p>Consequently, upon approval of the new house it was conditioned that a scheme of hard and soft landscaping and alterations to the boundary treatment be submitted to the Local Planning Authority for approval and be retained thereafter.</p>
Limited protection for aspects of historic open space landscaping and built features of the landscaped grounds,	Grounds of Harrow Weald residential care home and unmade	These are of historic importance as part of the grounds and landscaping of the Harrow Weald Park estate as explained within the the 'landscaping, green spaces and ecology' section of this appraisal. In recognition of this a large part is already contained on the London Inventory of Historic Green Spaces.

Pressures, Issues or Opportunity for Enhancement:	Location:	Description:
namely the locally listed gate pillars to Park Drive and historic walls e.g. to the former kitchen gardens.	track in grounds of 73 West Drive and gravelled former carriage driveway along Park Drive.	<p>The importance of the walls to the former kitchen gardens relate to their age (early 1800s) and their significance as part of the former kitchen gardens to the estate. This is outlined in the 'architectural qualities' section. Currently there is little protection for these historically significant and attractive walls.</p> <p>The locally listed gate piers form part of the historic landscaping to the estate and are important as the gate pillars that originally flanked the former south drive entrance to Harrow Weald Park estate. They have local historical importance due to their association and construction as part of the former Harrow Weald Park estate. This is expanded upon in the 'architectural qualities' section. Currently as these lie outside the conservation area boundary there is no formal requirement for planning permission for their removal.</p>
Pressure for sustainability measures	Throughout	It is likely that sustainability measures will lead to an increase in proposals involving solar panels and wind turbines. If well designed and integrated these should be able to be accommodated without disrupting local character. However, the sloping land makes this area particularly sensitive to such installations.

1.3.3 Public Consultation

1.88 This document and the following management strategy is subject of public consultation. Views are being sought from local residents, councillors, the Conservation Area Advisory Committee, Harrow Heritage Trust, and English Heritage. Notification was sent to each resident and it was available for viewing on the Harrow Council website and at the Planning Department offices at the Civic Centre on Station Road in Harrow. This document would subsequently be amended to reflect the responses received from the consultation exercise and was adopted in due course as part of the Harrow Weald Conservation Area Supplementary Planning Document (SPD), as part of the Council’s Local Development Framework (LDF).

1.4 Conservation Area Management Strategy

1.4.1 Purpose of the Strategy

1.89 Conservation Area Appraisals provide an analysis of the character and appearance of the conservation area in order to identify those elements that should be protected, as well as opportunities for change, improvement or enhancement. The Management Strategy uses the analysis to look forward and set out how the area’s character will be preserved or enhanced. It

sets out guidance and controls to protect and preserve the area and actions to enhance it. The following proposal statement provides a list of actions, related to pressures, issues or opportunities identified in the previous section.

1.90 Unless otherwise stated, the following should be regarded as a statement of intent. There are no set time limits. However, it is important to note that Conservation Area Appraisals and Management Strategies will be reviewed every 5 years.

1.4.2 Management Proposals

1.91 Pressures, issues and opportunities for enhancement are outlined in the above Conservation Area Appraisal and are addressed in the following table.

Pressures, Issues or Opportunity for Enhancement:	Location:	Action:
Listed gate piers	Junction of Brookshill and West Drive	If the original eagles are found or if good evidence of their appearance comes to light then these gate piers would benefit from restoration. Listed Building Consent and funding would be required for this.
Pressure for more development including alterations and extensions	Throughout	Ensure any future development preserves the special interest of the conservation area. The special character relies on it being a fragment of the original Victorian country estate, with later development largely respecting the historic location, integrity and extent of development, as shown by reference to historic OS maps. Development with no historic precedent would therefore be likely to be more sensitive and may very well be inappropriate, for example, areas of open space shown on historic OS maps as being part of the historic landscaping of the area, the surrounding open fields, and the open spaces and gaps between buildings.
Existing add hoc extensions and outbuildings	Intermittent	Ensure that any extensions/alterations are carefully considered in light of the special interest of the building to which they are attached, past extensions and the character of the wider area. Where the principle is accepted, extensions would need to be subservient to the original house, of high quality design respecting the original design of the building to which it would be attached and retain characteristic openness and features of interest. Outbuildings would need to preserve the openness and informal and semi-rural character of the area. An Article 4(2) direction is recommended for these works.
Hardsurfacing	Throughout	Gravel is a good alternative to hardsurfacing since it has a more informal and semi-rural character and allows water to percolate freely through the ground rather than being

Pressures, Issues or Opportunity for Enhancement:	Location:	Action:
		<p>absorbed into the built fabric. It is preferable though to retain the soft-landscaping in this conservation area wherever possible in order to retain its semi-rural character. Any hardsurfacing should therefore be offset by soft landscaping wherever possible. In places, article 4 directions would be beneficial to require planning permission for such works then such works could be managed to preserve the special interest of the area.</p>
Architectural features of interest	Throughout	<p>The original and historic architectural features of these buildings contribute to the special interest of the conservation area. They add historic authenticity and features of interest to look at. Sometimes they indicate the former use of these buildings. Also, the original form and design of the houses is generally of good quality and certain extensions/alterations could detract from this. The introduction of an article 4 direction to require planning permission for works of alteration would help ensure such changes could be managed to preserve the character of the area.</p>
Boundary treatments	Throughout	<p>It would be important that any such future development preserved the character of the area. The introduction of an article 4 direction to require planning permission for such works would help manage the conservation area. Reference should be made to the guidance in this document on the character of boundary treatments.</p>
Pressure for new formation, laying out and construction of a means of access to a highway, a new driveway and alterations to the boundary treatment	Timbers, Brookshill	<p>There is pressure to create a new driveway to Timbers that runs off the historic carriage driveway but this needs to be weighed against the need to preserve special interest of the historic landscaping of the estate. This driveway was always intended as a straight, single tunnelled route creating a sense of drama and anticipation for those approaching the mansion. An appeal decision relevant to this is awaited.</p>
Limited protection for aspects of historic open space landscaping and built features of the landscaped grounds,	Grounds of Harrow Weald residential care home and unmade	<p>To provide greater recognition of significance it is recommended that a large part of the current and proposed conservation area shown in the map in the 'landscape, green spaces and ecology section' is designated as a locally listed park and garden. This consultation therefore concerns this proposal. For the same reason it is</p>

Pressures, Issues or Opportunity for Enhancement:	Location:	Action:
namely the locally listed gate pillars to Park Drive and historic walls e.g. to the former kitchen gardens.	track in grounds of 73 West Drive and along Park Drive.	recommended that the conservation area is extended to include these areas. Extending the conservation area would also provide greater formal planning protection to the locally listed gate piers at the entrance to Park Drive by requiring planning permission for their removal. Similarly it is recommended that the walls to the kitchen garden are locally listed. For the same reason, following careful review and consultation an Article 4 direction is proposed for these former walls to the kitchen garden.
Pressure for sustainability measures	Throughout	It is likely that sustainability measures will lead to an increase in proposals involving solar panels and wind turbines. If well designed and integrated these should be able to be accommodated without disrupting local character. However, the sloping land in places and the great deal of openness and clear views makes this area particularly sensitive to such installations.

1.4.3 Reviewing the Conservation Area's Boundaries

1.92 Local Planning Authorities have a continuing duty under the Planning (Listed Buildings and Conservation Areas) Act (section 69 part 2 and section 70 part 1) to consider whether it should designate new conservation areas, or extend existing ones. Criteria for conservation area status is outlined within the overarching Harrow Weald Conservation Areas SPD. It is appropriate that the conservation area boundary is amended as shown on the map in the introduction to comply with this criteria. It is important that this is done since Government policy introduced in March 2012 under the National Planning Policy Framework states (paragraph 127) that 'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest'.

1.93 In 2006 the conservation area boundary was extended to include numbers 2-36, 1-29 and 33-41 West Drive and 2-42 and 1-47 Bellfield Avenue. These streets are quite distinct from the originally designated part of the conservation area as they are suburban 1930s residential development of medium to good quality.

1.94 This document represents the first formal written appraisal of the conservation area. Careful assessment of this area in drafting this appraisal has shown that the strict criteria for conservation area status is not met by these addresses. Whilst the area contains buildings that are mainly typical inter-war two storey suburban style buildings of a vernacular Domestic Revival style which is generally pleasing, it does not contain a layout, history or architectural qualities that are exceptional and is required to justify conservation area status. This is as per a 1980 decision which found that these addresses along West Drive did not contain 'enough distinguishable or unique features, either architectural or otherwise to justify designation as a Conservation Area'. This was prior to

much permitted development and alterations since then that have taken them further from their original form and design. Retaining this area within the conservation area would undermine the value of conservation areas in the borough.

1.95 At the same time, much of the original historic landscaping associated with the estate has until now been omitted from the conservation area, yet it is integral to its special interest. Conservation Areas are about the quality and interest of areas, rather than individual buildings that are the prime consideration in identifying areas. These areas should all be included since they form an integral part of the original Picturesque landscaping of the Harrow Weald Park estate and some of its architectural qualities as listed below and described in more detail in the 'landscaping, green spaces and ecology' and 'short history' sections:

1. the part of the original unmade track carriage driveway leading from Brookshill Drive to the West Drive enclave of historic ancillary buildings in the grounds of number 73
2. the original track driveway (now gravelled) leading along Park Drive from the Uxbridge Road to where the former mansion house was sited within the grounds of the current residential care home.
3. the original gate piers to the mansion house of strong local interest at the entrance to Park Drive.
4. the open meadow land and woodland surrounding where the former mansion house was once sited and adjacent the two former carriage driveways to the mansion and around the nearby large lake.
5. the large lake itself which was put in place to be visible in sweeping views from the mansion, and is now in the grounds of 31 West Drive.

1.96 Whilst these are protected to some extent by their presence in the setting of the conservation area and other designations, inclusion would bring about far greater formal planning protection equivalent to their heritage significance.

1.4.4 Setting of the Conservation Area

1.97 The conservation area's boundaries are tightly drawn. It should be noted though for this conservation area where special interest relates to its origins as part of a broader country estate, the surrounding open spaces including fields, field boundaries and garden spaces, are vitally important in preserving its special interest. This helps protect its semi-rural character, historic open spaces and field boundaries. Importantly the public and private large open spaces to the north, west and east are vital in retaining long, open and undeveloped views to and from the conservation area and the historic openness of this space. Similarly, the gardens to the rear of houses along West Drive form part of the former landscaped open grounds as do those on Park Drive.

1.98 Likewise, the gamekeeper's cottage which is now separated from the former core of buildings within the conservation area due to more recent development along West Drive, is integrally linked to it since it is one of the former estate buildings. This is protected by grade II listed status.

1.99 These surrounding areas are also protected separately though as they are in the setting of the Conservation Area, and development proposed within the setting of Conservation Areas will be considered with its effect on the Conservation Area in mind and the need to preserve those elements within its setting which help preserve its special interest. They are also protected by other designations, namely Green Belt, Area of Special Character, and sites of borough importance grade II for nature conservation. This separate and existing protection helps preserve those elements of the setting of the conservation area which are important to it.

1.4.5 Article 4 Directions

1.100 Permitted developments are already restricted nationally for any CA (see the Harrow Council’s Conservation Areas Residential Planning Guidelines – Do I Need Planning Permission?’ leaflet available on the Council’s webpage from: www.harrow.gov.uk/conservation).

1.101 A detailed review of the area and of the development trends therein suggested that there would be benefits to the character and appearance of the area if Article 4 directions were introduced. They require planning permission for some aspects of development normally classed as ‘permitted development’. This gives greater control over proposals for development, alterations and aspects of design and materials in sensitive areas. It is proposed that these relate to the boundary treatments, outbuildings, hardsurfacing and architectural features, in order to better preserve the high architectural qualities and historic authenticity of the area and its informal, green and semi-rural character. This is explained in the ‘problems, pressures and potential for enhancement’ and ‘management proposals’ sections.

- Relating to all houses in the conservation area:

Article 4 Directions are proposed to withdraw permitted development rights for the following types of development, where such development would front a highway, waterway or open space.
1. The enlargement, improvement or other alteration of a dwellinghouse.
2. Any other alteration to the roof of a dwellinghouse.
3. The erection or construction of a porch outside any external door of a dwellinghouse.
4. The provision within the curtilage of a dwellinghouse of a hard surface.
5. The installation, alteration or replacement of a satellite antenna on a dwellinghouse or within the curtilage of a dwellinghouse.
6. The erection, construction or alteration of a means of enclosure.
7. The erection, construction or placing, and the maintenance, improvement or other alteration of a building within the curtilage.
8. The painting of the exterior.
9. The erection, construction, maintenance, improvement or alteration of a gate, fence wall or other means of enclosure.

- Relating to the Eagles and 57 West Drive:

Article 4 Directions are proposed to withdraw permitted development rights for the following types of development:

1. The erection, construction, maintenance, improvement or alteration of a gate, fence wall or other means of enclosure.

1.4.6 Support

1.102 Relevant parties can contribute to the preservation and enhancement of the Conservation Area. These include local residents, property owners, and local societies. They should be involved in all stages of devising ideas, management, and enhancement of the area.

1.103 The above enhancement and improvement proposals and other possible future schemes require funding. Some can be managed within existing council budgets but much of the works would need to be completed by private owners. For the public realm works, the Council will continue to pursue funding for high quality conservation grade materials. The Council will continue to apply for grants wherever possible.

1.104 In line with English Heritage's guidance, it is essential when planning works within Conservation Areas that a considered approach which preserves or enhances the area's character or appearance is adopted. Where a conflict with general planning and highways policies occur, special care must be taken to find a solution that meets both the needs of the local community and the historic environment.

1.4.7 Guidance

1.105 To ensure consistent decision making, the following guidance has been identified as being of key relevance to this area with reference to the Conservation Area Appraisal.

Maintaining West Drive's Townscape and Built Character

To ensure that the character of the Conservation Area and its setting is both preserved and enhanced, all new development should:

- a) Respect the existing layout and historic form of the settlement and estate, especially its farmyard layouts, building lines and heights, and not diminish the gap between buildings and low densities of development.
- b) Complement existing buildings and areas of open space in terms of bulk, design, siting, detailing, scale, materials and use. Any extensions will be encouraged to be at the property's rear and subservient in scale to the original property, as well as match the existing house in design and materials.
- c) Not entail side extensions that significantly reduce the gap between buildings or diminish the architectural balance or details of the main building.
- d) Avoid impeding views between buildings or into areas of open space.
- e) Retain original design features (as identified within the character appraisal) and where replacement is necessary, the architectural detailing should closely match that of the original, in traditional materials.
- f) Not involve the painting of unpainted brick surfaces.
- g) Ensure material alterations to buildings protect the appearance of elevations that face onto a highway, including alterations to chimneys and rooflines. Dormers and rooflights on front and side roof slopes will be discouraged.
- h) Not entail the positioning of satellite dishes and aerials in prominent positions.
- i) Usually avoid change of use to flats and other institutional uses.
- j) Ensure microgeneration equipment is carefully sited to protect streetscene views and historic built fabric.

Maintaining West Drive's Greenery and Open Spaces

To ensure that the soft character of the Conservation Area and its setting is both preserved and enhanced, Harrow Council will:

- a) Encourage the retention and improvement of both public and private green spaces and open land, including trees, hedgerows and grass verges.
- b) Discourage development on existing areas of open land that contributes to the character of the Conservation Area.
- c) Further protect trees, and groups of trees, by creating additional Tree Protection Orders (TPOs) where appropriate.
- d) Discourage development that adversely affects significant trees.

Maintaining West Drive's Archaeology

a) Harrow Council recognises the archaeological importance of Harrow Weald's Conservation Areas and their settings, and will help to protect these by continuing to consult with English Heritage to ensure the appropriate action or works such as surveys are carried out before development commences.

b) Where appropriate, and in discussion with English Heritage, new Archaeological Priority Areas will be created and/or existing Archaeological Priority Areas revised, to safeguard Harrow Weald's archaeological remains.

Maintaining West Drive's Streetscene

To ensure that the character of the streetscene is both preserved and enhanced, Harrow Council will:

- a) Refer to existing policy on tall structures where telecommunications equipment or wind turbines are proposed.
- b) Encourage the utility companies to install the minimum amount of new and replacement street furniture and to locate this sensitively in suitable locations.
- c) Encourage street furniture to be well designed, and for redundant and unsightly street furniture and signage to be removed where opportunities occur.
- d) Encourage the retention of original floorscape materials, and wherever practicable, replacement floorscapes of appropriate traditional materials.

This page is intentionally left blank

LOCAL DEVELOPMENT FRAMEWORK PANEL MINUTES

29 JANUARY 2015

Chair: * Councillor Keith Ferry

Councillors: * Marilyn Ashton * Graham Henson
* Stephen Greek * Pritesh Patel
* Glen Hearnden (4) * Anne Whitehead

* Denotes Member present
(4) Denote category of Reserve Members

RECOMMENDED ITEMS

138. Consultation on the Draft Harrow Weald Conservation Areas SPD

The Panel received the report of the Corporate Director for Environment and Enterprise which introduced the draft Harrow Weald Conservation Areas Supplementary Planning Document, including the Conservation Area Appraisal and Management Strategy, which are proposed for public consultation.

In respect of the proposed amendments a Member enquired about the justification for these and whether there was evidence to support the view taken.

The Principal Conservation Officer informed the committee that this was the first Conservation Area Appraisal and Management Strategy for the West Drive Conservation Area and this proposed the removal of those streets which did not meet the criteria for inclusion in the Conservation Area (CA). It took into account the history and architectural importance of the area in determining what to retain or remove, and if agreed by Cabinet the proposals

would go out for a 5 week consultation period. The criteria for inclusion were listed in the SPD, and state that an area should meet at least two of the criteria.

In response to queries about resident views, and the status of trees within a CA, she confirmed that trees within a CA enjoyed some protection in that notice had to be given to the Council if work was planned which would impact on them, but that this would be lost if the CA status no longer applied. Regarding resident views, she stated that CA status would rest on relevant evidence rather than the number of views expressed, but added that suggestions would be welcome and considered.

In response to a question about whether or not locally listed status for a park and garden within the proposed new boundaries of the West Drive CA would restrict future development plans for the area, she stated that it would not present the same controls as a nationally listed park and garden but it would be an additional consideration in planning decisions.

A Member expressed her dismay and strong objections to the proposed amendments. She explained that she had been involved in agreeing the original CA, to preserve the character and attractiveness of the area and block inappropriate, unsympathetic and unrestricted development. The report at the time had acknowledged that these areas were marginal, but at the time there had been cross-party and unanimous support for the defined area to preserve greenery, roof lines and such like.

A Member observed that if inclusion was allowed without meeting the criteria it undermined the principles governing CA status. She accepted that residents might want to retain the CA status and if consultation responses demonstrated how criteria were met then it could be looked at again.

The Chair suggested that the consultation would allow residents to give their views and should go ahead.

The matter was put to the vote, and was decided by a majority of 4 votes to 2.

Resolved to RECOMMEND: (to Cabinet)

That a five week period of consultation for the draft Harrow Weald Conservation Areas Supplementary Planning Document be approved.

[Note: Councillors Ashton and Greek wished to be recorded as having voted against the above Recommendation].

Reason for Recommendation: When adopted, the Harrow Weald Conservation Areas SPD will constitute part of the Harrow Local Plan. This will form material considerations in the determination of planning applications both at planning committees and appeal proceedings. The SPD will also provide useful guidance to relevant Council departments when dealing with issues relating to Harrow Weald Conservation Areas. Before adoption can take place formal consultation on the SPD is required.

REPORT FOR: CABINET

Date of Meeting:	19 February 2015
Subject:	Fixed Penalty Notices for Environmental Crime Enforcement – Policy, Operational Guidance and Procedural Matters
Key Decision:	Yes
Responsible Officer:	Caroline Bruce, Corporate Director of Environment and Enterprise
Portfolio Holder:	Councillor Varsha Parmar, Portfolio Holder for Environment, Crime and Community Safety
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendix A – Environmental Compliance Enforcement Policy Appendix B – Fixed Penalty Operational Guidance Appendix C – Briefing Note ASB, Crime and Policing Act 2014 Appendix D – DEFRA Guidance – Litter and Refuse Appendix E – Equality Impact Assessment

Section 1 – Summary and Recommendations

This report presents a) the Environmental Compliance Enforcement Policy, b) the associated Operational Guidance for officers, c) seeks approval of new fixed penalty notices as set out in the Anti Social Behaviour, Crime and Policing Act 2014 (which came into force 20th October 2014) and d) sets out the proposal to consult on whether to designate any areas within the Borough in terms of land associated with unauthorised leaflet distribution.

The enforcement policy and operational guidance are fundamental to the effective implementation of fixed penalty notices (FPNs) as they set out the policy environment in which FPNs operate as well as providing guidance to officers on implementation. In doing so, they support the decision made by Cabinet on the 18 September 2014 to introduce FPNs for environmental crime offences in Harrow.

