

Call-In Sub-Committee Agenda

Date: Monday 14 June 2021

Time: 4.00 pm

Venue: Virtual Meeting - Online

Membership (Quorum 3)

Chair: Councillor Angella Murphy-Strachan

Labour Councillors: Jeff Anderson
Chloe Smith

Conservative Councillors: Stephen Greek
Norman Stevenson

Labour Reserve Members:

1. Dan Anderson
2. James Lee
3. Pamela Fitzpatrick

Conservative Reserve Members:

1. Jean Lammiman
2. Lynda Seymour

Contact: Alison Atherton, Senior Professional, Democratic Services
Tel: 07825 726493 E-mail: alison.atherton@harrow.gov.uk

Scan this code for the electronic agenda:



Useful Information

Meeting details

This meeting is open to the press and public and can be viewed on www.harrow.gov.uk/virtualmeeting

Filming / recording of meetings

Please note that proceedings at this meeting may be recorded or filmed. If you choose to attend, you will be deemed to have consented to being recorded and/or filmed.

The recording will be made available on the Council website following the meeting.

Agenda publication date: Wednesday 9 June 2021

Agenda - Part I

1. Attendance by Reserve Members

To note the attendance at this meeting of any duly appointed Reserve Members.

Reserve Members may attend meetings:-

- (i) to take the place of an ordinary Member for whom they are a reserve;
- (ii) where the ordinary Member will be absent for the whole of the meeting; and
- (iii) the meeting notes at the start of the meeting at the item 'Reserves' that the Reserve Member is or will be attending as a reserve;
- (iv) if a Reserve Member whose intention to attend has been noted arrives after the commencement of the meeting, then that Reserve Member can only act as a Member from the start of the next item of business on the agenda after his/her arrival.

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 Sub-Committee;
- (b) all other Members present.

3. Minutes (Pages 5 - 12)

That the minutes of the meeting held on 17 June 2019 be taken as read and signed as a correct record.

4. Appointment of Vice-Chair

To consider the appointment of a Vice-Chair to the Call-in Scrutiny Sub-Committee for the Municipal Year 2021/22.

5. Protocol for the Operation of the Call-In Sub-Committee (Pages 13 - 14)

6. Call-In of the Cabinet Decision (27 May 2021) - Harrow Town Centre Public Spaces Protection Order (PSPO) (Pages 15 - 104)

- (a) Notice invoking the Call-in;
- (b) Minutes of the Cabinet meeting held on 27 May 2021;
- (c) Report submitted to the Cabinet on 27 May 2021.

7. Call-in of the Cabinet Decision (27 May 2021) - The Council's Accommodation Strategy and the Harrow New Civic Centre (Pages 105 - 240)

- (a) Notice invoking the Call-in;
- (b) Minutes of the Cabinet Meeting held on 27 May 2021 (see pages 19-28);
- (c) Report submitted to Cabinet on 27 May 2021.

8. EXCLUSION OF THE PRESS AND PUBLIC

To resolve that the press and public be excluded from the meeting for the following item of business, on the grounds that it involves the likely disclosure of confidential information in breach of an obligation of confidence, or of exempt information as defined in Part I of Schedule 12A to the Local Government Act 1972:

<u>Agenda Item No</u>	<u>Title</u>	<u>Description of Exempt Information</u>
9.	The Council's Accommodation Strategy and New Harrow Civic Centre – Appendices to the report	Appendices 2, 5, 7 and 8 are not for publication by virtue of paragraphs 3 and 5 of Part 1 of Schedule 12 A of the Local Government Act 1972 as they contain information relating to the financial or business affairs of the Council and other parties as well as information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

Agenda - Part II

9. **Call-in of the Cabinet Decision - (27 May 2021) - The Council's Accommodation Strategy and the Harrow New Civic Centre** (Pages 241 - 306)
Confidential appendices to the Cabinet report.

Reason for lateness and urgency

In accordance with the Local Government (Access to Information) Act 1985, this meeting is being called with less than 5 clear working days' notice by virtue of the special circumstances and grounds for urgency stated below:-

Under Committee Procedure Rule 46.6, a meeting of the Call-in Sub-Committee must be held within 7 clear working days of the receipt of a request for Call-in. This meeting therefore had to be arranged at very short notice and it was not possible for the agenda to be published 5 clear working days prior to the meeting.

CALL-IN SUB-COMMITTEE MINUTES

17 JUNE 2019

Chair: * Councillor Angella Murphy-Strachan

Councillors: * Richard Almond * James Lee (2)
* Jean Lammiman (1) * Natasha Proctor

In attendance: Keith Ferry Minute 6
(Councillors) Paul Osborn Minute 6

* Denotes Member present
(1) and (2) Denote category of Reserve Members

1. Attendance by Reserve Members

RESOLVED: To note the attendance at this meeting of the following appointed reserve members:

Ordinary Member

Councillor Chloe Smith
Councillor Norman Stevenson

Reserve Member

Councillor James Lee
Councillor Jean Lammiman

2. Declarations of Interest

There were no declarations of interest.

3. Minutes

RESOLVED: That the minutes of the meeting held on 5 February 2018 be taken as read and signed as a correct record.

4. Appointment of Vice-Chair

It was moved by Councillor Lee and seconded by Councillor Proctor that Councillor Smith be elected Vice-Chair for the Municipal Year 2019/20. On being put to the vote the motion was declared carried.

5. Protocol for the Operation of the Call-In Sub-Committee

The Chair drew attention to the document 'Protocol for the Operation of the Call-In Sub-Committee'. She outlined the procedure to be followed at the meeting, and the options open to the Sub-Committee at the conclusion of the process.

In accordance with Committee Procedure Rule 46.5, a notice seeking to invoke the call-in procedure must state at least one of the following grounds in support of the request for a call-in of the decision:

- a) inadequate consultation with stakeholders prior to the decision;
- b) the absence of adequate evidence on which to base a decision;
- c) the decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework;
- d) the action is not proportionate to the desired outcome;
- e) a potential human rights challenge;
- f) insufficient consideration of legal and financial advice.

She informed the Sub-Committee that the grounds a), b), c) and f) had been cited on the Call In notice, and this had been deemed to be valid for the purposes of Call-in.

Referring to paragraph 8 of the Protocol, the Legal Adviser stated that the Sub-Committee, having considered the grounds for the call-in and the information provided at the meeting, may come to **one** of the following conclusions:-

- (i) that the challenge to the decision should be taken no further and the decision be implemented;
- (ii) that the decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework and should therefore be referred to the Council. In such a case the Call-in Sub-Committee must set out the nature of its concerns for Council; or
- (iii) that the matter should be referred back to the decision taker (i.e the Portfolio Holder or Executive, whichever took the decision) for reconsideration. In such a case the Call-in Sub-Committee must set out the nature of its concerns / reasons for referral for the decision taker/Executive.

RESOLVED: That the Call-In would be determined on the basis of the following grounds:

- a) inadequate consultation with stakeholders prior to the decision;
- b) the absence of adequate evidence on which to base a decision;
- c) the decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework; and
- d) insufficient consideration of legal and financial advice.

6. Call-in of the Cabinet Decision - (30 May 2019) - Harrow Strategic Development Partnership

The Sub-Committee received the papers in respect of the call-in notice submitted by 11 Members of the Council in relation to a decision made by the Cabinet on 30 May 2019, setting out a process to procure a Strategic Development Partner to assist with the delivery of a number of the Council's core strategic development sites within the Regeneration Programme.

The Chair advised the Sub-Committee on the suggested order of proceedings and reminded members of the timings allowed for submissions and questions. The Chair then invited the representative of the signatories to present his reasons for the call-in.

The representative began by explaining that he was not calling in the decision to develop a Partnership; the call-in was more concerned with the shortcomings in the processes that had been followed to reach this decision as set out in the Call-in notice. The representative went on refer to the specific reasons for the call-in and made a number of points with regard to each of the grounds as follows:

Inadequate consultation with stakeholders prior to the decision

Given that that the proposals were a significant departure from previous plans there was a reasonable expectation that further consultation would take place with residents or stakeholders. The report however only refers to consultation carried out 5 years ago. It was also disappointing that the Opposition had been denied an opportunity to discuss suggestions and concerns so that a cross party consensus to what would be a long term commitment could be secured.

The absence of adequate evidence on which to base a decision

The report includes three sites but specifically excludes the Greenhill Way site. No explanation is provided for this exclusion and no financial assessment is given about the site.

The decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework

The decision sets the Council on a path that may result in expenditure outside the current budget framework set by Full Council in February 2019. Any changes to this framework would require the approval of Full Council.

Insufficient consideration of legal and financial advice.

The report does not address the financial implications of the three schemes. Nor does it provide financial evidence to support the preferred site for the New Civic Centre.

The representative concluded his presentation by saying that he was disappointed that he had found it necessary to call-in the decision but felt that it was important for the Cabinet to get things right from the beginning given the implications for ratepayers for the next 20/30 years.

Responding to each of the grounds for the call-in the Portfolio Holder for Planning, Regeneration and Employment made the following points:

Inadequate consultation with stakeholders prior to the decision

Further consultation was not appropriate or necessary at this stage as the decision being sought was to agree a framework and commence a procurement exercise. Further consultation would be carried out once the exercise had been completed and the delivery mechanism set up.

The absence of adequate evidence on which to base a decision

There was no need for the report to include a financial assessment of sites, including the Greenhill Way site as, to emphasise the point made above, the decision being sought was to commence a procurement process and not to consult on sites at this stage.

The decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework

As the report in paragraph 9 - Financial Implications – made clear the cost of the procurement exercise would be contained within the budget agreed by Full Council to fund the revenue elements of the Regeneration Programme. The decision was not therefore contrary to the budget framework.

Insufficient consideration of legal and financial advice.

The business cases for the three schemes and financial evidence to support the preferred site for the New Civic Centre were not relevant in the context of seeking a decision to commence a procurement exercise.

Responding to questions from members of the Sub-Committee the Portfolio Holder made number of points including the following:

- Consultation had not taken place with stakeholders for the reason given earlier but further consultation would take place once the delivery vehicle had been set up;

- The outcome of the procurement exercise would be included in a report due to be submitted to Cabinet in April 2020 and this report would also seek a decision on the appointment of a Strategic Development Partner;
- The advantages of developing a Strategic Development Partnership over other delivery mechanisms were set out in paragraph 2.9 of the report and it would be premature to select a partner until the procurement exercise had been completed and a report submitted to Cabinet;
- Once a partner had been selected and as Section 9 of the report indicated the future costs would be assessed and if any adjustments to the revenue budget or capital programme were required then recommendations would be made to Full Council via Cabinet as required under the Budget Framework;
- As in most ventures there would be risks but these would be identified as part of the due diligence process and the intention was for the Council and selected partner to share them;
- The three sites referred to in the report had been selected following a financial assessment of 58 sites;
- The financial assessments had not been included in the report as they were not relevant to the proposal to start a procurement exercise;
- The Greenhill Way site had been excluded at this stage for the reason stated in paragraph 2.5 of the report but could be included at a later stage;
- The selection of the Peel Road site for the new civic centre would contribute to the wider regeneration of Wealdstone and the decision of the police to build there vindicated this selection;
- As the recommendations in Section 1 and paragraph 2.3 made clear the report was seeking the Cabinet's agreement to procure a Strategic Development Partner and nothing more; and
- A number of key decisions directly relating to the procurement exercise had already been taken as set out in paragraph 3.3 of the report.

On being asked to sum up the representative of the signatories reiterated a number of points:

- That the consultation was inadequate;
- No evidence had been provided to justify the selection of the Peel Road site for the new civic centre over the Greenhill Way site;

- The business cases for the three sites including the Greenhill Way site, should have been included in the report;
- To attract attention to the procurement process as much information as possible needed to be in the brief including the business cases for all four sites obviating the need for bidders to rebid in the event of a decision subsequently being taken to add a site; and
- The budgetary implications had not been assessed let alone included in the Budgetary Framework contrary to the Constitution.

The representative concluded by stressing the importance of getting the process right from the beginning. He estimated that the proposal would add £16m a year to the Council's debt which would double if things went wrong. The shortcomings in the decision taken by the Cabinet to initiate the procurement process were clear to see and he urged the Sub-Committee to uphold the grounds for the Call-in and refer the issue back to Cabinet for reconsideration.

The Portfolio Holder concluded by saying that there were no grounds for upholding the call-in. The report was about the procurement exercise, setting up a Strategic Development Partnership and selecting a partner. It was not about specific sites. No consultation was therefore necessary. The costs could be met from the current budget agreed by Full Council so no decision had been taken contrary to the Budget Framework. The decision had also been made having regard to the legal and finance advice given in the report. He therefore urged the Sub-Committee to take no further action thus allowing the decision to be implemented without further delay.

The Sub-Committee adjourned from 7.55 pm to 9.15 pm for deliberations.

Councillor Jean Lammiman asked for her objection to the Chair leaving the room to be recorded.

RESOLVED: That the decision of Cabinet be referred back in on ground 2) the absence of adequate information on which to base a decision be upheld as there was a reasonable expectation that the financial assessments carried out in 2014 would be updated and the inclusion of these updated assessments would not only have added transparency to the decision making process, it would also have helped to explain why the Greenhill Way site had been excluded.

The following grounds for call-in all not be upheld.

Inadequate consultation with stakeholders prior to the decision.

- 3) The decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework with the budget framework.
- 4) Insufficient consideration of legal and finance advice.

Reasons: Further consultation not necessary at this stage. The costs are being met from the existing budgetary provision. Legal and financial advice had been provided and considered.

(Note: The meeting, having commenced at 6.30 pm, closed at 9.20 pm).

(Signed) COUNCILLOR ANGELLA MURPHY-STRACHAN
Chair

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Protocol for the operation of the Call-In Sub-Committee

1. Call-in is the process whereby a decision of the Executive, Portfolio Holder or Officer (where the latter is taking a Key Decision) taken but not implemented, may be examined by the Overview and Scrutiny Committee prior to implementation. The Overview and Scrutiny Committee has established the Call-in Sub-Committee to carry out this role. Committee Procedure Rule 46 sets out the rules governing the call-in process.

The process for Call-in

2. Six of the Members of the Council can call in a decision of the Executive which has been taken but not implemented. In relation to Executive decisions on education matters only, the number of Members required to call in a decision which has been made but not implemented shall be six Councillors or, in the alternative, six persons comprising representatives of the voting co-opted members and at least one political group on Overview and Scrutiny Committee. Only decisions relating to Executive functions, whether delegated or not, may be called in.

150 members of the public (defined as anyone registered on the electoral roll of the Borough) can call in a decision of the Executive, which has been taken but not implemented.

3. Decisions of the Executive will not be implemented for 5 clear working days following the publication of the decision and a decision can only be called in within this period (this does not apply to urgent decisions - Committee Procedure Rule 46 refers). The notice of the decision will state the date on which the decisions may be implemented if not called in.
4. Call-in must be by notification to the Monitoring Officer in writing or by fax:
 - (i) signed by all six Members and voting co-optees requesting the call-in. A request for call-in by e-mail will require a separate e-mail from each of the six Members concerned.
 - (ii) signed by all 150 members of the public registered on the electoral roll, and stating their names and addresses.
5. In accordance with Committee Procedure Rule 45.5, a notice seeking to invoke the call-in procedure must state at least one of the following grounds in support of the request for a call-in of the decision:-
 - (a) inadequate consultation with stakeholders prior to the decision;
 - (b) the absence of adequate evidence on which to base a decision;
 - (c) the decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework;
 - (d) the action is not proportionate to the desired outcome;
 - (e) a potential human rights challenge;
 - (f) insufficient consideration of legal and financial advice.

Referral to the Call-in Sub-Committee

6. Once a notice invoking the call-in procedure has been received, the decision may not be implemented until the Chair and nominated member have considered the guidance outlined in Appendix 1 to the Committee Procedure Rules and, if required, the Call-in Sub-Committee has considered the decision. The Monitoring Officer shall in consultation with the Chair arrange a meeting of the Call-in Sub-Committee to be held within seven clear working days of the receipt of the request for call-in.
7. The Call-in Sub-Committee will consider the decision and the reasons for call-in. The Sub-Committee may invite the Executive decision-taker and a representative of those calling in the decision to provide information at the meeting.
8. The Sub-Committee may come to one of the following conclusions:-
 - (i) that the challenge to the decision should be taken no further and the decision be implemented;
 - (ii) that the decision is contrary to the policy framework or contrary to or not wholly in accordance with the budget framework, and should therefore be referred to the Council. In such a case the Call-in sub-committee must set out the nature of its concerns for Council; or
 - (iii) that the matter should be referred back to the decision taker (i.e the Portfolio Holder or Executive, whichever took the decision) for reconsideration. In such a case the Call-in sub-committee must set out the nature of its concerns for the decision taker/Executive.

CALL-IN NOTICE

Electoral Services

To be completed by Members of the Public, as per the provisions of Committee Procedure Rule 46.5.

To: The Director of Legal and Governance Services

1. Notice of Call-In of Executive Decision

In accordance with Committee Procedure Rule 46.5, we, the 150 signatories to this call-in notice (see numbered continuation sheets overleaf), being members of the public registered on the electoral roll of the London Borough of Harrow, hereby give notice that we wish to call-in the Executive decision detailed in section 2 below.

2. Details of Executive Decision

The details of the Executive decision are as follows:-

Decision: HARROW TOWN CENTRE PUBLIC SPACES PROTECTION ORDER

Made by: PEYMANA ASSAD
(Cabinet/relevant Portfolio Holder)

Published on: 28 MAY 2021
(Date)

3. Grounds for Call-In

(Please specify below the grounds for the call-in, in accordance with Committee Procedure Rule 46.5. Please note that, in the event that this call-in is referred to the Call-in Sub-Committee, the considerations of the Sub-Committee will focus on the grounds stated, and the Sub-Committee will seek evidence to support them. Please therefore also set out below details of the evidence to support the grounds for call-in, continuing on a separate sheet if necessary).

REFER TO ENCLOSED SHEET.

Call In Notice for the “The Public Spaces Protection Order (Harrow Town Centre) 2021”

Cabinet / Portfolio Holder – PEYMANA ASSAD

Publication Date – 28 May 2021

We, the undersigned, believe that this Order does not strike the proper balance between the rights of businesses and residents and the basic right of civil protest and campaigning.

While we understand the desire to reduce waste and litter, we note that other boroughs such as Bromley have an explicit exemption for political, charitable or religious leaflets:

https://www.bromley.gov.uk/info/200063/licences/997/distributing_free_literature_on_the_street

Additionally, the ban on amplification amounts to unfair restriction against those street musicians who use non-acoustic instruments.

We call upon Harrow Council to re-evaluate the Order in order to better protect fundamental human rights.

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Once completed, please forward this form to Manize Talukdar or Alison Atherton, Legal & Governance Services, Harrow Council, First Floor (West Wing), Civic Centre, HA1 2UH or send it by fax to 020 8424 1557 WITHIN 5 CLEAR WORKING DAYS OF THE DATE OF PUBLICATION OF THE DECISION.

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Cabinet

Minutes

27 May 2021

Record of decisions taken at the meeting held on Thursday 27 May 2021.

Present:

Chair: Councillor Graham Henson

Councillors: Phillip O'Dell Natasha Proctor
Varsha Parmar

In attendance (Councillors): Paul Osborn For Minute 460-477

Apologies received: Councillor Adam Swersky

460. Welcome

Having declared the first Cabinet meeting following the lifting of some of the Covid-19 restrictions and the end of the Regulations on virtual meetings as open, the Leader of the Council made the following clarifications in relation to the conduct the meeting:

- The meeting was being held in the Council Chamber at Harrow Civic Centre with Councillors Phillip O'Dell, Varsha Parmar, Natasha Proctor, Paul Osborn and himself as the Leader present in the room.
- The other members of Cabinet (Councillors Sue Anderson, Simon Brown, Keith Ferry, Christine Robson, Krishna Suresh, Peymana Assad, Dr Antonio Weiss and John Higgins (voluntary sector representative)) had joined the meeting virtually.
- Councillors Marilyn Ashton, Anjana Patel, Pritesh Patel and Richard Almond (for item 5 – Councillors questions) and Councillor Stephen

Greek who would be invited to speak briefly on the reference from the Overview and Scrutiny Committee in relation to item 11 – The Council's Accommodation Strategy had also joined the meeting virtually.

The Leader welcomed Councillor Natasha Proctor (Deputy Leader and Portfolio Holder for Finance and Resources) and Councillor Peymana Assad (Portfolio Holder for Community Cohesion, Crime & Enforcement) as newly appointed Portfolio Holders and members of the Cabinet.

461. Apologies for Absence

Apologies for absence were received from Councillor Adam Swersky, Non-Executive member of Cabinet.

462. Declarations of Interest

RESOLVED: To note that the declaration of interests had been published on the Council website and that:

- (1) Councillor Sue Anderson had declared a non-pecuniary interest in item 12 - Harrow Town Centre Public Spaces Protection Order (PSPO) in that she was a Councillor for Greenhill ward, which the report related to.
- (2) Councillor Keith Ferry had declared a non-pecuniary interest in item 11 - The Council's Accommodation Strategy and the Harrow New Civic Centre in that he was a Councillor for Greenhill ward and had been proposed as a Board Member of the Harrow Strategic Development Partnership when it was formed.
- (3) Councillor Graham Henson had declared a non-pecuniary interest in item 10 - West London Waste Authority Food Waste Funding in that he was the Council's representative and Chair of the West London Waste Authority. For the avoidance of any conflict of interest he would leave the meeting for the duration of the item and to the meeting would be chaired by Councillor Proctor, as Deputy Leader, for that item.
- (4) Councillor Paul Osborn, who was not a member of Cabinet, declared a non-pecuniary interest in item 4 – Public Questions (question 1) and item 5 – Councillor Questions (question 2) in that he lived on Vaughan Road. He would leave the meeting for the duration of these questions.
- (5) Councillor Varsha Parmar had declared a pecuniary interest in item 4 – Public Questions in that her husband worked for London Underground. She would remain in the meeting by virtue of her dispensation.
- (6) Councillor Adam Swersky, who had given apologies for this meeting, had previously declared a disclosable pecuniary interest in Item 12 - Harrow Town Centre Public Spaces Protection Order (PSPO) of the agenda in that he owned a flat in Harrow Town Centre.

463. Petitions

RESOLVED: To note that the following petition had been received:

- (1) Councillor Graham Henson presented a petition on behalf of Sancroft Road residents, received from the Sangat Advice Centre, containing 12 signatures and requesting the Council take action against a local tenant/owner to make their front and back garden garbage free.

RESOLVED: That the petition be received and referred to the Corporate Director of Community for consideration.

464. Public Questions

RESOLVED: To note that three public question had been received and responded to and the recording would be placed on the website.

465. Councillor Questions

RESOLVED: To note that nine Councillor questions had been received and responded to and the recording would be placed on the website.

466. Key Decision Schedule May - July 2021

Having noted that the report on “Treasury Management - Shared Service Arrangement with the Greater London Authority (GLA)” had been deferred to June, Cabinet

RESOLVED: To note the contents of the updated Key Decision Schedule for the period May – July 2021.

467. Progress on Scrutiny Projects

RESOLVED: To receive and note the current progress of the scrutiny reports.

468. Covid-19 Update

Having agreed to vary the order of business, Cabinet received a presentation from the Chief Executive, which provided Members with a regular strategic update on Covid-19 cases across the borough, the Council’s role in community testing and support, vaccination progress and plans for future recovery. Acknowledging the increasing pressures on Council services and the ongoing impact on organisational capacity and staff resilience throughout this challenging period, it was

RESOLVED: That

- 1) the verbal update and accompanying presentation from the Chief Executive, be noted;
- 2) the payments for community and surge testing, funded by the Government, be endorsed.

[Call-in did not apply to the decision above as it was a presentation]

Resolved Items

469. Renewal of the Wealdstone Selective Licensing Scheme

Having received a report on the renewal of the Wealdstone Selective Licensing Scheme, Cabinet agreed that the recommendations be approved, subject to the following amendments:

- Recommendation 4 – addition of ...” including the issuing and amending of licences and easily accessible information on the Council website here: <https://www.harrow.gov.uk/licences>”
- Recommendation 6 – removal of Portfolio Holder for Environment and addition of “Portfolio Holder for Community Cohesion, Crime and Enforcement”

RESOLVED: That

- (1) the evidence, consultation responses and other information forming part of the report be considered and Wealdstone ward (as delineated and edged in red on the map at Appendix C) be designated as being subject to Selective Licensing;
- (2) if the Wealdstone ward was to be designated again as being subject to selective licensing, confirm that the designation was to take effect from 2nd September 2021 for a period of five years;
- (3) it be agreed that the Council could begin to accept applications for Selective Licensing (if approved) from 2nd August 2021, in anticipation of the scheme coming into effect on 2nd September 2021;
- (4) the Head of Community & Public Protection, following consultation with the Portfolio Holder for Community Cohesion, Crime and Enforcement, be authorised to take all steps necessary to publicise, commence and administer the scheme including the issuing and amending of licences and easily accessible information on the Council website here: <https://www.harrow.gov.uk/licences>
- (5) the Selective Licensing scheme (if approved) be noted and the operation of the designation be reviewed annually;
- (6) the Acting Corporate Director for Community, following consultation with the Portfolio Holder for Community Cohesion, Crime and Enforcement, be authorised to amend and approve discretionary licensing conditions implemented by the Head of Community and Public Protection.

Reason for Decision: To continue to address issues of anti-social behaviour in the Wealdstone ward, in line with the corporate priorities of making a difference to residents, community, businesses and the vulnerable.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

470. West London Waste Authority Food Waste Funding

The Leader left the Council Chamber for the duration of this item and the meeting was chaired by Councillor Natasha Proctor as Deputy Leader. Having received the report and noted Members questions and comments, Cabinet

RESOLVED: That

- (1) the notification of the project and planned spend of the funding grant received from West London Waste Authority (WLWA) be approved;
- (2) the Director of Environmental Services, following consultation with the Director of Finance, Portfolio Holder for Environment and Climate Change and the Portfolio Holder for Finance and Resources, be authorised to spend the funding as required under the terms of the grant;
- (3) an increase to the 2021/22 Capital Programme by £357k to reflect the allocation of the funding for capital expenditure, be approved.

Reason for Decision:

- Harrow, in partnership with WLWA and the other partner Boroughs, had identified disposal budget pressures whereby significant changes must take place to ensure that Boroughs could maintain solvency whilst preparing for potential legislative changes in 2023 and responding to the climate emergency by 2030.
- WLWA and the Environment Directors Board (representing the 6 West London Boroughs) had agreed to make £0.5m available for each Borough to address one of the identified areas of change, food waste, of which the Council presented its business case and was successful.
- The funding had now been received and approval for spend of this funding was required to commence the project. The proposed spend would consist of £357k capital and remaining £143k revenue.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

471. The Council's Accommodation Strategy and the Harrow New Civic Centre

Having noted the confidential appendices to the report and the points raised by Councillor Stephen Greek as Vice-Chair of the Overview and Scrutiny Committee in relation to the reference submitted (at Appendix 9), Cabinet

RESOLVED: That

- (1) the Council's accommodation strategy be based on Forward Drive Depot and a new Harrow Civic Centre at Peel Road, Wealdstone;
- (2) the proposed new Harrow Civic Centre be at around 20,000 sq. ft floorspace at an estimated cost of £21.899m (this was broken down into £17.073m for the New Civic Centre and £4.826m for 40 units of basement parking, with the exact dimensions and costs determined following detailed design);
- (3) a further report to agree the final design and costs be submitted to Cabinet for approval;
- (4) the report on final design and costs be included in the draft business plan for the proposed Harrow Strategic Development Partnership together with the 40 units of basement car parking and the proposed construction of 46 units of affordable housing;
- (5) the fit out of Forward Drive Depot at an estimated cost of £8.415m (£7.690m capital expenditure and £0.725m revenue requirement), be approved;
- (6) the award of the fit out works to Kier, the principal contractors at Forward Drive Depot, be approved, by variation to the existing contract with the necessary waiver to the Council's Contract Procedure Rules;
- (7) the estimated financial impact for the Council of the Harrow Strategic Development Financial Viability Model as detailed in the financial implications section of the report, be noted;
- (8) within the 2021/22 Capital Programme a virement of £7.690m in 2021/22 be approved from the 'Poets Corner' scheme to a newly created scheme titled 'Accommodation Strategy' to fund the fit out of the Forward Drive Depot;
- (9) within the 2021/22 Capital Programme a virement of the balance of £0.429m be approved from the 'Poets Corner' scheme into the 'Investment in 3 core sites' scheme to support the capital requirement for the new HNC and basement parking;
- (10) the Chief Executive, following consultation with the Director of Finance, the Leader of the Council and the Cabinet Member for Finance & Resources, be authorised to make decisions pertaining to procurement and contractual issues, including the approval of further variations to the fit out of the Forward Drive Depot, and the authority to issue further variations to the contract with Kier.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

472. Harrow Town Centre Public Spaces Protection Order (PSPO)

Having received a report on the Harrow Town Centre Public Spaces Protection Order (PSPO), Cabinet

RESOLVED:

- (1) That the proposed Public Spaces Protection Order (Harrow Town Centre) (Harrow Council) 2021, be approved;

Cabinet also agreed to note the following additional recommendation:

- (2) That the PSPO would be subject to a communications campaign to raise awareness and aid in educating all, and full information would be easily accessible on the Council website on:

<https://www.harrow.gov.uk/licences>

Reason for Decision: The PSPO would allow direct action against low level anti-social behaviour, with the benefit of being able to issue fixed penalty notices for breaches, if appropriate.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

473. Ministry of Housing, Communities and Local Government (MHCLG) Future High Street Fund

RESOLVED: That

- (1) the Acting Corporate Director – Community, following consultation with the relevant Portfolio Holder(s), be authorised to enter into a Grant Agreement with Ministry of Housing, Community and Local Government to secure funding to invest in a new pedestrian bridge, public realm improvements and an Intelligent High Street in Wealdstone;
- (2) the Acting Corporate Director – Community, following consultation with the Director of Finance and relevant Portfolio Holder(s), be authorised to undertake procurement and to award contract(s) for the delivery of the Pedestrian Bridge, noting that the operational delivery of the project would be undertaken by the Divisional Director Environment.

Reason for Decision: To support the regeneration of Wealdstone through enhancing the physical infrastructure and to ensure the appointment of contractors able to deliver the capital programme.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

474. 2021-22 Discretionary Retail Relief Scheme

RESOLVED: That

- (1) the discretionary “Retail Relief scheme” & “Nursery Discount scheme” (at Appendix 1) for eligible business rate payers, be adopted for the year 2021/22;
- (2) the Corporate Director of Resources be authorised to exercise discretion under Section 47 of the Local Government Finance Act 1988, (as amended) (hereinafter “LGFA”) in order to operate the above scheme which followed MHCLG’s guidance contained in their letter to local authorities date January 2021.

Reason for Decision: To ensure Harrow Council’s eligible business ratepayers received the maximum amount of centrally funded relief that could be claimed and to ensure the Council supported the local economy.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

475. Appointment of Cabinet Advisory Panels, Consultative Forums and Appointment of Chairs

RESOLVED: That the membership of Cabinet Panels and Consultative Forums, the Chairs and Nominated Members of the Panels and Consultative Forums, be confirmed.

Reason for Decision: To confirm appointments and to allow the Panels to be constituted.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

476. Appointment of Portfolio Holder Assistants

Having noted that the report was for information as the Executive was required to confirm the appointment of any Portfolio Holder Assistant and that the Special Responsibilities Allowance (SRA) for Portfolio Holder Assistants had been approved by Council in February 2021, Cabinet

RESOLVED: That

- (1) the appointment of the identified Portfolio Holder Assistants and responsibilities be approved and note that these superseded previous appointments;
- (2) the payment of Special Responsibility Allowance (SRA) to the Portfolio Holder Assistants with the implementation date of 27 May 2021, be approved.

Reason for Decision: To enable the support to Cabinet Members in terms of information provision and management, to contribute to and ensure an effective decision-making framework as part of the democratic process.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

477. **Timetable for the Development of the Council's Policy Framework**

RESOLVED: That the timetable for the preparation and consideration of the plans and strategies set out at Appendix A to the report be noted and the Monitoring Officer authorised to vary the timetable if appropriate.

Reason for Decision: To comply with paragraph 3 of the Budget and Policy Framework Procedure Rules in Section 4C of the Council's Constitution.

Alternative Options Considered and Rejected: As set out in the report.

Conflict of Interest relating to the matter declared by Cabinet Member/Dispensation Granted: None.

(Note: The meeting, having commenced at 6.30 pm, closed at 8.51 pm).

Proper Officer

Publication of decisions:	28 May 2021
Deadline for Call-in:	5.00 pm on 7 June 2021 (Please note that Call-in does not apply to all decisions). To call-in a decision please contact: Mwim Chellah via email : mwimanji.chellah@harrow.gov.uk
Decisions may be implemented if not	8 June 2021

Called-in on:	
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Report for: Cabinet

Date of Meeting:	27 May 2021
Subject:	Harrow Town Centre Public Spaces Protection Order
Key Decision:	Yes
Responsible Officer:	Mark Billington, Acting Corporate Director (Community)
Portfolio Holder:	Councillor Peymana Assad, Portfolio Holder for Community Cohesion, Crime and Enforcement
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendix A – Consultation Responses Appendix B – Consultation written responses Appendix C – Draft Town Centre PSPO Appendix D – Equality Impact Assessment (EQIA)

Section 1 – Summary and Recommendations

This report proposes to introduce a Public Spaces Protection Order (PSPO) to cover Harrow Town Centre, as set out under the Anti-Social Behaviour, Crime and Policing Act 2014, to address matters of Anti-Social Behaviour (defined as activities that have a detrimental effect on the quality of life to those in the locality)

Recommendations:

Cabinet is asked to:

1. Consider and approve the proposed Public Spaces Protection Order (Harrow Town Centre) (Harrow Council) 2021

Reason: (For recommendation)

The PSPO would allow direct action against low level anti-social behaviour, with the benefit of being able to issue fixed penalty notices for breaches, if appropriate.

Section 2 – Report

Introduction

Harrow Council is committed to improving the environment, maintaining low crime and improving community safety. Directly relating to this commitment is the Council's action to address anti-social behaviour and related complaints in its main urban centre.

In March 2014, the Anti-Social Behaviour, Crime and Policing Act 2014 came into force, with commencement of various provisions staggered. One of the aims of the legislation is to enable intervention before something becomes a bigger problem.

Included within the legislation is the power to put in place a Public Spaces Protection Order, details of which are provided below. In November 2015, Cabinet granted the Corporate Director of Community authority to approve any PSPO affecting up to three bordering wards following consultation with the Portfolio Holder¹. Proposed PSPOs falling outside of this limitation need Cabinet approval.

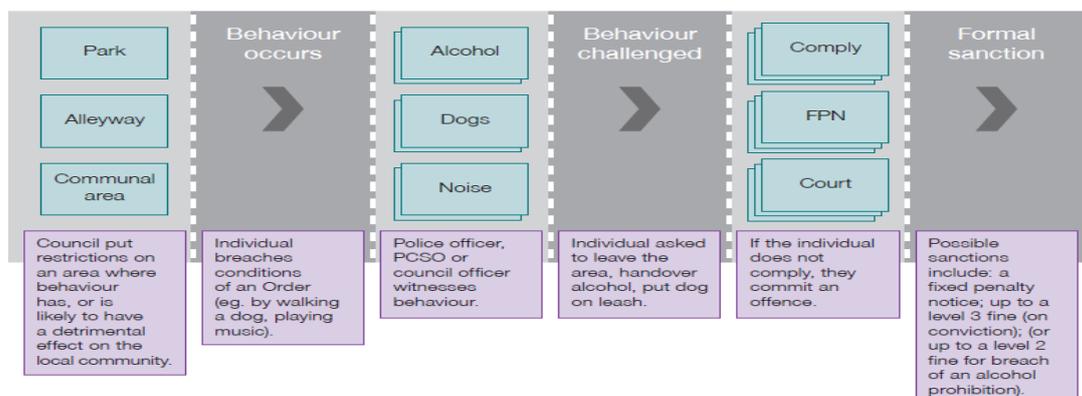
In this case, while the PSPO could in theory be approved by the Corporate Director, it is considered preferable for Cabinet to consider it instead given the location of it and the effect it will have on people from various parts of the borough visiting the town centre.

Public Spaces Protection Orders

Public Spaces Protection Orders provide a power to deal with particular nuisance or problems that directly affect an area.

An overview of the process is shown below, taken directly from the Official Guidance that accompanies the legislation.

Public spaces protection order



¹ <http://moderngov:8080/ieListDocuments.aspx?CId=249&MId=62618&Ver=4>

Harrow Town Centre PSPO

What are the activities that the proposed PSPO seeks to address?

It will introduce **new** powers around the following:

- Amplification of music and voice
- Financial Agreements (people trying to get visitors to sign up to them)
- Placing of tables, chairs, stands and other fixings / furniture on the street (not associated with a business, which is covered under other licensing)
- Feeding of birds and vermin
- Distribution of leaflets
- Illegal street trading (not associated with a business which is covered under other licensing)

Some other controls, as can be seen in the consultation document in Appendix B, were also consulted on but removed from this final draft order as these are now covered by a Borough Wide Public Spaces Protection Order that came into place on 1st February 2021. This includes:

- Alcohol consumption in public places
- Urinating, defecating and spitting

A prohibition for begging in the designated area was also consulted upon. However, on careful consideration, and taking into account other Councils who have sought this approach, this aspect of the proposed PSPO will not be pursued at this stage. It is felt that working with the Homeless Strategy Group and putting in place a clear strategy that seeks to engage and help genuine homeless persons would be a better approach, of which the aspect of begging can be considered as part of this.

For those who are not homeless and beg for other reasons, the Police have powers to deal with begging as well as powers for the Police and Local Authority under the ASB, Crime and Policing Act 2014 (matters of nuisance, harassment and annoyance).

All the proposed new powers, if introduced, will be subject to a communications campaign to raise awareness and aid in educating all, as the intention is to change behaviour and lead to compliance, rather than seeking continual enforcement.

Amplification of Music and Voice

While it is accepted that busking can add positively to the environment, it must be in a controlled manner and not to cause nuisance. Additionally, the town centre is subject to frequent occurrences of person(s) / groups using amplifiers to project their voices for different reasons. In many cases, it has led to a number of different amplifiers being used, competing with each other and causing nuisance. Harrow Council is not against free speech but needs to find a balance with the rights and enjoyment of others.

In relation to busking, a buskers pilot scheme has been implemented for 6 months from December 2020 to be able to enjoy busking for all and reduce unnecessary disturbance to others. For example, the Council has received complaints of people with amplifiers sat outside a business, playing very loud music that affects those within the business both customers and staff. This appears to be a common problem being faced by town centres now, with others taking a similar approach for example Hammersmith & Fulham² If this busking pilot proves successful, then it will go to Cabinet for final sign off. Information can be found at <https://www.harrow.gov.uk/licences/busking>

Financial Agreements

Harrow Council works with various businesses and charities to allow them to operate in the town centre, to get donations and sign people up to direct debits. This is mainly done through informal and / or verbal agreements. Unfortunately, it is an increasing case that more and more of this type of activity is occurring, leading to people walking through the town centre being accosted more often and leading to complaints. Again, this is not to stop such activities but to control them so they can take place but without causing nuisance.

Placing of tables, stands, and other furniture / fixings on the street

Harrow Council has an obligation to keep its streets free from unnecessary obstructions, especially by those who do so without permission or consideration. This would make it an offence to place such items without permission from the Council and partners where there is a need, and to ensure it is done in a safe way, and not just be placed wherever convenient for the trader as is the case now. Harrow Council is witnessing more and more people coming into the town centre and setting up stalls for leaflets, goods or other reasons without any due consideration and carried out in a way that does not benefit the area.

This is different to normal street trading, which has a licensing process in place but concentrates on the sale of goods but would not necessarily cover the setting up of furniture for the purposes other than sale of goods.

Feeding of birds and vermin

While Harrow Council understands that for some people, it is nice to feed the birds or it is carried out for a religious purpose, it has to balance this against the fact that such activities encourages both birds (e.g. pigeons) and vermin (e.g. rats). These then cause damage to the area, for example pigeons though their excrement that can cause damage to buildings and pavements and costs thousands of pounds to clean every year, as well as present a public health risk. People can safely feed birds elsewhere away from the urban centre without such an adverse effect on others, and therefore we are seeking to restrict this activity in the town centre

² <https://www.lbhf.gov.uk/articles/news/2019/07/amplifiers-removed-hammersmith-town-centre-make-it-safer-and-more-pleasant>

Distribution of leaflets

This is linked to both the placing of furniture as well as financial arrangements, in that if done correctly and with permission they can happen in a safe manner without nuisance or annoyance. But unfortunately, Harrow is witnessing more and more people turning up and handing out leaflets for various reasons, leading to increased litter in an area as well as complaints about nuisance. This control will let a better management of use of the town centre to ensure there are not a barrage of people handing out leaflets, and leading to nuisance from those visiting or working there.

Illegal street trading

Harrow Town Centre has seen an increase in people trying to manipulate the residents and visitors of Harrow by selling unsafe, counterfeit or unauthorised products, for instance "Perfume" that is fake and contains many different liquids from water to bleach. Not only does it endanger the customer, but it also directly affects the trade of local compliant businesses.

While street trading licensing is in place across the Borough, this is related to fixed pitches (e.g. outside shops or market stalls) and can cause a current grey area around transient sellers. This aspect removes that grey area.

What are the requirements for making a PSPO?

The ASB, Crime and Policing Act 2014, Section 59 sets out the conditions that need to be met for a PSPO to be made.

The first condition is that:

- (a) Activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality, or
- (b) It is likely that the activities will be carried on in a public place within that area and that they will have such an effect.

The second condition is that the effect, or likely effect, of the activities:

- (a) Is, or is likely to be, of a persistent or continuing nature,
- (b) Is, or is likely to be, such as to make the activities unreasonable, and
- (c) Justifies the restrictions imposed by the notice

The only prohibitions or requirements that may be imposed are ones that are reasonable to impose in order:

- (a) To prevent the detrimental effect referred to in the first condition above
- (b) To reduce the detrimental effect or to reduce the risk of its continuance, occurrence or recurrence

How will the PSPO be enforced?

Failure to comply with a PSPO is an offence and can lead to a summary conviction and fine not exceeding level 3 on the standard scale. In February

2015, the Council agreed that a Fixed Penalty (FPN) of £100 could be applied to any non-compliance with a PSPO if appropriate, rather than a prosecution. However, for repeat offenders or in cases where it is believed the issuing of a FPN would not deter future action, or the offence is deemed or if the offender fails to pay the FPN, a prosecution may be taken. A person authorised by the Council, a Police Officer and / or a Police Community Support Officer (PCSO) if authorised can enforce the PSPO.

How will the PSPO be advertised?

If the Order is put in place then information will go on the Council Website, using various forms of media, signage will be erected in relevant areas and through use of other methods to maximise publicity of the Order. This will include working with partners.

How long will the PSPO last?

Any PSPO can last a maximum of 3 years, although it can be extended if necessary, and/or reviewed (and varied or discharged) during the course of its life. In this case, the proposed PSPO is sought for 3 years.

Will it work?

The previous use of a Borough Wide PSPO showed that it was an efficient and effective means to control issues in the Borough, streamlining the approach to them and giving clear requirements and enforcement action. Therefore, this approach does work but will be kept under review to make sure it is effective.

Options considered

In relation to the recommendation in this report, the main options include:

1. Cabinet approve the Public Spaces Protection Order (Harrow Town Centre) (Harrow Council) 2021 (as drafted in Appendix C)

This would result in all aspects of the proposed PSPO coming into force for a duration of 3 years.

This is the preferred option and is supported by the consultations carried out as set out in Appendix to this report.

2. Cabinet approve some aspects of the Public Spaces Protection Order (Harrow Town Centre) (Harrow Council) 2021 (as drafted in Appendix C)

Where Cabinet does not agree with all the proposals, these can be removed or amended. Additionally, Cabinet can choose a shorter period for the PSPO.

3. Cabinet do not approve the Public Spaces Protection Order (as drafted in Appendix C)

By choosing this option, the Council will rely on current provisions, if any, to seek to achieve the same outcomes. However, there are inadequate or no provisions for dealing with the other issues that the proposed PSPO seeks to tackle, or grey areas around what is allowed and not. For example, with the use of amplifiers, reliance would have to be on other ASB powers, which has already been challenged by some when raised with them.

3. Community Consultation

The Anti-Social Behaviour, Crime and Policing Act 2014 and the '*Reform of anti-social behaviour powers Statutory guidance for frontline professionals*' sets out the requirements for consultation around a PSPO.

Before making a PSPO, the council must consult with the Chief Officer of Police, and the local police body, which was done in relation to the proposed PSPO and support was given (see consultation responses). Additionally, Ward Councillors were also kept informed of the intent to introduce the PSPO and provided support around this.

The council must also consult whatever community representatives they think appropriate, including charities that the Council works with in terms of homelessness. In this case, a consultation took place on the Council website from 23rd November 2020 to 15th January 2021, to seek maximum coverage and so that anyone could comment on the proposal. Communications took place around this to advertise the consultation, including the use of social media, local newspapers³ and also public notices put up in and around Harrow Town Centre. Additionally, Harrow Business Improvement District (BID) were actively involved in the advertising and promotion of the consultation including contacting businesses in their BID as well as on their website⁴

Appendix B provides the feedback from the consultation. As can be seen, there is wide support for all aspects of the proposed PSPO. The results regarding support for each proposal is seen below:

	For	Against	Don't Know
Amplification of music and voice	77%	13%	10%
Financial Agreements	88%	7%	5%
Placing of tables, stands and other items	80%	10%	10%
Feeding birds and vermin	87%	9%	4%
Distribution of leaflets	78%	12%	10%
Illegal Street Trading	97%	2%	1%

³ <https://www.harrowtowncentre.co.uk/news/article-details/help-us-remove-unwanted-activities-from-the-town-centre/13010/>

⁴ <https://www.halbid.co.uk/news/help-us-remove-unwanted-activities-from-the-town-centre/>

The main issues raised with amplification was concern that this would stop good busking taking place in the town centre. This is addressed by the fact a busking pilot is in place for this area to ensure busking continues but in a controlled way. The proposed PSPO does not seek to stop busking altogether. Additionally, it only affects the town centre and provides ample other venues for busking to take place with amplification in the Borough as long as not causing nuisance.

With distribution of leaflets, the main complaint was the amount of times people are approached by those giving out leaflets and also the litter generated. Again, the PSPO would allow permitted distribution, but stop the random acts taking place that have no controls over them.

Implications of the Recommendation

Resources

The resourcing of such a PSPO was an area of concern highlighted in the consultation feedback.

The management and enforcement of the PSPO will be through current staffing levels using on street enforcement officers, Community & Public Protection Officers, Police and all authorised officers will be able to take action where an offence under the PSPO is witnessed. These Officers are used to understanding and enforcing PSPOs due to the history of the Borough wide PSPO.

Legal comments

Chapter 2 of Part 4 of the Anti-Social Behaviour, Crime and Policing Act 2014 deals with Public Spaces Protection Orders (PSPO).

Sections 59 – 61 inclusive deal with the power to make such orders, their duration, and their variation and discharge.

In order to make a PSPO, a local authority has to be satisfied on reasonable grounds that two conditions are met:

1. *That—*

(a) activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality, or

(b) it is likely that activities will be carried on in a public place within that area and that they will have such an effect.

And

2. *That the effect, or likely effect, of the activities—*

(a) is, or is likely to be, of a persistent or continuing nature,

(b) is, or is likely to be, such as to make the activities unreasonable, and

(c) justifies the restrictions imposed by the notice.

A PSPO prohibits, or requires, things to be done in an area or for both – i.e. prohibit and require, but these must be to prevent or reduce detrimental effect in the area. A PSPO can be limited to apply by time/circumstances etc but must be clear to understand what is required and/or prohibited. The legislation sets out the requirements for the content of a PSPO and publication requirements that must be followed.

Under Section 60 of the Act, a PSPO cannot have effect for longer than 3 years unless extended.

Sections 62 and 63 covers aspects relating to PSPOs prohibiting the consumption of alcohol.

Sections 64 and 65 deal with orders restricting public rights of way over the highway.

Section 66 specifically provides an interested party (as defined in the Act) the ability to challenge the validity of a PSPO, or its variation, by application to the High Court. The grounds for such a challenge are that the local authority did not have the power to make or vary the order or include certain prohibitions/requirements, or that a requirement under the relevant part of the Act was not complied with.

There is a 6 week time limit to make such an application from the date of the order or variation. Pending full determination, the High Court can suspend the operation of the order, or variation. Upon determining the application, the Court, if it finds that the authority did not have the power to do what it did/required under the order, or that the interests of the applicant have been substantially prejudiced by a failure to comply with a requirement of the Act in relation to PSPOs, can quash or vary the order or any prohibitions or requirements under it.

When considering any proposed PSPOs, the authority must consider any equality issues pursuant to its duty under section 149 of the Equality Act 2010.

Financial Implications

The enforcement shall be carried out within the Public Protection Service as well as the Police and the use of our current third-party enforcement contractor. The third-party enforcement contractor works on the basis of taking a proportion of Fixed Penalty Notices (FPN) income successfully collected, so there is no cost to the Council.

Any income from FPN will be used to offset costs associated with managing the PSPO requirements and issuing fixed penalty notices which will be met from existing budgets, as well as environmental campaigns to increase education and compliance. To this end the scheme is based on cost recovery but should any income above and beyond this be received it shall be ring fenced to the environmental compliance team for this purpose and a review of fees carried out as it is not intended as an income generation tool.

Performance Issues

Improving the environment and reducing matters of anti-social behaviour will have a positive impact on helping make a difference to families, businesses and communities.

The introduction of the Public Spaces Protection Order puts in place clear requirements across the Borough that are less bureaucratic and more efficient to enforce.

If the scheme is not introduced, then it will limit the ability to enforce by the Council in these areas, with resources being focused on individual problems, not addressing the wider issues and limiting the action that is feasible to be taken and prevents the widening the ability for partners (e.g. Police) to deal with anti-social behaviour.

Environmental Impact

The aspects seeking approval are expected to have a hugely positive impact on the Environment, by putting in place a proactive scheme that addresses matters evidenced within the area.

By having clear requirements in place, backed up by the means of a timely penalty for non-compliance (Fixed Penalty Notices), it allows matters that affect the environment to be addressed in a more efficient and effective means and hopefully leading to longer term behavioural changes.

Procurement Issues

There are no procurement issues

Risk Management Implications

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No**

The relevant risks contained in the register are attached/summarised below.
N/A

The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
Bad publicity due to level of fine issued	<ul style="list-style-type: none"> ▪ Consultation has taken place to understand any issues that may lead to bad publicity ▪ Fines are standard for PSPO as agreed by Cabinet ▪ Communication in place and will be continued to seek compliance prior to need for fines to be issued 	
Poor payment of fines, therefore limited impact	<ul style="list-style-type: none"> ▪ Work has taken place with legal about streamlining prosecution process for non-payment including standardising templates ▪ More emphasis put on initial messaging to those receiving fines about consequences, as well as better follow up ▪ Past experience of collection of such fines shows a high payment rate (above 70%) and all others go to prosecution 	
Lack of resources to take these fines forward	<ul style="list-style-type: none"> ▪ 3rd Party on street enforcement team in place, working 7 days a week ▪ Training of staff to incorporate into normal work (e.g. compliance visits for food hygiene will pick up shop front trade offences) ▪ Re-investment of fines to increase capacity if needed 	
Lack of evidence to support follow up action	<ul style="list-style-type: none"> ▪ All Officers are required to provide statements to support offence as well as attend court ▪ Use of bodyworn cameras by 3rd party enforcement officers ▪ Quality assurance checks carried out by Management ▪ Contract with 3rd party company results in payment only for each successfully paid fine 	
Inconsistent approach to issuing, leading to loss of reputation	<ul style="list-style-type: none"> ▪ Operational policy in place around fixed penalty notices ▪ Training of officers issuing tickets ▪ Monthly performance checks to understand what has been issued by whom and why 	
Cost of administering the scheme outweighs the benefits	<ul style="list-style-type: none"> ▪ Contract with 3rd party company results in payment only for each successfully paid fine ▪ Systems set up to minimise cost of the scheme, including on line payment system 	
3 rd party officers fail to follow council policies and procedures, leading to loss of reputation	<ul style="list-style-type: none"> ▪ Clear contract in place with 3rd party ▪ Monthly performance and monitoring meetings ▪ Team leader conducts regular 1-2-1 meetings, team meetings and checks 	

<p>Proposal not agreed leading to limitations of action by officers</p>	<ul style="list-style-type: none"> ▪ Offences would have to be pursued through use of legal notices where feasible (e.g. Community Protection Notices) or prosecution ▪ Those FPNs already in place could still be enforced at the levels already set 	
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Equalities implications / Public Sector Equality Duty

Pursuant to section 149 of 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 who have 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.

In line with this, an initial Equalities Impact Assessment (EqIA) was completed but did not find that a full EqIA was required as no potential adverse impacts in relation to the decision for this report were considered likely for any of the protected groups. This was reviewed post consultation and no changes required.

Council Priorities

The introduction of the Town Centre PSPO clearly links in with the Council priority of:

1. **Improving the environment and addressing climate change**
2. **Maintaining low level crime and improving community safety**

Section 3 - Statutory Officer Clearance

Statutory Officer: Jessie Man

Signed on behalf of the Chief Financial Officer

Date: 5th March 2021

Statutory Officer: Paresh Mehta

Signed on behalf of the Monitoring Officer

Date: 6th May 2021

Statutory Officer: Nimesh Mehta

Signed by the Head of Procurement

Date: 4th March 2021

Statutory Officer: Mark Billington

Signed by the Acting Corporate Director - Community

Date: 18th May 2021

Statutory Officer: Susan Dixon

Signed by the Head of Internal Audit

Date: 5th March 2021

Mandatory Checks

Ward Councillors notified: No as Borough Wide

EqIA carried out: YES

EqIA cleared by: D Corby

Section 4 - Contact Details and Background Papers

Contact: Richard Le-Brun, Head of Community and Public Protection, 020 8424 6267, Richard.lebrun@harrow.gov.uk

Background Papers: Briefing Note – Town Centre PSPO

Call-in waived by the Chair of Overview and Scrutiny Committee

NO

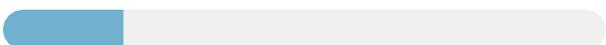
**The Public Spaces Protection Order (Harrow Town Centre) 2020
Consultation**

23 November 2020 – 15 January 2021

Summary of Responses

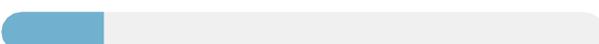
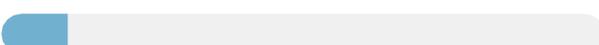
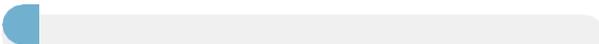
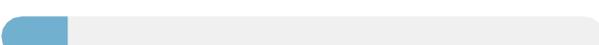
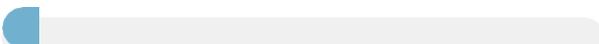
1. About You

Do you live in Harrow

Yes		74
No		18

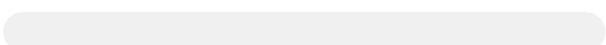
1a.

Do you live in one of the following

Barnet		3
Brent		2
Ealing		1
Hillingdon		2
Watford		1
Somewhere else		9

1b.

Are you a regular visitor to Harrow

Yes		18
No		0

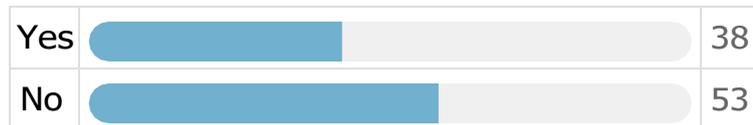
1c.

Which area of Harrow do you live in

This question has been answered 73 times.

2.

Do you work in Harrow?



3.

Do you own a business in Harrow?



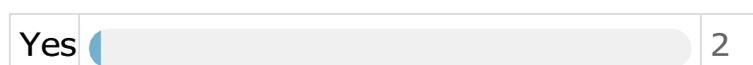
4.

Are you a Harrow Councillor?



5.

Are you completing this survey on behalf of a Harrow-based community or voluntary group?



No		90
----	---	----

5a.

Please tell us which group.

This question has been answered one time (Usurp Art).

6. Alcohol Consumption

Unfortunately, certain areas of Harrow have become popular for street drinking, with small groups forming and consuming alcohol in public and leading to complaints around not feeling safe when walking past these groups, littering as a result, and the general perception it gives. Therefore, this aims to address this aspect, allowing authorised officers to take action if those consuming alcohol in public are causing nuisance or annoyance. Again, an educative approach will be taken and we will continue to work with partners (including charities) to help those involved where needed. (Comments appendix B).

Do you think Harrow should restrict this activity?

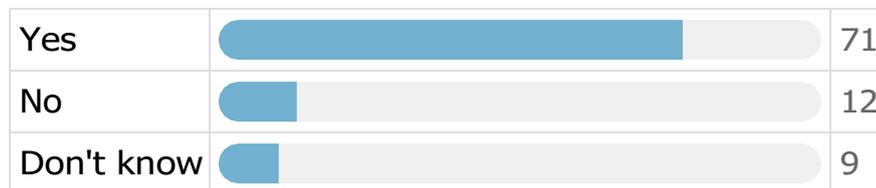
Yes		86
No		5
Don't know		1

7. Amplification of Music and Voice

While it is accepted that busking can add to the environment, it must be in a controlled manner and not to cause nuisance. Additionally, the town centre is subject to frequent occurrences of person(s) / groups using amplifiers to project their voices for different reasons. In many cases, it has led to a number of different amplifiers being used, competing with each other and causing nuisance. Harrow Council is not against free speech but needs to find a balance with the rights and enjoyment of

others. To this end, a buskers pilot scheme is being implemented to be able to enjoy busking for all. But also, a recognition that freedom of speech does not need to be done through amplification which affects those living, visiting and working in the area. (Comments appendix C).

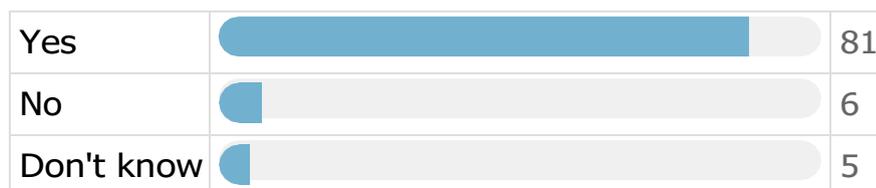
Do you think Harrow should restrict this activity?



8. Financial Agreements

Harrow Council works with various businesses and charities to allow them to operate in the town centre, to get donations and sign people up to direct debits. Unfortunately, it is an increasing case that more and more of this type of activity is occurring, leading to people walking through the town centre being accosted more often and leading to complaints. Again, this is not to stop such activities but to control them so they can taken place but without causing nuisance. (Comments appendix D)

Do you think Harrow should restrict this activity?



9. Begging

Harrow Council recognizes that there is unfortunately an issue with homelessness and continues to work with those who are genuinely homeless to get them help and accommodation. But begging is not acceptable, and is a behaviour that needs to be addressed as those that genuinely need help will be provided it and then unfortunately there are those who beg under false pretences. If introduced, the Council and Police

will continue to work with those who are begging to understand their genuine needs and assist them, but also give the powers to remove and address if this is not the case. (Comments appendix E).

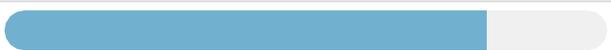
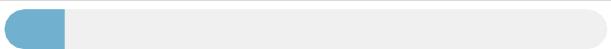
Do you think Harrow should restrict this activity?

Yes		82
No		6
Don't know		4

10. Placing of tables, stands, and other furniture / fixings on the street

Harrow Council has an obligation to keep its streets free from unnecessary obstructions, especially by those who do so without permission or consideration. This power would give the Council and partners to legitimately allow such items where there is a need, and done in a safe way, but not just be placed wherever convenient for the trader as is the case now. Harrow Council is witnessing more and more people coming into the town centre and setting up stalls for leaflets, goods or other reasons without any due consideration and carried out in a way that does not benefit the area. (Comments appendix F).

Do you think Harrow should restrict this activity?

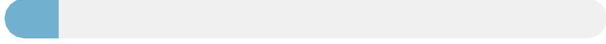
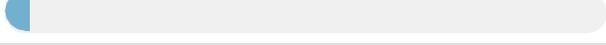
Yes		74
No		9
Don't know		9

11. Feeding of birds and vermin

While Harrow Council understands that for some people, it is nice to feed the birds or it is carried out for a religious purpose, it has to balance this against the fact that such activities encourages both birds (e.g. pigeons) and vermin (e.g. rats). These then cause damage to the area, for example pigeons though their excrement that can cause damage to buildings and pavements and costs thousands of pounds to clean every year. People can

safely feed birds elsewhere away from the urban centre without such an adverse effect on others, and therefore we are seeking to restrict this activity in the town centre (Comments appendix G).

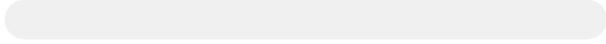
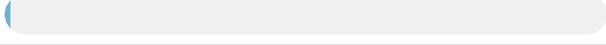
Do you think Harrow should restrict this activity?

Yes		80
No		8
Don't know		4

12. Urinating, defecating and spitting

No person can find such activities acceptable in modern society but unfortunately they still take place, including in alleyways and service roads in the area, and spitting on the street in front of people. They are neither hygienic or acceptable and the Council are seeking powers to directly address. (Comments appendix H).

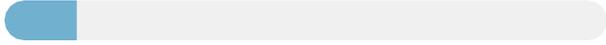
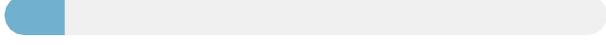
Do you think Harrow should restrict this activity?

Yes		90
No		0
Don't know		1

13. Distribution of leaflets

This is linked to both the placing of furniture as well as financial arrangements, in that if done correctly and with permission they can happen in a safe manner without nuisance or annoyance. But unfortunately Harrow is witnessing more and more people turning up and handing out leaflets for various reasons, leading to increased litter in an area.(Comments appendix I).

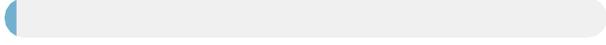
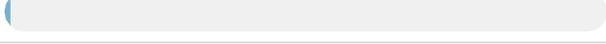
Do you think Harrow should restrict this activity?

Yes		72
No		11
Don't know		9

14. Illegal street trading

Harrow Town Centre has seen an increase in people trying to manipulate the residents and visitors of Harrow by selling unsafe, counterfeit or unauthorised products, for instance “Perfume” that is fake and contains many different liquids from water to bleach. Not only does it endanger the customer, but it also directly affects the trade of local compliant businesses. (Comments appendix J).

Do you think Harrow should restrict this activity?

Yes		89
No		2
Don't know		1

Anything else?

Do you have any other comments to make about the issues in this survey?

This question has been answered 24 times (see appendix K).

Monitoring information

Age

Under 16		0
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16 – 24 years		1
25 – 44 years		31
45 – 64 years		48
65 & over		6

Disability

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?

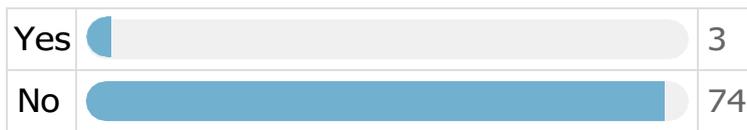
No		79
Yes, affecting mobility		7
Yes, affecting hearing		1
Yes, affecting vision		2
Yes, a learning disability		0
Yes, mental ill-health		2
Yes, another form of disability –		2

Marriage or Civil Partnership

Are you married

Yes		51
No		34

Are you in a Civil Partnership?

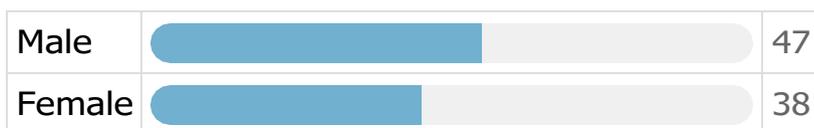


Pregnancy or Maternity

Have you been pregnant and / or on maternity leave during the past 2 years?



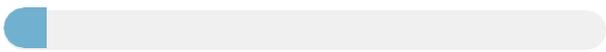
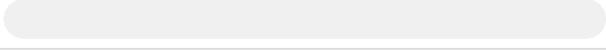
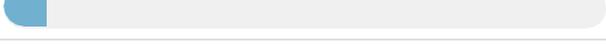
Sex



Is your gender identity the same as the gender you were assigned at birth?