Recommendations:

Cabinet is requested to:

- a. Approve the Environmental Compliance Enforcement Policy for adoption.
- b. Note the FPN Operational Guidance for staff.
- c. Approve the two new Fixed Penalty Notices and their fine levels - failure to comply with Community Protection Notice and non-compliance of a Public Space Protection Order both at £100 discounted to £60 if paid within 10 days.
- d. Agree the proposal to publically consult on whether any areas in the Borough are defaced by discarded printed matter so that consideration can be given to designating the area(s) as detailed in this report.
- e. Delegate authority to the Corporate Director of Environment and Enterprise following consultation with the Portfolio Holder for Environment, Crime and Community Safety to make amendments to the current policy only when there have been changes of Government guidance or new legislation.

Reason: (For recommendation)

Following the decision made by Cabinet on 18 September 2014 to introduce FPNs in Harrow, the detailed policy and operational guidance for staff have been updated. They support Members decision to roll-out FPNs for environmental crime offences. FPNs provide an alternative to prosecution in matters of low level environmental crime offences. They also support the Council's vision of "Working together to make a difference for Harrow".

In addition, new legislation supersedes some of the fixed penalty notices that were approved in September 2014 and cannot be used until approved. These are set out in this report.

Designated land must be identified, approved by the Authority and advertised before the Council can use Fixed Penalty Notices for unauthorised distribution of leaflets. Public consultation is required prior to designating the land and the report seek authority to consult.

Section 2 – Report

1. Introduction

- 1.1 Harrow Council is committed to maintaining a clean and safe environment for the benefit of everyone in the borough. The commitment recognises the Council's responsibility to keep the streets and local environment clear of litter and obstructions and deal with other local environmental quality issues.
- 1.2 All local authorities in England including Harrow Council now have extended powers to enable enforcement of certain environmental legislation intended to protect both the individual and community as a whole.
- 1.3 On 18 September 2014 Cabinet approved the use of Fixed Penalty Notices (FPNs) for environmental crime offences. Delegation and authority levels were also approved. Cabinet agreed at the time that a further report would be submitted to them for approval, setting out the environmental offences enforcement policy, operational procedure and designation of land in respect of the offence of 'unauthorised distribution of free printed matter on designated land'.
- 1.4 This report presents to Members the enforcement policy and operational guidance (appendices A and B). They include details of how the Council will use the legislation and powers to ensure an effective, consistent and clearer approach to street environment enforcement. This includes how spitting will be tackled in a robust and effective way.
- 1.5 In addition, since September 2014, the new Anti Social, Crime and Policing Act 2014 has come into place that revokes elements of fixed penalty notices previously agreed and replaces them with more generic enforcement options that, in themselves, have fixed penalty notice options. Therefore, these elements are also raised for approval in this report.
- 1.6 The new Anti Social Behaviour, Crime and Policing Act 2014 has introduced the use of a Public Space Protection Order (PSPO). The PSPO allows the Local Authority to identify a public place where activities are being carried on, which are detrimental to the quality of life of those in the locality and to subsequently prohibit or require specified things to be done in the restricted area. This order could therefore be used to restrict an area in the borough and have conditions applied to it, such as no spitting, and consequently to issue an FPN for non-compliance. Cabinet will be provided with evidence of various areas within the borough which may need to become restricted areas.

- 1.7 In terms of designated land for unauthorised leaflet distribution, it is a requirement to approve the proposal and suitably advertise to allow proper consultation prior to issuing FPNs for leaflet distribution.
- 1.8 The above will all assist in making a difference for communities and local businesses by allowing the issuing of FPNs to address environmental crime and improving Harrow for its residents, visitors and supporting a vibrant business environment.
- 1.9 The introduction of the new FPNs widens the effectiveness to also protect communities and vulnerable affected by matters of Anti Social Behaviour, classed as anything causing distress, annoyance or nuisance.

2. Options considered

- 2.1 The policy and operational guidance is needed in order to facilitate the roll out of FPNs as previously agreed by Cabinet, hence there are no further options being considered for this element of the report.
- 2.2 The charges for the new FPNs were considered and set at a level to deter offenders. Not introducing these new FPNs limits the Council's ability to enforce following the changes to Anti Social Behaviour, Crime and Policing Act 2014 (which came into force 20th October 2014)
- 2.3 Designating land with a formal Order allows the Council to enforce against unauthorised leaflet distribution. Consideration was given on whether or not to designate land and it was deemed important in order to stop the Borough being defaced with discarded leaflets.

Environmental Compliance Enforcement Policy & FPN Operational Guidance

- 2.4 The principles of Fixed Penalty Notices were set out in the report to Cabinet on 18th September 2014 and are not repeated in this report. This report sets out the detailed policy and operational guidance in Appendices A and B respectively.
- 2.5 The policy document sets out the enforcement policy of Harrow Council and how the Council uses legislation and powers to ensure an effective, consistent and clear approach to street environment enforcement.
- 2.6 It covers the following offences:
 - Littering
 - Waste
 - Dog fouling
 - Noise nuisance
 - Distributing of free literature without consent

Failure to produce authority (certificate of registration) to transport controlled waste
Failure to produce transfer notices
Street litter notice
Abandoned vehicles
Graffiti and fly posting
Nuisance vehicles

- 2.7 These services enforce a wide range of legislation that aims to protect the interests and rights of people in relation to the environment that they use.
- 2.8 Within this legislative framework and to promote a clean environment, fixed penalty notices (FPN) can be used. An FPN is a financial penalty that officers can issue directly to offenders once their offence has been established. Payment of the FPN discharges the offender from any consequent legal action regarding the offence. However if the FPN isn't paid then the offender may face legal proceedings.
- 2.9 The implementation of FPNs delivers a firm commitment made in the Council's Corporate Plan to introduce on the spot fines for littering in our streets to help clean up Harrow. This will make a difference for communities and local businesses by addressing environmental crime and improving Harrow for its residents and visitors and supporting a vibrant business environment.
- 2.10 The FPN for Environmental Offences - Operational Guidance sets out the relevant legislation and the FPN actions that officers can take.
- 2.11 FPNs are a valuable addition to the enforcement toolkit. Benefits include:-
- Having an appropriate and proportionate means of dealing with low-level offending.
 - Dealing with infringements in a swift, simple, efficient and cost-effective way.
 - Reducing demand on officer time such as preparing for prosecutions when an FPN can be issued instead.
 - Reserving court cases for the more serious and / or persistent offenders, reducing demand on legal support services.
 - Inducing behaviour change through financial penalty, often similar to the fine the court might impose for minor offences.
 - Serving FPN's by a variety of other persons as well as Council officers. These include Police Community Support Officers (PCSOs), Police and Council contractor staff.
- 2.12 However, it should be noted that there are some limitations, such as:-
- FPNs should only be used when there is sufficient evidence to prosecute, which needs to happen for non-payment to maintain credibility of enforcement.

- An FPN cannot be recovered as a civil debt, again emphasising the need to be able to prosecute in the case of non-payment.
- FPNs should not be used for fly tipping due to the seriousness of the offence, and prosecution is to be used.

New fixed penalty notices as set out in the Anti Social Behaviour, Crime and Policing Act 2014 (which came into force 20th October 2014)

- 2.13 On 20th October 2014, the new Anti Social Behaviour, Crime and Policing Act 2014 came into force. This redefined anti social behaviour in general, to encompass a wider remit, and put in place new powers to deal with it. A consequence of this is that a number of previous legislative aspects under other acts were revoked, and included:

Environmental Protection Act 1990 (c. 43)

In the Environmental Protection Act 1990, sections 92 to 94A (litter abatement notices, litter clearing notices and street litter control notices) are repealed

Clean Neighbourhoods and Environment Act 2005 (c. 16)

Sections 55 to 64, 66 and 67 of the Clean Neighbourhoods and Environment Act 2005 are repealed. (Dog Fouling and Dog Control Orders)

Anti-social Behaviour Act 2003 (c. 38)

The following provisions of the Anti-social Behaviour Act 2003 are repealed:

- (a) Part 1 (closure of premises where drugs used unlawfully);
- (b) Part 1A (closure of premises associated with persistent disorder or nuisance);
- (c) Part 4 (dispersal of groups etc);
- (d) sections 40 and 41 (closure of noisy premises);
- (e) sections 48 to 52 (removal of graffiti and fly-posting) and the cross-heading before section 48.

- 2.14 There were 19 Anti Social Behaviour (ASB) powers in place which condensed down to 6 broader powers that will allow the addressing of a much wider remit of ASB. These are:
- Civic Injunction
 - Criminal Behaviour Order
 - Dispersal Power (Police)
 - **Community Protection Notice**
 - **Public Space Protection Order**
 - Closure Power
- 2.15 A briefing note is supplied as Appendix C, detailing the new legislation and the use of these powers.

- 2.16 In terms of the **Community Protection Notice**, failure to comply with its requirements can lead to prosecution, but also permits a fixed penalty notice to be served to expedite enforcement.
- 2.17 With regards the **Public Space Protection Order**, which now replaces matters such as dispersal zones, alcohol exclusion zones and dog control areas, a fixed penalty notice can also be issued on non-compliance to the Order.
- 2.18 These powers directly replace previously approved fixed penalty notices: failure to comply with a street litter notice and litter clearing notice.
- 2.19 As with the Fixed Penalty Notices approved by Cabinet in September 2014, the two new Fixed Penalty Notices have a maximum penalty allowed as set out below with the recommended level for approval:

Description of Offence	Act	Section of Act	Allowable Penalty	Fee (Paid within 14 days)	Fee (Paid within 10 days)
Failure to comply with a Community Protection Notice	Anti Social Behaviour, Crime and Policing Act 2014	48	£100	£100	£60
Failure to comply with a Public Space Protection Order	Anti Social Behaviour, Crime and Policing Act 2014	63 and 67	£100	£100	£60

Resources

- 2.20 The approval of the new Fixed Penalty Notices and fees allows for a more effective and efficient addressing of matters previously requiring court time and expense. No additional resource implications result from adopting these powers of enforcement.
- 2.21 The Cabinet on September 18th 2014 gave delegated Authority to the Corporate Director of Environment and Enterprise to authorise persons not directly employed by the Council (i.e. Housing Associations) to issue Fixed Penalty Notices under this Act.

Designation of Land associated with Unauthorised Distribution of Leaflets

- 2.22 On 18th September 2014, Cabinet approved the use of fixed penalty notices associated with the unauthorised distribution of leaflets. The Environment Protection Act 1990 as amended, section 94B makes it an

offence for anyone to distribute any free printed material without the consent of the principal litter authority on land which the authority has designated by order as being applicable to this section. This offence does not apply to registered charities or the distribution of material for political or religious purposes.

- 2.23 To designate land, the authority must be satisfied that the land is being defaced by the discarding of free literature that is being distributed in the area. This tends to be the main shopping areas and public transport hubs within a Borough where free literature tends to be distributed most.
- 2.24 The legislation gives authorities the power to consent to the distribution of free literature on designated land on an application basis. This consent is based on number of distributors for an area, the type of literature, dates and times and to what it is related. It does not apply to materials that are for the primary purpose of promoting official charities, for religious purposes or for political purposes.
- 2.25 The authority may also require the payment of a fee before giving consent.
- 2.26 The amount of this fee is not set by default but must not be more than is reasonable to cover the cost of operating and enforcing the consent.
- 2.27 The Department for Environment, Food and Rural Affairs (DEFRA) has previously issued guidance on the procedures to make an order to designate land for the control of distribution of free printed matter, being a three step approach:
1. Notification of proposal to make an order
 2. Consideration of objections
 3. Notification of an order
- 2.28 Cabinet is asked to approve the consultation for a borough wide designation of land proposal. This will be a minimum three months consultation, working with key partners including the Harrow Town Centre BID Team.
- 2.29 A report will then be produced detailing the consultation results and the steps forward to be approved dependent on the consultation.
- 2.30 A copy of the relevant DEFRA Guidance on this is set out in Appendix D.

Resources

- 2.31 Costs are minimised and are centred on the consultation process, which is to include notice in a local paper, Council website and posting details around the Borough to which the proposed order/s is to apply.

- 2.32 The consultation shall be conducted between the Environmental Compliance Team and the Community Engagement team of Environment and Enterprise, and the costs of such action are contained within existing budgets.
- 2.33 Current staffing will be used, and there is no requirement for additional staffing for the purpose of the consultation process.

3. Community & Consultation

- 3.1 Public awareness activity undertaken to date includes:
- Borough consultation
 - Activities in the Town Centre
 - Online surveys
 - Co-ordinated days of action
 - Initiatives such as “secure streets”
 - Ongoing visits and warnings to commercial premises
- 3.2 These activities have been Borough wide, and carried out by the Environmental Compliance Team.
- 3.3 Future public awareness activity includes:
- Enhanced street signage
 - Campaigns in the local paper
 - An identifiable uniformed enforcement presence (with the capacity to advise and educate the general public in relation to environmental awareness)
- 3.4 The education and publicity campaign will be a continuous process as the success of any such Fixed Penalty Scheme is based on reduced enforcement due to a culture change.
- 3.5 The above will be in line with DEFRA Guidance on the use of FPNs. This states “It is recommended that authorities considering issuing fixed penalty notices for the first time allow a well-publicised lead-in period before any notices are issued. This should help ensure public support for fixed penalties. During this time, when an offence is committed, enforcement officers should not issue any fixed penalties; if the offence is serious they should report the offender with a view to prosecution; in other cases they should issue a warning that in future similar offences may lead to fixed penalty notices (or prosecution). This will help raise awareness within the community and should help manage the public’s perception.”
- 3.6 It should also be noted that awareness of people has increased due to a London Wide approach to Fixed Penalty Notices, with the Transport and Environment Committee of London Councils raising it on a broader level in December due to setting By Law FPN levels for such matters.

- 3.7 The public awareness campaign needed to be broader than originally anticipated and therefore FPNs will be ready for issue from 28th February 2015 using a phased approach. From April 2015 onwards, uniformed resources will be put in place to specifically target littering in main metropolitan areas.

4. Performance Issues

- 4.1 The Environmental Compliance Enforcement Policy & FPN Operational Guidance will allow officers to effectively and efficiently enforce against a range of environmental offences. In particular, FPNs will allow swift and simple enforcement.
- 4.2 The use of the new powers under the Anti-Social Behaviour, Crime and Policing Act 2014, in conjunction with the fixed penalty notices, will aid the Council in addressing those matters that directly and adversely affect communities, local businesses, families and the vulnerable. It will lead to expedite addressing of matters of annoyance, nuisance and distress with delay. It will also be consistent with the Police, who additionally have these powers and sanctions, to ensure all partners can take the same approach.
- 4.3 The powers to issue fixed penalty notices for leafleting has already been enacted from September 2014 Cabinet, and therefore land must be designated to allow their use. The intention of such proposals is to improve the street scene within Harrow, and reduce levels of littering especially around the main metropolitan areas. It will ensure that distribution of leaflets is controlled, and cost for any littering that occurs as a result is not placed on the public purse.

5. Environmental Implications

- 5.1 The aspects seeking approval are expected to have a positive impact on the Environment, by allowing swift and efficient enforcement of environmental offences.
- 5.2 The additional controls over free literature distribution and resulting littering that takes place will help to maintain a cleaner Harrow for residents, business and visitors.

6. Risk Management Implications

- 6.1 This policy and operational guidance are not included on the Directorate or any other corporate risk register.
- 6.2 The policy and operational guidance is introduced to minimise legal risk. They help to ensure that the principles of regulatory conduct are adopted as part of fixed penalty notices as well as other sanctions.

7. Legal Implications

Policy and Operational Guidance

- 7.1 Along with all other local authorities in England, Harrow Council now has extended powers (including the issuing of Fixed Penalty Notices) to enable enforcement of legislation intended to protect both the individual and community as a whole. This activity is set within the following legislation:

Environmental Protection Act 1990 (as amended)
Clean Neighbourhoods and Environment Act 2005
Highways Act 1980
Refuse Disposal (Amenity) Act 1978
London Local Authorities Act(s) 1995-2007
Town and Country Planning (Control of Advertisement) Regulations 1990 (as amended)
Greater London Council (General Powers) Act 1982
Criminal Justice and Public Order Act 1994
Anti-Social Behaviour Act 2003 (as amended)

Anti Social Behaviour, Crime and Policing Act 2014

- 7.2 New fixed penalty notices can be issued for the failure to comply with a Community Protection Notice or Public Space Protection Order as set out in the Anti Social Behaviour, Crime and Policing Act 2014 (which came into force 20th October 2014)

Designating land for dealing with leaflet distribution

- 7.3 Schedule 3A of the Environmental Protection Act 1990, as amended by the Clean Neighbourhoods and Environment Act 2005, sets out the offence regarding designated land.
- 7.4 Land designated must be land of the authority or highway for which the authority is responsible. As stated in the report, evidence will have to be shown of the land being defaced by the discarding of free printed matter distributed there.
- 7.5 The authority must carry out a statutory consultation by publishing notice of its intention in a local paper and on the land in question specifying the land, the date on which it is proposed that the order shall come into force (at least 28 days after the date of the Notice) and the fact that objections may be made including how they may be made and period in which they may be made (at least 14 days from the date of the Notice)
- 7.6 The authority must consider any objections made before making an order.

8. Financial Implications

Fixed Penalty Notices

- 8.1 The code of practice clearly states that the FPN regime is not intended as an additional source of income for authorities. Any income generated is designed to address all aspects of environmental crime.
- 8.2 In general, as the success of any FPN is advertised, the public become more compliant and fewer offences are committed and less income received. This is the main intention of the policy.
- 8.3 Any income will be used to offset costs associated with issuing the fixed penalty notices which will be met from existing budgets, as well as environmental campaigns to increase education and compliance. To this end the income shall be initially ring fenced to the environmental compliance team for this purpose.

Designated Land

- 8.4 It is not anticipated that there will be any significant cost element to the designated land proposal, and can be met within budget.
- 8.5 The enforcement of the consent process, should the proposal proceed, shall be carried out within the Environmental Compliance Team. The application process shall be undertaken within the licensing regime and absorbed into their work.

Equalities implications / Public Sector Equality Duty

The Equality Act 2010 outlines the provisions of the Public Sector Equality Duty which requires public authorities to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation. The duty also covers marriage and civil partnership, but to a limited extent.

The broad purpose of this duty is to integrate considerations of equality into day to day business and keep them under review in decision making, the design of policies and the delivery of services so that the potential impact on any protected groups is identified and steps taken to mitigate or remove them.

The EqIA carried out is attached to this report. Issues identified will form part of the education and promotion strategy to ensure that all parts of the Borough are informed of the introduction and use of FPNs.

The EqIA indicates that there may be a disproportionate adverse impact on the protected characteristics of age and race. There are however, steps being taken to mitigate against this by way of an education strategy, which shall address any concerns over language and age in particular, with all protected characteristics monitored as part of the introduction of FPNs and after the 6 month pilot.

The policies and procedures being introduced as part of this process address equalities and ensure a fair, balanced approach in line with statutory requirements and guidance.

Council Priorities

The Council's vision:

Working Together to Make a Difference for Harrow

The control of distribution of free literature and the use of Fixed Penalty Notices, including those introduced as part of this report, aid in meeting all the priorities of the Council including:

Making a difference to communities: Fundamentally, links into this priority, by addressing environmental and highway crime, and improving an area for its residents, visitors and businesses especially in terms of litter and ASB.

Making a difference to businesses: The tackling of environmental and highway crime fits in with supporting businesses, ensuring a vibrant business environment.

Section 3 - Statutory Officer Clearance

Name: Jessie Man	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 20 January 2015		
Name: Isha Prince	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 5 February 2015		

Ward Councillors notified:	NO, as it impacts on all Wards
EqIA carried out:	YES
EqIA cleared by:	Hanif Islam – EqIA Lead

Section 4 - Contact Details and Background Papers

Contact: Hanif Islam, Policy & Performance Manager, 020 8424 1548, Hanif.islam@harrow.gov.uk

Background Papers: [Report to Cabinet 18th September 2014](#)

Call-In Waived by the Chairman of Overview and Scrutiny Committee	NOT APPLICABLE <i>[Call-in applies]</i>
--	---

Environmental Compliance Enforcement Policy

Date: January 2015
Version: 1.1

Environment and Enterprise
Harrow Council
Civic Centre
Station Road
Harrow
HA1 2XA

Tel: 020 8863 5611

Policy and Performance, Environment and Enterprise
Environmental Compliance Enforcement Policy v1.1

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

Contents

1	Introduction	5
2	Background	6
2.1	<i>Previous enforcement</i>	6
2.2	<i>Current enforcement</i>	6
2.3	<i>Consultation and Engagement</i>	7
3	The Principles of Enforcement	7
3.1	<i>Proportionality</i>	7
3.2	<i>Targeting</i>	8
3.3	<i>Consistency</i>	8
3.4	<i>Transparency</i>	8
3.5	<i>Accountability</i>	9
4	The Purpose and Method of Enforcement	9
4.1	<i>Investigation</i>	10
4.2	<i>Authorisation of Officers</i>	11
4.3	<i>Powers of Entry</i>	11
4.4	<i>Obstruction of Officers</i>	11
5	Enforcement Options	12
5.1	<i>Prosecution</i>	12
5.2	<i>Simple Cautions</i>	14
5.3	<i>Fixed Penalty Notice (FPN)</i>	15
5.4	<i>Written Warning and Advice</i>	15
5.5	<i>No Action</i>	15
6	Action by the Courts	15
6.1	<i>Penalties</i>	16
7	Enforcement Notices	16
8	Seizure	16
9	Public Interest Factors	17
10	Conflict of Interest	17
11	Publicity	17
12	Partnership working	18
13	The Storing and Disclosure of Information	18
14	Complaints and Appeals	19
15	Definitions	20
16	Monitoring and Review	20
17	Amendments to this Policy	21
18	Appendix A - Local Level Settings	22
19	Appendix B - ACTION PLAN	24

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

1 Introduction

Harrow Council is committed to maintaining a clean and safe environment for the benefit of everyone in the borough. The commitment recognises the Council's responsibility to keep the streets and local environment clear of litter and obstructions and deal with other local environmental quality issues.

Along with all other local authorities in England, Harrow Council now has extended powers to enable enforcement of legislation intended to protect both the individual and community as a whole. This activity is set within the following legislation:

Environmental Protection Act 1990 (as amended)
Clean Neighbourhoods and Environment Act 2005
Highways Act 1980
Refuse Disposal (Amenity) Act 1978
London Local Authorities Act(s) 1995-2007
Town and Country Planning (Control of Advertisement) Regulations 1990 (as amended)
Greater London Council (General Powers) Act 1982
Criminal Justice and Public order Act 1994
Anti-Social Behaviour Act 2003 (as amended)
Anti-Social Behaviour, Crime and Policing Act 2014

This document sets out the enforcement policy of Harrow Council and how the Council uses this legislation and powers to ensure an effective, consistent and clear approach to street environment enforcement.

It covers offences including the following:

Littering
Waste
Noise nuisance
Distributing of free literature without consent
Failure to produce authority (certificate of registration) to transport controlled waste
Failure to produce transfer notices
Street litter notice
Abandoned vehicles
Graffiti and fly posting
Nuisance vehicles

These services enforce a wide range of legislation that aims to protect the interests and rights of people in relation to the environment that they use.

Within this legislative framework and to promote a clean environment, fixed penalty notices (FPN) can be used. An FPN is a financial penalty that officers can issue directly to offenders once their offence has been established. Payment of the FPN discharges the offender from any consequent legal action regarding the offence. However if the FPN isn't paid then the offender may face legal proceedings.

The implementation of FPNs delivers a firm commitment made in the Council's Corporate Plan to introduce on the spot fines for littering in our streets to help clean up Harrow. This will make Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

a difference for communities and local businesses by addressing environmental crime and improving Harrow for its residents and visitors and supporting a vibrant business environment.

The term “enforcement” is used in this policy to mean “actions taken by Council officers to prevent or rectify infringements of legislation”. These actions include: preventative work (including advice), informal warnings; and more formal actions such as the service of statutory notices, prosecutions and injunctions.

This Enforcement Policy sets out the general principles and approach, which Harrow Council will follow when enforcing environmental and highway legislation as the enforcing authority. Going forward, it will also take into account future guidance issued by Government, including the Department for Business Enterprise, Better Regulation Delivery Office (BRDO) and Regulatory Reform Statutory Code of Practice for Regulators. These principles cover all areas of enforcement within environmental and highways services.

Harrow Council regards the principal of prevention as a better means of dealing with compliance than enforcement and offers information and advice to those the Council regulates, and seeks to secure compliance avoiding bureaucracy or excessive cost. Individuals and businesses (‘Duty Holders’) are encouraged to act responsibly and to do so in all activities that could affect the highway and environment.

This policy is followed by the Council and any person(s) / company acting on its behalf in the capacities above. Harrow Council ensures that all appointed officers are competent and trained in the use of this policy.

2 Background

On 18 September 2014 a paper was presented to Harrow Cabinet seeking approval to use Fixed Penalty Notices (FPNs) as an enforcement tool for certain types of environmental crime and outlining its benefits. At this meeting, Cabinet approved the use of FPNs including delegation and authority levels. This policy supports the decisions made by Cabinet.

2.1 Previous enforcement

Issues such as litter, graffiti and abandoned cars are matters that are frequently raised by residents throughout the Borough and through Ward Councillors and MPs. These areas were previously enforced, but such enforcement was limited and time consuming. Enviro-crime enforcement was confined to taking informal action or prosecuting. As a result, issues such as littering did not get the effective enforcement needed due to time and resources, leading to increased environmental degradation.

2.2 Current enforcement

The Clean Neighbourhoods and Environment Act 2005 widened the types of offences for which FPNs can be used and the persons that can issue them. This was enhanced by the new ASB, Crime and Policing Act 2014.

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

The introduction of FPNs allows low level environmental crime in the Borough to be tackled, using a more cost effective and proportionate response to these offences. The FPN level is set to provide a deterrent aspect which goes towards the need to educate not just enforce.

The implementation of FPNs delivers a firm commitment made in the Corporate Plan to introduce on the spot fines for littering in our streets to help clean up Harrow. It also links directly to two of the Council's priorities. These are:

1. Making a difference for communities: by addressing environmental crime and improving an area for its residents, visitors and businesses.
2. Making a difference for local businesses: the tackling of environmental crime supports a vibrant business environment.

The ultimate aim is to ensure that residents and others increasingly take control of their own behaviour to the benefit of the wider community.

2.3 Consultation and Engagement

Consultation took place on the use of Fixed Penalty Notices between 15th August and 5th September 2014. This was by an on-line survey supported by self-completion questionnaires. A total of 327 surveys were completed.

The majority of respondents said there was a problem with the environmental issues raised. This ranged from 94% for litter to 59% for abandoned cars. Around 9 out of 10 respondents agreed that these matters should be dealt with by way of fixed penalty notice enforcement. The figures range from 94% for litter to 85% for leaflets.

3 The Principles of Enforcement

Harrow Council believes in firm but fair enforcement of environmental and highway law. This is informed by the principles of proportionality in applying the law and securing compliance; consistency of approach; targeting of enforcement action; transparency about how the Council operates and what those regulated may expect; and accountability for the Council's actions. These principles apply both to enforcement in particular cases and to the management of enforcement activities as a whole.

3.1 Proportionality

Proportionality here means relating enforcement action taken to the risk¹ to health and the environment. Those whom the law protects and those on whom it places duties expect that action taken by Harrow Council to achieve compliance or bring businesses or individuals to account for non-compliance should be proportionate to any risks to health and the environment, or to the seriousness of any breach, which includes any actual or potential harm arising from the breach of the law.

¹ In this policy, 'risk' (where the term is used alone) is defined broadly to include a source of possible harm, the likelihood of the harm occurring, and the severity of any harm to health and the environment. Policy and Performance, Environment and Enterprise

In practice, applying the principle of proportionality means that Harrow Council will take particular account of how far the individual / business has fallen short of what the law requires and the extent of the risks to people arising from the breach.

Some duties may be specific and absolute. Others require action as far as is reasonably practicable. Harrow Council will apply the principle of proportionality in relation to both kinds of duty.

3.2 Targeting

Targeting means making sure that regulatory effort is directed primarily towards those whose activities give rise to serious and / or persistent non compliance. Action will be primarily focused on breaches of the law or those directly responsible for the risk and who are best placed to control it.

Any enforcement action will be directed against those responsible for a breach. This may be businesses, residents or visitors to the Borough. Where several people / businesses have been identified in the act(s) of non-compliance, Harrow Council may take action against more than one when it is appropriate to do so in accordance with this policy.

Harrow Council will ensure that an appropriate senior officer is informed through daily reporting when officers issue warnings, fixed penalty notices, issue formal cautions or prosecute.

3.3 Consistency

Consistency of approach does not mean uniformity. It means taking a similar approach in similar circumstances to achieve similar ends.

Individuals and / or businesses found to be carrying out similar activities can expect a consistent approach from Harrow Council in the advice tendered; the use of enforcement notices; decisions on whether to prosecute; and in the response to incidents and complaints.

Harrow Council recognises that in practice consistency is not a simple matter. Officers are faced with many variables including the degree of risk, the attitude of individuals, any history of incidents or breaches involving the individual / business, previous enforcement action and the seriousness of any breach, which includes the persistence of the offence and any cumulative impact aspect.

3.4 Transparency

Transparency means helping people understand what is expected of them and what they should expect from Harrow Council. It also means making clear to businesses and individuals, not only what they have to do, but where relevant, what they should not. That means distinguishing between statutory requirements and advice or guidance about what is desirable but not compulsory.

Businesses and individuals also need to know what to expect from an Officer and what rights of complaint are open to them. This is linked directly to the policies and procedures of the Council, including the expectations placed upon Officers in the conduct of their duties.

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

The following can be expected when an officer visits a business:

When officers offer businesses and individual's information or advice, face to face or in writing, including any warnings, officers will tell them what to do to comply with the law, and explain why. Officers will, if asked, write to confirm any advice, and to distinguish legal requirements from best practice advice.

In the case of fixed penalty notices the officer will discuss the notice and explain the payment method. The notice will state the offence, date and time of offence, reason for issue of FPN, and in the Officers opinion what legislation has been breached.

3.5 Accountability

Regulators are accountable to the public for their actions. This means that Harrow Council has policies and standards (as set out in this document) against which it can be judged. The Council also has a mechanism for dealing with comments and handling complaints associated with enforcement.

The full procedures for this are available from Harrow Council.

4 The Purpose and Method of Enforcement

Harrow Council's Environmental Compliance Law Enforcement function is to ensure that the legislative requirements are met. This is achieved through a balance of proactive interventions and enforcement. This approach includes the proactive inspection of the highway including skip, crane and scaffolding usage. Additionally, the following up of complaints and service requests related to environmental or highway requirements, and the use of enforcement to seek compliance and remedy damage.

The purpose of enforcement is to:

- Ensure that individuals and businesses take action to deal immediately with failures of their duties,
- Promote and achieve sustained compliance with the law,
- Ensure that those that breach legal requirements are held to account, which may include bringing alleged offenders before the courts.

Harrow Council has a range of interventions at its disposal in seeking to secure compliance with the law and to ensure a proportionate response to criminal offences. Officers may offer information and advice, both face to face and in writing. This may include a warning that in the opinion of the officer, they are failing to comply with the law. Where appropriate, officers may also serve fixed penalty notices (where applicable), issue simple cautions, revoke licences and they may prosecute.

Investigating the circumstances encountered during interventions or following incidents or complaints is essential before taking any enforcement action. In deciding what resources to devote to these investigations, Harrow Council will have regard to the principles of Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

enforcement set out in this statement and the objectives of the Council. Each case will ultimately be assessed on its specific merits.

Harrow Council will use discretion in deciding when to investigate or what enforcement action may be appropriate. Officers will refer to this policy, and associated guidance, when determining enforcement action. Such judgements will be made in accordance with the principles of the Enforcement Concordat, the Regulators Compliance Code and Regulatory Reform Act 2006.

Any proposed enforcement action relating to prosecution and simple cautions will result in completion of a Legal Review Form, and the proposed action signed off by the Service Manager.

All officers when making enforcement decisions shall abide by this policy and guidance issued in conjunction with it. While case law has shown that the enforcement policy such as this is “guidance”, it is accepted good practice that such policies are followed unless good cause is given why it was not. Ultimately, the spirit of the enforcement policy must be maintained, especially in terms of being consistent, transparent and proportional.

4.1 Investigation

Harrow Council uses discretion in deciding whether incidents, complaints, or cases should be investigated. This is based on risk, potential legislative breach and seriousness of the issue.

Investigations are undertaken in order to determine:

- Causes;
- Whether action has been taken or needs to be taken to prevent a recurrence and to secure compliance with the law;
- Lessons to be learnt and to influence the law and guidance;
- What response is appropriate to a breach of the law.

To maintain a proportionate response, most resources available for investigation of incidents will be devoted to the more serious circumstances. The Council recognises that it is neither possible nor necessary to investigate all issues of non-compliance with the law which are uncovered in the course of preventive intervention, or in the investigation of reported events.

Harrow Council will carry out a site investigation of a highway licence application; unless it is an instance where the Council is not responsible or there are other specific reasons for not doing so, in which case those reasons should be recorded.

In selecting which complaints or reports to investigate and in deciding the level of resources to be used, Harrow Council will take account of the following factors;

- The severity and scale of potential or actual harm to person or land;
- The seriousness of any potential breach of the law;
- Knowledge of the past relevant compliance issues;
- The enforcement priorities;

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

- The practicality of achieving results;
- The wider relevance of the event, including serious public concern

4.2 Authorisation of Officers

Before an officer of the Council can carry out any enforcement duties, an officer will be authorised in accordance with the council's constitution and in accordance with legislation. Only competent officers who have appropriate qualifications or experience will be authorised to take enforcement action.

Inspector authorisations, or warrant cards, identify the Officer and provide evidence of the powers vested in the individual. The general authorisation to enter and inspect premises and do all such acts and things in accordance with Acts of Parliament and subordinate legislation applies to all officers. The Division when employing persons will look for qualifications and experience that are necessary for the post. Authorisation will be issued under delegated powers contained under the Council's Scheme of Delegation and will authorise suitably qualified / competent officers for the purposes of the Council's enforcement functions

4.3 Powers of Entry

Officers are authorised to hold the power of entry into commercial and residential premises in line with legislative requirements. Such powers are restricted in terms of environmental and highway legislation. Primarily such powers will be under the Environmental Protection Act 1990.

Due to the nature of the role, and the requirements of the legislation, visits to premises will be carried out without giving prior notice in terms of pro-active interventions where feasible. The exception is residential premises where 24 hour written notice shall be given.

In appropriate circumstances, an application will be made to the Magistrates Court for a warrant to enter (e.g. if access is refused, or the premises are vacant, or giving prior notice would be counterproductive. A warrant shall also be obtained where a visit to a residential address is needed due to a serious public health risk, and notice of the visit would defeat the object of the visit.

During all visits to premises, regardless of nature, Officers will show their authorisation to demonstrate authority to enter.

4.4 Obstruction of Officers

Areas of legislation enforced make it a clear offence to obstruct authorised officers in carrying out their roles. This includes offering the officer reasonable assistance in the conduct of their duties and investigations / inspections.

The Cleaner Neighbourhood and Environment Act 2005 sets out clear offences regarding the failure of people to furnish names and addresses to authorised officers who seek to serve an

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

FPN. These will be enforced, with Police assistance as required, to ensure that offences are dealt with at the lowest level possible.

The Council regards the obstruction of, or assaults (physical and/or verbal) on staff whilst lawfully carrying out their duties as a serious matter. Instances of such will be referred to senior managers with a view to instigating legal proceedings against the perpetrator. Any threat or assault will not be tolerated.

5 Enforcement Options

The main options for action are:-

- a) Prosecution
- b) Simple Cautions
- c) Fixed Penalty Notice
- d) Written Warning and Advice
- e) No Action

The Council works to ensure that enforcement decisions are consistent, balanced and fair and relate to common standards both locally and nationally. Internal guidance is issued relating to these matters with the purpose of encouraging consistency.

Where enforcement action is being contemplated which is inconsistent with local and national documented advice or guidance then the matter is referred to the relevant statutory / Government body.

Where enforcement action impacts upon aspects of a business' policy that has been agreed centrally by the decision making base of the business, then the matter is referred to the Primary / Home / Lead Authority for consideration. These are envisaged to be limited in terms of environmental and highway aspects.

5.1 Prosecution

Harrow Council uses discretion in deciding whether to bring a criminal prosecution. The decision whether to prosecute will take account of the evidential test and the relevant public interest factors set down by the Director of Public Prosecutions in the Code for Crown Prosecutors. No prosecution may go ahead unless the Council finds there is sufficient evidence to provide a realistic prospect of conviction and decides that prosecution would be in the public interest.

While the primary purpose of the Environmental Compliance Service is to ensure that businesses and individuals meet their statutory duties, prosecution is an essential part of enforcement. Where in the course of an investigation Harrow Council has collected sufficient evidence to provide a realistic prospect of conviction and has decided, in accordance with this policy and taking account the Code for Crown Prosecutors, that it is in the public interest to
Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

prosecute, then that prosecution will go ahead. Where the circumstances warrant it and the evidence to support a case is available, Harrow Council will prosecute without warning or recourse to alternative sanctions.

Criminal proceedings are taken against those persons responsible for the offence. Where a company is involved, it will be usual practice to prosecute the company where the offence resulted from the company's activities. However, the Council will also consider any part played in the offence by the employees of the company, including Directors, Managers and the Company Secretary. Action may also be taken against such employees (as well as the company) where it can be shown that the offence was committed with their consent or connivance or is attributable to neglect on their part and where it would be appropriate to do so in accordance with this policy.

Prosecution will generally be restricted to persons who blatantly disregard the law, refuse to achieve even the basic minimum legal requirements, often following previous contact with the Council and who put the public at serious risk. Regard should be had to the Crown Prosecution Service's Code for Crown Prosecutors which gives guidance on the decision making process for prosecutions.

<http://www.cps.gov.uk/publications/docs/codeeng.pdf>

Circumstances which are likely to warrant prosecution are:-

- a) Where the alleged offence involves a flagrant breach of the law such that public health, safety or well-being is or has been put at risk.
- b) Where the alleged offence involves a failure by the suspected offender to correct an identified serious potential risk having been given a reasonable opportunity to comply with the lawful requirements of an authorised officer.
- c) Where the offence involves a failure to comply in full or in part with the requirements of a statutory notice.
- d) Where there is a history of related similar offences.
- e) Where the offence is likely to lead to a cumulative impact on the Borough if left (e.g. cases of fly tipping that are likely to encourage others to duplicate this action)

The above is not an exhaustive list.

The decision to prosecute will normally be taken at the earliest opportunity. When circumstances have been identified which may warrant a prosecution all relevant evidence and information will be considered to ensure a consistent, fair and objective decision is made. Suspected offenders will be invited to offer an explanation before proceedings are commenced, unless circumstances dictate otherwise.

Before a prosecution proceeds, the officer will ensure that there is relevant, substantial and reliable evidence and that an identifiable person or company has committed an offence. There must also be a realistic prospect of conviction; a bare prima facie case is insufficient. A

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

Legal Review Form will be completed and signed off by a Service Manager prior to being approved.

Once the decision to prosecute has been made the matter will be referred to Legal Services without undue delay. The referral must include a legal review form stating the reasons for bringing the prosecution.

5.2 Simple Cautions

Formal (Simple) Caution will be considered by Harrow Council in the following circumstances where:

- There is sufficient evidence to prove the case;
- The offender has admitted the offence;
- The offender has agreed to be cautioned;
- The offence has not been committed by the offender before.

Reference should be made to Home Office Circular 016/2008 and officers will consider the use of simple cautions as an alternative to prosecutions.

<http://www.knowledgenetwork.gov.uk/HO/circular.nsf/79755433dd36a66980256d4f004d1514/d820bbad9e5edd8680257013004d1ccf?OpenDocument>

The purpose of the Formal (Simple) Caution is:-

- To deal quickly and simply with less serious offences;
- To divert offenders where appropriate from appearing in the criminal courts;
- To reduce the likelihood of re-offending.

In considering whether a Formal (Simple) Caution is appropriate, the investigating officer must consider the following facts:

- a) Is there sufficient evidence of the suspect's guilt to meet the Threshold Test (as outlined in the CPS Guidance)
- b) Is the offence indictable only (and the available evidence meets the Threshold Test)? If the answer is 'yes', this disposal option must be referred to a Crown Prosecutor.
- c) Has the suspect made a clear and reliable admission of the offence (either verbally or in writing)? An admission of the offence, corroborated by some other material and significant evidential fact will be sufficient evidence to provide a realistic prospect of conviction. This corroboration could be obtained from information in the crime report or obtained during the course of the investigation. A Formal (Simple) Caution will not be appropriate where a person has not made a clear and reliable admission of the offence (for example if intent is denied or there are doubts about their mental health or intellectual capacity, or where a statutory defence is offered).
- d) Is it in the public interest to use a Formal (Simple) Caution as the appropriate means of disposal? Officers should take into account the public interest principles set out in the Code for Crown Prosecutors.

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

- e) Is the suspect 18 years or over? Where a suspect is under 18, a reprimand or final warning would be the equivalent disposal.

If all the above requirements are met, the officer must consider whether the seriousness of the offence makes it appropriate for disposal by a Formal (Simple) Caution.