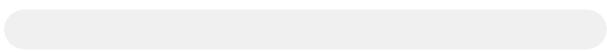
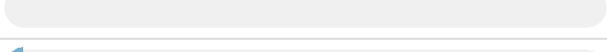
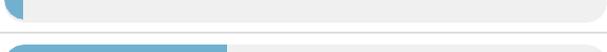
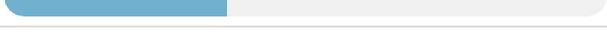


Sexual orientation

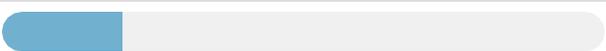
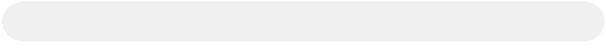
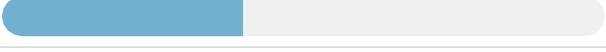
Bisexual		5
Gay Man		1
Gay Woman / Lesbian		0
Heterosexual		65
Other-		5

Ethnic origin

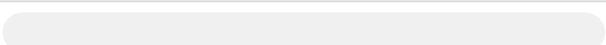
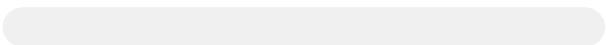
Asian or Asian British

Afghan		0
Bangladeshi		0
Chinese		2
Indian		16
Pakistani		0
Sri Lankan		1
Any other Asian background –		11

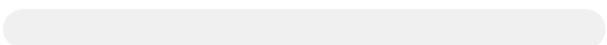
Black or Black British

African		1
Caribbean		2
Somali		0
Any other Black background		2

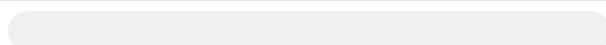
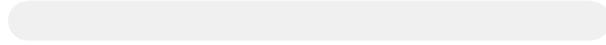
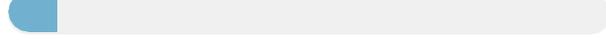
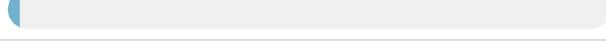
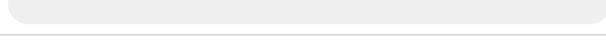
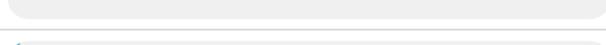
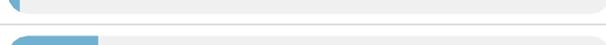
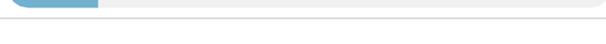
Mixed background

White and Black African		0
White and Black Caribbean		0
White and Asian		0
Any other mixed background		2

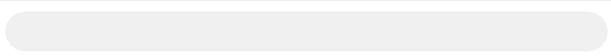
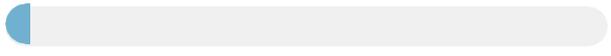
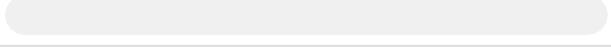
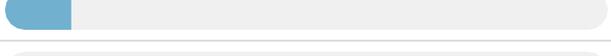
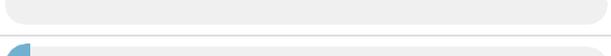
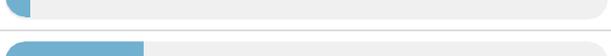
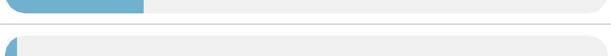
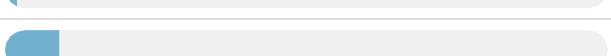
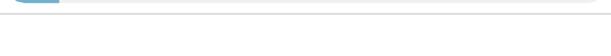
Other ethnic background

Arab		0
Iranian		0
Any other ethnic group		2

White or White British

Albanian		0
English		35
Gypsy / Irish Traveller		0
Irish		4
Polish		1
Romanian		0
Scottish		0
Welsh		1
Any other White background –		7

Religion and belief

Buddhism		0
Judaism		2
Christianity (all denominations)		28
Sikh		0
Hinduism		6
Zoroastrian		0
Islam		2
No religion / Atheist		13
Jainism		1
Other -		5

Appendix B Q6. Comments
This should be borough wide it's no good just having this in a zone as the troublemakers will move to just outside the zone like the hill opposite the college in lowlands road etc.
ASB is occurring on a regular basis due to this in our square which is a public area and residents are being intimidated by these individuals
Street drinking is evident by St John's Church on the junction of Station Road/ Sheepcote Road, these people should be discouraged from this activity by a Church.
Frequent visitor to Perceval Square. An intimidating new area. As a visitor we randomly encounter feral youths who are drinking etc. Harrow-On-The/Hill station is a little challenging, but lots of general public present. Perceval Square can be just a solo lady and a gang of foul-mouthed threatening, generally all male, group. Friends call it "Harrow Going- Down-Hill"
threatening, generally all male, group. Friends call it "Harrow Going- Down-Hill"
This excessive drinking sometimes leads to aggressive or bullying behaviour and taunting as people pass these groups by.
Harrow and Wealdstone high street has very annoying people who drink (may be alcohol because they are hiding it) make notice do not pee in surrounding street
It can be offensive for young children with parents to see drinkers especially at the bus stops around on the high street
To many people drinking on the streets and antisocial behaviour
Why should you stop those doing it responsibly? This should be changed to it is allowed to drink within reason. Of course, if you're causing a disturbance you are asked to stop. When the weather is nice and it is hot and sunny having a simple drink outside is nice, and you're taking that right away.
This is anti-social and can cause intimidating behaviour when under the influence
I feel it is the responsibility of Harrow Council to make sure that policing is high profile and the presence of law enforcement is more visible to deter any unsocial behaviour.
People shouldn't drink on the streets. Only if they are sitting outside a pub or restaurant.
This seems to be a growing problem in Harrow Weald, predominantly in the evening outside Tiger Dragon, Bombay Central, Discount Direct and Waitrose
I don't think there should be any alcohol consumed in open space
Please stop giving shops 24 hr. licenses to sell alcohol. it creates a lot of litter and anti-social behaviour. don't feel safe walking near these shops as groups of men gather to drink.
Unfortunately, I live in an area where this happens on street corners, alleyways and outside shops. Antisocial behaviour arises from drinking on the streets! It can result in urinating in the alleyways, also continues to drug taking and dealing if the area is known to be liberal.
Please ensure that alcohol consumption does not spill over to adjacent areas

Empty bottles and cans an ongoing problem in the area. Those who have clearly consumed alcohol have been abusive to multiple community members in local park, regardless of time of day.
There is also an ongoing problem of the abuse of Nitrous Oxide capsules in parks and open spaces.
It will be important for suitable and clearly visible signage for those who are consuming alcohol to be aware it will not be allowed. Only those that persist should be fined. Engagement and encouragement should be the first action due to the potential other mental and other factors leading to excessive alcohol consumption.
Not everyone should be penalised for the actions of a few. There is nothing wrong with a glass of wine on a summer's day.

Appendix C Q7. Comments
This type of activity is not welcome like how Bolivian flute players can afford to come here and basically beg
Entertainment is fine, not religious groups or extreme political groups
We live in the town Centre which is now a resident area too
Too many delusional buskers who can't even sing or play properly, causing an absolute nuisance and racket. The harp lady is quiet and provides some nice background music, all the others can sod off!
A lot of money has been invested in new development, but regeneration is slowly failing because the flagship Barratt Harrow Square/Perceval Square development is increasingly widely regarded as anti-social and dangerous.
Busking should be allowed.
Busking is enjoyable to listen to when out and about in Harrow, especially the South American music group who always dress up and it's a fun culture to see. Amplified voices such as using a megaphone has rarely been an issue whereby the voice is highly amplified so much so you hear it once you pass it, but I understand at times this may not be the cause, especially when energy firms/ phone sign up companies come with their adapted vehicles and aggressively advertise their services. This can be very disruptive at times.
Everyone enjoys busking from time to time, especially when you are out and about, shopping etc. The great thing about street performance is that you can enjoy it for the length of time you desire, however if you live directly in the area that is frequently used by busking it can become a nuisance, especially with the use of amplifiers! Personal experience shows that the volume is not controlled by those who are performing, if anything there is a lot of rivalry amongst those who perform and the volume seems to increase in order to compete with each other. When you live and work in such area it is not possible to escape from the loud noise and increased volume and it becomes impossible to concentrate at work or relax and enjoy yourself in your own home. I'm sure no one would appreciate being in their own home and being unable to listen to radio, watch TV or simply just relax. By living in city Centre I fully understand that the footfall as well as the noise is much higher than in residential areas however I do believe that there should be clear guidance for those who perform so everyone can enjoy themselves which would also reduce the amount of complaints received.
In sustain amount n time it is good
No amplifiers.
I manage a bank branch in Harrow that regularly has buskers with amplifiers outside. It has impacted us completing appointments with customers for bereavements and mortgages, which as you can imagine is very stressful for the customers concerned. There is a lady who uses a harp and keeps the noise level to a reasonable background level that is very nice but accordions and saxophones with amplifiers really impact our customers experience in our branch. This is especially relevant when you consider we need to keep most doors, including the main branch door, open due to COVID social distancing practices. It's hard to understand how much this impacts customers unless you have to apologies to a lady who is

registering the death of her son in your branch because of the music coming from outside. Please restrict this.
I work in retail outlet in St Ann's Road and they cause noise pollution which impacts on my working environment for both my colleagues and my customers
The Buskers that are regular on a Saturday bring a nice vibe to Harrow. As far as I am aware music and singing so far has been of an acceptable nature for many
There is one man whose music is ridiculously loud. It's not even a background noise.
I think there is a great opportunity to designate specific area's around Harrow for these activities and control the quality of what is played to the public.
At times there are too many buskers at once and they take up space on pavements making it more crowded so I think should be limited
I think that busking should be allowed, and the level of amplification should be subject to what is reasonable.
Busking is good if it's organised. One person or group at a time. Needs to be booked so other buskers get a chance.
we have had on many occasions' buskers sitting right outside our Branch and playing very loud instruments. When we ask them to quieten down, they refuse. This has impacted us in many ways. Firstly, our customers cannot hear us as and, we have had many bereavement appointments which we could not continue due to the sound. As you can imagine this is a sensitive time for the customers and when they come in, they are faced with listening to loud music.
Music is fine but I don't like being shouted at about Jesus or how the world is going to end
Town Centre would be acceptable in business hours. I would assume the minimal people living in a Town Centre would have had expectations of noise when choosing a location. I feel it brings a welcome atmosphere in Town where the people of Harrow gather
This seems to be a growing problem in Harrow Weald, predominantly in the evening outside Tiger Dragon, Bombay Central, Discount Direct and Waitrose
some disabled people play some kind of music in a not pleasant way to beg.
Please stop allowing people to put loud music on their stereo speakers in the park, it spoils the peace and quiet
If handled wisely both can co-exist like Glastonbury with different stages but spaced away from each other.
Within reason
If it doesn't cause nuisance then it should be allowed
People have a right to enjoy the outdoors without unacceptable levels of noise nuisance.
The must be adequate signage that clearly states amplification will be prohibited. I have noted retailers also using amplification and they should be clearly made aware of this. This must be carefully balanced with free speech and vitally, nuisance alone should not prohibit free speech.
Music is good for the soul. I couldn't think of anything worse than a quiet, sanitised Harrow. We should be promoting culture even if the music isn't to everyone's tastes.

Appendix D Q8. Comments
Chuggers are a nightmare it's like an obstacle course in a game show
This people are a nuisance and way too frequent.
These people are a nuisance and seem to be growing in number
Too much soliciting in Harrow town Centre
Restrict to certain areas
Too many "Chuggers" - charity muggers. Less is more.
These charity/business personnel can sometimes be too aggressive in their styles in promoting their

<p>cause/business and they start following you around and it is awkward and intimidating to pass them at times. Also, during these Covid times whereby people should maintain the adequate social distance, they do not always adhere to this policy. Furthermore, 2 or more of them are spread out in the same street whereby you may pass one only to come across the second person from the same charity/business and this may present as an obstacle course.</p>
<p>I don't believe in any stranger</p>
<p>No canvassing please.</p>
<p>This is where the more vulnerable can be taken advantage of especially young people who may not know the right questions to ask when approached</p>
<p>If I want to donate to a charity - I'd rather make my choice without being approached or even chased after for</p>
<p>When I donate to charity it will be done after I have properly researched it. I don't mind people standing with buckets collecting money but not the ones that stop you and want your card details</p>
<p>Overzealous representatives follow you and won't take no for an answer.</p>
<p>I do not like this type of charity work as I feel pressured and can make people feel very vulnerable. I don't think this type of charity work should be allowed if I want to give to charity I will do so in my way. I think these direct debits are a nuisance insecure and should be stopped all together</p>
<p>Generally, I think that charities collecting monies is fine but often find that the temporary stands where business try to get customers to switch providers of energy or set up direct debits, can pester people leading to complaints, so would either stop these or get them to sign up to a voluntary code of conduct with a financial penalty for non-compliance.</p>
<p>Everywhere you go now charities are asking for money. It makes me feel very uncomfortable and guilty. I subscribe to charities every month and don't need to feel uncomfortable every time I go shopping.</p>
<p>I'd be happy if you put a stop to this kind of activity altogether. It makes my heart sink when I'm walking along, drinking in the atmosphere of the town Centre, and then I see these looming commercial stands or clipboard hugging chuggers. Sometimes I go around a back way deliberately to avoid them. I can easily walk by and ignore them, but who wants to encourage that kind of rude behaviour? And they always seem to think I look like a good bet to approach. Thank you for considering reducing this nuisance, preferably to near zero. Use the pandemic as an excuse if you must!</p>
<p>When I am trying to have a conversation with someone, or I have something on my mind it's VERY annoying being approached by someone pretending to be my friend to get me talking. I have to spend most of my time in Harrow trying to dodge them. Also, my son is autistic and doesn't like being approached by strangers</p>
<p>Should be restricted to smaller amount of locations in Town</p>
<p>I find the people signing up very pushy and avoid going out while I'm in Harrow</p>
<p>all can be done online or in their belonging shops.</p>
<p>if people want to give to charity, they can give privately</p>
<p>You can say "no thanks".</p>
<p>It is such a nuisance to be stopped and sometimes harassed in the streets, making the town Centre not a nice place to be.</p>
<p>Again, only if causes problems then people do abuse should be taken to task</p>
<p>They are a menace and should be banned completely from approaching people.</p>
<p>I think Harrow should consider the elderly and vulnerable, many who might not understand exactly what their signing up for and often can ill-afford.</p>
<p>A simple application process needs to be implemented for this as collections from the public are key for charity finances and for them to continue their important activities.</p>
<p>This is a public nuisance and can put people off shopping locally.</p>
<p>The children's cancer charity workers in St Ann's outside Holland & Barrett are very aggressive and 'in your face'. I understand it is a worthwhile cause but when they accost you twice a day with their buckets and waving card readers in your face it can be quite intimidating</p>

Appendix E Q9. Comments
Lock them up or deport them or just hang them
Get rid of the beggars. Begging is illegal.
Too many beggars in Harrow town Centre
Donating to charity is a better way to address issues
Well know target area for "professional" beggars.
Beggars in Harrow can be highly confrontational and aggressive and if you don't stand to help them then they cuss and insult in their own language, this is highly offensive and confrontational and aggressive. Also, they always congregate outside the busiest places of Harrow making access very difficult for disabled residents. Please can this be tacked as an emergency as this presents serious dangers to residents who have to manoeuvre around Harrow as if it was an obstacle course.
The beggars look perfectly alright to work n get money rather than bagging
Every supermarket in Harrow has beggars outside. Please stop them.
Some of these people use the money to buy alcohol and drugs.
This is not acceptable and not a good image for Harrow town Centre
Some of the beggars can be quite aggressive
Often, they are part of an organised gang
Now out of control in Harrow<bar>Needs. Urgent attention
Restrict and stop all together, as I believe a lot of beggars in Harrow are not genuine even the genuine ones it would be better for a council or community group to organise tea and coffee and shelter for them rather than them begging and that would get rid of the non-genuine ones off the high street. <bar>I avoid shopping in Harrow because of these beggars and go to Uxbridge as don't see as many there!
If often see the same beggars in Harrow and think that if possible, their needs should be considered and addressed by the Local Authority, thereby removing the need to beg.
This also makes me feel uncomfortable.
Yes, please make sure that people get help if they need it and stop anyone from having an excuse to ask for money or anything else on the streets. It's intimidating to be approached by strangers asking for small change on false pretenses, and it gives a terrible impression of the town Centre if seemingly desperate wretches are sitting about on the ground with signs and begging pots. A good way would be to give passers-by a safe easy way to report such incidences and let it be known to all beggars that people will use it to help them and/or to stop their nuisance/predatory behaviour. Use the pandemic as an excuse if you must!
Gangs of beggars are a big visible problem in Harrow town Centre. I've never ever seen them being dealt with even though they are present every time I visit town. We wouldn't expect any other legal activities to be ignored
The supposed disabled beggars in Harrow around St Ann's and surrounding area are a nuisance and are becoming quite threatening
Again, very pushy
I have serious concerns about the impact of the Council criminalising begging
The people begging should be looked after and supported so there isn't a need to beg. Those begging under false pretenses should be fined.
Most of the beggars are not genuine homeless people, they are professional begging-gang members. These ones should be arrested and prosecuted.
Harrow need to step up their support of genuine cases whilst assuring ingenuine ones are fined. Many in our group are distressed by the amount of homeless in genuine need seem to be in the area. Harrow is failing too many.
Our homeless should not be punished for their state, rather they should be offered suitable care and social support.
This is a public nuisance and can put people off shopping locally.
Way too many organised beggars who the police/Harrow enforcement officers seem to ignore

Appendix F Q 10. Comments
They are not welcome
More planned use is fine. Use markings to help flow of people
Protect existing, rate paying, retailers.
Harrow, with all the new residential buildings being built, is experiencing a substantial increase in population so at especially busier times, Harrow sometimes becomes a very busy and inconvenient way to do shopping, the addition of these stalls and stands that take up the little room there is to manoeuvre, does not help matters and is a great hinderance.
Only allowed if permit issued. Please.
I have never witnessed this
All traders and stalls should have set places they can set up so to avoid crowding and congestion on the main high street...
As the population grows, the shopping centres get busier and so any unnecessary obstacles should be removed.
I must admit, I have manned quite a few charity and campaign stalls in the town centre myself. And I'd rather I didn't ever have to. When people set up random stalls and stands for commercial purposes it feels even more cheap and ugly. There must be a better way to use the space and make a vibrant town centre.
Also people selling perfume from bags. There should be posters up at regular intervals with a number to call direct to patrols to report to stop this
Not totally banned but managed sensibly
Coffee shops and restaurants are ok
many community shows have closed because of restrictions like North Harrow Show.
Harrow town centre is awful and isn't a nice place to visit, something needs to be done and I'd welcome a plan.
Harrow could offer better support to those needing to do so. This would protect the public and allow those who are struggling to operate to do so responsibly.
Clear signage and guidance will solve this.
It creates a bustle street environment. It makes the high street more inviting- encouraging local shoppers.

Appendix G Q11. Comments
It's the human vermin that causes problems not wildlife
These birds are pets and carry many diseases
Say where cannot do it
It's fun for kids so let them do
Food waste in bins.
There are plenty of parks and recreational grounds in Harrow for people to participate in this activity.
I think what they are doing now saying to not feed them is a good idea and discourages people who bring large quantities to do it. I don't think fines are the right way to go about discouraging people as feel this is just a council way to get revenue and preys on innocent. And would discourage me from coming to town centre.
Immigrants have a culture of feeding birds. They don't realise the vermin and mess this makes.
Please educate people that birds are perfectly well able to feed themselves. It might be entertaining for children and comforting for older people but spreading food about on the ground for wild creatures has no place in a town centre where it just adds to the litter and

vermin. I think some people use bird feeding as a way to get rid of their half-eaten cakes and pastries or stale bread. Food waste is a problem in itself - maybe find a popular way for it to be collected from public places and join the domestic food recycling stream. Better still, encourage everyone to stop buying food that only the birds are going to eat.
To throw a bit of food down is fine but don't allow piles of food to be left to attract vermin
Causing more to come and also gives them too much food
food given to birds is creating lots of rats in my area
DON'T FEED THEM !!!!!!!!!!!
It is a health hazard and unsightly.
Pigeons are vermin and shouldn't be encouraged by feeding them. They carry disease and their faeces destroys building and pavements .
Harrow is overrun with vermin.
Simple signage will solve it.
It's not good for the health of the birds and squirrels to be given bread and it attracts pigeons. Grain should be promoted.

Appendix H Q12. Comments
Hang them
Disgusting behaviour ASB
Fine everyone caught doing this, it's disgusting.
It's disgusting and people honestly just don't care, should be fined and barred from the town centre
No excuse, particularly during a pandemic.
Severe penalties should be imposed and CCTV should be added to alleyways in Harrow because, sadly, people use these as toilets and they always reek of urine and other waste matter.
It has to be stop n we have to take it very seriously
Red spit all over the place causing stains that do not go away. Fine them it is illegal.
I have avoided Harrow since lockdown as toilet facilities were closed. I came to Harrow few times and struggle to find any toilet open. But this is not normal. I heard other people have urinated behind bushes etc. But where can they go.
It's disgusting whether cultural or not
Main source of infection to multiple illness
You should add in public toilets in the town centre open 24/7 to help stop this.
Definitely needs to be enforceable action for this one as all horrible behaviour. Especially where in Harrow town centre where there are plenty of bathroom facilities available.
Especially with Covid 19 still around
That is a no brainier. disgusting habit.
Of course. Maybe providing and maintaining proper public toilet facilities would be one answer, like in the good old days!
Absolutely!!!
No respect
It's unacceptable and people should be fined again making Harrow an unsavoury place to be.
It should be addressed in the whole of Harrow. I still see spitting even during this COVID pandemic. Toilets should also be reopened in parks etc. especially to promote long distance walking.
This spreads disease and Harrow should have the power to issue on-spot fines.
This must be addressed where clear, video evidence provides a clear view of this occurring.
It's absolutely disgusting, damages property and spreads disease.

Appendix I Q13. Comments
Leaflets are litter
Because sometimes stranger coming with bad intense
Only with permission.
During this pandemic its best to avoid any kind of unnecessary contact
Don't think leafleting should go on in a high street as people aren't interested and just want to get on with there shopping. I find it a nuisance and do not like being approached by people even more so with COVID-19 I think this needs to stop all together
However, the interest of the public in the product/service should be verbally established first to reduce number of leaflets being discarded.
People don't read these leaflets, just Chuck them on the ground.
I've given out leaflets myself in the town centre, many times, and it's a horrible thing to have to do. I won't be sorry if there are tighter restrictions to encourage people to find better, more imaginative and more sustainable ways to get their messages across.
A pain when you are 'offered' a leaflet and when you decline they try and shove it in your hand anyway
Litter needs addressingHarrow is currently seen to be doing little, if anything. Harrow's removal of litter bins in the area are adding to the problem.
Leaflets distributed by local and responsible community organisations to advertise community events or activities should be allowed with a minimum of bureaucratic paperwork and the shortest time scale possible - for example and email to a named council officer authorised to give permission for leaflet distribution in a limited area for a limited time.
There should be no reason to restrict simple business promotion where done respectfully and without harm.
Leaflets usually advertise rubbish. If it's a useful stall I.e. planning matter information then fine. If it's for kebabs - we don't need it.

Appendix J Q14. Comments
This applies to most Asian shopkeepers selling hooky gear
Its itself illegal
It is criminal.
To survive in the current situation. Times are hard. If the traders are selling genuine products like to sell for maximize Christmas sales. Give genuine traders licence to sell. Illegal should be banned.
Especially perfume which no one knows what ingredients are used and could be dangerous. Also aren't they slave labour?
If it is illegal there are already powers to stop it, because it is illegal!
All street traders should be vetted on what they are selling and should have correct documentation for goods especially liquids and food items
People are making money out of vulnerable people and it must stop.
Of course, it should not only be - if it's illegal; surely we must aim to make sure it doesn't happen at all, mustn't we?
Harrow has a duty to protect the general public from dangerous or shoddy products.
Where there can be clear evidence of this type of activity it should stop and be prevented from occurring.
The products are made using modern slavery. We should not promote traders selling this.

Appendix K Any further comments
Harrow is a dump over crowded full of criminals
Extend the order to Harrow square, where the new Harrow library about to open
Skateboarding should also be banned
Restricting all of these activities will make Harrow Town Centre a much more welcoming environment for all to enjoy.
The Council are quite right to take a tough "zero tolerance" approach to activities that damage the civic pride that many folk have in Harrow. High standards lead to peace and prosperity for all citizens.
Harrow is suffering from a serious lack of seating, both inside the shopping centres in the town centre and all around the town centre. The slab of stones is extremely uncomfortable to use as they have no handlebars/ grips for use by disabled people and are mostly wet and freezing. The seats placed around Harrow are comfortable but should contain handlebars/grips for each seat, having them at each end is not adequate. The circular seating in the shopping centre entail many people sitting crushed against one another and this presents problems such as germ cross infection and general awkwardness and they too, lack hand bars/grips. Also, some seats should be allocated for specific use by disabled people and able-bodied residents should be encouraged not to use them. Furthermore, the town centre streets are always strewn with rubbish and chewing gum and it looks like the cleaning of the streets has substantially decreased. Some places also need to be re-painted and made to look cosmetically nice again. Some shops are using amplifiers in the streets to advertise their business, placed in front of their doors, and this should be banned as they are very high in volume and very distrustful.
It's being very dirty as well
Drug dealing openly around Belmont Circle. Please stop them.
Please keep necessities, toilet facilities, food places, and genuine shops opens. As long everyone following mask, wash hands, and space rules. It should be fine.
It's great to see that you are trying to make the town centre a more pleasurable place to visit.
North Harrow is getting very bad on drugs and alcohol. Hope we do something before it gets out of control.
Green spaces and footpaths of parks & green spaces, in Harrow is disgusting. Specially for children and elders. How come, they never get clean, in Autumn?
Force businesses/commercial premises owners to clean up messy property fronts. Prevent flyposting.
Harrow is looking increasingly run down and dirty. Harrow town centre in particular is awful.
I hope you go ahead with this initiative.
I know it's tempting to conject that the council can make money by charging people for permission to undertake some of these activities, but please hold off from introducing new scales of rules with fees. Town centres are changing and may never look the same again. We don't know what Harrow will be like post-pandemic. Our best bet will be to stop it becoming a place full of nuisances that is avoided by everyone except the criminal and the molester.
If there were security guards patrolling Harrow town centre it would help stop a lot of these problems. A text report line could help them get to any issues to stop them quickly
Extremely large increase in shoplifter In borough since lockdown
please stop spitting in street
All the issues in this survey are valid and hopefully if addressed would help to improve the ambiance of Harrow town centre . In order to address most of the issues a police presence or a council presence is needed to see that the rules and regulations are adhered to.
I don't see why you even need to have this survey - all the questions relate to basic bye-law enforcement that you should be doing anyway. Instead of asking should people be expected to

behave decently and lawfully just get on and enforce the rules with your existing powers.

Litter is an ongoing problem in Harrow and it should be made easier for Harrow to issue on the spot fines for littering as well as to households who dump furniture, old carpets, etc. in their drives, attracting vermin and contributing to the area being unsightly.

I am concerned about an approach in the Consultation Document. Education and engagement should be the main action and always be the first approach. The vast majority will not know that activities like leafleting are not allowed and the impact of this are considerable for the person. Only education and engagement has failed then a fine may be the next best option. The Public Spaces Protection Order (Harrow Council) 2020 consultation has the following approach that is lacking from this one: " Any person who fails to comply once requested to do so by an Authorised Officer shall be issued with a Fixed Penalty Notice (£100)." The approach taken by police for COVID should be followed based on the success of it, "Engage, Explain, Encourage, Enforce". Should those who are then breaching any of the PSPO then respond by ceasing the activity there should be no need for enforcement for it.

Dogs should be free in parks - not on leads.

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The Public Spaces Protection Order (Harrow Town Centre) 2020 Consultation

23 November 2020 – 15 January 2021

RESPONSES TO COMMENTS

Appendix B Q6. Comments	Responses
This should be borough wide it's no good just having this in a zone as the troublemakers will move to just outside the zone like the hill opposite the college in lowlands road etc.	The introduction of PSPOs is based on evidence and need. They are reviewed regularly and if needed, can seek to extend the area
ASB is occurring on a regular basis due to this in our square which is a public area and residents are being intimidated by these individuals	This is being addressed between partners and looking to restrict access which would stop it being a public square
Street drinking is evident by St John's Church on the junction of Station Road/ Sheepcote Road, these people should be discouraged from this activity by a Church.	This PSPO will assist, as will the Borough wide PSPO. Signage is already in place and enforcement can action
Frequent visitor to Perceval Square. An intimidating new area. As a visitor we randomly encounter feral youths who are drinking etc. Harrow-On-The/Hill station is a little challenging, but lots of general public present. Perceval Square can be just a solo lady and a gang of foul-mouthed threatening, generally all male, group. Friends call it "Harrow Going- Down-Hill"	Such matters should be reported to the Police either 101 (if non emergency) or 999 if imminent threat
This excessive drinking sometimes leads to aggressive or bullying behaviour and taunting as people pass these groups by.	That is why it is being addressed and working with Police around this
Harrow and Wealdstone high street has very annoying people who drink (may be alcohol because they are hiding it) make notice do not pee in surrounding street	This is covered by a Borough wide PSPO that includes street drinking and urination
It can be offensive for young children with parents to see drinkers especially at the bus stops around on the high street	That is why it is being addressed and working with Police around this
To many people drinking on the streets and antisocial behaviour	That is why it is being addressed and working with Police around this
Why should you stop those doing it responsibly? This should be changed to it is allowed to drink within reason. Of course, if you're causing a disturbance you are asked to stop. When the weather is nice and it is hot and sunny having a simple drink outside is nice, and you're taking that right away.	The alcohol aspect is only enforced when the officer believes it is causing nuisance or annoyance. For example, a family enjoying wine in a park as part of a picnic will not be enforced
This is anti-social and can cause intimidating behaviour when under the influence	That is why it is being addressed and working with Police around this

I feel it is the responsibility of Harrow Council to make sure that policing is high profile and the presence of law enforcement is more visible to deter any unsocial behaviour.	That is why it is being addressed and working with Police around this
People shouldn't drink on the streets. Only if they are sitting outside a pub or restaurant.	That is why it is being addressed and working with Police around this
This seems to be a growing problem in Harrow Weald, predominantly in the evening outside Tiger Dragon, Bombay Central, Discount Direct and Waitrose	There is a borough wide PSPO that can address this
I don't think there should be any alcohol consumed in open space	Noted
Please stop giving shops 24 hr. licenses to sell alcohol. it creates a lot of litter and anti- social behaviour. don't feel safe walking near these shops as groups of men gather to drink.	Any such licence does goes through a thorough process and people can put in representations. Additionally, the licenses can be reviewed if felt not managed properly
Unfortunately, I live in an area where this happens on street corners, alleyways and outside shops. Antisocial behaviour arises from drinking on the streets! It can result in urinating in the alleyways, also continues to drug taking and dealing if the area is known to be liberal.	That is why it is being addressed and working with Police around this
Please ensure that alcohol consumption does not spill over to adjacent areas	That is why it is being addressed and working with Police around this and also covered by a Borough wide PSPO
Empty bottles and cans an ongoing problem in the area. Those who have clearly consumed alcohol have been abusive to multiple community members in local park, regardless of time of day.	That is why it is being addressed and working with Police around this and also covered by a Borough wide PSPO
There is also an ongoing problem of the abuse of Nitrous Oxide capsules in parks and open spaces.	Noted and work is taking place to look at this issue
It will be important for suitable and clearly visible signage for those who are consuming alcohol to be aware it will not be allowed. Only those that persist should be fined. Engagement and encouragement should be the first action due to the potential other mental and other factors leading to excessive alcohol consumption.	Agreed and signage is being used
Not everyone should be penalised for the actions of a few. There is nothing wrong with a glass of wine on a summer's day.	Agreed

Appendix C Q7. Comments	Responses
This type of activity is not welcome like how Bolivian flute players can afford to come here and basically beg	Noted
Entertainment is fine, not religious groups or extreme political groups	Noted
We live in the town Centre which is now a resident area too	Noted, that is why it is important to control this activity
Too many delusional buskers who can't even sing or play properly, causing an absolute nuisance and racket. The harp lady is quiet and provides some nice background music, all the others can sod off!	Noted
A lot of money has been invested in new development, but regeneration is slowly failing because the flagship Barratt Harrow Square/Perceval Square development is increasingly widely regarded as anti- social and dangerous.	Noted
Busking should be allowed.	Agreed, and is but in a controlled manner
<p>Busking is enjoyable to listen to when out and about in Harrow, especially the South American music group who always dress up and it's a fun culture to see.</p> <p>Amplified voices such as using a megaphone has rarely been an issue whereby the voice is highly amplified so much so you hear it once you pass it, but I understand at times this may not be the cause, especially when energy firms/ phone sign up companies come with their adapted vehicles and aggressively advertise their services. This can be very disruptive at times.</p>	Noted
<p>Everyone enjoys busking from time to time, especially when you are out and about, shopping etc. The great thing about street performance is that you can enjoy it for the length of time you desire, however if you live directly in the area that is frequently used by busking it can become a nuisance, especially with the use of amplifiers! Personal experience shows that the volume is not controlled by those who are performing, if anything there is a lot of rivalry amongst those who perform and the volume seems to increase in order to compete with each other.</p> <p>When you live and work in such area it is not possible to escape from the loud noise and increased volume and it becomes impossible to concentrate at work or relax and enjoy yourself in your own home. I'm sure no one would appreciate being in their own home and being unable to listen to radio, watch TV or simply just relax. By living in city Centre I fully understand that the footfall as well as the noise is much higher than in residential areas however I do believe that there should be clear</p>	Noted and we are working to ensure clear guidance where necessary

guidance for those who perform so everyone can enjoy themselves which would also reduce the amount of complaints received.	
In sustain amount n time it is good	Noted
No amplifiers.	Noted
I manage a bank branch in Harrow that regularly has buskers with amplifiers outside. It has impacted us completing appointments with customers for bereavements and mortgages, which as you can imagine is very stressful for the customers concerned. There is a lady who uses a harp and keeps the noise level to a reasonable background level that is very nice but accordions and saxophones with amplifiers really impact our customers experience in our branch. This is especially relevant when you consider we need to keep most doors, including the main branch door, open due to COVID social distancing practices. It's hard to understand how much this impacts customers unless you have to apologies to a lady who is registering the death of her son in your branch because of the music coming from outside. Please restrict this.	Noted
I work in retail outlet in St Ann's Road and they cause noise pollution which impacts on my working environment for both my colleagues and my customers	Noted
The Buskers that are regular on a Saturday bring a nice vibe to Harrow. As far as I am aware music and singing so far has been of an acceptable nature for many	And good busking is being encouraged
There is one man whose music is ridiculously loud. It's not even a background noise.	Noted
I think there is a great opportunity to designate specific area's around Harrow for these activities and control the quality of what is played to the public.	A pilot is in place in the town centre around this
At times there are too many buskers at once and they take up space on pavements making it more crowded so I think should be limited	Noted
I think that busking should be allowed, and the level of amplification should be subject to what is reasonable.	Agreed
Busking is good if it's organised. One person or group at a time. Needs to be booked so other buskers get a chance.	Agreed

we have had on many occasions' buskers sitting right outside our Branch and playing very loud instruments. When we ask them to quieten down, they refuse. This has impacted us in many ways. Firstly, our customers cannot hear us as and, we have had many bereavement appointments which we could not continue due to the sound. As you can imagine this is a sensitive time for the customers and when they come in, they are faced with listening to loud music.	Noted
Music is fine but I don't like being shouted at about Jesus or how the world is going to end	Noted
Town Centre would be acceptable in business hours. I would assume the minimal people living in a Town Centre would have had expectations of noise when choosing a location. I feel it brings a welcome atmosphere in Town where the people of Harrow gather	Noted
This seems to be a growing problem in Harrow Weald, predominantly in the evening outside Tiger Dragon, Bombay Central, Discount Direct and Waitrose	This can be looked into
some disabled people play some kind of music in a not pleasant way to beg.	Noted
Please stop allowing people to put loud music on their stereo speakers in the park, it spoils the peace and quiet	If you report such incidents, the Council and Police can address
If handled wisely both can co-exist like Glastonbury with different stages but spaced away from each other.	Noted
Within reason	Noted
If it doesn't cause nuisance then it should be allowed	It will be in a controlled manner
People have a right to enjoy the outdoors without unacceptable levels of noise nuisance.	Noted