5.3 Fixed Penalty Notice (FPN)

This option can only be used for certain offences, e.g. littering and graffiti. This option gives the offender the opportunity to discharge liability for the offence by payment of a specified amount. FPNs must only be issued where there is sufficient evidence to prosecute. If the FPN is not paid within a specified time the case should proceed to prosecution.

Further information is provided in the Councils Environmental Compliance “Fixed Penalty Operational Guidance” document.

5.4 Written Warning and Advice

For some contraventions the offender will be sent a firm but polite letter clearly identifying the contraventions, giving advice on how to put them right and include a deadline by which this must be done. Failure to comply could result in a notice being served.

Informal action should be considered when:-

- a) Past history is good;
- b) The contravention is insufficiently serious to warrant formal action;
- c) Confidence in the individual/management;
- d) Non-compliance will not pose a significant risk to health or the environment

5.5 No Action

In exceptional circumstances, contraventions may not warrant any action. This is likely to be when the cost of compliance to the offender outweighs the impact of the offence. A decision of no action may also be taken when a trader has ceased to trade. The decision to take no action will be recorded detailing the decision making process.

It is expected even in cases where the duty holder has remedied the breach informally, that this is followed up in writing as part of the “education” process to prevent recurrence of the issue.

6 Action by the Courts

Where the matter is taken to court, the Council will seek to draw to the court’s attention to all the factors which are relevant to the court’s decision as to what sentence is appropriate on conviction

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

In cases of sufficient seriousness, and when given the opportunity, the Council shall consider indicating to the magistrates that the offence is so serious that they may send it to be heard or sentenced in the higher court where higher penalties can be imposed.

Due regard will be given to Court of Appeal guidance in considering what representation to make.

A list of the sanctions presently available to the Court is included in the policy. Higher Courts may impose unlimited fines and the option of imprisonment for some offences.

6.1 Penalties

The existing law gives the courts considerable scope to punish offenders and to deter others. Unlimited fines and, in some cases, imprisonment may be imposed by the higher courts. The Council will continue to raise the awareness of the courts to the gravity of offences and will encourage them to make full use of their powers. Examples of penalties presently available to the courts for certain offences are: -

- Magistrates' Courts; up to 6 / 12 months imprisonment and/or £20,000 fine;
- Crown Court: up to 2 years imprisonment and/or an unlimited fine.

The Council will always seek to recover the costs of investigation and legal proceedings.

7 Enforcement Notices

Notices may be issued to individuals or organisations as appropriate. Notices include those under the Highways Act 1980 (for instance Section 143, Power to Remove Structures). These are different to Notices requiring the furnishing of information (e.g. Section 16 Notices under the Local Government Miscellaneous Provisions) which have a legal remedy if not complied with.

Failure to comply with statutory notices will lead to legal proceedings and/or carrying out the works specified in the notice in the recipients default where applicable.

8 Seizure

Where a person is convicted of fly-tipping under Section 33 of the Environmental Protection Act 1990 the court can order the seizure of any vehicles involved in the offence. The court can also make an order depriving the owner of rights to any vehicle used in the commission of the offence and vesting these rights in the Environment Agency or a waste collection authority.

The Control of Pollution (Amendment) Act 1989 makes it a criminal offence for a person who is not a registered carrier to transport controlled waste to or from any place in Great Britain. It also provides under The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 for the seizure and disposal of vehicles used for illegal waste disposal.

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

Neither option shall be taken without a prosecution taking place. If the Officer considers that these are viable for the case, the matter shall be discussed and taken forward by the Council's Legal Department.

9 Public Interest Factors

Harrow Council will consider the following factors in deciding whether or not to prosecute:

- The seriousness of the offence;
- The foreseeability of the offence or the circumstances leading to it;
- The intent of the offender, individually and/or corporately;
- The history of offending;
- The attitude of the offender;
- The deterrent effect of a prosecution, on the offender and others;
- The personal circumstances of the offender;
- The likelihood of the offender being able to establish a legal defence.

These factors are not exhaustive and those, which apply, will depend on the particular circumstances of each case. Deciding on the public interest is not simply a matter of adding up the number of factors on each side. The Council decides how important each factor is in the circumstances of each case and goes on to make an overall assessment.

10 Conflict of Interest

There may be occasions where the Council operates the business and issues of non-compliance are identified (e.g. some schools).

Visit reports and follow up letters are issued in accordance with this policy to the Head of Service directly responsible for the Council business. Serious breaches of environmental and highways law are brought to the attention of the Chief Executive / Senior Corporate Officer without delay.

All correspondence will clearly state the level of enforcement action that would be taken and the reason for that action in the same way as if the premises were outside of local authority control. Contracted services are dealt with in accordance with this policy, Codes of Practice and other relevant guidance. The relevant Council officer responsible for the contract is kept advised of any action.

Authorised officers must ensure that at all times a conflict of interest does not arise as a result of their actions and activities.

11 Publicity

Harrow Council will consider making publicly available:

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

- Information on revocation of licences and number of fixed penalty notices served.
- Companies and individuals who have been convicted in the previous 12 months of breaking the law.

Harrow Council will also consider publicising any conviction, which could serve to draw attention to the need to comply with environmental and highway requirements, or deter anyone tempted to disregard their duties under such legislation.

12 Partnership working

This policy relies on strong partnership working. We aim to work with the following partners in delivering the policy:

- Police Community Support Officers (PCSOs)
- The Police
- Harrow Town Centre Business Improvement District (BID)

It is likely we will look towards a 3rd party company to be authorised to serve notices for littering on behalf of the Council.

13 The Storing and Disclosure of Information

Information collected or recorded as part of the Council's enforcement activities will be securely retained in a paper and/or electronic format for a period defined by legislation or required for future reference by the service. This information will include decisions taken about the choice of enforcement options.

The identity of a person providing the Council with information about other people committing crime, will remain confidential unless prior agreement by the person is obtained, or its disclosure is authorised by law or by a court of law.

Personal data held manually or as computer records will be handled in accordance with the Data Protection Act 1998 (DPA). This information will be used in accordance with the Council's DPA registration. Exemptions to this include where information is disclosed to other agencies or used for another reason for the purposes of detecting or preventing crime. This will include the sharing of information between Council services and with the police and other enforcement agencies. Sharing of information relating to the Crime and Disorder Act, will be undertaken in accordance with the appropriate information sharing protocol.

Right of access to information held by the Council will be given on request, in accordance with the Freedom of Information Act 2000 and Environmental Information regulations 2004 unless the information is already publicly available (as described in the Council's Publication

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

Scheme). Some exemptions to the Council can be found in the Act, Regulations and the Council's publication scheme. (

14 Complaints and Appeals

Anyone who is dissatisfied with enforcement actions that an Officer has taken will have their concerns investigated by the Service Manager Public Protection. Fixed Penalty Notices do not have an appeal process in place, but should a person feel that they have not caused an offence or the FPN was incorrectly served, they can write to the Service Manager (Public Protection), Harrow Council, PO Box 18, Station Road, Harrow HA1 2UT stating the reasons. This will be taken into consideration but does not mean that further formal action won't be taken if the reasons are not justified and payment is not made. If the complaint relates to the conduct of the Officer, rather than the actual offence being reported, the enforcement services will then follow Harrow Council's complaints procedures to deal with complaints and send a full written reply within 10 working days.

In the case of Enforcement Notices, as described, the correct appeal notes are to be given at the time the Notice is served. These notes will clearly show the appeal process for the relevant notice, setting out:

- a) The time limit for appeals;
- b) The place to submit an appeal, including contact details

If the Notes are not given at this stage, a copy will be given immediately to the recipient of the Notice and this matter recorded by the Officer.

In the case of written and verbal warnings issued by an officer, there is no set appeal process as no formal legal action has been initiated. Contact details of the person to contact, should a decision of the officer not be accepted or a matter be in dispute, will be made available without delay on request.

Any complaint about the conduct of an officer will be immediately notified to the Line Manager of the officer concerned, who will make a judgement on what action will be taken. An officer will not automatically be withdrawn from any case by virtue of a customer complaint. The Line Manager will consider the complaint and assess if the officer has acted outside their remit and / or has acted unprofessionally towards the business concerned. All complainants will be advised of their recourse to the Council's Corporate Complaint system. Stage 1 will be investigated by the Line Manager in line with the above. Stage 2 will be carried out by the Service Manager.

Should further complaints be made by a business / individual against an individual officer and no corporate complaint submitted, a decision will be made by the Line Manager whether to send an additional officer on future visits to ensure:

- Verification of the officers' actions; and
- Protection for the officer should the complaints be made for reasons of intimidation

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

This decision will be documented in the case file as well as on the database system.

The withdrawal of any legal action taken by an officer will not be entertained based solely on a complaint regarding the officer, as recourse is available through the appeal process, unless evidence is available to demonstrate the legal action does not meet the requirements set out in this Policy.

The Environmental Compliance Principal Officer / Team Leader shall have the authority to determine whether or not an appeal against a fixed penalty notice is successful.

The Public Protection Environmental Services Manager shall have the authority to cancel fixed penalty notices, but only should the notice be shown to be wrongly served.

There is no requirement for an appeal process for Fixed Penalty Notices. If there is refusal to pay, then the matter will be considered for prosecution.

A person can make a representation to the Public Protection Environmental Services Manager as to why a prosecution is not appropriate. Such representations are informal, and while consideration may be given to them, they do not necessarily prevent a prosecution taking place.

15 Definitions

Litter – The Environmental Protection Act 1990- Section 87 (as amended) states that an offence is committed if anything is dropped, thrown, left or deposited that causes defacement, in any place open to the air that the public have access to with or without payment.

Fly tipping – Waste dumping.

Graffiti – Any informal or illegal marks, drawings or paintings that have been deliberately made by anyone on any physical element in the outdoor environment.

Fly Posting – Any printed material and associated material, which is left illegally fixed to any structure.

Nuisance Vehicles – Selling two or more vehicles on a road or roads, within 500 metres of each other, is an offence. Repairing vehicles on a road is an offence.

Obstructions – Items left in the road, on pavements or overhanging pavements are a potential health and safety risk for road users and pedestrians.

16 Monitoring and Review

This policy will be reviewed within two years of its implementation. The review will highlight successes as well as areas for improvement and how effective the policy has been in reducing the impact on local environmental policy. Reviews will also seek to introduce where necessary

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

any new powers granted to local authorities in managing local environmental quality. The review will include measures such as:

- Reduction in the level of fly tipping
- Improvements in resident satisfaction relating to the cleanliness of the borough
- Reduction in levels of abandoned vehicles
- Review numbers of FPNs issued, cancelled and the subsequent payment rate
- Review of complaints statistics
- Evaluation of waste and recycling statistics

17 Amendments to this Policy

As may be necessary, for instance with the issuing of new guidance by Government, amendments will be made to this Enforcement Policy. Should such amendments not deviate away from the overall spirit, such amendments will be attached through an amendment document rather than the re-issuing of the Enforcement Policy as a whole.

Any matters of legal doubt will be assessed by the Councils Legal Section, prior to coming into place, where there is no clear-cut guidance, case law or precedent.

18 Appendix A – Local Level Settings

OFFENCES WITH LOCAL LEVEL SETTING AND DISCOUNTING ALLOWED:

Description of Offence	Act	Section of Act	Allowable Penalty	Fee (Paid within 14 days)	Fee (Paid within 10 days)
Depositing litter (includes spitting)	Environmental Protection Act 1990, as amended by section 19 of the CNEA 2005	87/88	Locally set between £50 and £80	£75	£50
Unauthorised distribution of free printed matter on designated land	Environmental Protection Act 1990, as amended by section 23 of the CNEA 2005	Schedule 3A, para 7(2)	Locally set between £50 and £80	£75	£50
Graffiti and Flyposting	Anti-Social Behaviour Act 2003, as amended by section 28 of the CNEA 2005	43	Locally set between £50 and £80	£75	£50
Failure to comply with a waste receptacle notice	Environmental Protection Act 1990, as amended by section 48 of the CNEA 2005	46/47/47 ZA/47ZB	Locally set between £75 and £100	£100	£60
Failure to comply with a Community Protection Notice	Anti Social Behaviour, Crime and Policing Act 2014	48	£100	£100	£60
Failure to comply with a Public Space Protection Order	Anti Social Behaviour, Crime and Policing Act 2014	63 and 67	£100	£100	£60

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

OFFENCES WITH NO LOCAL LEVEL SETTING AND DISCOUNTING ALLOWED:

Description of Offence	Act	Section of Act	Allowable Penalty	Fee (Paid within 14 days)	Fee (Paid within 10 days)
Nuisance parking	CNEA 2005	s.6(1)	£100	£100	£60
Abandoning a vehicle	Refuse Disposal (Amenity) Act 1978, as amended by section 10 of the CNEA 2005	Schedule 2A (1)	£200	£200	£120
Failure to furnish documentation (waste carrier's licence)	Environmental Protection Act 1990, as amended by section 45 of the CNEA 2005	s.34A(2)	£300	£300	£180
Failure to produce authority (waste transfer notes)	Control of Pollution (Amendment) Act 1989, as amended by section 38 of the CNEA 2005	s.5B(2)	£300	£300	£180

19 Appendix B - ACTION PLAN

The Action Plan reflects actions recommended to date to meet identified issues. Budget implications will be confined within the Directorates finances.								
No.	Ref	Action	Dependency	Action by	Expected Outcome	Budget	Start Date	End Date
A1.1		Further FPNs to be introduced in line with legislation, including ASB, Crime and Policing Act 2014						
A1.2		Unauthorised distribution of litter will be further defined in terms of area (and also has to be advertised for 28 days in the local paper)						
A1.3		Training for internal and external officers to ensure consistency with agreed policy and procedures	Availability of all relevant officers, including Police	R Le-Brun	Officers competent in the practical issuing of FPNs in line with Council policy and procedure	£10,000	Dec 2014	March 2014
A1.4		Procurement of a 3rd party company to carry out the uniformed enforcement of littering in Harrow	Dependant on meeting procurement requirements and in line with Council requirements	R Le-Brun / Procurement	Self funding external company in place to issue on street FPNs for the purpose of littering	Self funding external company in place to issue on street FPNs for the purpose of littering	Dec 2014	April 2014
A1.5		Authorisation of External Bodies to issue FPNs, including Police	Dependant on external bodies processes for such	R Le-Brun	Partnership approach to issuing of FPNs to maximise educational	None	Jan 2014	April 2014

759

Policy and Performance, Environment and Enterprise

Environmental Compliance Enforcement Policy v1.1

			authorisation		impact			
--	--	--	---------------	--	--------	--	--	--

Fixed Penalty Notices for Environmental Offences

Operational Guidance

Date: January 2015
Version: 1.1

Environment and Enterprise
Harrow Council
Civic Centre
Station Road
Harrow
HA1 2XA

Tel: 020 8863 5611

Table of Contents

Contents

Fixed Penalty Notices for Environmental Offences	1
Operational Guidance	1
1 Introduction	4
2 Grounds for Issuing an FPN	4
3 The Offender	5
4 Issuing the FPN	5
4.1 Summary of Rules for Issuing FPNs	6
5 Issuing FPNs to Young People	6
6 Dealing with Obstructing Offenders	6
7 Police and Criminal Evidence Act 1984 (Code C –Questioning)	7
7.1 Cautions.....	7
7.2 Interviews.....	7
8 Disputes	7
9 Amount of Fixed Penalty	8
10 FPN Specific Guidance	8
10.1 Environmental Protection Act 1990, Section 87 – Littering	8
10.2 Environmental Protection Act 1990, Section 46 & 47 (Duty of Care)	9
10.3 Environmental Protection Act 1990, Schedule 3A, paragraph 7 – Distributing Free Literature without Consent.....	9
10.4 Section 5B (2) Control of Pollution (Amendment) Act 1989	10
10.5 Section 34A (2) Environmental Protection Act 1990	10
10.6 Control of Pollution (Amendment) Act 1989, Section 5B – Failing to Produce Authority	10
10.7 Environmental Protection Act 1990, Section 34A – Failing to Produce Transfer Notes.....	10
10.8 Anti Social Behaviour, Crime and Policing Act 2014, Section 48	10
10.9 Anti Social Behaviour, Crime and Policing Act 2014, Section 63 and 67	11
10.10 Refuse Disposal (Amenity) Act 1978, Section 2A – Abandoned Vehicles.....	11
10.11 Anti-Social Behaviour Act 2003, Section 43 – Graffiti and Fly Posting.....	11
10.12 Cleaner Neighbourhoods and Environment Act 2005, Section 3 & 4 - Nuisance Vehicles...	12
11 Amendments to Enforcement Policy Additional Guidance	13
APPENDIX A: FIXED PENALTY NOTICES APPLICABLE UNDER THE CLEANER NEIGHBOURHOOD AND ENVIRONMENT ACT 2005 (CNEA 2005)	14

1 Introduction

Harrow Council is committed to maintaining a clean and safe environment for the benefit of everyone in the borough. The commitment recognises our responsibility to keep the streets and local environment clear of litter, obstructions and deal with other local environmental quality issues.

Along with all other local authorities in England, Harrow Council now has extended powers to enable enforcement of legislation intended to protect both the individual and community as a whole.

This activity is set within the following legislation:

- Environmental protection Act 1990 (as amended)
- Clean Neighbourhoods and Environment Act 2005
- Highways Act 1980
- Refuse Disposal (Amenity) Act 1978
- London Local Authorities Act(s) 1995-2007
- Town and Country Planning (Control of Advertisement) Regulations 1990 (as amended)
- Greater London Council (General Powers) Act 1982
- Criminal Justice and Public Order Act 1994
- Anti-social Behaviour Act 2003 (as amended)
- Anti-Social Behaviour, Crime and Policing Act 2014

Notices of Opportunity to Pay a Fixed Penalty/Fixed Penalty Notices (referred to as FPNs) can be issued by local authority officers for certain offences where the legislation permits and where the officer is authorised to do so. These notices provide a quick, visible and effective way of dealing with low-level straightforward environmental crimes, and an alternative to prosecution.

The purpose of this guidance is to establish standardised fixed penalty procedures to be followed by those with powers to issue fixed penalties, with guidance on the circumstances in which a fixed penalty notice should be issued. This operational guidance is based on the policy for this area of work. The full policy is set out in the Council's Environmental Compliance policy document.

A fixed penalty is not a fine. Payment of the penalty by the recipient discharges their liability to conviction for the offence for which the FPN was issued. It does not constitute an admission of guilt, but removes the possibility of the creation of a record of criminal conviction.

2 Grounds for Issuing an FPN

An FPN may only be issued where an officer has reason to believe a person has committed a penalty offence.

An officer may issue a FPN where the offence is of a nature suitable for being dealt with by an FPN. The specific offences and the circumstances in which an FPN is appropriate are discussed later in this document.

Normally, offences resulting in an FPN will be witnessed directly by the officer. However, an officer may consider it appropriate to issue an FPN to a suspect if they have not directly witnessed the offence, but have direct evidence of an offence or reliable witness testimony.

Any interview and questioning must be consistent with the practice and procedures established by the Police and Criminal Evidence Act 1984, Code C.

3 The Offender

An FPN should be issued only where there is sufficient evidence as to the offender's identity and place of residence.

Where a suspect is not cooperative, consideration may be given to an alternative disposal (e.g. prosecution and/or police involvement). FPNs must be issued to *and* received by the suspect. If an alleged offender refuses to give a correct name and address, and identity can be established through other means, i.e. by the police, the offence should normally be pursued by prosecution, rather than the FPN procedure. From April 2006 it has been a specific offence for a person to whom an officer proposes to issue a litter or fly-posting FPN, to fail to provide the officer with their name and address or to give false details (see section Dealing with Obstructing Offenders).

An FPN **will not** be appropriate:

- Where a suspect appears to be unable to understand what is being offered to them (for example, where the suspect is deaf). Where such circumstances arise every effort should be made to solicit/impart the required information.
- Where the suspect's behaviour suggests they have learning disabilities or mental disorder. Under such circumstances the officer should question whether issuing an FPN and (as it will probably go unpaid) prosecution is in the public interest.
- Where no satisfactory address exists for enforcement purposes. This may be where the officer has reason to believe that the suspect is homeless or sleeping rough.
- Where an offender is threatening, abusive or violent to the officer. Where an alleged offender becomes aggressive or violent, the officer should ensure their own safety and seek help from the police. The offender would be dealt with by way of prosecution, either by the police or the Authority. (The officer should refer to the guidance on dealing with difficult situations).

An FPN **may not** be appropriate where it is known that the suspect has a previous conviction or a caution for the offence, or has been issued with a number of FPNs, particularly if they have not paid. The officer should inform the offender that he will be reported with a view to prosecution.

4 Issuing the FPN

The officer will approach the alleged offender, identify him/herself and tell the person in simple terms that they have been seen committing an offence. The person will then be spoken with to obtain their name, address and date of birth. These details will be verified as far as practicable and the FPN will then be issued. Documentary evidence of identity and place of residence will be requested but not demanded and will be preferable to non-physical checks such as the electoral register. Failure to identify a suspect prior to issue could invalidate enforcement. Police assistance will be sought where necessary. The officer must record the suspect's forename, surname, address, post-code and date of birth on the FPN. These are required for processing purposes.

When the FPN is issued, the officer should explain that it provides an opportunity to avoid liability to prosecution and will draw the person's attention to the relevant points about making payment and prosecution in the event of non-payment.

If the person either refuses to accept an FPN or, having accepted such a notice, does not pay before the end of suspended enforcement period (14 days), a further final reminder letter should be issued giving a further seven days' notice. In the event that payment has not been received within seven days, the matter may result in prosecution. To ensure the credibility of an FPN scheme, all cases involving non-payment will be referred to the Council's Legal Services with a view to prosecution.

4.1 Summary of Rules for Issuing FPNs

In summary, when issuing fixed penalties, officers should ensure that they:

- Have all the proof necessary for the offence
- Are presentable, and carry identification and authorisation
- Are alert, active and prepared
- Are fair, equitable, courteous and cooperative
- Are firm and self-confident but not over-officious
- Are consistent
- Are accurate, ensure writing is legible and that the notice is complete
- Are tactful whilst maintaining a respectful and pleasant attitude

5 Issuing FPNs to Young People

In law, a local authority FPN can be issued to anyone over the age of 10. Parents and guardians are not responsible in law for paying fixed penalties issued to young offenders (in this respect fixed penalty notices differ from the police issued Penalty Notices for Disorder (PNDs)). However, a court can order the parent/guardian to pay any fine it may impose.

Children's service authorities, including local authorities and police, are under a duty under the Children Act 2004 to discharge their functions having regard to the need to safeguard and uphold the welfare of children.

A person under 17 is to be treated as a juvenile for the purposes of the Police & Criminal Evidence Act Codes of Practice. In straightforward situations, such as a littering offence, an interview would not be necessary and an FPN may be issued on-the-spot. However, there are further considerations for 10 – 15 years olds as set out below.

16 - 18 year olds

Once the age of the offender has been ascertained, FPNs can be issued to this age group using the same procedure as for adults.

10 - 15 year olds

Officers are advised to consider the merits of issuing an FPN to a person aged below 16. An FPN may be appropriate considering the concomitant behaviour of the young person (e.g. drinking alcohol in public and throwing down the can/bottle).

In addition to the young person's details, the officer should obtain the name and address of the person's parent or legal guardian.

Where an FPN would have been issued on-the-spot but the person is under 16 and not a persistent offender, the officer may choose to notify the parent, legal guardian or school in writing, as soon as practicable. This will act as a formal warning. The offender should also be informed that this information may be shared with their local Youth Offending Team.

An FPN *will not* be appropriate where a young person's behaviour suggests they have learning disabilities, or they suffer from a vulnerability that impairs his or her understanding of what goes on. In such cases the matter should be referred to the Youth Offending Team and Social Services. Any action in respect of the alleged offence can be decided on later.

6 Dealing with Obstructing Offenders

Offences involving obstruction of officers are normally dealt with by way of prosecution. In terms of fixed penalty offences, officers should note the following guidance:

- 1) Offender refuses to give details or gives false details, but provides correct details after being warned, or before police arrive – it is considered appropriate to offer and issue an FPN.
- 2) Offender gives correct details only after being required to do so by police officer – report for summons for original offence and offence of failing to give/giving false details
- 3) Offender gives false/inaccurate details, FPN is issued at time, and is subsequently paid – no further action in respect of giving false details as offender has not pursued the objective of offence
- 4) Offender gives false/in accurate details, FPN is issued at time and not paid, and enquiries identify offender – report for summons for original offence and the offence of giving false details

7 Police and Criminal Evidence Act 1984 (Code C – Questioning)

7.1 Cautions

Cautions are used to gather evidence from a person(s) or businesses suspected of committing an offence. When a caution must be given:

- A person whom there are grounds to suspect of an offence must be cautioned before any questions about an offence, or further questions if the answers provide the grounds for suspicion, are put to them if either the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.
- A person need not be cautioned if questions are for other necessary purposes, e.g.:
 - a) solely to establish their identity or ownership of any vehicle;
 - b) to obtain information in accordance with any relevant statutory requirement.

Guidance Note 10G of PACE states that a caution need not be given when informing a person not under arrest that they may be prosecuted for an offence.

7.2 Interviews

An interview may be used when questioning a suspect(s) under PACE in a formal setting

An accurate record must be made of each interview, which must state the place of interview, the time it begins and ends, any interview breaks and the names of all those present.

8 Disputes

Once an FPN has been issued the recipient may decide to phone or write in pleading mitigation or contesting the fact that a FPN was issued. The case will be reviewed by a senior officer who will decide if the issue of the FPN was appropriate and if the matter should be pursued further.

The opportunity to challenge the allegation and plead not guilty to the alleged offence is open to the recipient of the FPN if the matter proceeds to prosecution at the Magistrates Court. The amount of the fixed penalty, etc. will not be relevant, but claims that a defence applies will.

In certain circumstances it will be appropriate to withdraw an FPN and not to pursue the matter any further. This may be when information that was not available at the time the FPN was issued becomes available and it is determined that the offence to which the notice relates was not committed, or that the notice should not have been issued to the person who is named in the notice. Harrow Legal Services will assess each case on its merits before deciding whether to instigate proceedings.

9 Amount of Fixed Penalty

The Clean Neighbourhoods & Environment Act 2005 and the Environmental Offences (Fixed Penalties) (Miscellaneous Provisions) Regulations 2006 enable a local authority to specify the amount of some fixed penalties. See Appendix A for amounts set by London Borough of Harrow.

Payment of a fixed penalty by instalments will not be accepted.

10 FPN Specific Guidance

Reference should be made to the offence-creating statutes as well as to this guidance. As with any area of enforcement, it is essential that officers are aware of their powers under the **current and relevant** statutes.

This section summarises the legislation as it was at time of writing.

10.1 Environmental Protection Act 1990, Section 87 – Littering

In cases of littering, the normal course of action will be to offer an FPN, providing the person is cooperative.

The offence under s.87 of the Environmental Protection Act 1990, as amended in 2005, applies to **all** places that are open to the air, including private open land, and land covered by water.

A person does not commit a littering offence if they leave litter on their own land or if they have the permission of the landowner to leave litter.

Litter is not defined, but **includes** cans, bottles, confectionary wrappers, food and drink containers, chewing gum, plastic bags, till receipts, leftover food, cigarette and cigar ends and flyers.

The authorised officer must be satisfied that the two elements of the offence have been committed, namely that a person has thrown down, dropped or otherwise deposited any litter, and left it. The offence is made out when a person intentionally discards something (e.g. puts an empty bottle on a wall, screws up a bus ticket then drops it, spits out gum, removes a sandwich from a bag and drops the bag, or throws a can into a side street) and walks away. The offence may also be made out by reason of the person's behaviour (i.e. ripping or screwing something up and throwing it down while in a queue of people and not making any attempt to retrieve it within a notable period of time), or because of where the item was thrown (i.e. into a river or fenced area or from a car or bridge).

The offence does not rely on any requirement to ask a person who has deposited litter, to pick it up. However, where it appears that someone has dropped something inadvertently, or the officer cannot reasonably conclude that the litter has been left, (s)he should consider asking the person to pick it up. If the person refuses, it would constitute leaving, and there would be grounds to issue an FPN.

Where litter is thrown/deposited from a vehicle and the offender is not dealt with at the time (i.e. because the vehicle is moving), the identity of the registered keeper will be obtained from the DVLA. A Section 71 (EPA 1990) Notice will be sent to the registered keeper. An FPN will then be issued by mail where the individual who left the litter can be identified, e.g. by CCTV image, visual recognition,

admission or statement by the keeper (remembering that a person's spouse may not be compelled to give evidence).

Aggravated littering such as smashing glass bottles may be more appropriately dealt with by summons.

The Waltham Forest prosecution of September 2013 indicated that this regulation is applicable for addressing "spitting", being classed as a form of littering.

10.2 Environmental Protection Act 1990, Section 46 & 47 (Duty of Care)

The offence under Sections 46 and 47 of the Environmental Protection Act 1990, as amended in 2005, applies to all places that are open to the air, including private open land and land covered by water. A person does not commit an offence if they leave controlled waste on their own land and it is contained or they have the permission of the landowner to leave contained, controlled waste. Where an offence has occurred the normal course of action will be to offer a FPN, provided the person is co-operative and is not a habitual offender.

The offence under Sections 46 and 47 of the Environmental Protection Act 1990, as amended in 2005, applies to all places that are open to the air, including private open land and land covered by water.

A person does not commit an offence if they leave controlled waste on their own land and it is contained or they have the permission of the landowner to leave contained, controlled waste.

The authorised officer must be satisfied that an offence has been committed, namely that a person has deposited the controlled waste or has placed for collection the controlled waste on or at a place or at a time other than the designated collection place and time..

If a person cooperates and chooses to return to the controlled waste and remove it following the intervention of an officer it is unlikely that an FPN will be issued. However in certain circumstances the officer may feel that it is appropriate to still issue the FPN. Such action will be recorded by the officer and noted in the event of a subsequent prosecution.

10.3 Environmental Protection Act 1990, Schedule 3A, paragraph 7 – Distributing Free Literature without Consent

A person who distributes free literature in a designated place without the consent of the Authority commits an offence, where the person knows that the land is so designated (paragraph 1).

An offence is also committed by a person (or company) if (s)he causes another person to distribute free literature in a designated area without consent (paragraph 2). The person commissioning the actual distribution therefore also commits an offence. In this case there is no requirement for the person concerned to know that the land is designated.

The controls on free literature do not apply where the distribution is for political, charitable or religious purposes.

'Distribute' includes the giving out of free literature, and offering it or making it available to the public. It includes giving flyers out by hand or by means of placing newspapers, leaflets etc. in a stand on designated land. Flyers placed on or affixed to vehicles are also included, but the offence does not extend to material put inside a building or letterbox.

If the conditions attached to a consent are not complied with, the consent may be revoked entirely, or in part. Breach of conditions is not a fixed penalty offence.

10.4 Section 5B (2) Control of Pollution (Amendment) Act 1989

This fixed penalty offence was created in 2006 and is slightly different to the “on-street” offences above. Reference should be made to the current functional guidelines published by the Environment Agency as these offences are enforced by both local authorities and the EA. The offence is failing to produce authority to transport controlled waste and the charge is £300 that is fixed nationally.

10.5 Section 34A (2) Environmental Protection Act 1990

This fixed penalty offence was created in 2006 and is slightly different to the “on-street” offences above. Reference should be made to the current functional guidelines published by the Environment Agency as these offences are enforced by both local authorities and the EA. The offence is failing to furnish documents (waste transfer notes) and the charge is £300 that is fixed nationally.

10.6 Control of Pollution (Amendment) Act 1989, Section 5B – Failing to Produce Authority

An FPN will be the normal disposal for a first-time offence of failing to produce an authority (certificate of registration) to transport controlled waste, provided the offence is not committed with another offence.

If a person fails to produce an authority because he is not registered as a carrier of controlled waste (and is neither exempt nor excluded from the need to be so registered), the Authority will, subject to below, consider prosecution of that person.

As per the policy of the Environment Agency, a caution will be offered where the officer is satisfied that:

- the offence was committed unintentionally;
- the person, after being advised that he was required to be registered as a carrier of controlled waste, makes an application to become registered (i.e., within ten working days) and whilst the application is pending the person desists from carrying waste.

An FPN or caution will not be considered where:

- the waste being carried is liquid, hazardous or clinical waste. Under such circumstances prosecution would be the appropriate option.

10.7 Environmental Protection Act 1990, Section 34A – Failing to Produce Transfer Notes

An FPN will be the normal disposal for a first-time offence of failing to produce documents (waste transfer notes) as required by a notice under the Environmental Protection (Duty of Care) Regulations 1991.

An FPN *will not* be appropriate in cases where the offence is symptomatic of repeated regulatory breaches or part of a series of offences. In cases where this offence is associated with another offence for which prosecution would normally be considered, both offences should, where appropriate, be charged together. For example where waste is found fly-tipped by unknown persons and on enquiry the producer is identified and subsequently fails to produce transfer notes.

An FPN or caution will not be issued where the waste produced is hazardous or clinical waste. Under such circumstances prosecution would be the appropriate option over a long time, large amounts of waste are involved from a medium to large enterprise.

10.8 Anti Social Behaviour, Crime and Policing Act 2014, Section 48

The Anti Social Behaviour, Crime and Policing Act, which came into force on 20th October 2014, replaced a number of existing legislative functions including those previously under the Environmental Protection Act 1990 for street littering.

The ASB legislation introduces Community Protection Notices (CPN) to make a person or business stop or start an activity, or take a specific action. Failure to comply with a CPN can lead to a fixed penalty notice being issued or prosecution taking place.

The legislation requires a warning notices to be issued prior to the Notice to present reasonable opportunity to comply. There is a right of appeal to the Magistrates' Court against a Community Protection Notice. If a person fails to comply it is an offence with a maximum fine on conviction of £2500. As an alternative to criminal prosecution we may offer the opportunity to pay a fixed penalty notice instead.

10.9 Anti Social Behaviour, Crime and Policing Act 2014, Section 63 and 67

The Anti Social Behaviour, Crime and Policing Act 2014 introduced the power to place an order on an area and place conditions upon it. This replaced previous legislation covering dog control orders, alcohol exclusion zones and dispersal zones.

The Public Space Protection Order (PSPO) must be relevant to the issues in the area, properly consulted upon and set clear, enforceable conditions that must be advertised.

Failure to comply with a PSPO requirement can lead to the issuing of a FPN and / or prosecution as necessary.

10.10 Refuse Disposal (Amenity) Act 1978, Section 2A – Abandoned Vehicles

Vehicles that have been abandoned on the roads, public or private land may cause a significant nuisance to the residents of that area. Both due to the parking spaces they may be taking up and also the unsightly nature of the abandoned vehicle.

The Refuse Disposal Amenity Act states that where it appears to a local authority that a vehicle has been abandoned without lawful authority on any land in the open air or on any other land forming part of a road or highway it shall be the duty of the local authority to remove the vehicle.

Where the local authority has been able to identify an individual as having abandoned a vehicle and therefore committed a criminal offence under the Refuse Disposal (Amenity) Act the local council can serve on him a fixed penalty notice requiring the payment of £200.

While the individual is subject to the fixed penalty notice no criminal proceedings can be brought against him for 14 days after he has become subject to the notice or if he pays the notice. If he does not pay the notice then criminal convictions can be brought.

Subject to the Refuse Disposal (Amenity) Act amended by the Clean Neighbourhoods and Environment Act the local authority is only under a duty to remove cars which have been abandoned on the road or highway. The Authority will charge a £60 administration cost for investigation of cars abandoned on private roads.

An FPN *will not* be appropriate in cases where the offence is symptomatic of repeated regulatory breaches or part of a series of offences. In cases where this offence is associated with another offence for which prosecution would normally be considered, both offences should, where appropriate, be charged together.

10.11 Anti-Social Behaviour Act 2003, Section 43 – Graffiti and Fly Posting

The Anti-Social Behaviour Act 2003 created the ability to issue penalty notices for graffiti or fly posting. The intention behind the legislation is that fixed penalty notices are to be used to deal with

less serious instances of graffiti and fly posting, and that where fines remain unpaid, prosecution for the offence is pursued.

Fixed penalty notices are not appropriate for racially or religiously targeted or motivated graffiti or fly-posting offences. The Act therefore specifically excludes such offences.

Penalty notices can be issued to children aged 10 or over, as well as to adults. See DEFRA guidance on FPN's for juveniles published in April 2006.

Offenders have 14 days in which to pay the penalty, after which time prosecution for the offence can be initiated. No proceedings may be brought where the penalty has been paid within the 14-day period.

The Cleaner Neighbourhoods and Environment Act 2005, Section 29 makes it an offence for a person to withhold their name and address to an authorised officer who seeks to issue an FPN upon them.

10.12 Cleaner Neighbourhoods and Environment Act 2005, Section 3 & 4 - Nuisance Vehicles

The Clean Neighbourhoods and Environment Act specifies the following two criminal offences in relation to nuisance parking:

- 1) Exposing vehicles for sale on a road
- 2) Repairing vehicles on a road

Exposing Vehicles for Sale

Some garages and businesses place cars for sale, for an extended period of time, on the street and also in lay-bys. This can cause a significant nuisance to local residents and can also take up valuable parking spaces required for local residents.

An individual will be guilty of this offence if he does one of the following actions:

- Leaving two or more motor vehicles parked within 500 metres of each other on a road or roads where they are exposed or advertised for sale, or
- Causing two or more motor vehicles to be so left

If an individual or a business has been convicted of one of these offences then they can be liable for a fine of up to £2,500. Alternatively an FPN of £100 can be given.

Repairing Vehicles on the Road

The commercial repairing of vehicles should be something that is carried out in a garage or a site which is removed from the road. If cars are left on the street for a prolonged period of time in a state of repair or in lay-bys this may cause a significant nuisance to the local residents of the area. Parking may significantly be limited due to the cars taking up parking spaces and possibly also due to the difficulty of moving them when in a state of repair. Section 4 of the Clean Neighbourhoods and Environment Act makes it an offence for anyone to carry out restricted works on a motor vehicle on a road.

Restricted works are defined by the act as the following:

- Repair
- Maintenance
- Servicing

- Improvement
- Dismantling
- Installation of parts
- Replacement of parts
- Renewal of parts

Section 4(3) of the Clean Neighbourhoods and Environment Act states a person will not be guilty of an offence if he can prove to the court he was not carrying out restricted works in the course of a business or for gain or reward.

If an individual or a business has been convicted of one of these offences then they can be liable for a fine of up to £2,500. Alternatively an FPN of £100 can be given.

11 Amendments to Enforcement Policy Additional Guidance

As may be necessary, for instance with the issuing of new guidance by Government, amendments will be made to this Guidance. Should such amendments not deviate away from the overall spirit, such amendments will be attached through an amendment document rather than the re-issuing of the Guidance as a whole.

Any matters of legal doubt will be assessed by the Council's Legal Section, prior to coming into place, where there is no clear-cut guidance, case law or precedent.

APPENDIX A: FIXED PENALTY NOTICES APPLICABLE UNDER THE CLEANER NEIGHBOURHOOD AND ENVIRONMENT ACT 2005 (CNEA 2005)

Description of Offence	Act	Section of Act	Allowable Penalty	Full amount of penalty, payable within 14 days	Proposed discounted amount if paid within 10 day	Local Level Setting and Discounting Allowed
Littering	Environmental Protection Act 1990, as amended by section 19 of the CNEA 2005	87/88	Locally set between £50 and £80	£75	£50	Yes
Unauthorised distribution of free printed matter on designated land	Environmental Protection Act 1990, as amended by section 23 of the CNEA 2005	Schedule 3A, para 7(2)	Locally set between £50 and £80	£75	£50	Yes
Graffiti and Flyposting	Anti-Social Behaviour Act 2003, as amended by section 28 of the CNEA 2005	43	Locally set between £50 and £80	£75	£50	Yes
Failure to comply with a waste receptacle notice	Environmental Protection Act 1990, as amended by section 48 of the CNEA 2005	46/47/47ZA/47ZB	Locally set between £75 and £100	£100	£60	Yes
Nuisance parking	CNEA 2005	s.6(1)	£100	£100	£60	No

Description of Offence	Act	Section of Act	Allowable Penalty	Full amount of penalty, payable within 14 days	Proposed discounted amount if paid within 10 day	Local Level Setting and Discounting Allowed
Abandoning a vehicle	Refuse Disposal (Amenity) Act 1978, as amended by section 10 of the CNEA 2005	Schedule 2A (1)	£200	£200	£120	No
Failure to furnish documentation (waste carrier's licence)	Environmental Protection Act 1990, as amended by section 45 of the CNEA 2005	s.34A(2)	£300	£300	£180	No
Failure to produce authority (waste transfer notes)	Control of Pollution (Amendment) Act 1989, as amended by section 38 of the CNEA 2005	s.5B (2)	£300	£300	£180	No

FIXED PENALTY NOTICES APPLICABLE UNDER THE ANTI SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014

Description of Offence	Act	Section of Act	Allowable Penalty	Fee (Paid within 14 days)	Fee (Paid within 10 days)	Local Level Setting and Discounting Allowed
Failure to comply with a Community Protection Notice	Anti Social Behaviour, Crime and Policing Act 2014	48	£100	£100	£60	Yes
Failure to comply with a Public Space Protection Order	Anti Social Behaviour, Crime and Policing Act 2014	63 and 67	£100	£100	£60	Yes

This page is intentionally left blank

Briefing Note – Anti Social Behaviour, Crime and Policing Act 2014

1. Background

In March 2014, Parliament passed the ASB, Crime and Policing Act 2014, with commencement of the provisions set for 20th October 2014. The purpose of the Act was to reduce the bureaucracy associated with tackling ASB, and put the focus firmly on giving the power back to communities to raise issues and expect action.