<p>The must be adequate signage that clearly states amplification will be prohibited. I have noted retailers also using amplification and they should be clearly made aware of this. This must be carefully balanced with free speech and vitally, nuisance alone should not prohibit free speech.</p>	<p>Signage will be put up if the PSPO is approved</p>
<p>Music is good for the soul. I couldn't think of anything worse than a quiet, sanitised Harrow. We should be promoting culture even if the music isn't to everyone's tastes.</p>	<p>Agreed</p>

Appendix D Q8. Comments	Responses
Chuggers are a nightmare it's like an obstacle course in a game show	Noted
This people are a nuisance and way too frequent.	Noted
These people are a nuisance and seem to be growing in number	Noted
Too much soliciting in Harrow town Centre	Noted and being addressed
Restrict to certain areas	Noted
Too many "Chuggers" - charity muggers. Less is more.	Noted
These charity/business personnel can sometimes be too aggressive in their styles in promoting their cause/business and they start following you around and it is awkward and intimidating to pass them at times. Also, during these Covid times whereby people should maintain the adequate social distance, they do not always adhere to this policy. Furthermore, 2 or more of them are spread out in the same street whereby you may pass one only to come across the second person from the same charity/business and this may present as an obstacle course.	Noted and this means that aspect can be addressed
I don't believe in any stranger	Noted
No canvassing please.	Noted
This is where the more vulnerable can be taken advantage of especially young people who may not know the right questions to ask when approached	Noted
If I want to donate to a charity - I'd rather make my choice without being approached or even chased after for	Noted
When I donate to charity it will be done after I have properly researched it. I don't mind people standing with buckets collecting money but not the ones that stop you and want your card details	Noted
Overzealous representatives follow you and won't take no for an answer.	Noted
I do not like this type of charity work as I feel pressured and can make people feel very vulnerable. I don't think this type of charity work should be allowed if I want to give to charity I will do so in my way. I think these direct debits are a nuisance insecure and should be stopped all together	Noted
Generally, I think that charities collecting monies is fine but often find that the temporary stands where business try to get customers to switch providers of energy or set up direct debits, can pester	Noted

people leading to complaints, so would either stop these or get them to sign up to a voluntary code of conduct with a financial penalty for non-compliance.	
Everywhere you go now charities are asking for money. It makes me feel very uncomfortable and guilty. I subscribe to charities every month and don't need to feel uncomfortable every time I go shopping.	Noted
I'd be happy if you put a stop to this kind of activity altogether. It makes my heart sink when I'm walking along, drinking in the atmosphere of the town Centre, and then I see these looming commercial stands or clipboard hugging chuggers. Sometimes I go around a back way deliberately to avoid them. I can easily walk by and ignore them, but who wants to encourage that kind of rude behaviour? And they always seem to think I look like a good bet to approach. Thank you for considering reducing this nuisance, preferably to near zero. Use the pandemic as an excuse if you must!	Noted
When I am trying to have a conversation with someone, or I have something on my mind it's VERY annoying being approached by someone pretending to be my friend to get me talking. I have to spend most of my time in Harrow trying to dodge them. Also, my son is autistic and doesn't like being approached by strangers	Noted
Should be restricted to smaller amount of locations in Town	Noted
I find the people signing up very pushy and avoid going out while I'm in Harrow	Noted
all can be done online or in their belonging shops.	Noted
if people want to give to charity, they can give privately	Noted
You can say "no thanks".	Noted
It is such a nuisance to be stopped and sometimes harassed in the streets, making the town Centre not a nice place to be.	Noted
Again, only if causes problems then people do abuse should be taken to task	Noted
They are a menace and should be banned completely from approaching people.	Noted
I think Harrow should consider the elderly and vulnerable, many who might not understand exactly what their signing up for and often can ill-afford.	Noted
A simple application process needs to be implemented for this as collections from the public are key for charity finances and for them to continue their important activities.	Agreed

This is a public nuisance and can put people off shopping locally.	Noted
The children's cancer charity workers in St Ann's outside Holland & Barrett are very aggressive and 'in your face'. I understand it is a worthwhile cause but when they accost you twice a day with their buckets and waving card readers in your face it can be quite intimidating	Noted

Appendix E Q9. Comments	Responses
Lock them up or deport them or just hang them	Not appropriate comments
Get rid of the beggars. Begging is illegal.	Begging is but aim is to also assist those who genuinely need help
Too many beggars in Harrow town Centre	Noted
Donating to charity is a better way to address issues	Noted
Well know target area for "professional" beggars.	Noted
Beggars in Harrow can be highly confrontational and aggressive and if you don't stand to help them then they cuss and insult in their own language, this is highly offensive and confrontational and aggressive. Also, they always congregate outside the busiest places of Harrow making access very difficult for disabled residents. Please can this be tackled as an emergency as this presents serious dangers to residents who have to manoeuvre around Harrow as if it was an obstacle course.	Noted
The beggars look perfectly alright to work n get money rather than bagging	Noted
Every supermarket in Harrow has beggars outside. Please stop them.	Noted
Some of these people use the money to buy alcohol and drugs.	Noted
This is not acceptable and not a good image for Harrow town Centre	Noted
Some of the beggars can be quite aggressive	Noted
Often, they are part of an organised gang	Noted
Now out of control in Harrow<bar>Needs. Urgent attention	Noted
Restrict and stop all together, as I believe a lot of beggars in Harrow are not genuine even the genuine ones it would be better for a council or community group to organise tea and coffee and shelter for them rather than them begging and that would get rid of the non-genuine ones off the high street. <bar>I avoid shopping in Harrow because of these beggars and go to Uxbridge as don't see as many there!	Noted
If often see the same beggars in Harrow and think that if possible, their needs should be considered and addressed by the Local Authority, thereby removing the need to beg.	Noted
This also makes me feel uncomfortable.	Noted

Yes, please make sure that people get help if they need it and stop anyone from having an excuse to ask for money or anything else on the streets. It's intimidating to be approached by strangers asking for small change on false pretenses, and it gives a terrible impression of the town Centre if seemingly desperate wretches are sitting about on the ground with signs and begging pots. A good way would be to give passers-by a safe easy way to report such incidences and let it be known to all beggars that people will use it to help them and/or to stop their nuisance/predatory behaviour. Use the pandemic as an excuse if you must!	Noted
Gangs of beggars are a big visible problem in Harrow town Centre. I've never ever seen them being dealt with even though they are present every time I visit town. We wouldn't expect any other legal activities to be ignored	Noted
The supposed disabled beggars in Harrow around St Ann's and surrounding area are a nuisance and are becoming quite threatening	Noted
Again, very pushy	Noted
I have serious concerns about the impact of the Council criminalising begging	It technically already is, but this is to target those who are aiming to deceive and don't need assistance
The people begging should be looked after and supported so there isn't a need to beg. Those begging under false pretenses should be fined.	Agreed, and that is the approach being taken to help the genuine people in need
Most of the beggars are not genuine homeless people, they are professional begging-gang members. These ones should be arrested and prosecuted.	Noted
Harrow need to step up their support of genuine cases whilst assuring ingenuine ones are fined. Many in our group are distressed by the amount of homeless in genuine need seem to be in the area. Harrow is failing too many.	Agreed
Our homeless should not be punished for their state, rather they should be offered suitable care and social support.	Noted
This is a public nuisance and can put people off shopping locally.	Noted
Way too many organised beggars who the police/Harrow enforcement officers seem to ignore	Noted

Appendix F Q 10. Comments	Responses
They are not welcome	Noted
More planned use is fine. Use markings to help flow of people	Noted
Protect existing, rate paying, retailers.	Noted
Harrow, with all the new residential buildings being built, is experiencing a substantial increase in population so at especially busier times, Harrow sometimes becomes a very busy and inconvenient way to do shopping, the addition of these stalls and stands that take up the little room there is to manoeuvre, does not help matters and is a great hinderance.	Noted
Only allowed if permit issued. Please.	Noted
I have never witnessed this	Noted
All traders and stalls should have set places they can set up so to avoid crowding and congestion on the main high st	Noted
As the population grows, the shopping centres get busier and so any unnecessary obstacles should be removed.	Noted
I must admit, I have manned quite a few charity and campaign stalls in the town centre myself. And I'd rather I didn't ever have to. When people set up random stalls and stands for commercial purposes it feels even more cheap and ugly. There must be a better way to use the space and make a vibrant town centre.	Noted
Also people selling perfume from bags. There should be posters up at regular intervals with a number to call direct to patrols to report to stop this	Will be looked at re how to report
Not totally banned but managed sensibly	Agreed
Coffee shops and restaurants are ok	Noted
many community shows have closed because of restrictions like North Harrow Show.	Noted
Harrow town centre is awful and isn't a nice place to visit, something needs to be done and I'd welcome a plan.	Noted
Harrow could offer better support to those needing to do so. This would protect the public and allow those who are struggling to operate to do so responsibly.	Noted
Clear signage and guidance will solve this.	Noted
It creates a bustle street environment. It makes the high street more inviting- encouraging local shoppers.	Noted

Appendix G Q11. Comments	Responses
It's the human vermin that causes problems not wildlife	Noted
These birds are pets and carry many diseases	Noted
Say where cannot do it	Noted
It's fun for kids so let them do	Unfortunately it is also a risk to their health, other peoples and causes great cost to the public purse. There are far better places to allow children to feed birds
Food waste in bins.	Noted
There are plenty of parks and recreational grounds in Harrow for people to participate in this activity.	Noted
I think what they are doing now saying to not feed them is a good idea and discourages people who bring large quantities to do it.I don't think fines are the right way to go about discouraging people as feel this is just a council way to get revenue and preys on innocent. And would discourage me from coming to town centre.	Noted
Immigrants have a culture of feeding birds. They don't realise the vermin and mess this makes.	Noted
Please educate people that birds are perfectly well able to feed themselves. It might be entertaining for children and comforting for older people but spreading food about on the ground for wild creatures has no place in a town centre where it just adds to the litter and vermin. I think some people use bird feeding as a way to get rid of their half-eaten cakes and pastries or stale bread. Food waste is a problem in itself - maybe find a popular way for it to be collected from public places and join the domestic food recycling stream. Better still, encourage everyone to stop buying food that only the birds are going to eat.	Noted
To throw a bit of food down is fine but don't allow piles of food to be left to attract vermin	Unfortunately not fine as encourages more birds
Causing more to come and also gives them too much food	Noted
food given to birds is creating lots of rats in my area	Noted
DON'T FEED THEM !!!!!!!!!	Noted
It is a health hazard and unsightly.	Noted

Pigeons are vermin and shouldn't be encouraged by feeding them. They carry disease and their faeces destroys building and pavements .	Noted
Harrow is overrun with vermin.	Noted
Simple signage will solve it.	Noted
It's not good for the health of the birds and squirrels to be given bread and it attracts pigeons. Grain should be promoted.	Noted

Appendix H Q12. Comments	Responses
Hang them	Not appropriate comment
Disgusting behaviour ASB	Noted
Fine everyone caught doing this, it's disgusting.	Noted
It's disgusting and people honestly just don't care, should be fined and barred from the town centre	Noted
No excuse, particularly during a pandemic.	Noted
Severe penalties should be imposed and CCTV should be added to alleyways in Harrow because, sadly, people use these as toilets and they always reek of urine and other waste matter.	Noted
It has to be stop n we have to take it very seriously	Noted
Red spit all over the place causing stains that do not go away. Fine them it is illegal.	Noted
I have avoided Harrow since lockdown as toilet facilities were closed. I came to Harrow few times and struggle to find any toilet open. But this is not normal. I heard other people have urinated behind bushes etc. But where can they go.	Noted – with covid restrictions it is appreciated there are less toilets open, but hopefully this will change soon
It's disgusting whether cultural or not	Noted
Main source of infection to multiple illness	Noted
You should add in public toilets in the town centre open 24/7 to help stop this.	Noted
Definitely needs to be enforceable action for this one as all horrible behaviour. Especially where in Harrow town centre where there are plenty of bathroom facilities available.	Noted
Especially with Covid 19 still around	Noted
That is a no brainier. disgusting habit.	Noted
Of course. Maybe providing and maintaining proper public toilet facilities would be one answer, like in the good old days!	Noted
Absolutely!!!	Noted
No respect	Noted
It's unacceptable and people should be fined again making Harrow an unsavoury place to be.	Noted
It should be addressed in the whole of Harrow. I still see spitting even during this COVID pandemic. Toilets should also be reopened in parks etc. especially to promote long distance	Noted

walking.	
This spreads disease and Harrow should have the power to issue on-spot fines.	Noted
This must be addressed where clear, video evidence provides a clear view of this occurring.	Noted
It's absolutely disgusting, damages property and spreads disease.	Noted

Appendix I Q13. Comments	Responses
Leaflets are litter	Noted
Because sometimes stranger coming with bad intense	Noted
Only with permission.	That is the aim
During this pandemic its best to avoid any kind of unnecessary contact	Noted
Don't think leafleting should go on in a high street as people aren't interested and just want to get on with there shopping. I find it a nuisance and do not like being approached by people even more so with COVID-19 I think this needs to stop all together	Noted
However, the interest of the public in the product/service should be verbally established first to reduce number of leaflets being discarded.	Noted
People don't read these leaflets, just Chuck them on the ground.	Noted
I've given out leaflets myself in the town centre, many times, and it's a horrible thing to have to do. I won't be sorry if there are tighter restrictions to encourage people to find better, more imaginative and more sustainable ways to get their messages across.	Noted
A pain when you are 'offered' a leaflet and when you decline they try and shove it in your hand anyway	Noted
Litter needs addressing Harrow is currently seen to be doing little, if anything. Harrow's removal of litter bins in the area are adding to the problem.	More bins have been put in place
Leaflets distributed by local and responsible community organisations to advertise community events or activities should be allowed with a minimum of bureaucratic paperwork and the shortest time scale possible - for example and email to a named council officer authorised to give permission for leaflet distribution in a limited area for a limited time.	Noted
There should be no reason to restrict simple business promotion where done respectfully and without harm.	Noted
Leaflets usually advertise rubbish. If it's a useful stall I.e. planning matter information then fine. If it's for kebabs - we don't need it.	Noted

Appendix J Q14. Comments	Responses
This applies to most Asian shopkeepers selling hooky gear	Not appropriate categorization
Its itself illegal	Noted
It is criminal.	Noted
To survive in the current situation. Times are hard. If the traders are selling genuine products like to sell for maximize Christmas sales. Give genuine traders licence to sell. Illegal should be banned.	Noted
Especially perfume which no one knows what ingredients are used and could be dangerous. Also aren't they slave labour?	Noted
If it is illegal there are already powers to stop it, because it is illegal!	Noted
All street traders should be vetted on what they are selling and should have correct documentation for goods especially liquids and food items	Noted
People are making money out of vulnerable people and it must stop.	Noted
Of course, it should not only be - if it's illegal; surely we must aim to make sure it doesn't happen at all, mustn't we?	Noted
Harrow has a duty to protect the general public from dangerous or shoddy products.	Noted
Where there can be clear evidence of this type of activity it should stop and be prevented from occurring.	Noted
The products are made using modern slavery. We should not promote traders selling this.	Noted

Appendix K Any further comments	Responses
Harrow is a dump over crowded full of criminals	Noted
Extend the order to Harrow square, where the new Harrow library about to open	This area is being looked at separately
Skateboarding should also be banned	Technically any wheeled vehicle is covered
Restricting all of these activities will make Harrow Town Centre a much more welcoming environment for all to enjoy.	Noted
The Council are quite right to take a tough "zero tolerance" approach to activities that damage the civic pride that many folk have in Harrow. High standards lead to peace and prosperity for all citizens.	Noted
<p>Harrow is suffering from a serious lack of seating, both inside the shopping centres in the town centre and all around the town centre. The slab of stones is extremely uncomfortable to use as they have no handlebars/ grips for use by disabled people and are mostly wet and freezing. The seats placed around Harrow are comfortable but should contain handlebars/grips for each seat, having them at each end is not adequate. The circular seating in the shopping centre entail many people sitting crushed against one another and this presents problems such as germ cross infection and general awkwardness and they too, lack hand bars/grips. Also, some seats should be allocated for specific use by disabled people and able-bodied residents should be encouraged not to use them.</p> <p>Furthermore, the town centre streets are always strewn with rubbish and chewing gum and it looks like the cleaning of the streets has substantially decreased. Some places also need to be re-painted and made to look cosmetically nice again. Some shops are using amplifiers in the streets to advertise their business, placed in front of their doors, and this should be banned as they are very high in volume and very distrustful.</p>	<p>Noted</p> <p>Steps have been taken to increase seating especially during covid where people are safer outside</p>
It's being very dirty as well	Noted
Drug dealing openly around Belmont Circle. Please stop them.	Been reported to Police
Please keep necessities, toilet facilities, food places, and genuine shops opens. As long everyone following mask, wash hands, and space rules. It should be fine.	Noted

It's great to see that you are trying to make the town centre a more pleasurable place to visit.	Noted
North Harrow is getting very bad on drugs and alcohol. Hope we do something before it gets out of control.	This has been reported to Police
Green spaces and footpaths of parks & green spaces, in Harrow is disgusting. Specially for children and elders. How come, they never get clean, in Autumn?	Noted
Force businesses/commercial premises owners to clean up messy property fronts. Prevent flyposting.	Noted
Harrow is looking increasingly run down and dirty. Harrow town centre in particular is awful.	Noted
I hope you go ahead with this initiative.	Noted
I know it's tempting to conject that the council can make money by charging people for permission to undertake some of these activities, but please hold off from introducing new scales of rules with fees. Town centres are changing and may never look the same again. We don't know what Harrow will be like post-pandemic. Our best bet will be to stop it becoming a place full of nuisances that is avoided by everyone except the criminal and the molester.	Noted
If there were security guards patrolling Harrow town centre it would help stop a lot of these problems. A text report line could help them get to any issues to stop them quickly	Noted
Extremely large increase in shoplifter In borough since lockdown	Noted
please stop spitting in street	This is covered by the Borough wide PSPO
All the issues in this survey are valid and hopefully if addressed would help to improve the ambiance of Harrow town centre . In order to address most of the issues a police presence or a council presence is needed to see that the rules and regulations are adhered to.	Noted
I don't see why you even need to have this survey - all the questions relate to basic bye-law enforcement that you should be doing anyway. Instead of asking should people be expected to behave decently and lawfully just get on and enforce the rules with your existing powers.	By laws tend to be very old with very limited enforcement impact.

<p>Litter is an ongoing problem in Harrow and it should be made easier for Harrow to issue on the spot fines for littering as well as to households who dump furniture, old carpets, etc. in their drives, attracting vermin and contributing to the area being unsightly.</p>	<p>Noted</p>
<p>I am concerned about an approach in the Consultation Document. Education and engagement should be the main action and always be the first approach. The vast majority will not know that activities like leafleting are not allowed and the impact of this are considerable for the person. Only education and engagement has failed then a fine may be the next best option. The Public Spaces Protection Order (Harrow Council) 2020 consultation has the following approach that is lacking from this one: " Any person who fails to comply once requested to do so by an Authorised Officer shall be issued with a Fixed Penalty Notice (£100)." The approach taken by police for COVID should be followed based on the success of it, "Engage, Explain, Encourage, Enforce". Should those who are then breaching any of the PSPO then respond by ceasing the activity there should be no need for enforcement for it.</p>	<p>To be clear, the enforcement approach will always be about engagement and education, with enforcement being the last resort where people don't listen or where a serious issue exists that needs a culture change.</p>
<p>Dogs should be free in parks - not on leads.</p>	<p>This isn't being proposed</p>
<p>POLICE</p>	
<p>The consultation is very promising, and your proposed controls are based on real complaints from the public.</p> <p>For some of the controls, there would need to be some streamlined systems in place for us to check whether a busker/charities/businesses/leafleters etc are legitimately operating when we encounter them.</p>	<p>Agree re systems and this is being looked at as was the case with the joint use of community protection notices</p>

The Public Spaces Protection Order (Harrow Town Centre) (Harrow Council) 2021

Harrow Council (“The Authority”) has made the following Public Spaces Protection Order under Section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 (“the Act”)

The Order comes into force on **TO BE CONFIRMED** for a period of 3 years.

In this Order an “Authorised Officer” means any person who is authorised in writing by the Council for the purpose of enforcing and giving directions in relation to public spaces protection orders, as well as Police Officers. “The Restricted Area” relates to all public spaces within the area as shown in schedule 1.

Offences

The offences listed below relate to all public spaces in the “restricted area” within the administrative area of the London Borough of Harrow as outlined in red on the plan in schedule 1 of this order.

1. Amplification

- 1.1 No person shall use a microphone, loudspeaker, megaphone, loud hailer or any other similar equipment designed to amplify the volume of speech or music unless authorised by the council in writing.
- 1.2 No person shall use mains electricity or generator power for the purposes of amplification unless authorised as above.
- 1.3 This does not prevent free speech as long as carried out without the use of any equipment stated in 1.1
- 1.4 Any person who without reasonable excuse fails to comply with this prohibition commits an offence.

2. Financial Agreements on the Street

- 2.1 Any person involved in stopping people for the purpose of getting them to enter into financial agreements for charitable or other purposes must only operate from a set stand and approach people a maximum 2 metres from the stand.
- 2.2 No stand must be placed on the public highway, which includes the pedestrianised area, without the written consent of the Council in line with the requirements of Section 3 of this Public Spaces Protection Order

3. Placing of tables, stands, or other furniture / fixings

- 3.1 No person(s) shall place a table, stand, furniture or other fixings in any part of the public area without written consent from the Council.

4. Feeding of Birds and Vermin

- 4.1 No person shall purposely deposit food on to the ground which is edible by birds (including seeds, bread and grains), within the restricted area.

5. Distribution of leaflets

- 5.1 No person(s) shall distribute any free leaflet, pamphlet or written word without written permission of the Council or the Harrow Business Improvement District

6. Illegal Street Trading

- 6.1 No person shall sell any product or item in outdoor public spaces within the restricted area without having the express written permission or licence from the Council.
- 6.2 This includes persons selling from bags, trolleys, or other mobile means.

7. Obstruction of Authorised Officer

- 7.1 Any person who attempts to obstruct an Authorised Officer in carrying out their duties under this Public Spaces Protection Order shall commit an offence
- 7.2 Obstruction includes, but is not limited to, giving false information, physically obstructing an Authorised Officer and refusing to comply with any reasonable instruction given to ensure compliance with this PSPO.

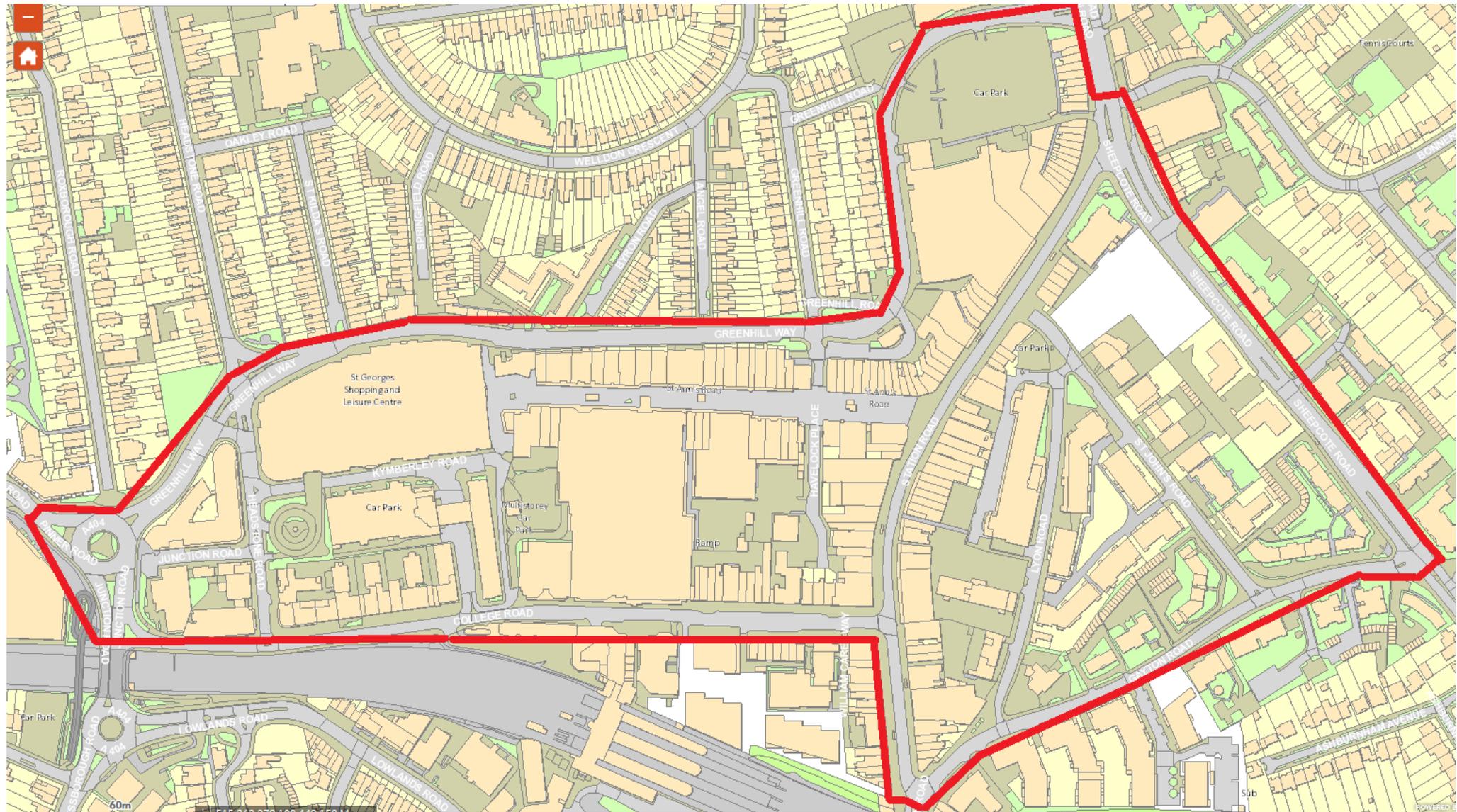
8. Penalties

- 8.1 A person who is guilty of an offence under this part of the order shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

Information

Further information about this PSPO and matters related within it, including licensing and seeking written permissions, can be found at www.harrow.gov.uk/licensing

**SCHEDULE 1 – DESIGNATED RESTRICTED AREA
(The Public Spaces Protection Order (Harrow Town Centre) (Harrow Council) 2021)**



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Equality Impact Assessment (EqIA)



You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)

Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	Town Centre PSPO Introduction	Date EqIA created 19 th March 2021
Name and job title of completing/lead Officer	Richard Le-Brun, Head of Community & Public Protection	
Directorate/ Service responsible	Community / Community & Public Protection	
Organisational approval		
EqIA approved by Directorate Equalities Lead	Name D Corby	Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval 29 th March 2021

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<p>1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)</p>
<p>a) What is your proposal?</p> <p>Introduce the Public Spaces Protection Order across Harrow Town Centre to address issues of busking, amplifiers, leaflet distribution, wheeled vehicles and furniture on the street</p> <p>Since the initial consultation, the aspects around begging is being addressed through other means from the PSPO</p>
<p>b) Summarise the impact of your proposal on groups with protected characteristics There are not expected to be any adverse or positive impacts on any protected characteristic groups.</p>
<p>c) Summarise any potential negative impact(s) identified and mitigating actions.</p> <p>No negative impacts Identified</p>

2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	None of the conditions within the PSPO should have any effect on this characteristic. For example, busking tends to be conducted by young people but a busking pilot is in place to allow this and the restriction on amplification does not prevent this taking place	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disability	None of the conditions within the PSPO should have any effect on this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender reassignment	None of the conditions within the PSPO should have any effect on this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage and Civil Partnership	None of the conditions within the PSPO should have any effect on this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy and Maternity	None of the conditions within the PSPO should have any effect on this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Race/ Ethnicity	None of the conditions within the PSPO should have any effect on this characteristic. The aspect of amplification for example cannot be related to any specific ethnic group(s) as such usage is wide spread across various racial and ethnic groups.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or belief	There have been some comments that this prevents free speech by targeting amplification. This is not the case, and free speech remains in place but does not need to be amplified so as to potentially cause a nuisance. Also there is the allowance to distribute leaflets but in a controlled manner that prevents any adverse effect on the environment. There is currently no evidence to show this will affect any one group more than any other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender	None of the conditions within the PSPO are expected to affect this characteristic. For example, buskers are a mix of men and women in the town centre so the controls around amplifiers will not impact any one more than any other.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual Orientation	None of the conditions within the PSPO should have any effect on this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</p> <p><input type="checkbox"/> Yes No <input checked="" type="checkbox"/></p>					
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p>					
<p>2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?</p> <p><input checked="" type="checkbox"/> Yes No <input type="checkbox"/></p>					

This will impact the Town Centre in a positive way as provides another tool to use to address matters adversely affecting the environment

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

No Impact

--

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

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

Outcome 2
Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4

Outcome 3
This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.

Include details here

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Briefing Note – Town Centre PSPO Cabinet Report

Harrow Council is committed to improving the environment, maintaining low crime and improving community safety. Directly relating to this commitment is the Council's action to address anti-social behaviour and related complaints in its main urban centre.

On 1st February 2021, the Borough Wide Public Spaces Protection Order was renewed which included controls around alcohol consumption in public places as well as urinating, defecating and spitting. But the town centre faces specific issues that were addressed through consultation and included

- Amplification of music and voice
- Financial Agreements (people trying to get visitors to sign up to them)
- Placing of tables, chairs, stands and other fixings / furniture on the street (not associated with a business, which is covered under other licensing)
- Feeding of birds and vermin
- Distribution of leaflets
- Illegal street trading (not associated with a business which is covered under other licensing)
- Begging
- Wheeled vehicles

Consultation was not a tick box exercise, and taking into account concerns of negative impact on the homeless if begging was targeted, as well as concerns over the use of scooters and bikes amongst the young, the aspect of begging and wheeled vehicles was removed from the final PSPO proposed.

The main issues raised with amplification was concern that this would stop good busking taking place in the town centre. This is addressed by the fact a busking pilot is in place for this area to ensure busking continues, with permitted amplification, but in a controlled way. The proposed PSPO does not seek to stop busking or free speech but stop the war of sound from various parties using amplification to preach, play music or to carry out other activities.

As with any enforcement discretion is key, and will be enforced sensibly. Failure to comply with a PSPO is an offence and can lead to a summary conviction and fine not exceeding level 3 on the standard scale. All enforcement officers as well as Police are authorised to take action under it.

The PSPO will be in place for a maximum 3 years as per the law, but will be reviewed to ensure it is effective in its approach in tackling issues that affect businesses and the public,

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Supplementary Note – Town Centre PSPO

In line with the Cabinet Report of 27th May 2021, with regards the Town Centre PSPO, the following clarifications are made to support the report

Education and Communication

If the Order is put in place then information will go on the Council Website, using various forms of media, signage will be erected in relevant areas and through use of other methods to maximise publicity of the Order. This will include working with partners.

In line with enforcement codes and good practice, the aim is to use the June period to maximise publicity around the order, including the use of social media, MyHarrow, and other channels. This is all part of the education approach.

Officers will be out in the town centre, working with partners including the Harrow BID, to promote the PSPO and inform those that are unaware to ensure they comply going forward.

Buskers Pilot

In relation to busking, a buskers pilot scheme has been implemented for 6 months from December 2020 to be able to enjoy busking for all and reduce unnecessary disturbance to others. For example, the Council has received complaints of people with amplifiers sat outside a business, playing very loud music that affects those within the business both customers and staff. This appears to be a common problem being faced by town centres now, with others taking a similar approach for example Hammersmith & Fulham¹

Further surveys are taking place with businesses and others to understand the impact and approach. If this busking pilot proves successful, then it will go to Cabinet for final sign off.