One of the major factors is to enable authorities to act at a much earlier stage, including early intervention before something becomes a problem.

2. The New Act

The Act has 14 parts, being:

- Part 1-6 deals with ASB
- Part 7-10 covers dangerous dogs, firearms, protection from sexual offences and prohibitions on forced marriages
- Part 11-14 Policing, Extradition and General

There are currently 19 ASB powers in place which are to be condensed down to 6 broader powers, which will allow the addressing of a much wider remit of ASB. These are:

- Civic Injunction
- Criminal Behaviour Order
- Dispersal Power (Police)
- Community Protection Notice
- Public Space Protection Order
- Closure Power

Additionally, the legislation sets out a new aspect of a “Community Trigger”, which underpins the community involvement in getting action against ASB matters. This gives victims the ability to demand action, starting with a review of their case, where the locally defined threshold is met

3. Community Trigger Threshold

This has been trialled by a number of Councils, led by Richmond. Harrow is adopting the threshold model from this, being:

“If you (as an individual) have complained to the Council, Police or a Registered Housing Provider (social landlord) about three separate incidents in the last six months and you consider there has been no action taken.”

Once they have asked for a Community Trigger, all the agencies involved to provide details of their complaints and actions that they have considered and taken. A meeting will take place between the appropriate agencies, or the Registered Housing Provider and other partners (if they are involved) to discuss the anti-social behaviour and what actions have been considered and taken. The group will review how the Partnership has responded and make recommendations on how the problem can be resolved.

A response will be sent to the person who instigated the trigger, explaining the action taken and also suggestions on how the Partnership can attempt to resolve the anti-social behaviour.

Harrow will seek to address the matters of Community Triggers through the Anti Social Behaviour Advisory Group (ASBAG) forum that is conducted between all partners on a monthly basis. A victim support representative will be invited, to take into account the victims views and ensure their physical and emotional needs are met. Additionally all other agencies as required will be invited.

This does not replace current complaint processes, or cover matters of crime including hate crime.

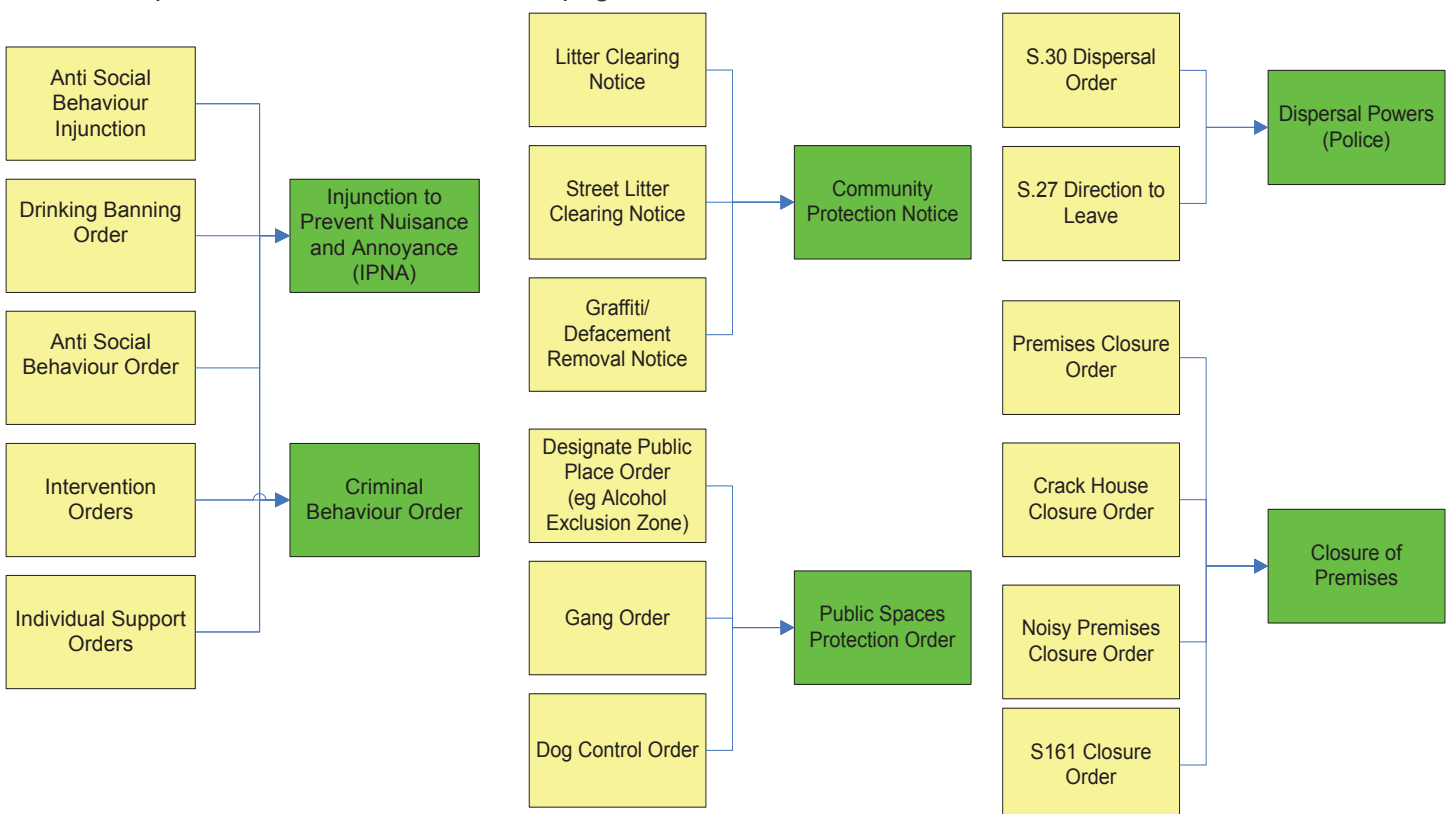
4. ASB Powers

Early and Informal Intervention:

- Verbal / Written Warnings – covers where ASB has or is likely to occur
- Community Resolution – informal agreement between perpetrators and victims to provide an out of court disposal
- Mediation – to seek resolution between all parties
- Acceptable Behaviour Contracts – written agreement between agencies and perpetrator, placing down conditions.
- Parenting Contracts – similar to ABCs but signed by parents / guardians
- Support and Counselling – positive intervention including against alcohol and drug use

Formal Powers

These are shown below, including the powers they replace. The actual processes involved in each process are shown on the next pages.



5. Community Remedy

The new Act introduces the Community Remedy, which is an alternative to court sanctions. This falls in line with information interventions, but with the victim consulted on the sanction to be offered to the offender. The sanctions can include monetary restitution, ABCs, mediation and community service. Failure to accept or conduct the remedy would result in court action.

6. Positive Measures

The new powers do not just concentrate on enforcement in terms of the “stick” approach, but also looks to address the underlying causes. When a prosecution takes place, and an injunction or order is produced, “positive measures” can be (and are actively encouraged to be) added. For instance, instead of banning a person from drinking in an area, the Court can add a condition that they must also attend a substance misuse awareness session.

There are third party organisations preparing to take on the provision of such interventions, these will need to be paid for by the prosecuting authorities, where other funding cannot be established.

7. Responsibilities

The Act puts most responsibilities on the Council, Social Landlords and the Police. With the use of the Community Trigger, responsibilities are monitored by other partners, with them able to intervene should the appropriate action not take place. For instance, if a Social Landlord does not address matters of reported ASB, the Council can seek to take action and recover costs. The format to do this is being investigated, including the potential use of Service Level Agreements.

8. Initial Work

The new Act requires a number of actions to be taken by the Council, and its partners. Harrow has agreed the community trigger, in line with London as a whole, with agreement from the Mayors Office of Policing and Crime (MOPAC). Additionally, the forum for addressing the trigger (ASBAG) has been agreed.

Work is taking place to highlight the new powers and requirements. All forums that are likely to be involved are being consulted upon, including the Youth Offending Team (YOT). Policies and procedures will be addressed to ensure they take on the new powers.

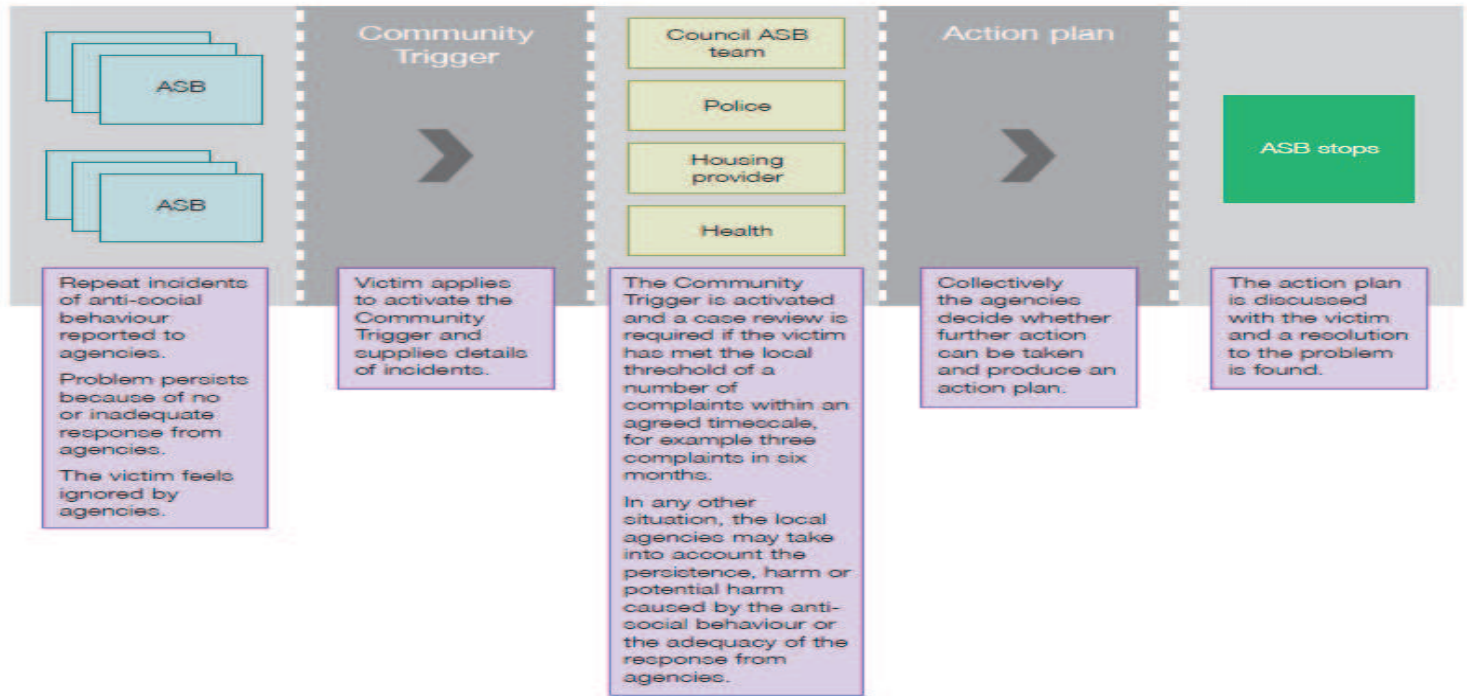
Areas such as current dispersal zones and alcohol exclusion zones will be replaced by Public Space Protection Orders, and work is taking place with legal and Police to ensure a smooth transition.

9. Conclusion

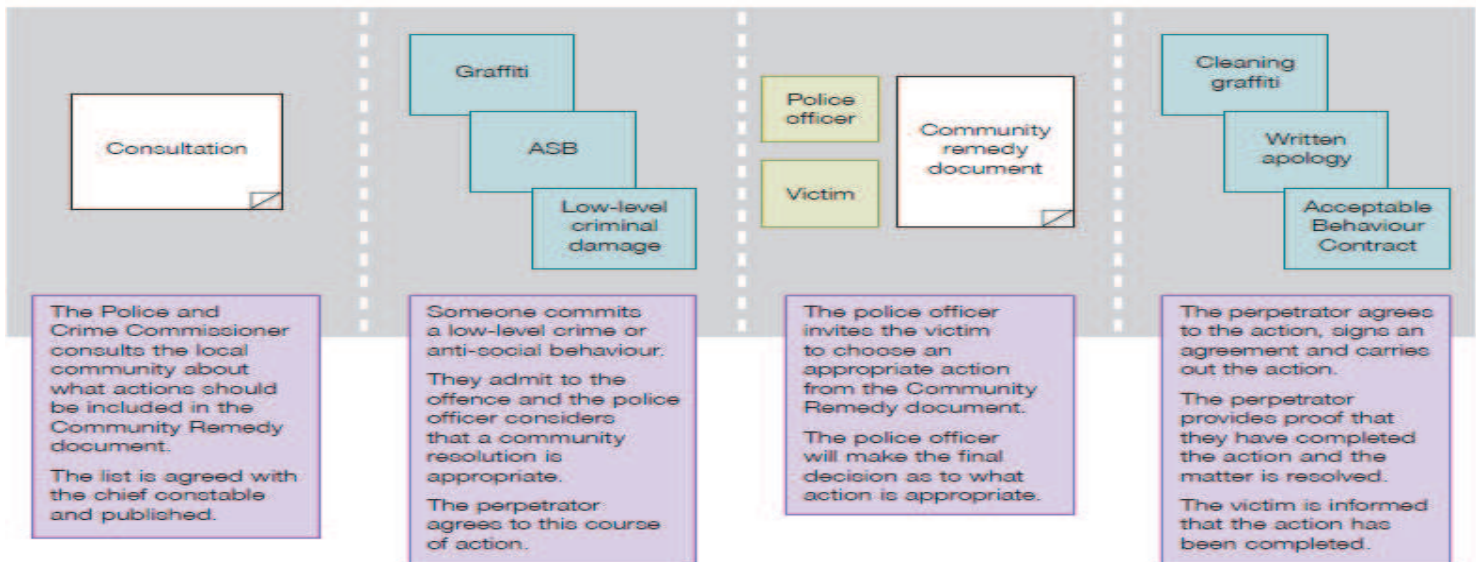
The new powers open up opportunities going forward to address ASB, including before it happens. It removes any restrictive element to the definition of ASB, and puts in place the framework that requires partners to work closely to resolve issues in the community not in isolation.

An overview, taken from the Statutory Guidance, is available covering the above areas. Additionally, a copy of the Statutory Guidance can be provided on request electronically.