Information can be found at <https://www.harrow.gov.uk/licences/busking>

Further Details

In terms of permissions to carry out activities that are to be regulated by the PSPO, this will be through a simple process of emailing licensing@harrow.gov.uk with details of the proposal, evidence of insurance and a risk assessment. Further details will be put on the website and clearly signposted if the PSPO is approved.

Consultation

Appendix A of the Cabinet Report contains details of those that responded to the Consultation, but overall 92 people responded.

¹ <https://www.lbhf.gov.uk/articles/news/2019/07/amplifiers-removed-hammersmith-town-centre-make-it-safer-and-more-pleasant>

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Call in Notice – Cabinet Decision – 27 May 2021 – The Council’s Accommodation Strategy and the Harrow New Civic Centre

We would like to Call-in the decision made by Cllr. Graham Henson, Leader and Portfolio Holder for Strategy, Regeneration, Partnerships & Devolution and Cllr. Natasha Proctor, Deputy Leader and Portfolio Holder for Finance & Resources which was made at the Cabinet meeting on Thursday 27th May 2021.

The decision is question was The Council’s Accommodation Strategy and the Harrow New Civic Centre.

We believe this decision should be called-in for the reasons listed below.

Inadequate consultation with stakeholders prior to the decision

This decision will change the facilities the Council operates from and the way in which the Council will work for decades to come. As such, we believe the Council should run a meaningful consultation of Harrow residents as well as Council staff before making a decision. At present there has not been any open forum for residents to formally comment on the Accommodation Strategy. Also, residents should have been thoroughly consulted on the proposals to move Council offices to Forward Drive. No such consultation is mentioned in the reports for this decision.

At present the only consultation on which the Strategy is based was conducted on a previous proposal several years ago. It is not sufficient to rely on the consultation for the previous new Civic Centre plans when the current proposals are materially different, and the passage of time has also reduced the relevance of the previous consultation.

There also seems to have been very limited consultation with staff, with no evidence shown in the report of the views of staff on the Strategy, which will have a profound effect on their working environment.

The absence of adequate evidence on which to base a decision

The Accommodation Strategy is focused on the new ‘flexible futures’ scheme. This new way of working has not been finalised, employees have not been properly

consulted on the final proposals and nor have they been trialled. Hence this strategy is based on an incomplete, unscrutinised, and untested 'flexible futures' scheme, which the Council may find is unfit for purpose once implemented. As there has been no meaningful trial, there has been no proper evaluation of their impact on productivity or cross Council working.

Furthermore, the proposed parking at both the new Civic Centre and the Forward Drive site is not backed up with evidence. There is no analysis in the report of how staff travel to work and whether public transport is a viable option for significant numbers of staff. In addition, no analysis has been undertaken on how Councillors or residents attending meetings travel to the Civic Centre.

The current working situation both at the Council, and across the country, is very fluid. We are still in a pandemic and the current working situation is unlikely to last as things settle down. Therefore, it is not possible to truly gauge how many staff will need parking bays at the new Civic Centre or at Forward Drive, there for this part of the decision is without evidence.

There is a lack of proper evidence when it comes to the safety of staff, Councillors and residents leaving the Civic Centre after meetings at night. There will not be enough parking for Councillors, let alone staff and members of the public at the new Civic Centre. This means many people will have to park away from the Civic Centre, walk or rely on public transport. Given that a number of meetings keep Councillors, staff and the public in the Civic Centre well after dark, this Strategy has not addressed concerns over people's safety. In the wake of Sarah Everards murder, and the Council's duty of care to its staff and residents, this concern should be properly addressed in the Strategy.

No business plan has yet been presented for this Strategy for the new Civic Centre. The report states that the business case will be prepared in the next stage of the project. But that as it may be, how can Cabinet make an informed and evidenced decision, which will have a generational effect on Harrow, without having a business case?

The action is not proportionate to the desired outcome

The initial driver for a new Civic Centre in Wealdstone was to aid in the regeneration of that area. These new proposals, as made clear in the Voltrera report, will have minimal impact on regeneration in Wealdstone with the bulk of the staff now being

located at Forward Drive. This means that the Council will be spending tens of millions of pounds without significantly contributing to its desired outcome.

To be clear, this scheme is not cost neutral. It has only been made to seem cost neutral by taking many costs out of the scope of the Accommodation Strategy. For example, the cost of the Forward Drive development.

The decision and its appendices repeatedly call the proposed building at the Peel Road site a 'new Civic Centre'. The definition of a Civic Centre is a facility where all civic functions and services are centred. It is clear from this decision that this Strategy will fail to deliver a 'new Civic Centre'. Most Council officers will be based out of Forward Drive, a separate location from the Peel Road site, and ancillary sites will be based permanently in locations which have not been finalised. The 'new Civic Centre' will be nothing of the sort, as it will only host Council meetings, Councillors and Group Offices. Therefore, this strategy proposes action that is not proportionate to the desired outcome. It will not deliver a 'new Civic Centre', but instead we will only get a glorified Town Hall with separate offices in Forward Drive.

In effect, the Council is spending over £22 million on some meeting rooms.

Potential Human Rights Challenge

The Equality Impact Assessment (Appendix 4 of the Cabinet papers) shows the Council has at least 80, and potentially over 800 (including prefer not to say and unknown), disabled members of staff. This Strategy will reduce the 24 disabled bays (not 12 as stated in the report) at the current Civic Centre to just 5 at Forward Drive, it will also reduce the overall amount of parking by over 70%. This would mean there would not be an opportunity for people with disabilities to park at either the Forward Drive site or the HNC when the disabled spaces are fully occupied. There is no analysis in the EqIA of how many staff, who have classified themselves as having a disability, need to drive to work and how feasible a public transport alternative may be.

Also, the Strategy makes no allowance for the fact that parking in the streets surrounding both the HNC site and Forward Drive is already a significant problem. The recent construction of two high-rise developments in Palmerston Road, which have very limited parking facilities, has already strained parking in the area. The belief that all staff, residents in the area (in the car free developments) will walk, cycle, or take public transport to work is unrealistic and unsubstantiated.

Contrary to the Policy Framework

The Council passed a Borough Plan in February which does not refer to this significant change in its way of working. Previous references in Corporate Plans have always referred to Peel Road as being the main location for staff and civic meetings. This proposal splits the two functions and in effect means the Council will have two Civic Centres.

At the February Council meeting responsibility was delegated back to Cabinet for approving a Council Delivery Plan, this has not occurred. Until the Cabinet approves a Council Delivery Plan, it is difficult to see how this Accommodation Strategy would fit within the policy framework of the Council.

Contrary to, or not wholly in accordance with the budget framework

The budget makes clear that a new Civic Centre should be cost neutral. This strategy and the Council's current plans are only cost neutral by ignoring or placing out of scope many significant costs, including but not limited to:

- Cost of Forward Drive - £44 million
- Fit out of Forward Drive - £10.217 million
- Fit out of HNC – Unknown but likely to be millions
- Manage the decant - £225,000
- Rehouse ancillary services elsewhere in the borough - £500,000
- Future costs and loss of productivity from maintaining and serving residents from multiple ancillary locations – Unknown
- Modernisation and Additional Capacity Funding – Over four million

Signed by

Councillor Paul Osborn

Councillor Marilyn Ashton

Councillor John Hinkley

Councillor Chris Mote

Councillor Janet Mote

Councillor Anjana Patel

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Report for: Cabinet

Date of Meeting:	27th May 2021
Subject:	The Council's Accommodation Strategy and the Harrow New Civic Centre
Key Decision:	Yes - this is a key decision because: <ul style="list-style-type: none">i. it will result in the Council incurring expenditure in excess of £1m capitalii. it will be significant in terms of its effects on communities in all wards of the Borough as the decision relates to the Council's Headquarters building.
Responsible Officer:	Sean Harriss - Chief Executive
Portfolio Holder:	Councillor Graham Henson Leader of the Council and Portfolio Holder for Portfolio Holder for Strategy, Regeneration, Partnerships and Devolution Councillor Natasha Proctor – Deputy Leader and Portfolio Holder for Finance and Resources
Exempt:	Appendices 2, 5, 7 and 8 listed below are not for publication by virtue of paragraphs 3 and 5 of Part 1 of Schedule 12 A of the Local Government Act 1972 as they contain information relating to the financial or business affairs of the Council and other parties as well as information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
Decision subject to Call-in:	Yes
Wards affected:	All

Enclosures:

Appendix 1: Council Strategic Brief to Bidders

Appendix 2: Avison Young Reports on Forward Drive and Wealdstone 2020/2021 (Not for publication)

Appendix 2: Avison Young Reports on Forward Drive and Wealdstone 2020/2021 (Public)

Appendix 3: Volterra Economic Study

Appendix 4: Equalities Impact Assessment

Appendix 5: Financial profile (Not for publication)

Appendix 6: Forward Drive Fit -out Design Concept

Appendix 7: Savills - Peel Road (Not for publication)

Appendix 7: Savills - Peel Road (Public)

Appendix 8: Forward Drive Depot Contract Claims (Not for publication)

Appendix 9: Reference from the Overview and Scrutiny Committee (to follow)

Section 1 – Summary and Recommendations

1.1 This report sets out the proposed approach to the Council's future accommodation, outlines the reasons for this and seeks the necessary approvals for carrying out works to the Forward Drive Depot, and incorporating the proposals in the Harrow Strategic Development Partnership Business Plan.

1.2 Cabinet is requested to:

- i. Approve that the Council's accommodation strategy be based on Forward Drive Depot and a new Harrow Civic Centre at Peel Road, Wealdstone

-
- ii. Approve that the proposed new Harrow Civic Centre should be at around 20,000 sq. ft floorspace at an estimated cost of £21.899m. This is broken down into £17.073m for the New Civic Centre and £4.826m for 40 units of basement parking. The exact dimensions and costs will be determined following detailed design.
 - i. A further report to agree the final design and costs will be brought back to Cabinet for approval.
 - iii. Agree that the proposal at i. above should be included in the draft business plan for the proposed Harrow Strategic Development Partnership together with the 40 units of basement car parking and the proposed construction of 46 units of affordable housing.
 - iv. Approve the fit out of Forward Drive Depot at an estimated cost of £8.415m (£7.690m capital expenditure and £0.725m revenue requirement).
 - v. Approve the award of the fit out works to Kier, the principal contractors at Forward Drive Depot, by variation to the existing contract with the necessary waiver to the Council's Contract Procedure Rules.
 - vi. Note the estimated financial impact for the Council of the Harrow Strategic Development Financial Viability Model as detailed in the financial implications section of the report.
 - vii. Within the 2021/22 Capital Programme approve a virement of £7.690m in 2021/22 from the 'Poets Corner' scheme to a newly created scheme titled 'Accommodation Strategy' to fund the fit out of the Forward Drive Depot.
 - viii. Within the 2021/22 Capital Programme approve a virement of the balance of £0.429m from the 'Poets Corner' scheme into the 'Investment in 3 core sites' scheme to support the capital requirement for the new HNC and basement parking.
 - ix. Agree to delegate decisions pertaining to procurement and contractual issues, including the approval of further variations to the fit out of the Forward Drive Depot, and the authority to issue further variations to the contract with Kier, to the Chief Executive, following consultation with the Director of Finance and Assurance, the Leader of the Council and the Cabinet Member for Finance & Resources.
-

Section 2 – Report

Introductory paragraph

2.1 The Council's ambitions to update its' style and ways of working will be facilitated by new accommodation that will enable a modern agile approach to work. The proposed approach is that the Council's main office space where

staff can hold meetings, collaborate and carry out relevant work will be at Forward Drive Depot, and the Councils Civic Centre with public, community and member space will be at Peel Road. The new Civic Centre will be delivered by the Harrow Strategic Development Partnership which has been procured by the Council for this purpose, among others. This report seeks approval of the strategy so that the new Civic Centre can be included in the HSDP Business Plan and seeks approval for the spending to fit out the Forward Drive Depot for council staff use.

Options considered

2. The following options have been considered:

2.2.1 Build the Harrow New Civic Centre (HNC) at the size specified in the original strategic brief

The strategic brief to bidders is attached at Appendix '1' and covered in detail below. It sought a building of 94,000 sq. ft, gross internal area. It is now clear that taking into account the Council's proposed approach to modern ways of working, together with the completion of Forward Drive Depot and learning from the recent pandemic, the Council would have more office accommodation than it now requires and that this would lead to both inefficient use of space and in all likelihood, to unused office space.

2.2.2 Letting of part of or all the HNC site

The Council's advisers Avison Young have confirmed that office development in Wealdstone without a confirmed occupier is high risk, as a market that was limited and already potentially, significantly dependent on public sector take up, has been damaged by the COVID pandemic. Given the Council's financial position speculative office development would not be a wise step.

2.2.3 Remain in the present Civic Centre

Such an approach would mean that there would be no, or less, possibility of developing much needed housing in Wealdstone, losing the economic benefits and affordable housing that will bring. As detailed later in report, the cost of bringing the offices to a fit for purpose modern office state are extensive and do not represent value for money.

2.2.4 The proposed way forward

Having considered the above alternative options, the proposed way forward set out in this report is the most advantageous option.

Background

2.3 At its meeting of 30th May 2019 Cabinet resolved that a Strategic Development Partnership, established through a Limited Liability Partnership was the preferred delivery approach for the development of Poets Corner, Peel Road and Byron Quarter Phase 1 (the Core Sites) in the Regeneration Programme.

2.4 Cabinet approved the commencement of a procurement process under the Public Contracts Regulations 2015 and agreed a proposition to be put to

the market as part of the procurement process, as set out in the Information Memorandum attached at Appendix 'B' of the Cabinet report. The Cabinet decision of 30th May was subject to a Call-In. The decision was taken back to Cabinet in June 2019, where Cabinet resolved to confirm the decision of 30th May. Specification to bidders of the Council's requirements for the HNC was delegated to the Corporate Director Community and is contained in the Strategic Brief attached at Appendix '1'.

2.5 Subsequently the agreed procurement process was carried out and this resulted in the appointment by Cabinet in September 2020 of Wates Residential as Preferred Bidder for the Harrow Strategic Development Partnership. That report authorised the development of a business plan and the finalisation of contract documents with a view to establishing the Harrow Strategic Development Partnership.

2.6 The Council is adopting a three- stage approach to finalising the agreement of the partnership. The first stage was the appointment of Wates as preferred bidder. This report deals with the Council's Accommodation Strategy with reference to the HNC, which will enable the finalisation of the business plan for the HSDP. The report enabling contract close and completion of the legal documents establishing the partnership is scheduled to be brought to Cabinet in July 2021. This report also includes requests for authorisation to finance the necessary fit out works to Forward Drive depot

The Council's original proposals for the new Civic Centre

2.7 The Council's existing Civic Centre which was built in the 1970s is no longer fit for purpose both in terms of the accommodation being unsuitable for modern working by type, and the prohibitive cost of refurbishment required to bring it to a modern effective office standard, estimated to cost a minimum of £42m. This figure has been estimated by the Council's preferred partner Wates, based on benchmark costs of current and previous work.

2.8 The Council has considered options for a new Civic Centre over some years and has resolved that its' aim is for a new Civic Centre in Wealdstone, providing a focus for and helping provide economic benefit to the town centre.

2.9 In its' procurement for the HSDP the Council expressed a preference for the Peel Road site, but did not direct that this was essential, leaving bidders to suggest the most appropriate site.

2.10 The brief set out that as part of the work of the HSDP the Partnership would construct for the Council a new Civic Centre comprising civic, community and public space with office space. The building was to comprise 94,000 sq. feet gross internal area, 73,000sq ft net (floorspace) of which 16,000 sq. ft was public civic and community space including café and visitor space. The Council sought 60 car parking spaces.

2.11 In their bid Wates residential proposed a 6-storey civic centre meeting these requirements, although they stated that 40 car parking spaces was the maximum achievable on site through basement provision. The proposed

building was estimated at early 2020 prices to cost £42 million including the car parking.

Flexible Futures

2.12 The Council has adopted an approach to modernising the working practices of its staff. The Flexible Futures programme aims to introduce, develop and embed flexible and agile working practices within the Council. It focusses on four areas:

- **Championing agile working** across the Council's programmes and managing the interdependencies;
- The provision of support and guidance for the development of a flexible and agile **mindset** and the development of the **skills and behaviours** as well as the **policies and processes** that enable and enhance the effectiveness of agile and flexible working - including appropriate terms and conditions which will be the subject of a separate report to Cabinet;
- The development of the **technology** that will enable flexible and agile working – this includes cloud-based technology, virtual mobility and collaboration, access to kit including laptops, smart phones etc., and the adoption of flexible print, scanning and mail services;
- Understanding the **accommodation** needs of the services and providing easily bookable collaboration workspaces; flexible use of space depending on need, and clear guidance and advice on how to use the spaces. Managing the move into Forward Drive and – for some teams – a move to alternative sites.

2.13 The Flexible Futures Programme will:

- Continue the flexible working practices that have been implemented during Covid-19 to allow staff to work around their personal commitments and extend them through updating the terms and conditions
- Develop and embed agile remote working practices, including home working, that most office-based officers have operated under during the Covid-19 restrictions, ensuring that officers have the skills, tools and facilities to work effectively remotely
- Support managers to develop the skills to manage an agile team
- Introduce collaboration and touch down spaces in Forward Drive and at other locations around the borough to allow a more balanced split between office and remote working than has been possible under Covid-19 restrictions
- Relocate mainly customer facing services out of the Civic Centre and into the community

2.14 This is not just about home working; it is a more complete working experience than home working. Post Covid working will provide a balance of office based, flexible and home working about which staff are very positive as evidenced through the December 2020 Pulse Survey.

2.15 The Council's instructions to the bidders for the HSDP reflected the approach to flexible futures to some degree, albeit at a conservative ratio of staff to desk and workspaces and assuming a 2:1 desk ratio and 4 days a week in the office.

2.16 It is now clear that a more modern approach to the Council's accommodation can be taken and it can be used more effectively. Assessment of experience elsewhere together with learning from the working over the pandemic period leads to a proposal to provide workspaces at a ratio of 3:1 with an assumption that staff will only visit the office on average 2.5 days a week. The recent Pulse Survey confirms that this is feasible and acceptable to staff.

2.17 To ensure this works well the Council has already made significant investment in Information Technology and is embarking on significant investment in staff training and development to support the new ways of working. There will be extensive engagement with staff and members (via the members working group) from now through to occupation and beyond.

Current situation

2.18 Taking into account the Council's ambitions for changing its methods of working, together with the march of time, it is fair to say that the Council now finds itself in a different situation to that which applied at the beginning of the procurement.

2.19 Firstly, the Category A fit out of Forward Drive Depot is scheduled to complete in September 2021 making available for the Council extensive modern office space, subject to the final Category B or tenant's fit out. The Council had considered letting much of this space but this will not be possible due to the current planning position and the current market which suggest that there is not a significant market for the depot office space particularly at beneficial rates and without long void and rent free periods. Avison Young's report from 2020 is attached as Appendix '2'. The situation has not improved since that time.

2.20 It was originally planned that the Civic Centre at Poets Corner would remain operational until the new Civic Centre opens, scheduled for 2025. However, it would now be difficult and expensive to reopen in full due to a combination of necessary fire safety works, enhancement of COVID protection at least in the early days, and the imperative to remodel the building to allow for new ways of working. Because the Depot will be modern, effective and smaller accommodation, moving in the short term to Forward Drive will also result in reduced costs.

2.21 Moving from Poets Corner early, frees the site for development offering the opportunity for earlier provision of housing both private and affordable, potentially earlier returns to the Council and the social and economic benefits that the regeneration and development will bring.

2.22 Remaining in Forward Drive as the Council's principal office focus removes the additional costs and complexities that would be incurred if two moves were made.

2.23 The COVID emergency has shown that a mix of office working together with homeworking based on a flexible model is both feasible and exciting to staff and this clearly suggests that less office space is required.

2.24 One option that was considered was to build the HNC to the scale and size previously envisaged and to let the spare space to the private sector. However, although Avison Young were optimistic about the Wealdstone lettings market in 2020, in their updated report dated 2021 they are clear that COVID has damaged the lettings market making speculative office investment high risk for the Council. Their earlier view was in any event significantly based on public sector take up, which is unlikely to materialise.

Forward Drive in operation

2.25 The offices at Forward Drive Depot are ultra- modern and of high quality, constituting a considerable improvement on the current civic centre. They comprise

- 5 floors with a range of modern work settings of different types
- 48,500 sq. m net internal area with 38,000 of usable office floorspace
- 813 work settings plus meeting spaces totalling approximately 1000 spaces
- 6 sq. m per work setting
- Welfare facilities and café
- The high -quality modern office will enable staff to be in office accommodation for the estimated amount of time for collaboration with colleagues, team meetings and relevant work.

2.26 The office building has a B1 planning consent for office use and the planning process restricted the two upper floors to public sector use.

2.27 This will be under these proposals, the Council's main collaborative working space and office focus. This is more than acceptable within the planning permission and in planning terms it is appropriate for this to become the Council's main collaborative space.

2.28 The ground floor will house the café and welfare facilities, with the café located at the main entrance playing a crucial role in the arrivals experience and providing an informal, collaborative space. The cafe has been designed with flexibility in mind to enable the area to also provide both formal meeting and auditorium settings, should they be required, with appropriate IT and AV infrastructure in place to support alternate uses of the space.

2.29 Other than the CCTV room on the first floor, which will provide a modern technological hub to support the upgrade of CCTV cameras across the borough, the upper floors will provide a modern space to facilitate the implementation of a new AGILE operating model for the Council, with the fit out, including the specification of all the furniture, designed to create an accessible and easy to use workplace across all floors, that addresses as many mobility and impairment challenges as possible

2.30 The new Forward Drive offices will not have any fixed desks allocated to a person or team in the traditional manner, but will provide around 1000 work settings (including

working and collaboration space in the café) ranging from traditional desks to open plan meeting tables, privacy booths and individual Pods, providing a range of inclusive work settings for all employees. In addition to the various work settings provided in the open plan areas, there are 20 private meeting rooms across the offices to cater for meetings of four to 16 people. The fourth floor also provides a multi faith room for use for meditation, reflection and prayer with a dedicated area for washing, providing a welcoming space for all faiths.

2.31 The proposed breakdown of work settings across the floors is set out below:

	Ground	Level 1	Level 2	Level 3	Level 4	Total
	Seats	Seats	Seats	Seats	Seats	Seats
Ergonomic Work Positions		47	57	63	57	224
-Reused Linear fixed height desk		20	24	28	20	
-circular sit to stand		16	20	28	20	
-study pods		11	13	7	17	
Alternative Work Settings	8	174	158	151	145	636
<u>Bookable Enclosed meeting</u>	<u>8</u>	<u>44</u>	<u>20</u>	<u>18</u>	<u>40</u>	130
-with 750mm table	8	40	20	10	36	
-with 900mm table		4		4	4	
<u>Bookable Open meeting</u>		<u>12</u>	<u>21</u>	<u>42</u>		75
-with 750mm table		6	6	18		
-with 900mm table			15	24		
-with 1050mm table		6				
<u>Non Bookable Open meeting</u>		<u>112</u>	<u>113</u>	<u>85</u>	<u>105</u>	415
-with coffee (or no) table		12	7	13	34	
-with 750mm table		84	100	58	71	
-with 900mm table		16	6	8		
-with 1050mm table				6		
<u>Non Bookable individual</u>						16
-touchdown bench		6	4	6		
<u>Lockers</u>		36	82	116	106	304
Total seats per floor	8	221	217	214	202	

2.32 The design of the new offices at Forward Drive will promote both vertical and horizontal circulation throughout the building, promoting greater collaboration by allowing employees to move around the workplace and providing a range of work settings to support different tasks

2.33 The completed offices will reflect the evolution in working practices as a result of technological innovation, creating a more efficient asset through the improved utilisation of office space, providing a space which truly augments remote capabilities, and places to work, collaborate and communicate in a way that underpins the move to an AGILE work environment.

Ancillary Spaces and Council Meetings

2.34 Following an initial review, £500,000 revenue has been set aside in the Accommodation Strategy Reserve as the estimate to re-house the

'ancillary services. These include Registrars, Social Care and Homelessness interactions with Residents, and the front-of-house of Access Harrow.

2.35 Since that review, the need for the organisation to focus on Covid-19 and the effect upon Services that the pandemic has brought, has had several effects:

- The detailed review of requirements and possible locations has been delayed.
- There is likely to be a probable surge in resident needs in certain face-to-face services, specifically in People and Homelessness, as lockdown lifts for which we need to plan at least in transition.
- There will be longer term changes in resident requirements, and how we support residents, that has been brought in through changes in behaviours and need driven by Covid-19.

2.36 The detailed further review is near completion and the following picture is emerging:

- A trial of operating front-of-house Access Harrow in libraries will be carried out following extremely promising investigations of the possibility of bringing this area closer to residents for the same costs as incurred today.
- Registrars was initially proposed to move to Headstone Manor, where there are synergies with wedding services and secure archive facilities. This is still a strong possibility although other venues are also being investigated which may be more advantageous to serving clients.
- Planned interactions with Social Care clients will be managed within the estate of Children's Centres and Adult NRCs.
- A location for the clinical space for the Integrated Learning Disabilities Service is still being sought.
- It will be advantageous for our residents if Homelessness and unplanned, emergency Social Care interactions with clients are housed together. A site for this joint arrangement is under investigation.

2.37 Although every endeavour to keep the costs of the changes, outlined above, within the £500,000 that is set aside, it may be that, in order to fully grasp the opportunities the changes can bring to the service we provide to residents, costs may rise beyond that number. If they do, the costs are likely to be capital and existing capital schemes that can be stopped to cover the additional costs will be identified before a proposal is brought forward.

2.38 The roadmap for Council, Cabinet, Committee and panel meetings is as follows:

- Up to September 2021, a mixture of virtual and hybrid meetings has been agreed.
- After September, various options are being considered including using the Civic Centre for some purposes until it is vacated in 2022. External community locations and interactive technology solutions may also be used where social distancing measures require them.
- Between the Civic Centre being vacated and the new Civic Centre being available public meetings will take place in community locations while others may take place at Forward Drive. A technical solution for continued online access to meetings has is being developed.

- The Council will of course continue to comply with applicable regulations in force concerning meetings.
- Once the new Civic Centre is available it will become the focus for democratic activities and meetings will ordinarily take place there.

Fit out

2.39 As the Council is going to occupy Forward Drive itself it now needs to carry out the Category B or 'tenants' fit out to make this ready. The estimated budget for this is £7.690m which includes a provision for extension of time/ loss and expense claims and COVID 19 building requirements.

2.40 It is proposed that this work should be undertaken by Kier, the existing contractor on Forward Drive Depot, through a variation to their existing contract. The basis for doing this is that it will enable the work to proceed smoothly and concurrently with the existing work, allowing timely completion and avoiding any disruption caused by the use of multiple contractors which could lead not only to practical difficulties but also to further delay and costs, including significant additional preliminaries costs for a new contractor.

2.41 Analysis of alternative options has been carried out and there is unlikely to be any significant cost advantages from any of these.

Kier Claims under the existing contract

2.42 The ongoing redevelopment works at Forward Drive being delivered by Kier are being undertaken under a JCT Design and Build Contract 2016.

2.43 The contract entitles the contractor to an extension of time or "Adjustment of Completion Date" where an event has caused a delay to the programme. These matters are defined as "Relevant Events" and the contract is prescriptive in what matters or events entitle the Contractor to claim an extension of time to complete the Works.

2.44 As with an extension of time entitlement, the contract also sets out the matters which will entitle the Contractor to claim for loss and/or expense. These matters are defined as "Relevant Matters" and entitle Kier to loss and/or expense caused by deferment of giving possession or if "*regular progress of the Works... has been... materially affected by any Relevant Matter*"

2.45 Kier has subsequently submitted two claims for Loss & Expense; the first was submitted in relation to extensions of time already awarded, which resulted in the contract completion date being adjusted to 9 February 2021 for completion of the scheme; the second was issued in respect of delay letters Kier have submitted as a result of Client changes but which have still to be fully assessed and for which no extensions of time have been awarded to date. Full details of the claims for loss and expense are set out in Appendix '8' and the financial implications are included in the financial implications section of this report. Kiers first loss and expense claim has been largely agreed, while the second is still subject to assessment and negotiation. Kier are entitled to claim under the contract, and while the Council

does not accept at this stage the full quantum of their second claim the submission and adjudication of claims is normal contractual practice.

2.46 It is the view of officers and advisers that the benefits of awarding Kier this work are sufficiently significant to continue with the proposed award notwithstanding the ongoing contractual position with the claims.

The new proposal for the HNC

2.47 In response to the Council's current space needs Wates are now proposing a Civic Centre with circa 20,000 sq. ft floorspace including collaborative office space for 100 staff.

2.48 This building will still be the Council's main public focus with Civic space including Mayors Parlour, Council meeting room, and a suite of rooms to host Council, group and community activities. 16,000 sq. ft floorspace will still be devoted to these uses. Collaborative space allows member meetings and interaction between members, staff and the public to continue unchanged. There will also be a café and public space on the ground floor.

2.49 Under this proposal there will be 40 car parking spaces in the basement which will be available for members, staff and the public during the day.

2.50 The cost of this proposal is estimated at £21.899m (£17.073m new HNC and £4.826m for 40 units basement car parking). It should, however, be remembered that this is at an early stage of design and the final figure will be arrived at as the design is refined and incorporated in the HSDP business plan.

Car Parking

2.51 As a result of the development at Peel Road 284 car parking spaces are being built on. The planning context has now changed with the London Plan seeking car free developments in high PTAL areas such as Wealdstone, and car-lite developments in less high areas. Redevelopments are expected to move to car parking at current standards rather than re-provide at previous levels of provision. Nonetheless, in light of the development of spaces, together with additional spaces built on at Poets Corner, officers have carried out a detailed review of opportunities for car parking across the centre of Wealdstone and propose the following way forward.

2.52 As discussed above it is proposed, subject to planning, to provide 40 basement spaces plus 6 surface disabled spaces at Peel Road. At Forward Drive there are 67 spaces available plus a further 70 which are being considered for staff pool cars but will otherwise be ready for use.

2.53 The Pool car scheme which was originally assessed on 70 vehicles needs further consideration in light of the changes to methods of working.

2.54 In addition it is proposed subject to consultation and investigation of the site to refurbish the existing basement car park at Churchill Place which would

give a further 60 spaces, and to revive the expired planning permission at Canning Road allowing for a further 12 spaces.

2.55 Additional provision at Masons Avenue is to be considered, together with a potential further use of daytime spaces at the K P Centre. Following assessment of these options a further report with full costings and financial implications will be brought back to Cabinet for approval.

Affordable housing

2.56 As a result of a revised Civic provision requiring less space, Wates estimate the Peel Road site could accommodate a further 46 affordable housing units at a cost of £15.890mm (£345k per unit). The Building Council Homes for Londoners (BCHFL) model assumes an average of £325k per unit which is affordable within the HRA. Therefore, a robust financial assessment will be undertaken to ensure the final agreed scheme is affordable within the HRA.

Economic Implications

2.57 There is already a significant amount of positive development in Wealdstone that is changing the face of the area for the better. The Origin and Collective housing developments will bring significant spend and economic impact to Wealdstone; some benefit will come from developments further afield such as the Kodak development; and the housing to be built by the HSDP itself will be of considerable economic benefit.

2.58 The HNC development is a smaller but nevertheless important component of this change. Volterra, economic consultants were appointed in February to assess the benefits of the new proposals, and concluded that overall, the new proposal was of positive impact compared to the initial plan. By having the Forward Drive Depot as the Council's principal staff space the resulting economic spend was not lost to the Borough and for Wealdstone centre itself this was partially offset by the additional residential spend from the affordable housing.

2.59 The Volterra report which is attached at Appendix '4' also points to potential additional further benefits such as additional Council tax and non-financial benefits such as health, crime reduction and well-being.

Proposed way forward

2.60 The proposed way forward is to establish Forward Drive Depot as the Council's principal focus for staff, with the new Harrow Civic Centre at circa 20,000 sq. ft as the Council's public, community and civic space. The new Civic Centre will have 40 basement car parking spaces and there is a proposal for building 46 affordable units on the Peel Road site.

2.61 The Council has been advised throughout this process by its commercial advisers Avison Young. They are fully in support of the approach given the circumstances and the market conditions at this time.

2.62 To obtain a further measure of independent advice the Council also sought the views of Savills who as part of their overview talked in detail to Wates, the Council's preferred bidder. Savills concluded that;

- The site is not considered suitable for a speculative office-led development. This, along with revised Council occupational requirements and potentially viable alternative land uses (subject to planning), mean that the proposed strategy is considered appropriate.
- The principle of the proposed change in approach and land-use appears reasonable and affordable housing is likely to be a key priority for any savings that are produced as a result of the reduced civic element. The costs of the affordable housing provided by Wates are not out of kilter with other London schemes we see.

2.63 Savills also recommend further work on the financing and delivery of the affordable housing which will be incorporated in the business plan and refined during the design phase. Savills report is attached as Appendix '7'.

Next steps

2.64 The next step is for the further refinement of costs and then the incorporation of these proposals into the financial model for the HSDP. The financial model with appropriate due diligence and sensitivity testing will be part of the business plan which will come back to Cabinet for approval with the report recommending contract award, close and the launch of the HSDP in May.

Ward Councillors' comments

NA

Financial Implications

2.65 Harrow Strategic Development Partnership (HSDP)

The Financial Viability Model encompasses the financial implications of the Harrow Strategic Development Partnership for the three core sites (Peel Road, Bryon Quarter and Poets Corner) and the new Harrow Civic Centre (HNC) including basement parking. The model is based on the planned activity within the Business Plan which will be recommended for approval at Cabinet in July. The Business Plan will be subject to review which could lead to changes in the model and this will be managed and reported through the governance arrangements supporting the development partnership.

2.66 The model covers an initial 12-year period of the partnership arrangement, from 2021 to 2032. The values quoted for the Councils capital requirements and investment returns are in line with the model at the point of agreeing the Business Plan. The detailed financial profile is detailed in Appendix '5' with the details summarised below:

2.67 The Councils total capital investment over the initial 12-year period will be £48.690m:

£26.790m – Capital investment into the HSDP. This cost includes a 5% developer contingency.

£17.073m – Capital investment to fund the building of the new Harrow Civic Centre. This cost includes a 10% build contingency and the development management fee and will deliver a building to Category B fit out. It is accepted that the Council will incur an additional fit out cost for the HNC, the funding implications of which are held outside the model. This will be required nearer the completion of the project in 2025.

£4.826m – Capital investment to fund the provision of 40 basement car parking spaces at the HNC.

The total capital investment figure of £48.690m is the investment required by the Council and therefore excludes the Council owned land which is required to be transferred into the partnership. The land has been valued at £11.640m for the purposes of the model and the Council will receive a capital receipt to the same value which will be used as a contribution to fund the Capital investment costs.

2.68 The capital investment requirement will be funded by a total of £38.430m capital receipts received from the partnership as properties are completed and sold, as detailed:

£26.790m – capital receipts in repayment for the £26.790m capital investment in the HSDP

£11.640m – capital receipts in repayment for the £11.640m land value

2.69 After accounting for capital receipts, the Council is left with a net borrowing requirement of £10.260m over the initial 12-year period. The Council's peak debt requirement is reached in 2029 at £30.7m (gross of JV dividends). After accounting for JV dividends, the residual debt is in relation to the HNC and parking with the HSDP investment being self-funding.

2.70 In terms of revenue implications, the model calculates interest payments due to the Council at £9.384m:

£1.884m interest on the land draw value of £11.640m

£7.5m interest on the £26.790m investment in the HSDP.

2.71 The Council will hold these interest payments to fund the capital financing implications of the net borrowing requirement of £10.260m.

2.72 In addition, the model calculates that JV dividends of £39.213m will be received over the 12-year period. The first call upon these dividends will be the repayment of borrowing to ensure there is no remaining debt at the end of the partnership which ensures the cost neutrality principle is delivered upon.

2.73 This report is not recommending any amendment to the Revenue Budget or additions to the Capital Programme for 2021/22. Per the model, capital of

£0.350m is required in 2021 for the commencement of the new HNC and basement parking. Within the Capital Programme there is budget of £8.525m for 'Investment in 3 Core Sites' profiled £6.610m in 2021/22 and £1.915m in 2022/23. This report recommends a virement within the Capital Programme, moving the balance of £0.429m from the 'Poets Corner' scheme into the existing 'Investment in 3 Core Sites' scheme which will prove sufficient to fund the year 1 capital implications. Per the model no interest payments are due to the Council until 2023 hence no adjustment required to the 2021/22 Revenue Budget. Budget provision for the Regeneration Team of £2.5m (£1.250m in each 2021/22 and 2022/23) has already been provided for. At the point of writing this report, it is not possible to calculate the impact in the MTFs due to the number of variables. The overarching principle is cost neutrality and action will be taken as information becomes available to ensure the financial implications meet this expectation. Managing the impact on the MTFs is an ongoing process and will be reported to Cabinet quarterly as part of the Revenue Budget update.

At the point of taking the refreshed draft MTFs and Capital Programme to Cabinet in December 2021, the implications over the three years of both plans will be quantified based on the most up to date information.

2.74 As the new HNC is smaller than originally planned this releases space on the Peel Road site for 46 affordable housing units. The council's aspiration is for the affordable housing to be owned by the council within the HRA subject to financial assessment once detailed design is completed, costs confirmed and they are within the assumed estimates within the current Building Council Homes for Londoners (BCHfL) approved model. The BCHfL model assumes an average £325k total development cost /unit inclusive of fees and contingency, which is affordable to the HRA. Please note that this is at an early stage of design and that the final figure will be confirmed as the design is completed and subject to planning. All BCHfL projects will be reviewed at the overall programme level to ensure costs are contained within the overall funding envelope. The revenue related costs associated with financing any related borrowing of the BCHfL programme has been included within the HRA business plan and incorporated within the annual HRA budgets approved by cabinet. The current estimated cost from the HSDP is £345k per affordable unit which will be worked through as part of the financial assessment to ensure the final agreed scheme is affordable within the HRA.

2.75 The cost estimates are based on the current Business Plan which it is appreciated is at an early stage of design and the final cost estimates will be arrived at as the design is refined. The HSDP Business Plan will be updated and reported back to Cabinet, including the revised financial implications, in accordance with the governance arrangements.

Accommodation Strategy Based at Forward Drive

2.76 The financial implications of the Councils accommodation strategy being based at the Forward Drive depot, including the suitable fit out of an agile workspace for staff, is estimated at £8.415m of which £7.690m is capital

expenditure and £0.725m is a revenue requirement. The cost estimate is broken down over four areas:

Original Depot Project

2.77 This scheme has an agreed capital budget of £33.9m. The current forecast spend against this budget is £33.692m.

Accommodation Strategy

2.78 The estimated cost of fitting out an agile workspace for staff at the Forward Drive depot is £10.217m which includes a provision for the extension of time claims. There is a current capital budget of £2.087m. This is made up of £1.712m which was moved into the scheme as part of the depot redevelopment virement agreed by Cabinet in December 2020. The balance of £0.375m is provision for LAN works which is part of the existing IT capital programme. Therefore, additional budget of £8.130m is required of which £7.405m is capital expenditure to fund Category B fit out works and extension of time claims. A revenue requirement of £0.725m (one off) is required to fund ancillary spaces (£0.500m) and to manage the decant (£0.225m). The Category B fit out estimate includes a contingency provision of £0.315m.

Covid 19 Building Requirements

2.79 These costs are estimated at £0.285k. There is no current provision hence a capital budget of £0.285k is required.

Kier Claims

2.80 An estimated cost for the extension of time claims is included within the above Accommodation Strategy additional capital requirements.

2.81 The financial implications are summarised in the table below:

Financial Implications: Accommodation Strategy

Area	Budget	Forecast	Additional Requirement	
			Capital	Revenue
	£'000	£'000	£'000	£'000
Original Depot Project	33,900	33,692	0	0
Accommodation Strategy	2,087	10,217	7,405	725
Covid 19 Building Requirements	0	285	285	0
Total	35,987	44,194	7,690	725

2.82 The additional capital requirement can be funded from within the existing Capital Programme. There is a budget of £8.119m for the 'Poets Corner' scheme and this report recommends a virement of £7.690m from the 'Poets Corner' scheme to a newly created Capital Programme scheme titled 'Accommodation Strategy'. The balance of £0.429m within the 'Poets Corner' scheme is recommended to be vired into the 'Investment on 3 Core

Sites' Scheme to support the capital requirements of the Financial Viability Model.

2.83 The additional revenue requirement of £0.725m has been provided for as part of the 2020/21 Revenue Budget Outturn and will be held in the Accommodation Strategy Reserve until drawn down. The full details of the 2020/21 Budget Outturn will be reported to Cabinet in June 2021.

2.84 In terms of the annual running costs for Forward Drive, there is a budget of £1.69m to cover the running costs of both the existing Civic Centre and depot. The principle behind funding the running costs of the new Harrow Civic Centre and Forward Drive is that they must be affordable within the existing £1.6m resource.

2.85 The financial implications of the refurbishment of the existing basement car parking at Churchill Place and reviving the expired planning permission at Canning Road allowing for a further 12 spaces are unknown at this stage and will be subject to a separate Cabinet decision.

Procurement Implications

2.86 Following a comprehensive appraisal of the options available to the Council in respect of the delivery of the fit-out work at Forward Drive it was considered to be in the Council's best interest from a procurement as well as operational perspective to award this work to our incumbent contractor.

2.87 The award of fit out to Kier is considered permissible from a procurement regulations perspective. The Public Contract Regulations 2015 (as amended) allow for a variation to the existing contract with Kier under Regulation 72 'Modification of Contracts during their term' This allows for variations up to 50% of the contract value which would be the case here. The proposed contract variation and its associated value will therefore comply with public procurement regulations 2015 (as amended). This will exceed the 10% variation permitted by the Council's Contract Procedure rules (P9) and accordingly approval for a waiver is sought to this.

Legal Implications

2.88 The following legal implications arise from the proposals in this report:

- The planning application and permissions processes will need to be progressed in line with planning law;
- Contract close out and establishment of the Limited Liability Partnership with Wates need to be completed;

2.89 The extension of the existing Kier contract or a direct award of the fit-out contract to Kier must comply with public procurement regulations and the Council's Contract Standing Orders. Under Regulation 72 (1) (b) of the Public Contracts Regulations 2015, variations are permitted to accommodate additional works, services or supplies by the original contractor, which have become necessary but were not included in the initial procurement, where a change of contractor both:

- cannot be made for economic or technical reasons
- would cause significant inconvenience and substantial duplication of costs for the contracting authority.

And any increase in price must also not exceed 50% of the value of the original contract (subject to indexation).

2.90 These conditions appear to be met here and can be relied on to extend the current Kier contract to include the fit out works at the Depot.

Environmental Impact

2.91 The Council’s Declaration of Climate Emergency and the current policies pertaining to the environment and sustainability have been made available to bidders during the procurement process and taken into account in their submissions. Wates responded and scored well to this with their submission particularly comprehensive on the HNC.

2.92 Environmental implications will be considered in detail during the design process and appropriate environmental assessment and scrutiny will take place in the planning process.

Risk Management Implications

2.93 Risks included on corporate or directorate risk register? **No**

2.94 Separate risk register in place? **No**

2.95 The relevant risks contained in the register are attached/summarised below. **n/a**

2.96 The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations
By not adopting the strategy, the Council will expose itself to the risk of being unable to let or use two floors of Forward Drive This would also require costly and inefficient extra space to be built at the HNC	<ul style="list-style-type: none"> ▪ The mitigation is to agree this proposed strategy
The plans for the HNC and the affordable housing are at concept design stage and as design proceeds there is risk of cost escalation	<ul style="list-style-type: none"> ▪ Clear cost and design management by design team ▪ Value engineering as necessary ▪ Close management of planning processes ▪ Close attention to procurement policy and processes ▪ Council refrain from variations and adhere to principles of agile working
Cost of the 46 affordable housing units is not affordable within the HRA	<ul style="list-style-type: none"> ▪ The Building Council Homes for Londoners (BCHFL) model assumes an average of £325k per unit which is

	<p>affordable within the HRA</p> <ul style="list-style-type: none"> ▪ A robust financial assessment will be undertaken to ensure the final agreed scheme is affordable within the HRA ▪ The current estimated cost from the HSDP is £345k per affordable unit which will be worked through as part of the financial assessment to ensure the final agreed scheme is affordable within the HRA.
Risk of insufficient car parking having a detrimental effect on agile working	<ul style="list-style-type: none"> ▪ Maximise feasible car parking spaces ▪ Monitor car parking usage
Kier linking the costs of the Cat B fit out works with their current Loss & Expense claims	<ul style="list-style-type: none"> ▪ Adherence to contractual procedures ▪ Close scrutiny of claims and costs
Risk of further claims from Kiers if additional work awarded	<ul style="list-style-type: none"> ▪ Strong design management and change control procedures to prevent variations impacting on programme
Potential cost increases of fit out works at Forward Drive	<ul style="list-style-type: none"> ▪ Clear change control measures to prevent variations to design
Estimate cost of £500,000 to re-house the 'ancillary services' is exceeded	<ul style="list-style-type: none"> ▪ Costs are likely to be capital and we will consider what capital schemes can be stopped to cover the additional costs before a proposal is brought forward.
Unable to find suitable locations/sufficient face to face space for 'ancillary services'	<ul style="list-style-type: none"> ▪ Detailed further review is near completion, use of Libraries, Headstone Manor, Children's Centres and Adult NRCs being investigated/piloted as detailed in the report
Limited Liability Partnership with Wates not completed	<ul style="list-style-type: none"> ▪ Contract currently being drafted
Fit out costs of HNC unaffordable	<ul style="list-style-type: none"> ▪ Current capital provision for the three sites ▪ Realistic and approved cost plan for fit out prior to any decisions
Changes to the model for the HSDP increase costs/reduced income increasing in the Council's borrowing requirement making it unaffordable	<ul style="list-style-type: none"> ▪ Professional partner (Wates) employed as Development Manager ▪ Ability to adapt Business Plan to revise scheme and manage costs ▪ Governance structure will be in place to support changes and their implications
Annual running costs of Forward Drive exceed the combined cost of running the Civic Centre and Depot of £1.6m	<ul style="list-style-type: none"> ▪ New building ▪ Smaller and more modern building ▪ Realistic approach to operating model in light of budget envelop
Impact on MTFS is not cost neutral.	<ul style="list-style-type: none"> ▪ Robust management of the cash flows, both capital and revenue alongside existing provision in the Capital Programme ▪ Financial performance reporting to Cabinet quarterly as part of revenue budget update

Equalities implications / Public Sector Equality Duty

2.97 Was an Equality Impact Assessment carried out? Yes

2.98 Equalities Impact Assessment attached as Appendix '4'

Council Priorities

2.99 The Council's Accommodation Strategy, as part of Flexible Futures will help deliver a flexible and agile workforce working in a range of venues, including the Council's principal buildings which will be modern, environmentally efficient buildings. The strategy will help improve performance allowing a flexible approach to service delivery and allowing staff to optimise their working time and practices.

2.100 As detailed above the strategy helps the economy of Wealdstone by bringing a net increase in spend to the Borough, a significant proportion of which is obtained in the Wealdstone area. During the construction period additional spend and opportunities will arise in the area.

The proposal within the strategy to build affordable housing units contributes to the Council's ambition to build homes and this will also bring health and well-being benefits with it.

Section 3 - Statutory Officer Clearance

Statutory Officer: Dawn Calvert

Signed by the Chief Financial Officer

Date: 13/05/21

Statutory Officer: Hugh Peart

Signed by the Monitoring Officer

Date: 13/05/21

Chief Officer: Sean Harriss

Signed by the Chief Executive

Date: 13/05/21

Head of Procurement: Nimesh Mehta

Signed by the Head of Procurement

Date: 13/05/21

Head of Internal Audit: Susan Dixson

Signed by the Head of Internal Audit

Date: 13/05/2021

Mandatory Checks

Ward Councillors notified: No, as it impacts all wards

EqIA carried out: YES

EqIA cleared by: Shumaila Dar

Section 4 - Contact Details and Background Papers

Contact: Julian Wain, Interim Commercial Director, 020 8736 6149, Julian.Wain@harrow.gov.uk

Background Papers: None

Call-in waived by the Chair of Overview and Scrutiny Committee

NO

Assumptions	
Full time employees (FTE)	1,840
Workstation ratio (desks:FTE)	0.5 :1
Number of workstations	700
Away from office (see right)	38.5 %
Office headcount (on average day)	1,132
Net to gross efficiency	80 %

Remote	20%
Annual leave	8.50%
Sickness	4%
Part time	6%
Total	38.5%

Other Civic Accommodation provided elsewhere
Utilise 220 workstations

Detailed area schedule							
Function	Space	Room detail	Location	Occupants	Net internal area		
					Per w'stn	Overall	
					Sqm	Sqft	
General office	Individual workstation	Desk, chair and circulation, coat, personal locker			4.0	2,800	30,139
	Meeting spaces	Small meeting (4p), large meeting (10p), booth (2p), informal			1.1	770	8,288
	Informal working	Touchdown workpoints and team tables			0.6	420	4,521
	Breakout	Coffee/tea making facilities, comfy chairs			0.6	420	4,521
	Utility	Multifunction printers, binding etc.			0.1	70	753
	Storage	Team storage, roller racks			0.1	70	753
	Circulation				0.8	560	6,028
	General office total				7.3	5,110	55,004
Private case + interview rooms	Case conference room 1	Children and adult services	Ground	14		28	301
	Preparation room	Adjacent to case conference room	Ground	4		6	65
	Case conference room 2	Children and adult services	Ground	14		28	301
	Preparation room	Adjacent to case conference room	Ground	4		6	65
	Waiting area	For case conference customers	Ground	4		6	65
	Private interview room 1	Housing, with secondary escape	Ground	10		20	215
	Private interview room 2	Children and adult services, with secondary escape	Ground	8		18	194
	Private interview room 3	Children and adult services, with secondary escape	Ground	6		12	129
	Private interview room 4	Children and adult services	Ground	6		12	129
	Private interview room 5	Children and adult services	Ground	6		12	129
	Private interview room 6	Children and adult services, with secondary escape	Ground	3		6	65
Private interview room 7	Children and adult services	Ground	3		6	65	
Private case + interview rooms total					160	1,722	
Community rooms	Chamber	Multifunction, includes furniture storage	Ground	125		250	2,691
	Viewing gallery	Overlooking chamber	Ground	40		50	538
	Committee room 1			65		130	1,399
	Committee room 2	Dividable (not of equal size)		65		130	1,399
	Committee room 3	Also marriage room		40		80	861
Committee room 4	Dividable		30		60	646	
Community rooms total					700	7,535	
Political offices	Party office 1	Office, meeting room (or Leader's office)	Not adjacent to PO2	15		50	538
	Party office 2	Office, meeting room (or Leader's office)	Not adjacent to PO1	15		50	538
	Party office 3	Office space		4		15	161
	Mayor's office	Office, waiting room		1		15	161
Political offices total					130	1,399	
Registrar + democratic	Registrar reception	Reception and waiting		20		40	431
	Registrar offices			6		40	431
	Wedding interview room 1	Wedding couple interviews		3		6	65
	Wedding interview room 2	Wedding couple interviews		3		6	65
	Strong room	For storage of birth, marriage, death certificates etc.				25	269
	Toilets	For wedding guests, oversized				30	323
Storage	For election equipment etc.				40	431	
Registrar + democratic total					187	2,013	
Public entrance + customer service	Reception desk	With storage and space behind	Ground	3		40	431
	Entrance triage	Directly on entry via main public entrance	Ground			50	538
	Waiting area	Incl. cash machine and 2 cash payment machines with rear access	Ground			60	646
	Self service kiosks	8 self service booths and 4 self service scanners, each@ 4sqm	Ground			48	517
	Service booths	8 @ 4sqm each	Ground			32	344
	Private interview room 8	Hold room for vulnerable/upset/volatile, with secondary escape	Ground			14	151
	Changing Places WC		Ground			12	129
Public toilets	Within core	Ground			0	0	
Coffee kiosk	Within entrance triage/waiting area	Ground			0	0	
Public entrance + customer service total					256	2,756	
Other	Multi-faith room			3		15	161
	Wellness room			1		5	54
	IT training classroom			15		35	377
	Changing room	Male and female: showers, changing, lockers				60	646
	CCTV resilience room	Within general office				0	0
	Emergency Command Centre	Large meeting room fitted-out for command centre in emergency only				0	0
	Staff kitchen and eating	Small kitchen for reheating etc.; lounge/eating area				140	1,507
Server room	Small provision, floor-by-floor coms. space to be incl. in core				30	323	
Other total					285	3,068	
Net internal area total					6,828	73,496	

Circulation + plant	Core, circulation and facilities	Net to gross efficiency of 80%			1,918	20,645
	Additional FM space and plant	CHP/district heating			211	2,271
Gross internal area total					8,746	94,141

Indicative general office breakdown								
Function	Space	Number	Item sqm	Total sqm	Occupants	Total occupants	Indicative ratio item:FTE	
								Individual workstation
	Coat storage	140	0.5	70	2,800		1 :13.1	
	Personal locker	1,400	0.4	560			1 :1.3	
Meeting spaces	Small meeting room	34	9	308	770	4	137	1 :50
	Large meeting room	17	18	308		10	171	1 :110
	Private booth	14	5.5	77		2	28	1 :130
	Informal meeting space	8	10	77		4	31	1 :240
Informal working	Team tables	8	20	168	420	10	84	1 :220
	Touchdown workpoint	67	3.75	252		2	134	1 :30
Breakout	Breakout + refreshment	5	90	420	420		1 :390	
Utility	Printing etc.	7	10	70	70		1 :260	
Storage	Team storage	8	9	70	70		1 :240	
Circulation	Circulation	700	0.8	560	560			
				5,110				
						Indicative capacity	1,285	With meeting rooms
							918	Work points only

Additional considerations				
Space	Location	Number	Sqm	Sqft
Car parking	HNC	60*		
Bike storage	HNC	130**		
Roof terrace	HNC	1		
Cashier office	Depot		30	323
Bullion room	Depot		30	323
Print room	Premier House***		98	1,055
Post room	Premier House***		56	603
CCTV main room	Depot		63	678

* To include office parking, disabled, pool cars, and town centre spaces
** Or policy compliant with draft New London Plan
*** Required within HNC brief if Peel House car park site not chosen

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Harrow Depot and HNC Business Case Review

Harrow Central Depot, Forward Drive, HA3

May 2020

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Prepared By: Hugo Parry MRICS
Status: Final
Date: May 2020

For and on behalf of Avison Young (UK) Limited t/a Avison Young

1. Executive Summary

1.1 Key findings from this report include:

- Option 2(a) which assumes the relocation of the Council's back office to the Depot and the integration of commercial space at the HNC is Avison Young's recommended option. This option generates a greater capital return for the Council than Option 1 and requires less management than if PRS or Private for Sale were to be integrated to the HNC.
- Occupier demand for the Depot will be determined by those who prioritise lower rents, larger floor plates, and the availability of car parking over access to public transport and/or needing to be within a client-facing building.
- Integration of commercial occupiers at the new Brent Civic Centre and Hounslow Civic Centre demonstrates demand amongst public sector and national associations for space within civic buildings.
- The Council should consider the One Public Estates programme when looking to integrate commercial occupiers into the Depot and HNC as there are considerable wider benefits that co-location of public service providers can deliver across the Borough.
- Whilst releasing further space at HNC (beyond what is suggested in Option 2) might yield a higher return, this will carry increasing risks for the Council in terms of the management and letting of the building.

2. Introduction

- 2.1 Avison Young received instructions from Harrow Council (the 'Council') in February 2020 to undertake a business case review for the redevelopment of the Depot and to provide our own assessment in respect of the potential redevelopment options and earning potential of the Depot and HNC.
- 2.2 In doing so we have also carried out a qualitative review of the likely occupier demand within the Depot and HNC taking into consideration the nature and likelihood of demand across various uses for both options.
- 2.3 We have then carried out an assessment of any potential barriers and opportunities on both sites which might affect their earning potential including the planning constraints to the third and fourth floor and associated mitigation strategies.
- 2.4 Finally, we present an assessment of the potential income across both sites and options followed by Avison Young's recommendations.
- 2.5 We have also conducted an extensive assessment of the current office, PRS, and private for sale markets in the local area looking into key performance indicators and comparable evidence to help inform our view of the market which can be found at Appendix I.
- 2.6 An inspection of the Depot and HNC site was carried out on 4 February 2020 by Hugo Parry, MRICS.
- 2.7 We have been provided with the following documents from the Council:
- Redevelopment of Central Depot Business Case dated July 2018 (Appendix II)
 - HNC/Depot Accommodation Issues Presentation
 - Depot Redevelopment Presentation
- 2.8 The advice offered in this Report does not constitute a valuation and cannot be regarded or relied upon as a valuation. This advice is exempt from the current RICS Valuation Standards (the Red Book) other than the requirements of PS 2 Ethics, competency, objectivity and disclosures, with which this advice complies.
- 2.9 We confirm that as far as we are aware, no conflict exists, nor is there a risk of a conflict of interest. We are required by the RICS to confirm this to all parties we act for.

3. The Sites

The Depot

- 3.1 The Depot is located within a larger industrial site known as the Central Depot which serves as the operational base for the Council's front line services, including fleet maintenance services, as well as providing rental accommodation for a number of local businesses. The area to be redeveloped (red line) forms approximately 50% of the wider Central Depot site (blue line) shown in the image below:



- 3.2 The wider Depot site is located approximately 800m south-east of Harrow & Wealdstone station and is bound by the railway line to the west, Kenmore Avenue to the South and East and the rear gardens of residential units to the North.
- 3.3 The scheme was originally approved in April 2017 and in July 2018 members approved an additional two floors of office space and additional car parking. The proposed development (which is under construction) will now provide workshop, office and welfare space over 5 floors as well as a 3 storey car park. Each floor measures 9,817 sqft (NIA) equating to 49,085 sqft in total. Four of these floors totalling 39,268 sq ft will be considered for incoming producing purposes which this report will focus on.

Harrow New Civic

- 3.4 The HNC is likely to be located on the site of the existing Peel House Car Park within Harrow and Wealdstone's main retail district approximately 250m north of the Harrow & Wealdstone station and measuring

approximately 0.8 acres. It is bound by Canning Road to the north, Gladstone Way to the West, the A409 to the East and Palmerston Road to the South.



- 3.5 Current proposals for the redevelopment of the HNC are for a 94,000 sqft (GIA) development for civic purposes of up to 6 storeys. The proposals include 60 car parking spaces, bike storage, and a roof terrace. It is expected that the Council will relocate staff to the Peel House site from the existing Civic Centre which is being replaced with housing and ancillary commercial uses.

4. Occupier Demand

The Depot

- 4.1 We have spoken with several local commercial agents and carried out our own extensive review of the market to determine the nature and likelihood of occupier demand for the Depot space.
- 4.2 In terms of size, typical office occupiers within the local area tend to be searching for space between 1,500-5,000 sqft which is reflective of the scale of local enterprises being mostly small to medium sized businesses. This suggests that the Council would require at least 2 occupiers per floor for typical office occupiers.
- 4.3 The Harrow and Wealdstone area attracts a variety of office tenants including accountants, solicitors, IT specialists, and other standard professional services. We are however of the view that the subject site would not appeal to such client facing occupiers due to its location within a generally industrial area which is also adjacent to the Harrow Recycling Centre, railway line, and not within particularly close proximity to major transport routes.
- 4.4 We are however of the view that the Depot would appeal to a different category of office occupier including those that consider large floor plates, staff car parking, and more economical rents as a priority over location.
- 4.5 We have established a range of possible sectors which the site would appeal to including:
- Administrative Services
 - Back Office Operations
 - Building Contractors
 - Call Centres
 - Civil Engineering
 - Logistics Services
 - Maintenance Providers
 - Public Sector / Local Authority Services / One Public Estate (OPE)
 - Security
 - Transport Services
- 4.6 Whilst typical office occupiers (professional services etc) tend to demand space between 1,500-5,000 sqft we would expect that the above alternative occupiers might seek larger sized offices and therefore consider it likely that whole or multiple floors could be let to a single occupier of this nature at the Depot.

- 4.7 We are confident that there would be demand from occupiers of the nature outlined above at a rental level to be discussed in Section 6 of this report.
- 4.8 We consider that a focus on opportunities across OPE should be considered as a priority as a number of these service providers are likely to be well suited to the nature of the space offered at the depot. Further, a OPE co location approach can yield far wider benefits across the Borough both in terms of operational performance but also in terms of potential site release.

Harrow New Civic

Office

- 4.9 Upon completion, the HNC has the potential to offer best-in-class office space within the Harrow Borough. Its likely location on the former Peel House car park will mean it is in close distance to the Wealdstone retail offering and train station which will benefit employees.
- 4.10 In comparison to the Depot the location and design of the HNC would in our view appeal to a wider range of occupiers and including those who tend to be more client facing. We understand that the Council has aspirations for the HNC to become a leading sustainable building which will appeal to an increasing number of potential users which is linked to wider trends in the market for sustainability conscious occupiers . Provided that the specification of the available office space meets the Grade A office space criteria, we believe there would be good demand from a wide range of private and public sector occupiers for the space.
- 4.11 It is our view that the HNC would appeal to the following office sub-sectors:
- Administrative Services
 - Charities
 - Health Services
 - Professional Services (Accountants, Financial Advisers, Consultants, Lawyers)
 - Public Sector / Local Authority Services / One Public Estate (OPE)
 - Transport Services
- 4.12 Typically such occupiers would be seek between 1,500-5,000 sqft and therefore we anticipate that the floors of the Civic would be multi-let.
- 4.13 We have carried out research into the occupancy of new civic centres within other London Boroughs as examples of where such integration is being achieved. As a good example, the Brent Civic Centre (built in 2013) provides approximately 30,000 sqft for the VOA, The Secretary of State for Commerce, and Soceité Air France combined over the top floor. Another example is LB Hounslow's new civic centre, Hounslow House, which also accommodates the Hounslow Clinical Commissioning Group, New Adult Education classrooms, and the Council's police partners. The sixth floor also includes the more modern and flexible Council Chamber,

which can also be used as community or event space. This is a clear indication of demand amongst other public sector bodies and national associations to locate within civic buildings.

- 4.14 Our view is that the Harrow New Civic will provide rare Grade A and sustainable office space in the local area and we are confident that this would result in demand from the occupiers described above at a rental level to be discussed in Section 6 of this report.
- 4.15 In addition we consider there may be scope to consider opportunities across the OPE within Harrow and there is lots of evidence where Councils' have successfully sublet space within their civic centre to these occupier groups.

PRS

- 4.16 We have been asked to consider the likely demand for PRS units which could potentially be integrated within the HNC.
- 4.17 Based on information provided to us by the Council, the maximum potential available floor space of the HNC equates to c. 31,378 sqft NIA (to be discussed in more detail in Section 6). Based on the assumption of an 80% Gross:Net ratio this would result in an NIA of c. 25,100 sqft for approximately 44 PRS units (assuming avg. unit size of 575 sqft).
- 4.18 We have discussed this as an opportunity with our in-house residential team who have said that from an institutional investor perspective 44 units would be too small to consider. Typically, institutional investors would require minimum 120 units and therefore the likely investor demand for such a PRS project is not likely to be high.
- 4.19 Alternatively, there may be an opportunity for the Council to receive income from the PRS units either by managing the units themselves or by appointing a third party to oversee operational management. We are aware of companies such as PRSim who are able to offer such services.

Private for Sale

- 4.20 We would expect the primary demand for new build town centre apartments to come from young professionals working in and around the town centre or in nearby business parks. However, due to the placemaking mandate of the scheme we believe that young families currently living in the town would be encouraged to move for the convenience of good amenity access and transport. This may also be true of small families living outside of Harrow but working in the town who wish to minimize commuting time.
- 4.21 Additionally, as Harrow & Wealdstone station is a 12 minute train journey away from London Euston, we would expect a large proportion of potential purchasers to be commuters seeking to benefit from this short journey and the relative value of Harrow compared to other more expensive commuter-belt locations. The short commute to central London is likely to also attract renters and in turn create interest in predominantly smaller units from buy-to-let investors.

5. Further Barriers and Opportunities

Planning Constraints

5.1 Planning permission (Ref: P/4251/18) for the Depot was granted in September 2019 for the:

“Redevelopment to provide part single, part two and part five storey building with plant room on roof and part first floor mezzanine incorporating workshop (B1 light industrial), office (B1 use), warehouse (B8 use) and ancillary uses; multi storey car park and external car parking; bin store (demolition of existing buildings) (Amended description).”

5.2 However the permission is subject to a number of conditions including the following which limits the third and fourth floors for the purposes of civic functions associated with the Council:

“The B1a office accommodation on the third and fourth floors hereby approved shall be used solely for the purposes of civic functions associated with Harrow Council Services, and for no commercial purpose outside of this remit without prior written consent from the local planning authority;

REASON: (a) To safeguard the on-going operation of a locally important function within the Borough; and (b) In the interests of highwaysafety.”

5.3 We interpret this condition to allow any business which provides services or benefits to the Council to occupy the premises, including third party service providers.

5.4 In terms of the impact of this planning constraint, we anticipate that a third party Council-related body would be willing to pay the market rent however we would expect there to be a slightly extended void period of around 2-3 months as a result of a restricted demand pool.

5.5 Whilst we do not consider the impact of the planning constraint to be severe, we have been asked to provide our view as to any mitigation strategies the Council may use to circumvent this constraint.

Car Parking

- 5.6 **The Depot** – LB Harrow has a relatively large catchment area meaning that a greater percentage of employees opt to drive to work. As a result we believe the addition of car parking to the Depot would be an attractive feature to occupiers.
- 5.7 **HNC** – Whilst the existing Civic Centre has approximately 500 car parking spaces we understand the number of these spaces is to be significantly reduced within the HNC. However, due to the location of the HNC within short walking distance to Harrow & Wealdstone station, we do not foresee that this fall in car parking space will be a concern for commercial occupiers.