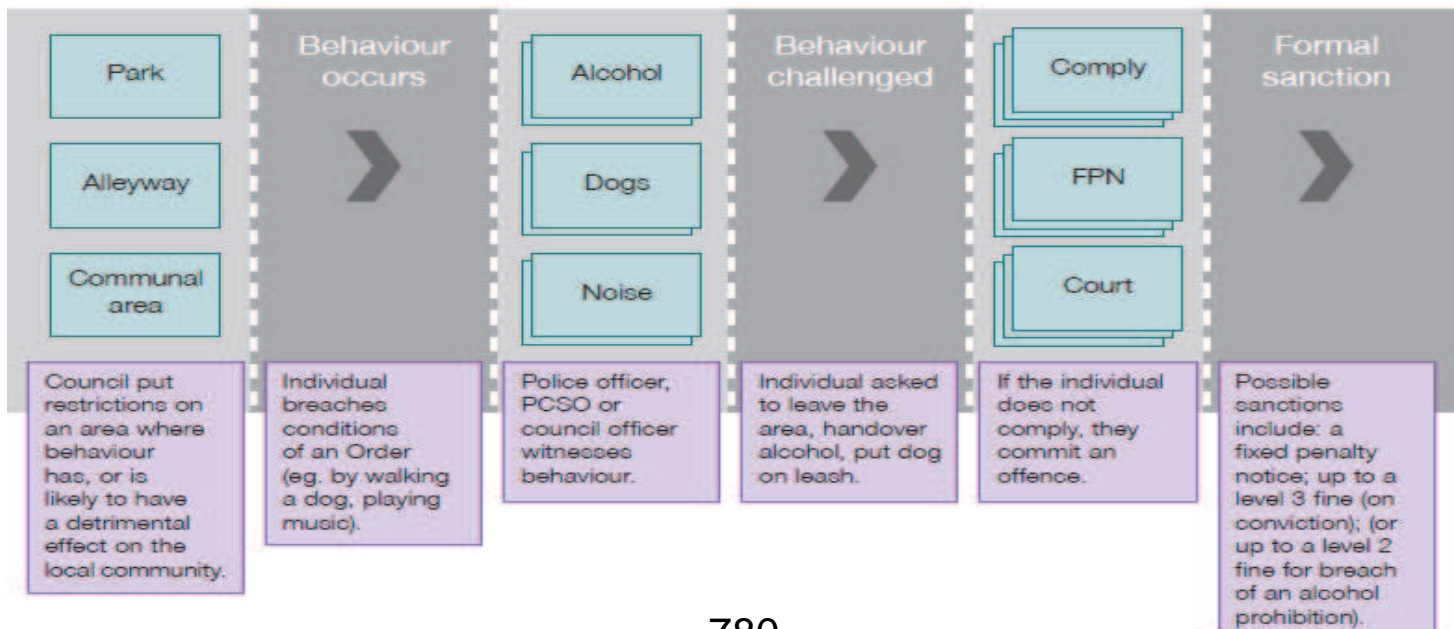
Community Trigger



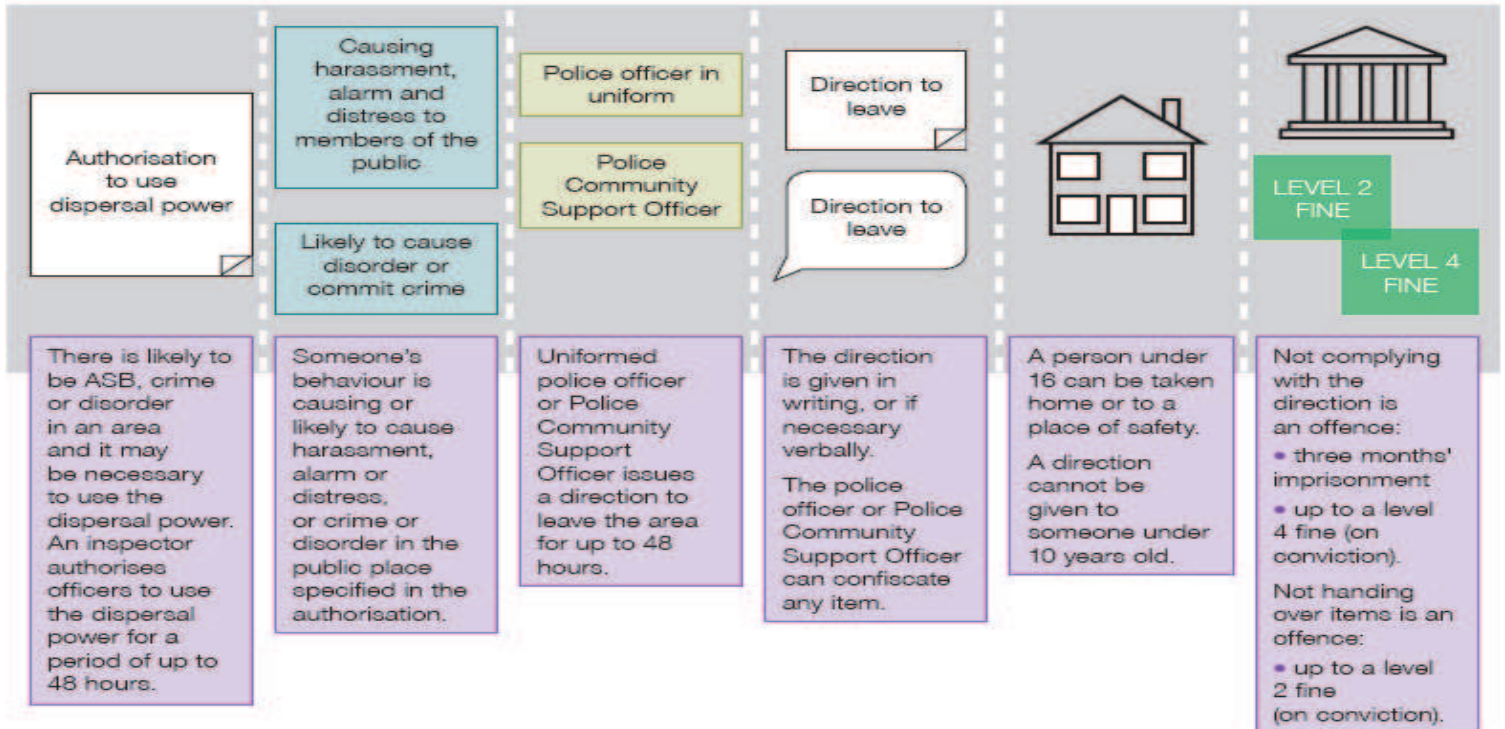
Community Remedy



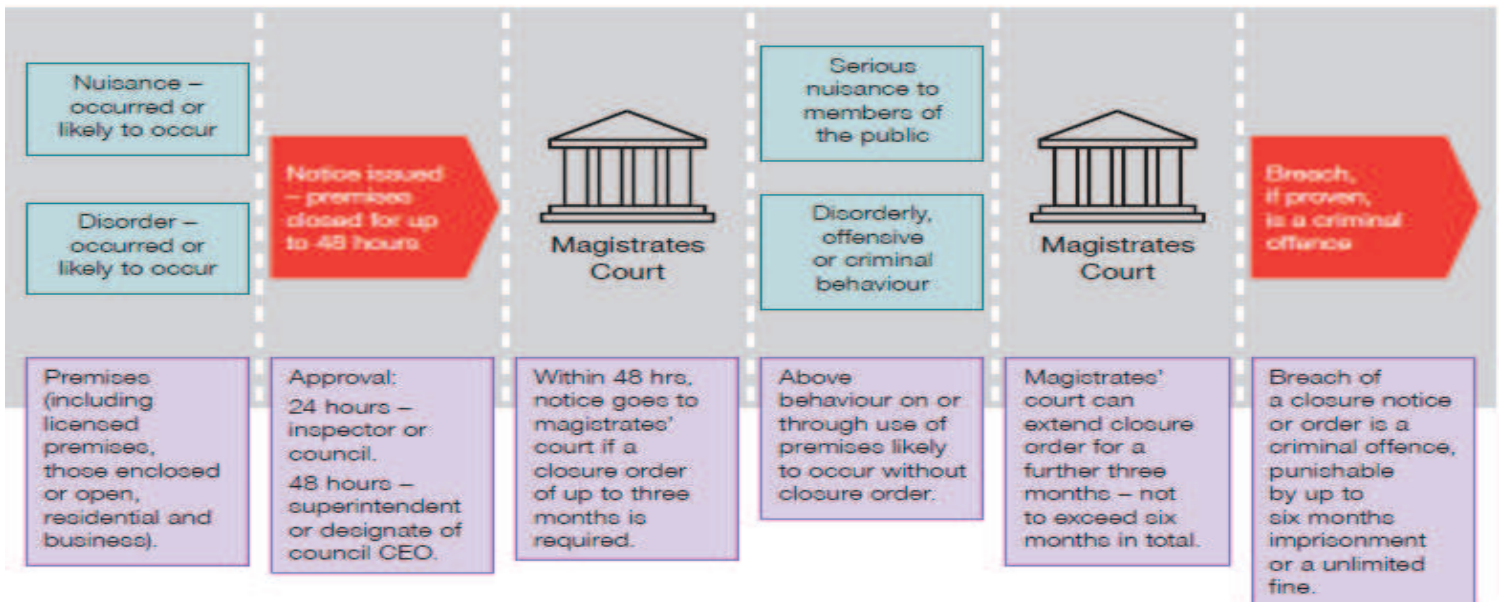
Public spaces protection order



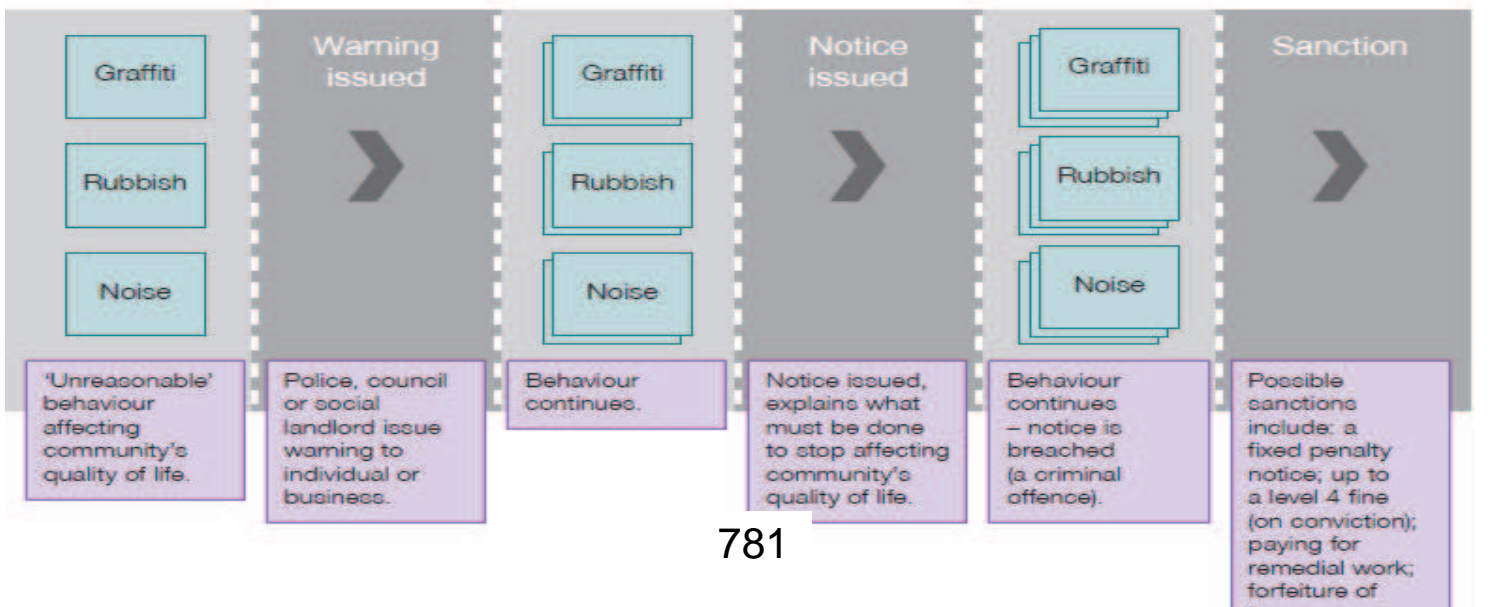
Dispersal power



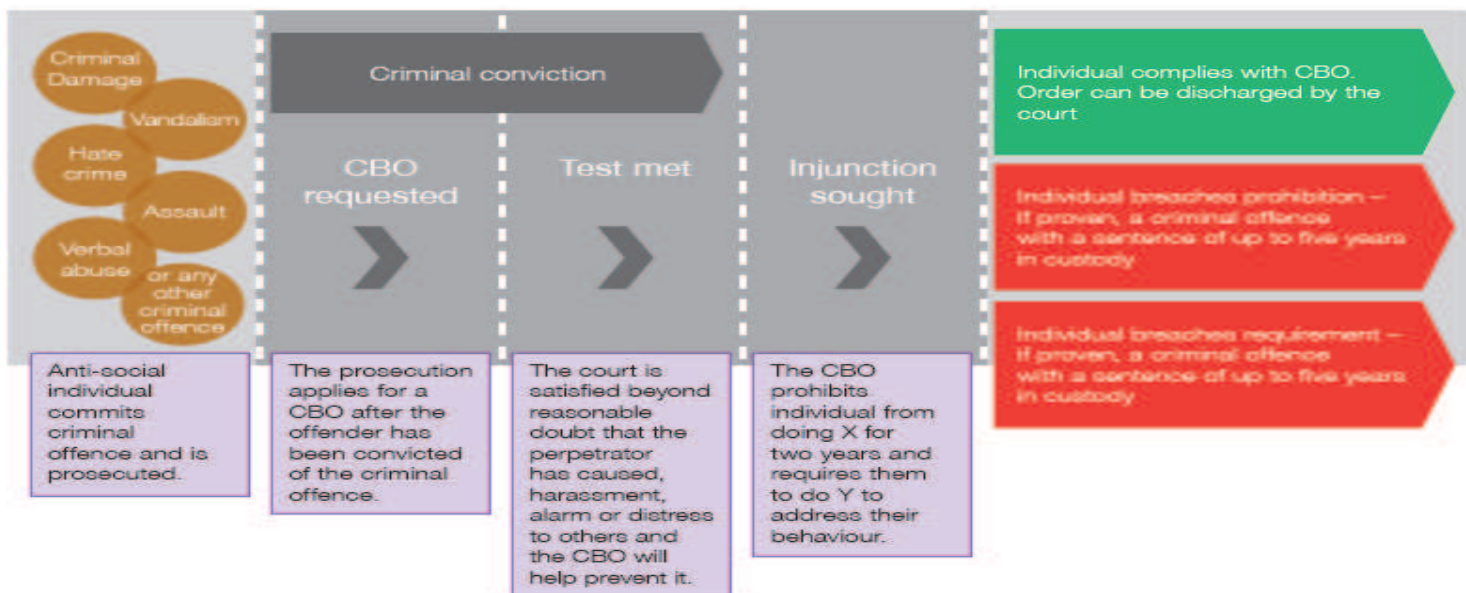
Closure powers



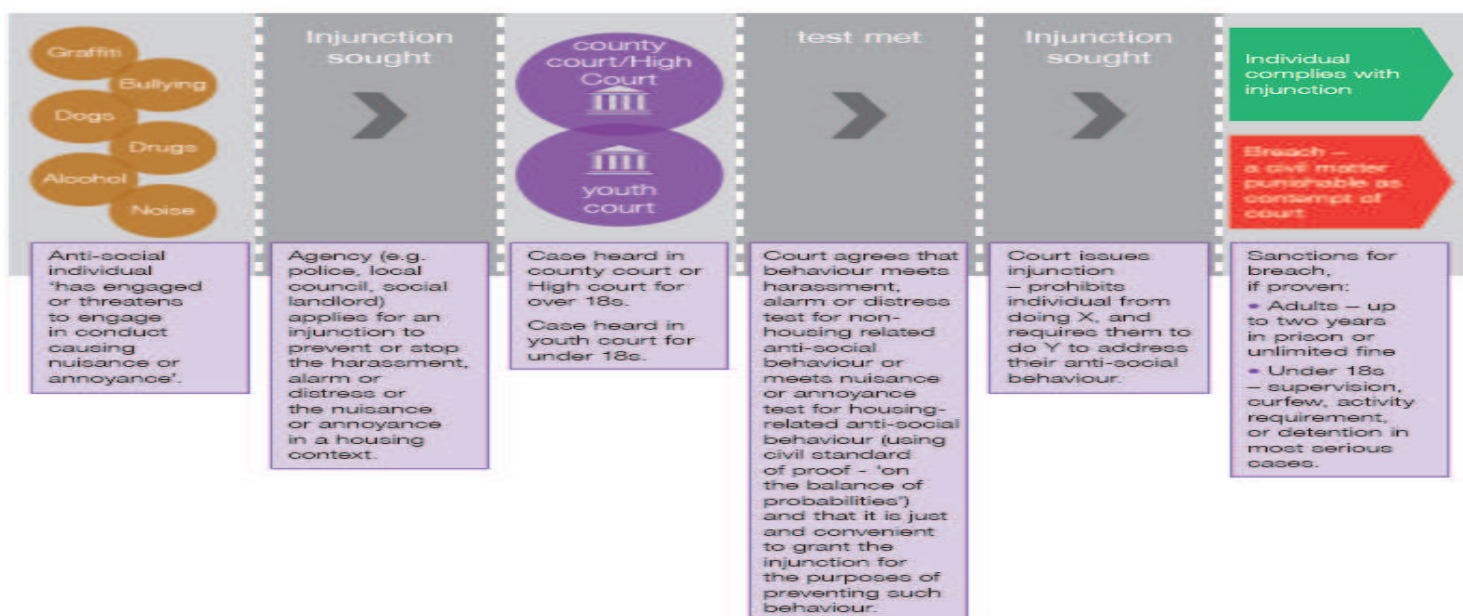
Community protection notice



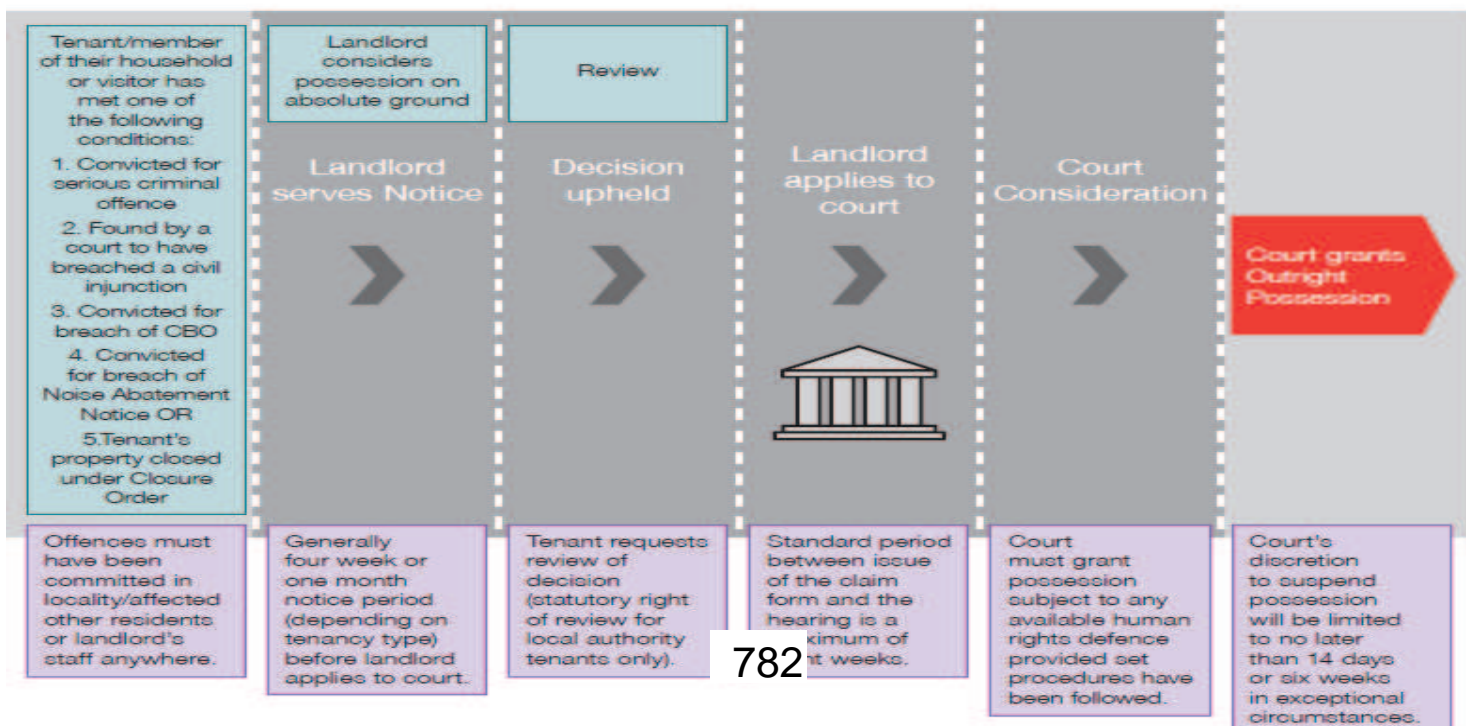
Criminal behaviour order



Civil injunction



New absolute ground for possession





Litter and Refuse

Guidance on Part 4 of the Environmental Protection Act 1990 as amended by the Clean Neighbourhoods and Environment Act 2005



8. Controlling the distribution of free literature

(Section 94B & schedule 3A)

8.1 The distribution of free literature can blight public spaces if leaflets and other printed materials are subsequently dropped as litter. Section 94B of and Schedule 3A to, the Environmental Protection Act 1990, as inserted by the Clean Neighbourhoods and Environment Act 2005, give principal litter authorities powers to control such distributions. The regime allows local authorities to designate, by order, areas of their own land or highways, in which the distribution of free literature is permitted only with their consent, and anyone distributing free literature in such an area without consent commits an offence, punishable by a fine of up to level 4 (currently £2,500) on the standard scale or a fixed penalty notice. It is also an offence to commission or pay for the distribution of free printed matter in a designated area without the necessary consent. Land can only be designated if the principal litter authority is satisfied that the discarding of free literature is causing its defacement.

8.2 Distributors and organisers who commission them will need to be aware that they may need to obtain consent from more than one principal litter authority if the proposed distribution will take place in a number of areas or cut across authority boundaries. Principal litter authorities should make it clear to applicants that they can only give consent for land which they have designated, and should advise applicants to check other authority designation orders and seek consent where necessary. It is recommended that any individual guidance prepared by principal litter authorities on Schedule 3A explains this, and includes name and contact details of the relevant departments of neighbouring authorities.

8.3 As with other provisions in Part 4 of the Environmental Protection Act 1990, principal litter authorities are encouraged to work with retailers and businesses to minimise the problems associated with the distribution of free literature before imposing restrictions.

For example, some advertising companies have codes of conduct to minimise the amount of free literature that is discarded and ends up accumulating as litter in the local environment. Principal litter authorities may wish to endorse these codes and encourage others to adopt them or establish a voluntary scheme with advertisers before seeking to designate an area. Detailed guidance on the use of the legislation, including the granting of consent and imposition of conditions is given below.

Offence of unauthorised distribution

8.4 Paragraph 1 of Schedule 3A creates the offence of unauthorised distribution of free printed matter.

8.5 Sub-paragraph (1) states that for the offence to be committed:

- The land on which the matter is distributed must be designated under paragraph 2;
- The person distributing the matter must know that the land is designated.

8.6 To ensure that the second condition is met, principal litter authorities will need to ensure that they adequately publicise details of land in their area which has been designated. This should be undertaken by means of on-site signage wherever it is practicable to do so. Principal litter authorities should also consider publicising by other means, for example, websites, leaflets, local publications and direct contact with businesses and distributors in the area.

8.7 Sub-paragraph (2) states that an offence is committed if someone causes another person to distribute free printed matter in a designated area without consent. The person commissioning the actual distributor therefore also commits an offence. In this case there is no requirement for the person concerned to know that the land is designated; those organising the distribution of free printed matter are expected to inform themselves of the existence of designated areas. However, under sub-paragraph (3) someone organising such a distribution is not guilty if he can show that he took 'reasonable steps to ensure that the

distribution did not occur on any land designated under this Schedule'. To benefit from this defence, an organiser would need to be able to demonstrate that he had taken steps, through, for example, written instructions, to ensure that the distributors of the printed matter were aware of the location of any designated land and that they should not distribute the matter on that land.

8.8 Sub-paragraph (4) creates a specific exemption from the provisions of the Schedule where the distribution is for political, charitable or religious purposes, so as not to inhibit the right to freedom of expression and freedom of thought, conscience and religion enshrined in the European Convention of Human Rights and the Human Rights Act 1998.

There is no definition of these terms in the legislation, and interpretation of them is a matter for the courts, and European case law has seen these terms interpreted widely. In all other cases, the legislation allows for justifiable controls. However, the decisions of local authorities to designate land and to give or refuse consent must still be compatible with

Article 10 of the European Convention of Human Rights.

8.9 Sub-paragraph (6) defines the term 'distribute' as covering the giving out of free printed matter, and offering it or making it available to the public. It therefore catches material that is given out by hand or by means of placing newspapers, leaflets etc. in a stand on designated land. Matter placed on or affixed to vehicles is included within the definition, but the offence does not extend to material put inside a building or letterbox. By virtue of sub-paragraph (7) the provisions do not extend to the distribution of printed matter inside a public service vehicle such as a bus, as defined in Part 1 of the Public Passenger Vehicles Act 1981. However, the provisions will still apply to material distributed to the public *from* a vehicle on to designated land, whether it is stationary or in motion.

Free newspapers

8.10 Free newspapers are captured by the provisions to the same extent as any other type of free printed matter such as leaflets, pamphlets and stickers. Whether or not their distribution is exempt under sub-paragraph (4) will depend on their content. Free newspapers posted through letter-boxes, placed inside buildings, or distributed inside a public service vehicle will not fall under the controls in accordance with sub-paragraphs (6) and (7). Promotional supplements and fliers contained within newspapers should not be regarded as 'free' if they are part of a paid-for package.

Designation

8.11 Paragraph 2 authorises a principal litter authority (other than a county council in an area where there is a district council) to designate an area in which the distribution of free printed matter is to be controlled and sets out the procedures that are to be followed.

8.12 Under sub-paragraph (2) land that is designated must be either relevant land of the authority or all or part of any relevant highway for which the authority is responsible, or both. For definitions of 'relevant land' and 'relevant highway' see s 86 of the 1990 Act (in guidance on section 89 above). Restrictions cannot therefore be imposed in relation to private land or premises.