One Public Estate

- 5.8 We believe there is a significant opportunity for both sites to benefit from the OPE programme which provides practical and technical support and funding to deliver collective public sector assets.
- 5.9 The programme focuses on bringing together various public sector bodies within the same area or building to promote collaboration, reduce management costs, and to release surplus public sector land elsewhere.
- 5.10 We consider there is a strong case to pursue OPE at both the Depot and HNC as we believe these assets could be home to a range of public sector services. We have considered a range of local occupiers who we believe would be suitable under the OPE programme including:
- Educational groups
 - Emergency Services – Fire & Ambulance
 - Network Rail
 - NHS Harrow CCG
 - The Royal Mail
 - Transport for London
- 5.11 We therefore recommend that the Council carries out further investigation into pursuing this avenue which can deliver a number of benefits to the Council, third party public sector bodies and the wider Borough. These can include:
- Operational savings through for example shared reception areas and back office functions
 - Knowledge sharing through co location
 - Release of surplus public sector land which in turn can be redeveloped for wider economic and social benefit

General

- 5.12 This Report has been prepared by Hugo Parry, MRICS, Surveyor within the Planning, Development and Regeneration Department and reviewed by Kimberley Grieveson MRICS, RICS Registered Valuer and Director within the Planning, Development and Regeneration Department.
- 5.13 Please note that this advice is subject to our usual Definitions and Reservations. This report is provided solely for the benefit of Harrow Council and it should not be relied upon by any third party. In addition, we note that any figures provided are not formal valuations and cannot be relied upon as such.

Appendix I

Market Overview

1. Market Overview

Office

- 1.1 Although primarily a residential area in London's commuter belt, Harrow is nonetheless home to just under 3 million sq ft of offices. It had been one of the capital's best-performing submarkets until recently, with positive demand and office-to-residential conversions pulling vacancies down sharply and boosting rents. However, while Harrow's vacancy rate remains close to 1%, demand has turned mildly negative over the past year and rent growth has also fallen away, driven by rental losses in older stock. Investment volumes remain relatively robust, however, with investors largely looking to office buildings in places like Harrow for their future conversion potential.
- 1.2 Harrow's office vacancy rate has come down sharply in recent years. Steady demand and the loss of stock to other uses (especially residential) has brought about a marked change in the submarket's fortunes, at least from a landlord's perspective. In 2011, vacancies hovered around 11%, well above the London average. Today, vacancies sit close to 1%, well below the market average and making Harrow one of the tightest submarkets in London.
- 1.3 That said, Harrow has lost some momentum in recent quarters. Net absorption has turned mildly negative, with some firms vacating older stock or consolidating space. The number of lettings of 2,000 sq ft or more has fallen away over the past year, with Expomax's 3,000-SF letting at 66-68 College Road (Hygeia) one of the few to occur in 2019. Expomax signed a six-year lease at an effective rent of £17 per sq ft. College Road has been the hotspot for office demand in recent years. The 166 College Road refurbishment has been particularly popular, attracting a number of new tenants such as Comparex UK, MG Group and Transport Exchange Group. FH Bertling and Burn Holt Aberdeen also took take space there in 18Q3.
- 1.4 A lack of availability in Harrow could restrict demand moving forwards, with only a handful of 2,000-plus-SF spaces on the market at the time of writing. Fundamentals should remain tight here over the next couple of years, especially given the lack of office development and the continuing trend towards residential conversion.
- 1.5 Harrow has avoided the rental losses experienced in most London submarkets over the past couple of years, helped by its low vacancy rate and its low base level. However, rent growth has slowed since peaking at about 17% in 2016, and flattened off completely during 2019. Harrow's recent performance has been dragged down by older, 3 Star properties, with better-quality, 4 & 5 Star properties continuing to record healthy rental gains. Asking rents at the popular 166 College Road scheme rose to £34.50/SF last year, up from £32.50/SF a year earlier and from £29/SF in late 2016.
- 1.6 Little new office space has been delivered in Harrow in recent years. The north London submarket has actually lost more than 200,000 SF of offices on a net basis during this period through conversion to residential use. Lyon House in Harrow town centre (100,000 SF) was one of the largest such examples in 2015, with Imperial House in Rayners Lane (103,000 SF) following suit in 2017. Several buildings along Northolt Road in South Harrow have also been converted to flats in recent years.

- 1.7 Harrow has finally welcomed a couple of new office buildings in recent months, albeit small ones. Bradburys Court completed as part of the mixed-use Lyon Square development in Harrow's town centre. The nine-story, 11,000-SF building completed in 2019, with the nearby Masters Court (16,000 SF) following suit in early 2020. Both were built speculatively. The only other office deliveries of note in the past decade were in Stanmore and Wealdstone, where Sceptre House and Artisan Studios (each around 25,000 SF) delivered in 2015 and 2016, respectively.
- 1.8 No major office projects are in the pipeline. Office construction in London's north-western boroughs will be focused on Wembley in the Brent Submarket over the next few years, where developer Quintain is slowly building out a large, mixed-use scheme.
- 1.9 Investment in Harrow has picked up sharply in recent years. Less than £10 million traded per year in 2008–12, whereas annual volumes have averaged more than £40 million in the years since as investors explored higher-yielding or residential conversion opportunities outside of Central London. Volumes peaked at more than £70 million in 2017 and cooled in 2018 and 2019, although the number of deals remained elevated.
- 1.10 Redevelopment opportunities remain the driver of investment volumes in Harrow. The largest deal of 2019 was Harrow Council's purchase of King's House for £22.9 million. Quinata Global, which sold the building, had previously acquired both King's House and the adjoining Queen's House from Dandi Living for £33.8 million in 2017, with both buildings ultimately destined for redevelopment into housing. Another large example occurred in September 2017, when betting firm Ladbrokes sold its offices at Imperial House in Rayners Lane for £26.1 million to a property developer. The building has since been converted to a residential development known as Broad House.
- 1.11 More straight-forward, income-producing transactions in recent quarters include SSRE Investments' £10.8 million acquisition of Stewart House, a 26,000-SF mixed-use asset in Kenton, in June 2018. More recently, HGB Group paid £1.2 million to acquire 297-299 Kenton Road, for its own occupation, in January 2019.

RENTAL EVIDENCE:

Image	Address	Lease term	Rent £psf	Comment
	Hygeia 66-68 College Rd Harrow HA1 1BE 2,600 sq ft	6 years 4 year tenant break Start March 2019 New lease	£17.00	Located in central harrow opposite train station. Lower ground floor suite with limited natural light.
	Hygeia 66-68 College Rd Harrow HA1 1BE 4,120 sq ft	10 years 7 year mutual break Start Aug 2018 Lease renewal 9 months' rent free	£23.95	Located in central harrow opposite train station. 2 nd floor non-refurbished space

	166 College Rd Harrow HA1 1BH 2,790 sq ft	10 years 5 year tenant break Start Apr 2019 New lease 9 months' rent free	£30.95	Centrally located in Harrow Refurbished space
	Masters House 1 Marlborough Hill Harrow HA1 1UX 4,970 sq ft	To Let	£22.32 psf	5 min walk from Harrow & Weald Station. New build
	21-23 The Bridge Harrow HA3 5AG 2,028 sq ft	To Let	£32.29 psf	1 min walk from Harrow & Weald Station. Average condition

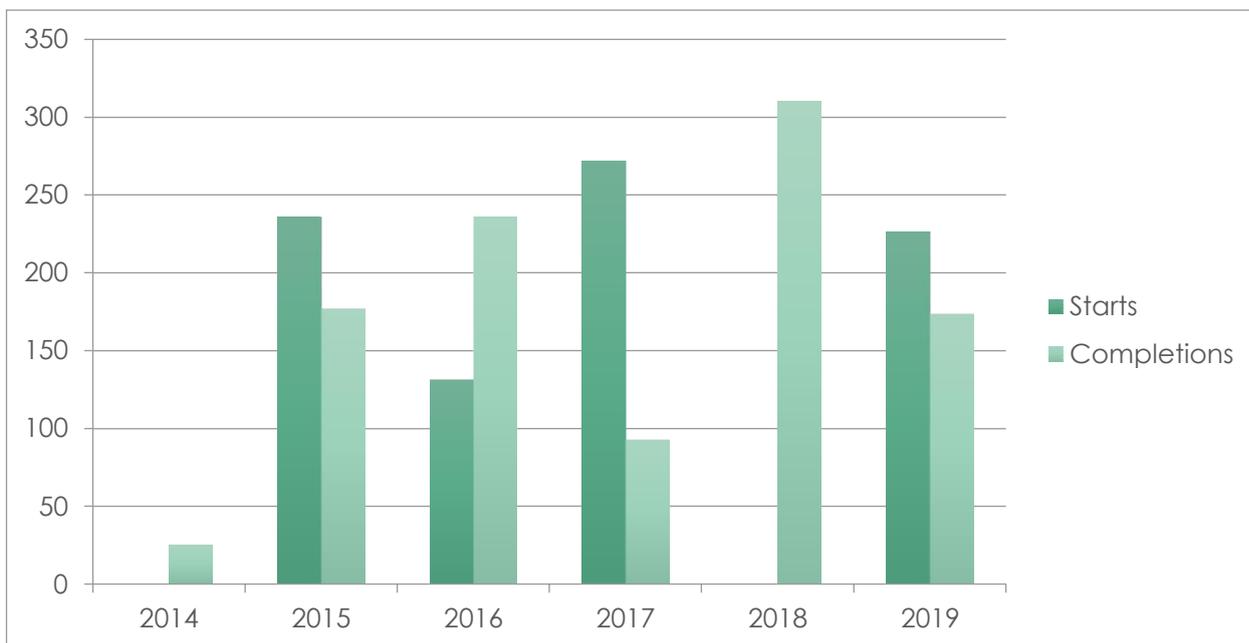
SALES EVIDENCE:

Image	Address	Sale details	NIY	Comment
	166 College Rd Harrow HA1 1BH 34,292 sq ft	£13.8m £398.21 PSF WAULT – 4.8 years Sold Jan 2020	7.10%	Centrally located in Harrow Multi-let (8 tenants) Refurbished
	Kings House Kymberley Road Harrow HA1 1US	£22.91m £274.84 PSF	Unknown	Top floor suite available at £21.00 psf Multi-let

PRS

- 1.12 There are just over 152,000 Build to Rent homes across the UK, including those in the planning pipeline. A quarter of these are now complete, equal to 40,180 homes. London continues to lead the way, accounting for 50% of all completed stock. Newham, Tower Hamlets, Croydon and Brent have contributed the most completed stock to date. Key regional cities have kept pace with the capital throughout 2019 and Manchester, the next closest city, now holds 17% of completed stock. Birmingham, Liverpool and Leeds are home to 5%, 3% and 3% of completions respectively.
- 1.13 Across the country, the entire Build to Rent sector has grown by 15% since Q4 2018. In real terms, this amounts to over 20,000 additional Build to Rent homes in the past year. The majority of this growth has come from outside of the capital in key regional cities such as Birmingham, Cardiff and Edinburgh.

1.14 The chart below shows Build to Rent construction starts and completions in LB Harrow over the last 6 years to December 2019. Construction starts faltered in 2018 following a strong 2017, whereas 2018 was the strongest year for completions with approximately 310 units completing in the Borough. Starts and completions were at their combined highest at 400 units in 2019 since the Build to Rent format took hold in the market in 2015 (413 units).



1.15 We are aware of a nearby Build to Rent scheme named The Hub – an Aberdeen Standard Investments owned development which completed in October 2016. The scheme is located in central Harrow (HA1) and consists of 84 PRS units which were fully let by July 2017. Studios have generally rented from £1,100 to £1,200 per month, 1-beds from £1,250 to £1,495 and 2-beds from £1,550 to £1,740 per month.

Private for Sale

National Overview

1.16 Activity across the housing market is subdued with the number of buyers and sellers entering the market down amid on-going uncertainty in the UK economy.

1.17 House price growth for the UK is starting to show improvement with the latest Nationwide figures showing a year-on-year growth of 2.3% in February. Halifax data shows the price of the average home rose by 4.1% in the year to February. While Land Registry shows an increase of 2.2% in the year to December 2019. Despite the wider social-economic climate, the UK housing market has continued to demonstrate resilience via modest growth.

1.18 The latest RICS UK Residential Survey (January 2020) reported an increase in buyer enquiries, agreed sales and new instructions over from the previous month. Rightmove reports that the average price of property coming to market rose by 0.8% (+£2,589) in February, just £40 short of a new all-time high. It also reports a year on year increase of 12.3% in number of sales agreed nationally. Meanwhile buoyant mortgage approvals indicate more resilient activity within this portion of the market.

- 1.19 The first-time buyer market has remained buoyant in Q4 2019, with a 2.3% increase on year-on-year average asking price for this market. The significant government incentives – mainly Help to Buy and Stamp Duty relief – for those looking to get on to the property ladder has kept first time buyer demand strong.
- 1.20 The RICS residential survey observed steady positive growth in house prices across all UK regions and in particular a turnaround in London and the South East. The current market remains a buyers' market for now but with buyer demand and agreed sales increasing this may change over the next year.
- 1.21 The following table shows the percentage change (yearly in house prices and average price for all property types in September 2019 from Land Registry data:

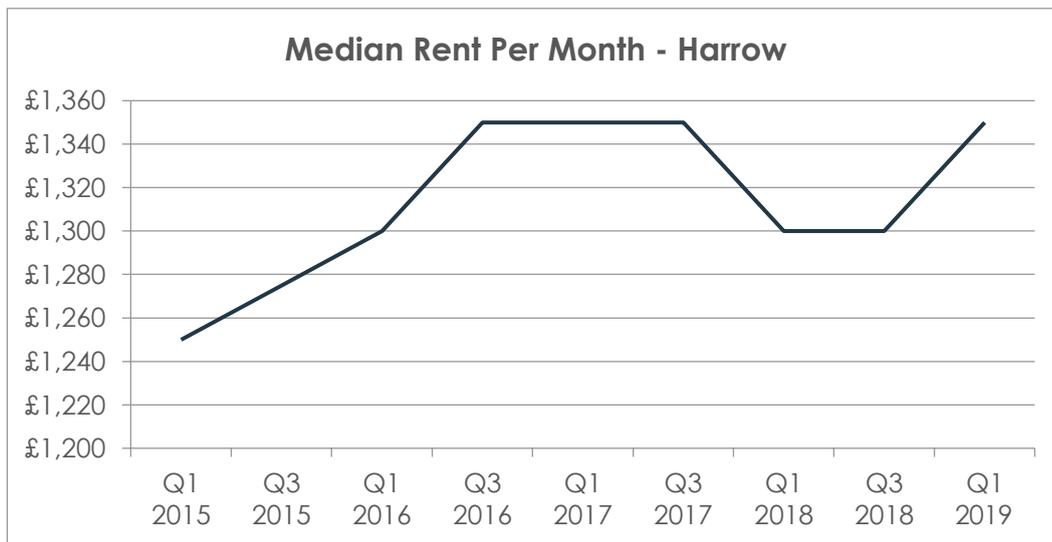
Region	% Yearly Change (Dec '18-19)	Average Price
England	2.2%	£251,711
Greater London	2.3%	£483,932
LB Harrow	-3.0%	£448,263

The Local Market

Macro Location

- 1.22 Land Registry data shows a slight negative growth in Harrow between December 2018 and 2019 of -2.0%. By way of comparison, house price growth in Greater London in general increased by 2.3% across the same time frame.
- 1.23 The chart below shows most recent available average rental figures for LB Harrow to Q1 2019. This shows a generally stable median rent paid of £1,350 from Q3 2016.

Table 6: Average residential rent per month – Borough of Harrow



Source: London Datastore(2020)

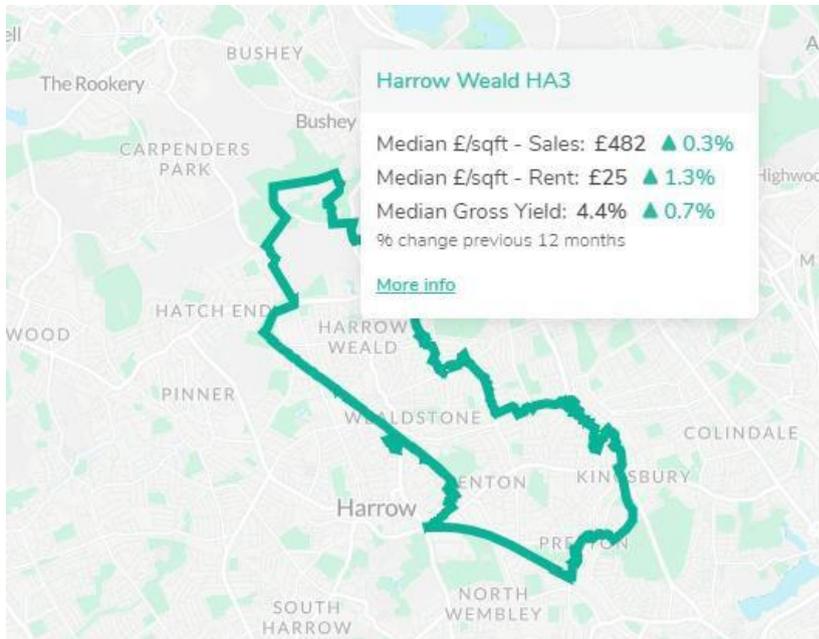
Micro Location

- 1.24 The median price paid for all new build property within the HA3 postcode over the last 12 months was £461,542, which represents a 1% decrease over the period. However, the median price per square foot over this period

was £482 psf reflecting a 0.6% increase over the period indicating that smaller sizes are a contributor towards the slight fall in capital values.

1.25 The median rent £ per sq ft paid for new build property within the HA3 postcode over the last 12 months is £25, which is an increase of 1% over the period. The median rent paid over the same period was £1,435, an increase of 3%, indicating an increase in the average size of rental unit.

1.26 The HA3 postcode area, encompassing the subject Site, is illustrated in the map below:



Source: Realyse (2020)

1.27 We have been provided with local agent's opinion of new build residential values for the civic centre site (below). Summarised, these suggest blended values per sq ft of £525 to £550. This is higher than the median price paid for new homes in the HA3 area as the proposed scheme is likely to reap the benefit of its own 'placemaking' and therefore set benchmark values for the area.

Harrow Depot and HNC Business Case Review

Market Update

January 2021

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Prepared By: Hugo Parry

Status: V1

Draft Date: January 2021

For and on behalf of Avison Young (UK) Limited

1. Context

- 1.1 In June 2020, Avison Young were instructed by LB Harrow (“the Council”) to produce a report which reviewed accommodation options for both the Harrow Depot and the proposed HNC. The report explored options to flex the amount of Council accommodation across both sites and explored the commercial case for any surplus space.
- 1.2 This market update should be read in conjunction with our initial report.

- Private residential not yielding high enough values due to 40% affordable housing provision and the disjoint of delivering this within the same building as the HNC which is likely to temper unit pricing

2. HNC Status

- 2.1 Discussions are ongoing with the Council's preferred partner, Wates and their architects Shepherd Robson to further explore options for the Council's requirement at the HNC.
- 2.2 It is likely that this requirement will be significantly reduced from the options we reported on in May 2020.
- 2.3 On account of the substantive change and the major economic and workspace changes that have occurred over the course of 2020 you have sought that we revise our report to provide an update on the market position which has fundamentally shifted over the course of 2020 and into 2021.
- 2.4 Further, we understand that the Council has undertaken work to explore the potential OPE demand in Harrow and this has proved fruitless and as such is unlikely to yield any demand for space within the HNC.

3. Market Update

Covid 19 Market Impact

London Sector Indices and DART

- 3.1 Figure 1 below shows the Sector Indices for London based on research conducted by Avison Young. The index is a reliable tool allowing us to track data changes in a shorter time period, such as weekly movements, opposed to GDP which only provides the ability to track monthly change. The indices for each sector are made up of 3-6 sector specific indicators which highlight general performance within that sector, for example Hotel & Leisure is made up of restaurant booking numbers and hotel take up rates. Our internal research team has selected the indicators for each sector and our baseline for the data is 29 February 2020, where we believe the sectors were performing at a 'normal' level.

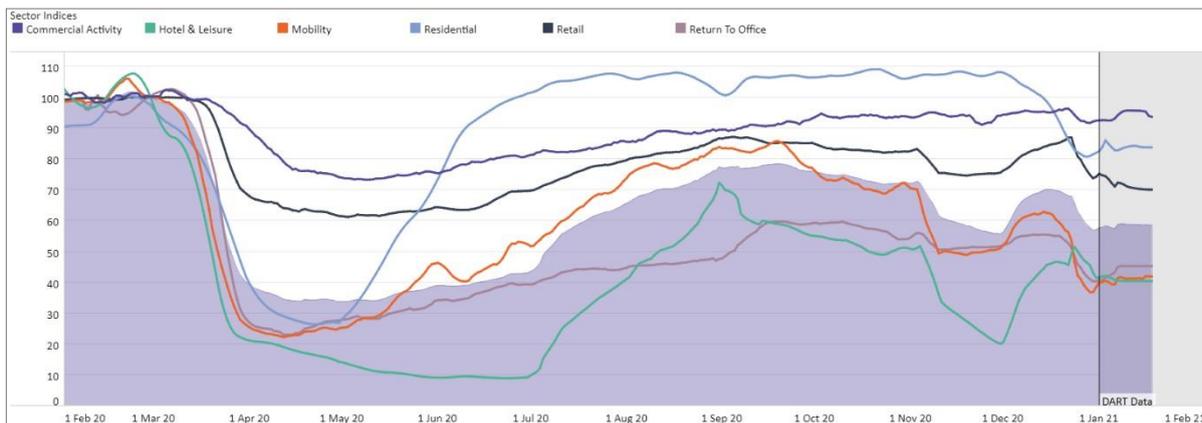


Figure 1: Sector Indices for London

- 3.2 The Commercial Activity Sector Index continues to remain relatively robust and now stands at 91.8. However, continued high levels of unemployment and the National Lockdown implemented in December 2020 is acting as a downward weight on its recovery.
- 3.3 Meanwhile the index for the residential market stood at 83.6 on the 18th of January 2021, which translates to a 16.4% decrease in activity when compared to the baseline of 29 February 2020. This latest figure fell from 107.8 as at 1 December 2020 – a 7.8% increase from the February 2020 baseline – indicating that overall the residential market during Covid-19 has been fairly resilient compared to other sectors. This has most likely been due to pent-up demand during lockdowns and the Stamp-Duty holiday. The recent fall in the Residential Index at the start of this year is likely due to the enhanced government restrictions that have been imposed at the start of 2021.
- 3.4 The return to office index shows a sharp fall during the first lockdown but has remained relatively flat since the second wave in 2020 and still below 52% of pre Covid levels. With the announcement of further restrictions at the start of 2021, the index stood at 45.1 on the 18th January 2021 and we do not expect this figure to improve until lockdown measures are relaxed.

National DART Compared to Covid-19 Hospitalisations:

- 3.5 Figure 2 below compares the national DART (Daily Activity Recovery Tracker), a database which tracks daily higher frequency data over a short time period, to the rate of Covid-19 hospitalisations.

3.6 Evidently, there is a direct correlation between National index and the number of Covid-19 hospitalisations. As covid-19 hospitalisations rise, this negatively impacts the Indices.

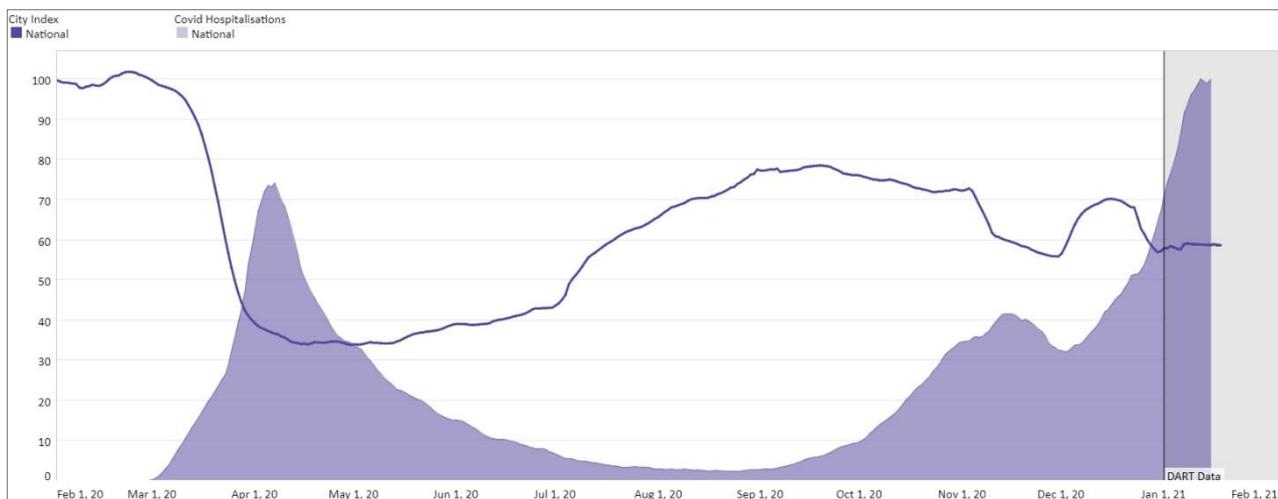


Figure 2: The Index for London and Covid Hospitalisations.

Office Sector

Office Market Overview & Covid-19:

- 3.7 Q2 was a difficult period for the office market and as lockdown measures eased, Q3 failed to bring the anticipated return to work for more office-based workers after schools went back in September 2020. Any resurgence in occupier activity, just as occupancy numbers began to increase, were dealt a further blow with the announcement of a second national lockdown in December 2020. This had the effect of putting large parts of the market on pause and plans for a manageable return to work and a longer-term view on tenants’ occupational strategies was put back again.
- 3.8 With further restrictions put in place to control a second spike in the Covid-19 pandemic, and with rising unemployment, Q1 2021 looks to be another challenging and ultimately quiet quarter for take up. Naturally, occupiers who do not have to move are continuing to re-gear existing leases or reduce their footprint where possible whilst they navigate their way through these troubling and uncertain times. Of note, there are a number of companies who are yet to reopen their offices even in part following the initial restrictions in Q2 of 2020.
- 3.9 However, fears that the office market will not bounce back once the pandemic is under control seem to have abated. Despite the initial productivity results of working from home looking positive, as the onset of Winter continues, recent surveys indicate that occupiers are looking forward to returning to the office, when it is safe to do so, to benefit from the social impact it has and the subsequent creativity

and cross pollination it brings. However, when employees do start returning to offices, we expect working practices will almost certainly have changed for good with increased pressures that office space needs to 'entice' workers to leave their home environment and forego the time and cost of a commute.

- 3.10 Headline rents are coming under pressure, but it is incentives that are taking the pain for now. As landlords fight it out for the limited demand there is in the market, incentives have begun to increase with 5-year leases offering longer rent-free periods to induce an early commitment from occupiers. Rental levels in the areas of over supply will inevitably begin to fall; but as landlords begin to offer other differentiators, such as fitted space, this will be limited in the main and the occupier is likely to benefit from more choice and some compelling bargains are to be had.
- 3.11 The UK economy has significantly contracted due to the impact of Covid-19. This in turn has impacted the demand for office space and led to many larger occupiers re-thinking their office space strategy. Subsequently, for the September 2020 quarter day the rent collection for office space was only 68.1% across Greater London.

Harrow Office Market:

- 3.12 Office demand in Harrow has been subdued in recent years and this has been exacerbated by the Covid-19 pandemic, in line with the wider market. Demand for office space within Harrow has lost further momentum in recent quarters, as net absorption turned mildly negative as firms vacated older stock or consolidated space. Few lettings of any size have occurred since the Covid-19 pandemic began in March 2020.
- 3.13 Our engagement with local agents also indicated that office performance remains poor but there remains some demand for Grade A space in prime locations at a maximum size of 1,500 sq ft.
- 3.14 One potential upside from the Covid-19 pandemic is that it may lead to an increase in demand in suburban areas like Harrow as part of a 'hub-and-spoke' model. This model refers to a more flexible workspace and working style opposed to the traditional single office headquarters model. Hub and Spoke offices allow employees to work from either their city hub or a dedicated, strategic spoke location. This market is still emerging however with limited transactional data thus far.
- 3.15 In terms of location, Wealdstone is seen as a less desirable area whilst Central Harrow remains arguably the most buoyant office area with several funds occupying space within the area, such as Columbia Threadneedle.

- 3.16 In terms of supply, LB Harrow has lost more than 200,000 sq ft of office space on a net basis since 2014. This is largely due to a number of residential conversions previously and limited development. One notable development is Bradbury's Court which completed as part of the mixed-use Lyon Square development in Harrow's town centre; at the end of 2020 we understand this was nearly fully let.
- 3.17 In terms of vacancy, Harrow had seen a fall in vacancies in recent years, not as a consequence of high demand but more-so driven by the lack of supply and a number of office-to-residential conversions as aforementioned, which in turn boosted rents within the area.
- 3.18 However, in light of the Covid-19 pandemic, vacancies now stand at 2.7%, a 1.7% increase since our last report, albeit this is a figure which is still below the market average for London submarkets.
- 3.19 Average rents are now falling gently with several landlords reducing asking rents in recent months. Further declines across the next few months and possibly years are expected as demand for conventional office space is expected to fall. However, there is a chance the 'hub-and-spoke' model will absorb some of this rental pressure.
- 3.20 Few sales occurred in 2020 largely due to Covid-19, with the pandemic depressing investor demand across London.
- 3.21 One noteworthy income-motivated deal did take place just before the pandemic began that provides a clue to pre-crisis pricing. In February 2020, CLS Holdings bought 166 College Road for £13.8 million. The price for the newly refurbished, fully let building reflected a 7.1% yield. As per the demand within the area, redevelopment opportunities have been the biggest driver of investment volumes in Harrow in recent years.

Office Market Conclusion:

- 3.22 The challenge over the short to medium term will be to make sure that office space is fit for purpose, and that it is a place where creativity and productivity thrive. But how and when exactly we return to using offices is still unknown and we would expect that Flex Space and a 'hub-and-spoke' model will become increasingly important as part of an occupier's portfolio. This will allow new ways of working to be assessed and longer-term plans to be made, whilst not having to commit to lengthy traditional leases.
- 3.23 However, within Harrow, the falling rental levels and level of office stock continue to make it a difficult market. Investors continue to purchase stock primarily with the goal of redevelopment into residential as there is growth and value in this market.

- 3.24 Whilst the flexible and hub-and-spoke office market offers a road to recovery within this sector, we believe that given the current market uncertainty, trends towards residential conversion, increasing vacancy rates, and likelihood of a continued work from home policy based on surveys carried out amongst businesses, we would caution the development of large speculative office space within Harrow at the moment and consider it would expose the Council to risk in a fast evolving market.
- 3.25 On the basis of the above we consider that alternative uses may be more suitable for any surplus space generated by the reduced HNC footprint. Discussions with agents indicated that whilst there has been no transactions data, yields are likely to have moved out by c. 50 BPS from 7% and headline rents are likely to have dropped from £30 psf to around £25psf. Rent free periods and tenant incentives are also likely to increase as the demand to secure occupiers into office space is high across the market

Private Rented Sector

National Overview

- 3.26 There are 157,512 Build to Rent homes across the UK, including those in the planning pipeline. 43,236 homes are now complete, 33,505 are under construction and 80,7771 are in the planning stages.
- 3.27 London contributes 74,892 units of these Build to Rent homes. Salford and Manchester remain other hotspots, while the number of schemes within the midlands is also growing fast.
- 3.28 Whilst the coronavirus pandemic may have delayed some of the schemes mentioned above, evidence suggests that BTR is to remain a strong trend post-pandemic. It is also being treated as a safe haven for institutional investors given the low risk it represents compared to other investments.
- 3.29 Demand is still holding up within the market and developments are adapting to the post Covid-19 environment in various contactless and social distancing ways.
- 3.30 Q3 2020 saw a record £1.84 billion invested in UK Build to Rent. This is driven by strong occupancy and rental collection levels which has attracted investors.

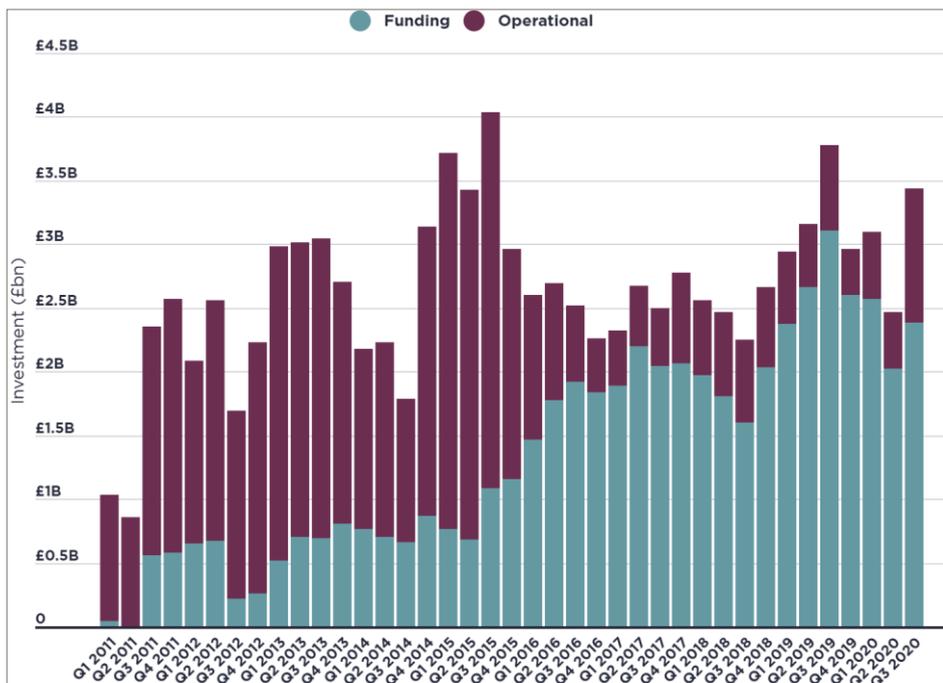


Figure 3: Investment flows into UK BTR by deal type, annual rolling

Harrow Overview

- 3.31 Our engagement with local agents indicated that the PRS market is moving fast and they are not seeing a significant impact from national lockdowns. Demand remains at the same level if not higher than the same period last year.
- 3.32 We are aware of 5 recent BTR schemes within Harrow which have been granted planning permission, in construction or now complete.
- 3.33 Lexicon, which was completely sold at the end of Q1 2020. London Borough of Harrow launched Swift House in June 2019, starting gross monthly rents for the 53 BTR units were £1,325 for a one bed, £1,700 for a 2 bed and £1,850 for a 3 bed. The lettings of these units completed in October 2019, 18 weeks after the first units became available.
- 3.34 Ferrari House, this scheme includes 25 BTR units, construction completed during Q2 2020, the scheme has been built to rent but our research indicates there is no sign of marketing. It is suspected that this scheme was let out to housing waiting list residents only.
- 3.35 The Heights, which is currently under construction, which begun in Q3 2020. The development will provide 125 units, all of which are BTR units.