8.13 Under sub-paragraph (3) a principal litter authority can only designate land if it is satisfied that it is being defaced by the discarding of free printed matter which has been distributed there. As in section 92(1), whether or not land is 'defaced' is a matter of fact, but the impact of the defacement will depend on a number of factors, such as the condition of the site and impact on the surrounding area. It is therefore unlikely that a designation order for a whole local authority or city will be appropriate as designations will relate to a point source or sources from which the materials are being distributed and the area around it that is affected by litter.

Authorities are advised to gather evidence of the defacement, for example, by taking photos or carrying out litter surveys, in support of any proposal to designate.

8.14 Sub-paragraphs (4) to (7) set out the procedures for designation. These are summarised below:

Step 1: Notification of proposal to make an order

8.15 The authority must issue a notice setting out its proposal. This must be:

- published in at least one newspaper circulating in the locality; and
- posted directly on the land.

Principal litter authorities are also advised to publish the notice on the internet via their individual websites.

8.16 The notice must contain:

- details of the land that the principal litter authority proposes to designate. It may be useful for the notice to include a map showing the boundary of the area;

- the date that the proposal will come into force. This must be at least 28 days from the date the notice is issued;
- how and for how long objections to the proposal may be made. At least 14 days from the date of the notice must be allowed for objections.

Step 2: Consideration of any objections

8.17 Principal litter authorities are required to take account of all objections they receive. Proper consideration should be given to each objection, and if it is decided to reject it, the reasons should be recorded; this could be crucial if the decision to go ahead with a proposal and to reject objections to it is challenged legally. It is good practice to write to all objectors whose objections have been rejected explaining the reasons for the authority's decision.



Step 3: Notification of an order

8.18 If a principal litter authority decides to go ahead with an order, it must issue a notice announcing its decision. This must be:

- published in at least one newspaper circulating in the locality; and
- posted directly on the land.

Authorities are also advised to publish the notice on the internet via their individual websites.

8.19 The notice must give the date that the order will come into force. This must be at least 14 days from the date the notice is issued.

8.20 Sub-paragraph 2(8) allows a principal litter authority to revoke an order at any time. By sub-paragraph 2(9), notice of the revocation must be:

- published in at least one newspaper circulating in the locality; and
- posted directly on the land.

Authorities are also advised to publish the notice on the internet via their individual websites.

Consent and conditions

8.21 Paragraph 3 sets out the rules for issuing consents to distribute free printed matter in an area subject to a designation order.

8.22 Under sub-paragraph (1) anyone wishing to distribute free literature in a designated area must apply to the principal litter authority for consent to do so. Consent may be given by the authority to the person applying or to any other person. The consent may be for named individuals or by description. An example of the latter would be to all the employees of a particular company. Where the applicant wishes to use a variety of distributors, such as independent contractors, self-employed distributors and their agents or employees, the authority should ensure the applicant is aware of their responsibilities for ensuring the consent is complied with, in granting authorisation. Authorities should agree a reasonable timescale for responding to applications, and applicants should be advised of this.

8.23 **Sub-paragraph (2)** allows the principal litter authority to place limitations on the consent:

- by reference to the material that may be distributed;
- by reference to a particular period, or particular times or dates;
- by reference to any part of the designated land;
- to a particular distribution.

Alternatively, a blanket consent may be given to the persons specified, allowing the distribution of any material in any part of the area at any time.

8.24 **Sub-paragraph (3)** states that the principal litter authority 'need not' give consent to the applicant if it considers that the proposed distribution would likely lead to defacement of the designated land. There is no requirement for the local authority to grant consent to an applicant, but at the same time the authority must be able to justify its refusal based on the likelihood of the distribution causing defacement of the local environment. Under sub-paragraph (4) the principal litter authority may also

refuse consent if the applicant has been convicted of an offence, or, has paid a fixed penalty notice for the distribution of free literature without consent in a designated area, within the five years preceding the date of the application.

8.25 **Sub-paragraph (5)** enables the principal litter authority to place conditions on the consent if it considers that these are necessary or desirable for protecting the designated land from defacement or for the effective operation and enforcement of the Schedule. The ability to impose conditions on the consent may be a mitigating factor where the authority would otherwise refuse to grant consent. For example, if the authority is concerned that a particular distribution is likely to cause defacement of the designated area it may place a requirement on the distributor to clear up any such material which is discarded there.

8.26 Sub-paragraph (6) enables a principal litter authority to require a person distributing printed matter in a designated area to provide written evidence of the consent, on demand, to an authorised officer. It is therefore implicit in the legislation that any consent granted under the Schedule should be given in writing.

8.27 Under sub-paragraph (7) a consent may be revoked entirely, or in part, at any time, if the person to whom the consent was granted fails to comply with the conditions imposed on him or is convicted of an offence under paragraph 1 or pays a fixed penalty under paragraph 7. Similarly, under sub-paragraph (8) any condition imposed in relation to the consent may be varied or revoked at any time by notice to that person.

8.28 As sub-paragraph (7) only refers to the person to whom the consent was given, if principal litter authorities are granting authorisation to others under the consent the conduct of those persons may be dealt with as a condition. The person receiving the consent would then be subject to this, any breach of which would render the consent revocable.

Fees

8.29 Paragraph 4 authorises principal litter authorities to charge a fee for issuing a consent. The amount of this fee is for the authority to determine but it must not be more than is reasonable to cover the costs of operating and enforcing the Schedule 3A provisions in its area. For example, this may include: the initial survey of the area, administration of consents, notification procedures, and the monitoring and enforcement of restrictions. They may not include potential clean-up costs.

Appeals

8.30 The process for appeals by any person aggrieved by decisions in relation to a consent is outlined in Paragraph 5. Appeals may be made to the magistrates' court against a decision to refuse a consent, to impose any limitation or condition on a consent, or to revoke a consent.

Seizure of material

8.31 Paragraph 6 deals with the seizure of printed matter being distributed in a designated area.

If a person is found to be distributing free literature in a designated area without consent, an authorised officer of the principal litter authority may seize all or any of the material. This may be reclaimed by the person purporting to be its owner on application to the magistrates' court. The court must order the return of the printed matter to the owner if it is not required for legal proceedings brought by the authority under this Schedule. If the material is not reclaimed, and the authority does not know the name and address of the person from whom it was received, it may be disposed of or destroyed at the conclusion of proceedings for an offence, at the end of the time period in which proceedings may be brought, or, on discontinuation of any proceedings that have been initiated. In all other cases, the material must be returned.

Fixed penalty notices

8.32 Fixed penalty notices may be issued as an alternative to prosecution for the offence of distributing free literature without consent under **paragraph 7**.

Local authorities may set the level of the fixed penalty, or, if they choose not to do so, a standard default amount of £75 applies. **Paragraph 8** applies the wider definition of 'authorised officer' to the Schedule, so that local authorities may make arrangements with other persons to issue fixed penalties in addition to their own employees.

8.33 More detailed information on the application and use of fixed penalties is provided in the separate guidance available on fixed penalty notices.

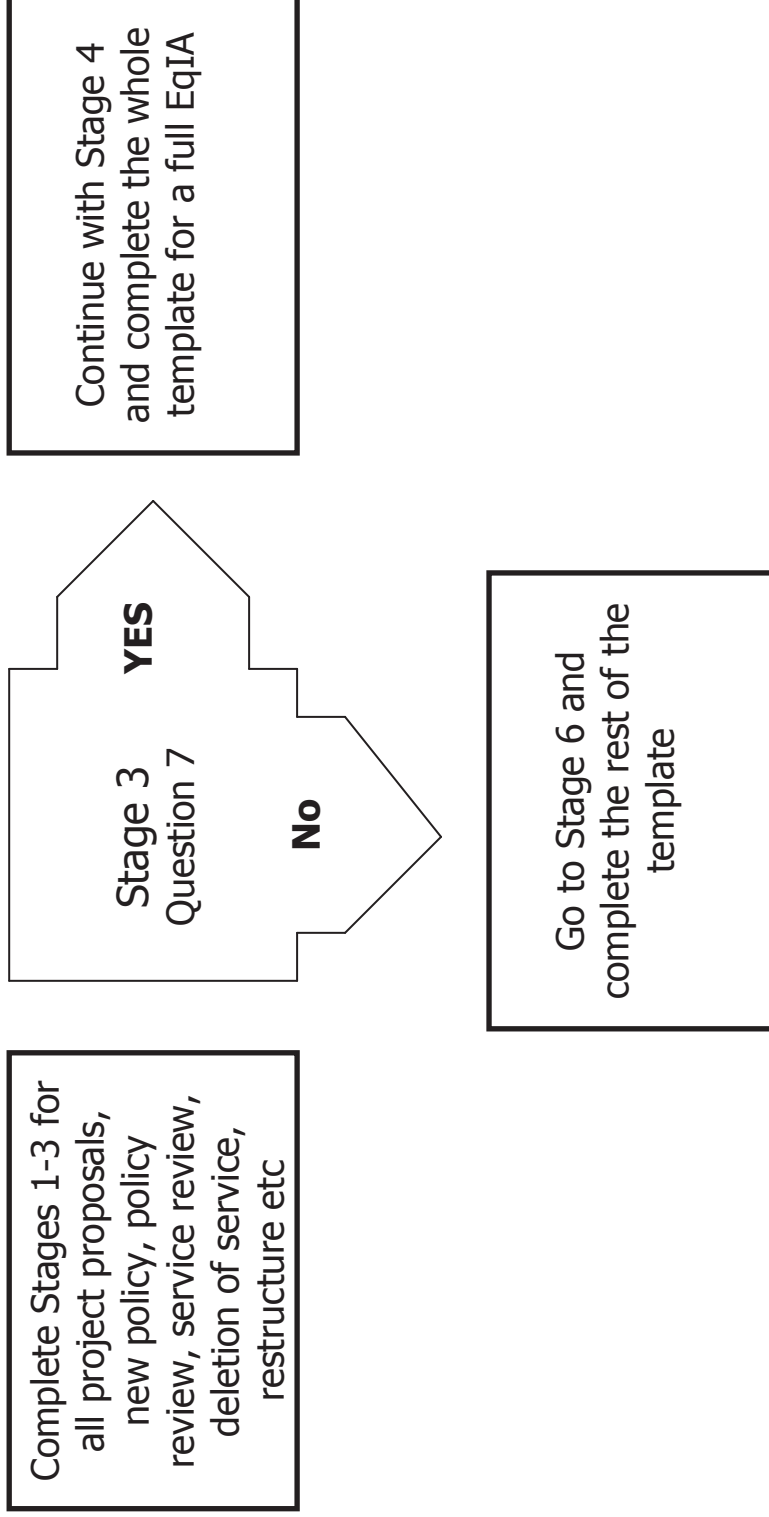
Repeals

8.34 Section 4 of the London Local Authorities Act 1994 and sections 21 and 22 of the City of Newcastle-upon-Tyne Act 2000 are repealed by the Clean Neighbourhoods and Environment Act 2005. These local Acts previously allowed for the control of free literature distribution in London and Newcastle but are no longer necessary now that similar powers have been introduced on a national basis.



Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan	✓	Corporate Strategic Board	
Other		Other	
Title of Project:	Introduction of Fixed Penalty Notices for Low Level Environmental Non-Compliances		
Directorate / Service responsible:	E&E / PUBLIC PROTECTION		
Name and job title of lead officer:	Richard Le-Brun. Environmental Services Manager (Public Protection)		
Name & contact details of the other persons involved in the assessment:			
Date of assessment:	Initial Assessment - 6 th August 2014, Reviewed 21 st January 2015.		

Stage 1: Overview

1. What are you trying to do? (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)	Introduce a set of Fixed Penalty Notices that cover matters of low level environmental crime, which allow flexibility of enforcement approach and prevents the need to consider prosecution as the sole means to address the matters covered.					
2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Residents / Users	✓	Partners	✓	Stakeholders	✓
	Staff	N/A	Age	✓	Disability	✓
	Gender Reassignment	N/A	Marriage and Civil Partnership	N/A	Pregnancy and Maternity	N/A
	Race	✓	Religion or Belief	N/A	Sex	N/A

	Sexual Orientation	N/A	Other
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	No		
<p>Stage 2: Evidence / Data Collation</p>			
<p>4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.</p> <p>(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)</p>			
Age (including carers of young/older people)	Historical evidence shows that matters of graffiti and littering tend to be carried out by younger persons. In reality, all ages could carry out the offences, and will have to be reviewed after a suitable period to understand if there are any trends.		
Disability (including carers of disabled people)	No data available to demonstrate a specific issue related to FPNs and disability		
Gender Reassignment	No data available to demonstrate a specific issue related to FPNs and gender reassignment		
Marriage / Civil Partnership	No data available to demonstrate a specific issue related to FPNs and marriage / civil partnership		
Pregnancy and Maternity	No data available to demonstrate a specific issue related to FPNs and pregnancy and maternity		
Race	Historical evidence of enforcement in Harrow shows that language that can be a barrier to enforcement and compliance. Harrow has a high proportion of ethnic minorities, and these could be impacted. Again, this is to be reviewed after a suitable period to understand if there are any trends.		
Religion and Belief	No data available to demonstrate a specific issue related to FPNs and religion / belief		

Sex / Gender	No data to demonstrate a specific issue related to FPNs and sex / gender		
Sexual Orientation	No data to demonstrate a specific issue related to FPNs and sexual orientation		
Socio Economic	No data available to demonstrate a specific issue related to FPNs and socio economic impact		
5. What consultation have you undertaken on your proposals?			
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
Borough Wide Consultation	On line survey Communication with Community Champions	The main area raised was that the levels of fine were too low, but these are statutorily set so cannot be impacted by the feedback. Additionally, in a lot of areas those who commented stated the need for prosecution not FPNs, but a graduated approach is required of the local authority. No protected characteristic was raised in terms of being affected.	It is proposed that after 6 months of implementation, a further review will be conducted to see if any characteristic has been highlighted as being more affected, and any changes are needed. The policy and procedures seeking approval at Cabinet in February will also ensure a fair and consistent approach to enforcement that will address further concerns over equality and diversity.
796			
6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?			
List the Title of reports / documents and websites here.		DEFRA Guide to Fixed Penalty Notices Various Council reports into the introduction of FPNs	

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	✓					✓			
No		✓	✓	✓	✓		✓	✓	✓

YES - If there is a risk of disproportionate adverse Impact on any ONE of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

797

0 - If you have ticked 'No' to all of the above, then go to Stage 6

- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

(include this evidence, including any data, statistics, titles of documents and website links here)

General investigation and benchmarking against local authorities who have introduced such schemes. Unfortunately, each council is unique and can only give a general overview of potential issues.

9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups /	What actions have you taken to address the findings of the

				Protected Characteristics?	consultation? (This may include further consultation with the affected groups, revising your proposals).
Borough Wide	Website consultation, which was also sent to neighbourhood champions.	Not available as ends start of September	N/A		

Stage 5: Assessing Impact and Analysis

10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

798	Protected characteristic	Adverse ✓	Positive ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
	Age (including carers of young/older people)			Findings of other Councils that have introduced FPNs have indicated that young mothers particularly in fine weather meet up to browse shops and market areas with their young children in prams/buggy's, littering particularly cigarette ends are being thrown upon the floor resulting in the offenders being issued with a FPN. Fixed Penalty Notices are not aimed at any one particular age group, but based solely on the offence being committed. The impact will not be able to be assessed until the introduction, but the Service will be carrying out a 3 month period of education on introducing FPNs to	The Service will be carrying out a minimum 3 month period of education on introducing FPNs to ensure the message gets to all sectors of the community, working with community engagement to ensure this. Additional work will take place with the Police School Officers to help get the message into schools. The scheme will be well advertised on the Council website as well as within Council facilities. Work will also take place with the Harrow Town Centre Team. This includes promotional activities, including a "don't feed the pigeons" awareness campaign in the town centre on the 29 th August 2014.

			ensure the message gets to all sectors of the community, working with community engagement to ensure this.	The Operational Policy clearly covers issues of age, especially in terms of enforcement against 10-18 year olds
Disability (including carers of disabled people)			There is a need for the Officer to evaluate each situation taking into account not only physical impairment but mental health and learning difficulties also. The expertise of the officers who will have had full training on dealing with people with disabilities determines the course of action and the advice given.	<p>The Service would look to record disability on the FPN ticket.</p> <p>The service takes into account any disability before issuing an FPN, e.g. if a blind person was to drop litter they recognise that they would not be able to see a bin due to their impairment and no formal action would be taken, however advice would be given to the individual.</p>
Gender Reassignment			No impact is assessed	As with sexual orientation, such an aspect is not known by the service and is not a barrier or target for enforcement work to be carried out. There is no data available to indicate this aspect. Sufficient data does not exist to monitor any patterns and gender reassignment does not have any impact upon offences committed
Marriage and Civil Partnership			No impact is assessed	Marriage and civil partnership is not a barrier or target for enforcement work to be carried out. Sufficient data does not exist to monitor any patterns and these factors do not have any impact upon offences committed
Pregnancy and Maternity			No impact is assessed	Pregnancy or maternity is not a barrier or target for enforcement work to be carried out. Sufficient data does not exist to monitor any patterns and these factors do not have any impact upon offences committed
Race			<p>Due to the multi cultural community of Harrow, it is envisaged that language could be a potential issue in communicating the requirements and the issuing of the FPN.</p> <p>The impact will not be able to be assessed until the introduction, but the Service will be carrying out a 3</p>	<p>The Fixed Penalty Notice (ticket issued by the Officers) will only be available in English. It would not be cost effective for patrolers to carry the ticket in different languages in case they needed to issue to a non English speaking member of the community.</p> <p>It is envisaged that Officers will occasionally meet</p>

			month period of education on introducing FPNs to ensure the message gets to all sectors of the community, working with community engagement to ensure this.	language barriers due to the multi cultural community of Harrow. Officers would seek an English speaking family member or friend to translate to the offender. Ethnicity is in itself not a barrier to issuing of FPNs it is a language issue.
			It should be noted that spitting may be prevalent in some cultures.	This will be addressed as part of the education programme.
Religion or Belief			No impact is assessed	Religious belief is not a barrier or target for enforcement work to be carried out and does not impact upon offences committed.
Sex			No impact is assessed	The issuing of FPN's is not gender specific but offender specific
Sexual orientation			No impact is assessed	A person's sexuality is not known by the service and is not a barrier or target for enforcement work to be carried out. There is no data available to indicate a person's sexuality. Sufficient data does not exist to monitor any patterns and sexuality does not have any impact upon offences committed
11. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?			Yes	No
If yes, which Protected Characteristics could be affected and what is the potential impact?				
11a. Any Other Impact – Considering what else is happening within the			Yes	No

800

<p>Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?</p>	<p>At a time of financial cut backs in the Council, the introduction of FPNs addresses community concerns over increased littering and environmental impacts that may increase with a decrease in Council street services.</p>								
<p>If yes, what is the potential impact and how likely is to happen?</p>	<p>12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation</p>								
<p>Yes</p>	<p>Age (including carers)</p>	<p>Disability (including carers)</p>	<p>Gender Reassignment</p>	<p>Marriage and Civil Partnership</p>	<p>Pregnancy and Maternity</p>	<p>Race</p>	<p>Religion and Belief</p>	<p>Sex</p>	<p>Sexual Orientation</p>
<p>No</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>
<p>If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)</p>									
<p>the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.</p>									
<ul style="list-style-type: none"> ▪ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4) ▪ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4) 									
<p>Stage 6: Decision</p>									
<p>13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)</p>									
<p>Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.</p>									
<p>Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i></p>									
<p>Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below)</p>									

Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals.	

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.					
Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
All	Educational campaign to be carried out using a 3 rd Party Company, in line with the requirements as set out in the Cabinet Report	Contracted 3 rd Party recruitment and activities	September to December 2014	Richard Le-Brun	Integral to cabinet report going to Cabinet in September
802	A review of the use of FPNs after a reasonable period of time to assess what other action can be taken if any impact is seen against any one particular characteristic	Review of FPNs issued, where issued and any subsequent issues	September 2015	Richard Le-Brun	Will form part of future plans

Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.	
15. How will you monitor the impact of the proposals once they have	Officers issuing FPNs will be collecting basic information on those being

been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	issued to, include date of birth, disability and ethnicity
16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Annual review as part of any service plan, policy and / or procedure review
17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	Consultation taking place until end of August 2014.
Stage 9: Public Sector Equality Duty	
18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups. (Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be compliant etc)	
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups
Clear enforcement policy and operational policy related to Fixed Penalty Notices	Foster good relations between people from different groups
Clear enforcement policy and operational policy related to Fixed Penalty Notices	Clear enforcement policy and operational policy related to Fixed Penalty Notices
Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)	
The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.	
19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	
Signed: (Lead officer completing EqIA)	Signed: (Chair of DETG)
Date:	Date:
21 January 2015	21 January 2015

Date EqIA presented at the EqIA
Quality Assurance Group

Signature of ETG Chair

[Redacted Signature]