- 3.36 2 Dalston Gardens is an office conversion completed in November 2020 and consists of 24 BTR flats. As at December 2020, only one unit was still available to let.
- 3.37 The average asking rents for Harrow in the last 2 years are shown in the figure below and appear to have remained relatively static. Given that PRS products offer a variety of amenities on top of a typically rented home, we would typically expect PRS rents to command a slight premium above these indicated rents.



Figure 4: Average asking rents for new build Flats in Harrow over the last 2 years

- 3.38 We believe that the continued growth in the Build to Rent sector makes it a suitable opportunity for the subject site. Rents remain strong and it represents a low risk and attractive opportunity for investors. The appetite for renting will likely increase following the end of the Stamp Duty holiday at the end of March 2021. However, we caution that PRS investors would typically require a minimum of around 100 units and therefore any proposed PRS development at HNC below this threshold would carry additional risk.

Private for Sale

National Overview:

- 3.39 Covid-19 had a significant impact on the UK housing market in 2020. Lockdown restrictions virtually brought transactions to a halt and the impact on the economy and personal finances has affected willingness and ability to undertake house purchases.

- 3.40 Despite this, the most recent data points to a 'bounce-back' in the market. This is partly due to a release of pent-up activity from the initial lockdown and also a demand boost from the recently announced stamp duty holiday, albeit this is due to come to an end at the end of March 2021.
- 3.41 There are a range of government interventions in the market such as the moratorium on evictions and mortgage holidays which have protected against distress. The removal of these protections and the potential for significant increases in unemployment, currently being held off by high levels of government support, are risk factors for the market.
- 3.42 Nationwide's House Price Index (HPI) release reported that house prices across the UK increased by 7.3% in December, compared to the same period the previous year. The Outer Metropolitan area saw an increase of 5.6% for Q4 2020, up from 5% the previous quarter.
- 3.43 The monthly rise has been attributed to the lifting of lockdown allowing a release of some pent-up demand as well as the announcement of the stamp duty holiday for property valued under £500,000 between 8 July 2020 and 31 March 2021. Although this is a strong month-on-month growth figure, a key question is whether the house price growth is sustainable and it is likely that the ending of the Stamp Duty holiday at the end of March will have a negative impact on the national market.
- 3.44 Rightmove data for January 2021 indicates that buyer activity has continued to exceed the same period compared to a year ago, even though 2020 also had a very active start. Visits to the Rightmove website have continued to increase and were up 33% at the start of January when compared to the same period in 2020. The number of sales agreed is also up 9% for January so far compared to the previous year. It is expected activity levels will remain high with buyers keen to complete before the end of the Stamp Duty holiday. However, Rightmove data indicates the possibility of completing before the end of the holiday is low with it currently taking 126 days from the time an offer is accepted until legal completion, just over four months.
- 3.45 Rightmove data also illustrated a post-lockdown boost in activity following the initial lockdown. The site recorded its 10 busiest days ever in May and June, with 955,000 hours spent on the site on 6 June alone. In a typical month, Rightmove may expect to accrue around 1.4 million hours spent on their site. Asking and achieved price data shows transactions on Rightmove achieved 97.7% of their asking price in June, up from 96.6% in February. This strong performance fuelled continued growth in asking prices on the site, increasing by 2.4% in July compared to March with an annual growth of 3.7%.
- 3.46 The RICS residential market survey, which is a good timely indicator of sentiment, delivered more positive readings in the December 2020 report. New buyer demand held a net balance of +15%.

Although this increase has gradually slowed in recent months, it still represents a strong level of growth within the market.

3.47 Price expectations for the coming twelve-months from the survey period remain slightly negative, despite persisting confidence in positive five- year growth.

3.48 As Acadata notes:

There has thus been a substantial turnaround in the market. It is clear that the Stamp Duty holiday applied on 8 July (in Wales the reduction came into being on 27 July) has acted to stimulate activity (London is the biggest beneficiary in terms of the tax reduction impact) – as was intended. This holiday continues until March 3rd, 2021 in England and Wales, as well as in Scotland. Landlords continue to pay the 3% additional tax. Of course, as with the previous tax holidays it will cause purchases to be brought forward, with the potential consequence that we could see a contracting market post March 2021 – which might also coincide with a contracting economy.

Currently, the housing market is busy – the Halifax release referred to it as a “mini boom” – and most lenders are supported by the BoE Term Funding scheme (which is offering up to £150 billion of funding at rates very close to the Bank Rate of 0.1%), with the result that funds are plentiful and cheap. However, the supply of higher loan-to-value loans has contracted, impacting first time buyers with limited deposits. Many lenders are displaying a high degree of caution, partly because they are busy processing payment holidays, but also because there is an exception of a significant contraction in house prices, along with an upturn in mortgage arrears and repossessions following the end of the furlough scheme.

There is thus an element of caution overlaying the current optimism. Some analysts argue that the current activity is the “dead cat bounce”, built on suppressed demand and will be finite, others that the buoyant market will be sustained. We shall see, in addition to the way in which the emerging new geography of the housing market develops in terms of prices and demand. Will inner city areas see sustained falls, and outer suburban areas/rural see sustained rises? Certainly, the evidence set out in this release indicates it is having an impact now.

3.49 The following table shows the percentage change yearly in house prices and the average price for all residential property types in November 2020 from Land Registry data:

Region	% Yearly Change (November '19-20)	Average Price
England	7.61%	£266,742
London	9.65%	£513,997

Region	% Yearly Change (November '19-20)	Average Price
LB Harrow	5.23%	£474,528

Harrow Overview

Macro Location

- 3.50 Land Registry data shows a growth in prices within Harrow between November 2019 and November 2020 of 5.23% By way of comparison, the house price growth in London in general increased by 9.65% across the same period.
- 3.51 The average sale price for new build flats within Harrow across the last 2 years can be seen below. Although there has been strong growth within the market for 3 bedroom flats, the prices for 1 and 2 bedroom new build flats appears to be relatively flat.

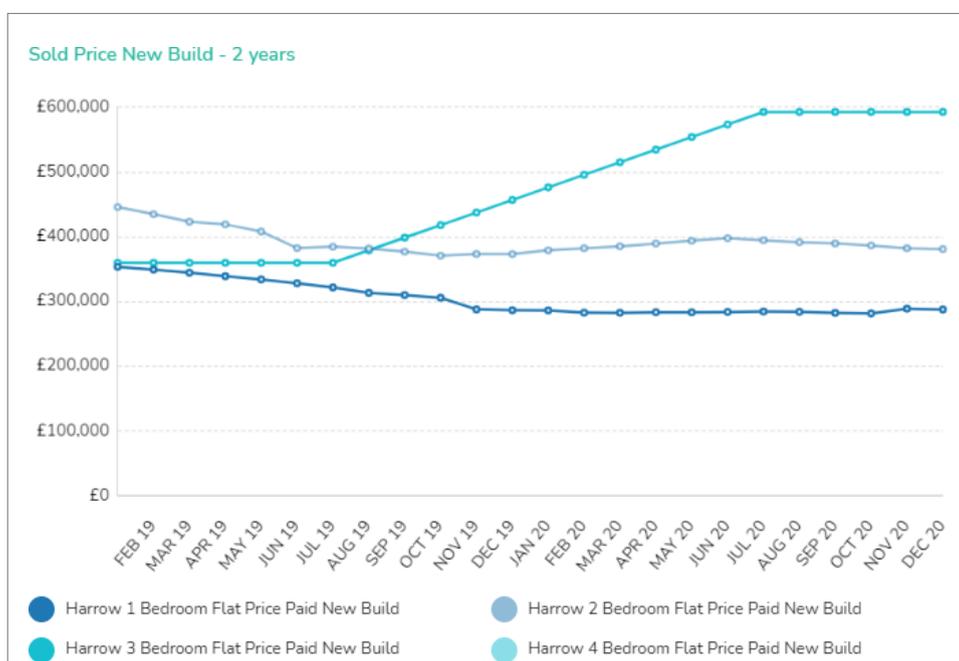


Figure 5: Sale price of new build Flats in Harrow over the last 2 years

- 3.52 Within Harrow we are aware of several new build schemes which have been granted planning permission, begun construction or completed within the last 2 years.
- 3.53 Jubilee House which is the demolition of a former office building and four semi detached houses and a redevelopment to provide 103 residential units and a further 70 units within a five-eight story building. Taona House which will provide 70 units is due to complete in January 2021. The 1-beds are priced from £340,000, 2-beds from £560,000 and 3-beds from £685,000.

- 3.54 Lyon House, which completed during Q4 2018 sold its last unit in Q3 2020, this again was a demolition of the former Lyon House and Equitable House and redevelopment to provide 287 residential units. There was an affordable housing provision of 49 units.
- 3.55 Harrow View West (Kodak), is a site which was purchased by Persimmon in late 2015 for £50 million. The development is for 314 residential units and includes 60 units allocated to affordable housing. At the end of Q4 2020 the scheme had sold out. Phase 1 which included 114 private units and 10 affordable has now completed and all units are sold. Phase 2 is 64 private houses, all now sold and complete. Phase 3, 76 private units sold out during Q4 2020, our research indicates that 50 units are complete, the rest are expected to complete in Q1 2020. The affordable allocation for this phase will complete in Q2 2020.

Micro Location

- 3.56 The median price paid for property within the HA3 postcode over the last 12 months was £476,695. Most sales within the HA3 subarea during the last year were semi-detached properties, selling for an average price of £516,557. Overall, sale prices in HA3 have risen 5.82% over the past 12 months.
- 3.57 As at November 2020, the current asking price for property within HA3 is £511,857. A breakdown of average prices across property types is summarised in the table below.

Property Type	1 Bed	2 Beds	3 Beds	4 Beds	5 Beds
Houses	£205,875	£411,704	£552,993	£706,280	£856,906
Flats	£255,925	£335,309	£386,869	£450,000	-
All	£250,587	£345,795	£540,090	£698,144	£856,906

- 3.58 The average sale price for Flats within HA3 across the last 2 years can be seen below. The sale price is relatively static, and this is likely due to a lack of transactional data within the Micro location.



Figure 6: Sale price of new build Flats in Harrow over the last 2 years

3.59 The table below summarises the current asking rents within HA3, the average current asking rent is £1,271.

Property Type	1 Bed	2 Beds	3 Beds	4 Beds	5 Beds
Houses	£734	£1,484	£1,689	£2,087	£2,600
Flats	£972	£1,337	£1,489	£1,826	-
All	£920	£1,349	£1,647	£2,058	£2,600

3.60 Agents within the Private Sale Market indicated that it remains a very strong market and the quality of buyer has increased. The Stamp Duty holiday has significantly aided the market, although there is a degree of uncertainty with what will happen after March. First time buyers accounted for most of buyer demand.

4. Conclusions and Recommendations

4.1 Since Avison Young’s previous market report in June 2020, the Covid-19 pandemic has evidently had a further impact on all real estate markets but in particular the office sector - driven by working from home policies as a result of government restrictions and lockdown measures - has been most negatively affected.

- 4.2 In line with this trend, this report highlights that within Harrow, demand for office space has also fallen with vacancy levels rising by 1.7% since our previous report was issued and rents falling within the area.
- 4.3 Whilst a hub-and-spoke model, flexible space, and the rollout of a vaccine throughout 2021 offer hope of a recovery within the office sector in Harrow, we anticipate a sustained working from home policy to be common amongst most businesses throughout 2021 which will contribute towards further increased vacancies and falling rental levels. Furthermore, when employees do start returning to offices, we expect working practices will almost certainly have changed for good and the current level and nature of demand will not be the same as before.
- 4.4 Based on these trends and movements within the Office sector, we do not consider the development of large speculative office space within Harrow to be appropriate at this time. However, given the relatively low level of supply within Harrow, there may be opportunities to explore this sector by providing either small Grade A units of c. 1,500 sq ft or units intended for a hub-and-spoke model albeit this remains fairly unproven within the market and carries risk.
- 4.5 We believe that the continued growth in the Build to Rent sector makes it a suitable opportunity for the subject site. Rents remain strong and it represents a low risk and attractive opportunity for investors. The appetite for renting will likely increase following the end of the Stamp Duty holiday at the end of March 2021. However, we caution that PRS investors would typically require a minimum of around 100 units and therefore any proposed PRS development at HNC below this threshold would carry additional investor risk.
- 4.6 In terms of the Private for Sale market, following a resurgence in activity due to pent-up demand from the initial lockdown and an increase in demand from the Stamp Duty holiday, we caution that the impact of lifting this Stamp Duty holiday at the end of March 2021 remains to be seen. There is ongoing dialogue that it could have a negative impact on the market and we would therefore recommend that the Council waits to assess the impact of this event before pursuing a Private for Sale development opportunity which we would consider well suited for the subject site.
- 4.7 Based on the above, as part of exploring further options for the Council's requirement at the HNC, we do not consider the speculative development of medium to large office space to be appropriate, albeit the development of small, flexible and 'hub-and-spoke' type units may present less risky opportunities within this sector. We would recommend that the Council explores PRS use, provided the proposed development could support at least c. 100 units, and/or Private for Sale use should this market remain stable following the ending of the Stamp Duty holiday at the end of March 2021.

General

- 4.8 This Report has been prepared by Hugo Parry, MRICS, Surveyor within the Planning, Development and Regeneration Department and reviewed by Kimberley Grieveson MRICS, RICS Registered Valuer and Director within the Planning, Development and Regeneration Department.
- 4.9 Please note that this advice is subject to our usual Definitions and Reservations. This report is provided solely for the benefit of Harrow Council and it should not be relied upon by any third party.

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Volterra

Harrow Civic Centre

Economic Report

Wates

A report by Volterra Partners, February 2021

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1 EXECUTIVE SUMMARY

- 1.1 This report considers the economic impact of proposals to reduce the size of the proposed civic centre at Peel Road in the London Borough of Harrow (LBH). The initial and current proposals are briefly described below. This report considers the net impact of the changes.

Initial proposals	Current proposals
c. 90,000sqft civic centre at Peel Road	c. 20,000sqft civic centre at Peel Road
136 PRS units	137 PRS units and 46 affordable homes
Civic office space at council depot underutilised	Civic space at the council depot used as the principal location for staff attendance and collaboration
40 car parking spaces	No car parking provision

Changes in working patterns

- 1.2 There have been significant changes in the demand for employment floorspace in recent years due to advances in technology, working patterns and the sectoral makeup of the economy. Whilst it has not always been a straight line, many of these changes have intensified the use of workspace, particularly for office jobs. Evidence from the GLA suggests that average office densities were around 18sqm per worker in 1997, and that this has fallen markedly, with the latest (from 2015) densities guide recommending average densities of 12sqm per worker. More recent information from the VOA suggests that densities in London fell by 23% in the decade to 2019. LBH's office density has mirrored this regional trend, with a higher drop of 35%.
- 1.3 Lockdown measures to curb COVID-19 have accelerated these changes by forcing many people to work from home where possible. Working from home is popular and many businesses are committing to more flexible working moving forwards, so these trends are expected to persist after the pandemic.
- 1.4 The civic centre at Peel Road was initially planned on the assumption that only 20% of staff time would be spent remotely. Following consideration of these trends and feedback from staff, this has been revised to an assumption of 50% of staff time spent working remotely. The evidence summarised in this report finds that a 50% ratio is optimal. This clearly has a direct implication for the physical office space required. The initial plans for the civic centre were based on a higher estimate of the space required to accommodate workers. If this quantum of new space were provided, it is likely that the space at the depot would also remain underutilised. It is therefore judged that the council assets can be put to better economic use.
- 1.5 The new proposals would be an efficient use of LBH space as they utilise existing space at the depot which would otherwise be hard to rent – certainly in the short term – because of a planning condition that the depot can only be let for civic use. The amended proposals for a civic centre, combined with the depot, would provide sufficient space for the workers who require civic workspace at any one time. There aren't, therefore, expected to be any material changes in economic impacts in terms of the number of onsite workers and their expenditure overall.
- 1.6 It is acknowledged that there would be likely to be some geographical shift in worker spending as a result of staff located at the depot as it is further away from Wealdstone town centre. It is estimated that, compared to the previous proposals for the HNC, there would be a net loss of worker expenditure in Wealdstone town centre (-£453,000). It is

anticipated that some of this reduction would be offset by an increase in residential expenditure (+£270,000) as a result of the spending from residents of the new affordable units at the Peel Road site. Given data limitations, this increased spend is estimated across both Harrow and Wealdstone town centres, so it is not a like for like comparison. This cannot be considered in isolation however, and in the context of the considerable residential growth in Wealdstone town centre, annual residential expenditure across both town centres is expected to rise by an estimated £40m. Set in this context, the reduction in worker expenditure in Wealdstone is likely to be insignificant. The redevelopment of the Peel Road site would also have a positive effect on Wealdstone town centre compared its existing use as a car park.

	Expenditure in Wealdstone
Existing proposal – expenditure of Peel Road workers	£1.1m
New proposal – decreased worker expenditure in Wealdstone (fewer workers at Peel Road, half of depot workers' expenditure) plus increased residential expenditure (new residents of Peel Road)	£883,000
Net effect in Wealdstone	- £183,000
Net effect across Wealdstone and Harrow town centres	+ £270,000

- 1.7 Furthermore, there would be expected to be further economic benefits in the form of spending in Harrow town centre. It is estimated that there would also be an additional £453,000 of worker expenditure in Harrow town centre due to the workers located at the depot, which coupled with a proportion of the residential spending and spending growth from wider residential growth will also lead to positive impacts in Harrow town centre as well as Wealdstone.
- 1.8 The number of visitors to the original proposals for the civic centre is also not expected to be materially different to the amended civic centre, nor is their associated expenditure. There would be further benefit to the council due to reduced expenditure on business rates, but the value of this has not yet been determined.

Need for affordable housing

- 1.9 Like the rest of the capital, there is a housing crisis in LBH. Despite meeting historic targets for annual housing delivery, if current average annual delivery were to continue to 2029, there would be a shortfall in residential dwellings of 508 (based on the updated annual target of 802 dwellings per year in the London Plan), indicating a need for additional dwellings.
- 1.10 The minimum target for affordable housing is that 40% of new housing is affordable. LBH has fallen below this with average provision of 29% over the past decade. Affordable housing delivery was mostly strong over the period 2009/10 – 2014/15, but has dropped off in recent years, where an average of 205 affordable units have been built each year (32% below target).
- 1.11 The imbalance between housing demand and supply has resulted in rising rents and capital costs. Median house prices were 11.9 times higher than incomes in 2019; this ratio has grown 52% over the last decade. Furthermore, conventional guidelines suggest that households should not spend more than 25% of their net income on housing, and in 2016 this was 31% for social renters in London.

- 1.12 The revised proposals would provide an additional 46 affordable housing units at the Peel Road site. These additional units increase the total residential unit contribution of the site from 18% to almost a quarter of LBH's annual housing requirement, a significant contribution for a single plot. These additional residents would be expected to spend a further £270,000 (26% increase from initial proposals) in the local economies (Harrow and Wealdstone) and support additional annual council tax receipts of £77,000, 35% higher than the initial proposals.
- 1.13 As well as the positive contribution to historic under-delivery of affordable housing across the borough, there are also other benefits from affordable housing including: higher self-rated health, crime prevention, higher life satisfaction, improved education and higher levels of community cohesion. The Joseph Rowntree Foundation found that access to low-cost housing can increase disposable incomes, prevent material deprivation, improve work outcomes, and reduce poverty, and so these benefits would be likely to have proportionally greater effects in areas that are more deprived. Moreover, studies aiming to quantify these benefits have found that for that every £1 of public investment in new housing, between £2.10 to £3.50 is generated in economic output, indicating a strong return on public investment in housing.

Impacts of the change in car parking provision

- 1.14 The existing car park at Peel Road is underutilised, with only a third of the car park occupied during the week on average and 38% on weekends. There is no definitive source which quantifiably and robustly links car parking spaces to increased retail revenues. In fact, research by TfL found that cycle parking delivers five times higher retail spend than the same area of car parking.
- 1.15 The literature summarised in this report shows that reductions in car traffic in urban centres can lead to economic benefits in the forms of increased investment, footfall and retail rents. For car parks specifically, it has been shown that retailers tend to significantly overestimate how many of their customers will use a car, whilst other studies conclude that there is a lack of evidence supporting the link between increased footfall and reduced car parking, and there is no common approach.
- 1.16 There is a general desire across the country, but even more pronounced in London given its excellent public transport network, to reduce the use of and reliance upon car travel. The Publication London Plan sets a target of encouraging redevelopment of town and out-of-centre retail spaces which reduces car use and dependency whilst improving access by walking, cycling, and public transport. The provision of car parking in well-connected urban settings is discouraged, and the London Plan states that this should be restricted in line with levels of existing and future public transport connectivity. The dominance of vehicles on streets is a significant barrier to walking and cycling, reduces the appeal of streets as public places and has an impact on the reliability and journey times of public transport. LBH, and the site in particular, is very well connected by public transport, with a PTAL rating of 6a.
- 1.17 Car ownership across London has decreased in recent times, despite increases in the population of the capital. Evidence on how residents in London travelled to major retail centres found that the most popular modes are walking, bus and tube, and statistical analysis has found that the average number of cars per household rises as public transport accessibility decreases. In the case of Wealdstone, public transport accessibility is very good, with further plans to improve this in the years to come.
- 1.18 Additional improvements to Wealdstone town centre – with £2.7m having been allocated to major transport infrastructure projects in the most recent Infrastructure Funding Statement and £7.4m awarded to Wealdstone in the High Street fund – are planned to

reduce the dominance of traffic and increase levels of walking, cycling, and public transport use. There are also expected to be other changes to car parks in and around the town centre, notably Poet's corner, which will result in a loss of car parking. Some parking is likely to be retained as it will be provided on new developments in line with London Plan guidance.

- 1.19 Overall, there are limited economic arguments in favour of retaining 40 car parking spaces at the site. Existing parking is underutilised and there are plans to improve the bus network, reduce the dominance of cars and increase the levels of walking, cycling, and public transport use within the town centre. The removal of the car park is consistent with all these plans. The evidence is not clear on the economic implications of the loss of car parking spaces. However, it does suggest that any costs are unlikely to be material and there may be positive impacts associated with reduced car use.
- 1.20 It is acknowledged that for some specific groups of users the loss of car parking, both directly within the site and indirectly within the wider town centre context, will be an inconvenience and that some pockets of reduced spend may occur for these user groups. However, in the context of the significant planned regeneration of Wealdstone, and in particular the number of new homes within walking distance of the town centre and the increased residential expenditure this will support, this report concludes that any minimal reduction due to loss of car parking will be more than offset by wider increases in expenditure.

2 INTRODUCTION

- 2.1 LBH and Wates are operating in a partnership to redevelop three sites in Harrow town centre. There have been longstanding plans for a new civic centre – Harrow New Civic (HNC) – and Private Rented Sector (PRS) housing at one of the sites, Peel Road, which is currently an underutilised car park. Due to changes in working patterns, the current plans for the site reduce the civic centre from the initial size of approximately 90,000 sq ft to approximately 20,000 sq ft, enabling 46 affordable housing units to be located onsite, as well as the PRS housing that was originally planned.
- 2.2 The nearby council depot, at Forward Drive, has a reasonable amount of office space (38,000 sq ft), as well as a planning condition that it can only let for civic use. It is planned that this will be used to accommodate some of the civic centre activities and be the principal location for staff attendance and collaboration. The revised proposals would also remove the 40 car parking spaces previously envisaged to be included as part of the redevelopment of the Peel Road site, meaning that there is no car parking provision on site.
- 2.3 Volterra Partners has been commissioned to undertake a high level economic impact assessment of the new proposals compared to the previous proposals for the civic centre. This report considers the net economic impact of the following:
- **The retained civic space:** considers the economic impacts associated with the amended civic centre proposed at Peel Road. It considers trends in the demand for workspace and whether the alternative option would provide sufficient space for the workers and therefore support the resulting economic benefits. It also considers the efficiency of utilising the space at the council depot;
 - **Provision of affordable housing:** considers the net economic impacts associated with the provision of an additional 46 affordable housing units on-site at Peel Road. This reviews the need for housing and affordable housing in LBH and the effect of the new proposals, evidence on the benefits associated with affordable housing, and any other resulting economic benefits, including residential expenditure and council tax receipts; and
 - **Changes to car park provision:** the final section summarises literature on the economic benefits or disbenefits of car parking in relation to the removal of the car park in the new proposals for Peel Road.

3 THE RETAINED CIVIC SPACE

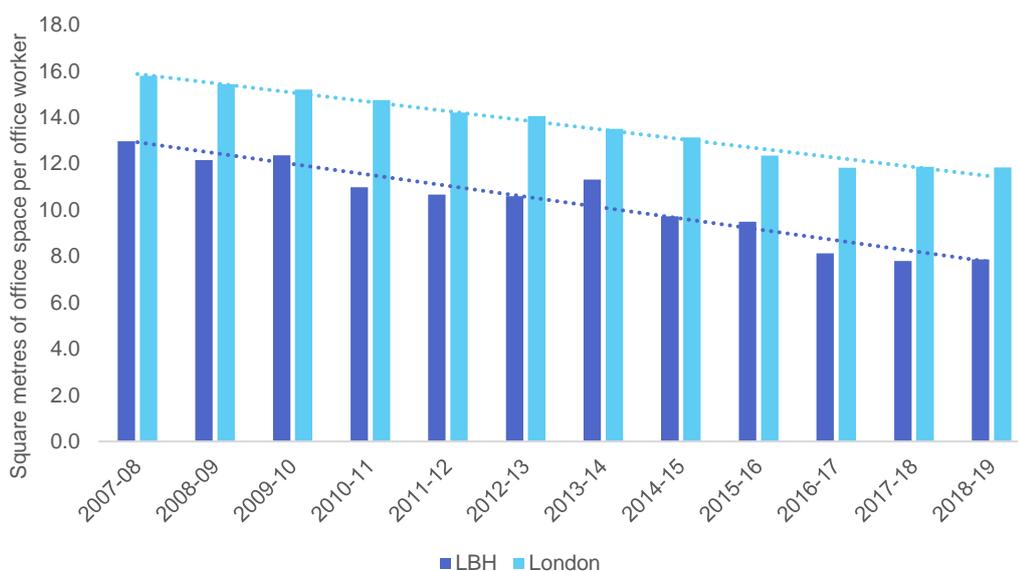
3.1 The revised proposals for Peel Road include a reduction in civic centre floorspace at the Peel Road site and a plan to utilise the office space at the nearby council depot. This section considers the rationale behind the reduction in floorspace at the site as well as the net economic impacts.

Changes in working patterns

3.2 There have been significant changes in the demand for employment floorspace over many years due to related changes in technology, working patterns and the sectoral makeup of the economy.

3.3 Evidence from the GLA suggests that average office densities were around 18sqm per worker in 1997,¹ and that this has fallen markedly, with the latest (from 2015) densities guide recommending average densities of 12sqm per worker.² **Figure 1** presents more recent information from the VOA, showing that densities (office floorspace per worker) in London fell by 23% in the decade to 2019.³ LBH's office density has mirrored this regional trend, with a higher drop of 35%.

Figure 1 Sqm of office space per office worker, 2007/08 – 2018/19



Source: VOA, 2019. Non-domestic rating: stock of properties including business floorspace; ONS, 2019. Business Register and Employment Survey

3.4 This higher density of use of office space has been enabled by changes in the way we work. Advances in technology, such as reliable wireless connectivity, have facilitated flexible working by reducing the need for a fixed desk. The dynamics of the workspace have also changed over the last few decades: the freelance economy grew by 25% between 2001 and 2015,⁴ today one in seven of the UK workforce is self-employed,⁵ and 77% of UK employees work in organisations that provide some kind of flexible working.

1 CAG Consultants (on behalf of the GLA), 2017. London Employment Sites Database 2017
 2 Homes and Communities Agency (HCA), 2015. Employment Density Guide – 3rd edition
 3 VOA, 2019. Non-domestic rating: stock of properties including business floorspace; ONS, 2019. Business Register and Employment Survey
 4 ONS, 2016. Trends in self-employment in the UK: 2001 to 2015
 5 Rhino Interiors Group, 2017. Flexible working: Goodbye to 9-5, Hello to the Flexible Future of Work

These trends are global: evidence from the US shows a general decrease in the space needed per worker over the last 20 years, specifically in office-based sectors.⁶ Whilst the impact of these changes has not always moved in one direction, they have had the general effect of intensifying the use of workspace, particularly for office jobs.

- 3.5 COVID-19 has accelerated these changes, with lockdown measures forcing many people to work from home where they can. It is unclear how many people will continue to work from home in the longer term when we exit the pandemic, but working from home is popular: 88% of people asked in a survey would like to continue working from home in some capacity.⁷ In a study by PwC in the US, 69% expect almost two-thirds of their workforce to be working from home at least once a week in the future.⁸ In the UK, and London specifically, large employers in the financial sector expect less time to be spent in the office in the future, with a largescale shift towards flexible working.⁹ These trends are therefore expected to persist post-COVID-19.
- 3.6 It's clear from the evidence that employees want to work from home for more than one day a week: a study found that 39% of employees would like to work from home 3-4 days per week, with a different study finding that 85% of people would prefer to continue working from home at least a few days a week in the future.¹⁰ This is also reflected in a recent poll, finding that more than half of employees want to work from home for most of the week.¹¹
- 3.7 There have been general trends towards more remote working and reduced demand for employment floorspace, which have been accelerated by COVID-19. Studies expect space per worker to continue to decline and employers will need to plan to support flexible working.¹²

Civic workspace requirement

- 3.8 The space designated for office uses in the existing scheme was based on the assumption that 20% of staff time would be spent working remotely. Following consideration of the trends identified above as well as feedback from staff, this has been revised to an assumption of 50% of staff time spent working remotely. This is consistent with studies:
- a study found that working remotely up to two and a half days per week has positive impacts on wellbeing, but that three days or more can cause a deterioration in the quality of co-working relationships; and¹³
 - a meta-analysis of 36 studies involving more than 12,000 employees found that working from home more than 2.5 days a week could negatively affect relationships with co-workers, as well as knowledge transfer.¹⁴
- 3.9 This evidence suggests that a 50% working from home ratio is optimal.
- 3.10 The initial proposals for the civic centre were planned based on the need to support an office headcount of 1,132 on the average day, 220 of which would be based in other council accommodation. This estimate was based on several assumptions concerning the proportion of workers on annual leave (8.5%), sickness (4%) and those who aren't working

6 Miller, N. 2014. Workplace trends in office space: Implications for future office demand

7 Felstead, A and Reuschke, D, 2020. 'Homeworking in the UK: before and during the 2020 lockdown'. WISERD Report, Cardiff: Wales Institute of Social and Economic Research. Available from: <https://wiserd.ac.uk/publications/homeworking-ukand-during-2020-lockdown>

8 PwC, 2020. PwC's US Remote Work Survey

9 Financial Times, 2020. City employers plan for lasting switch to remote working

10 Forbes, 2020. The surprising truth about how many employees want to keep working from home

11 People Management, 2020. Majority of employees want to work from home for most of the week, research finds

12 Financial Times, 2020. Covid-19 has made it vital for employers support flexible working

13 Nuffield Health, 2019. The effects of remote working on stress, wellbeing, and productivity

14 Gajendran, R., and Harrison, D. 2007. The good, the bad, and the unknown about telecommuting: Meta-analysis of psychological mediators and individuals consequences

at any one time as they are part time (6%). The key assumption driving this was that 20% of staff time would be spent working remotely at any one time, which, as discussed above, is an underestimate of the number that are likely to work remotely in the future. The original plans for the civic centre therefore result in an overestimate of the likely space required given these recent and persistent changes in working patterns. This would result in the delivery of unnecessary / underutilised civic floorspace, leaving the office space at the depot underutilised.

- 3.11 Based on the assumption that remote working increases to 50%, in line with the optimal figure identified above and staff feedback, and assuming that the previous assumptions apply in the same way, the office headcount needed to be supported at Peel Road and other civic accommodation falls to 663. Even assuming a 10% comfort factor to ensure flexibility, there is more than sufficient space at the combination of the amended civic centre and council depot to support these workers.

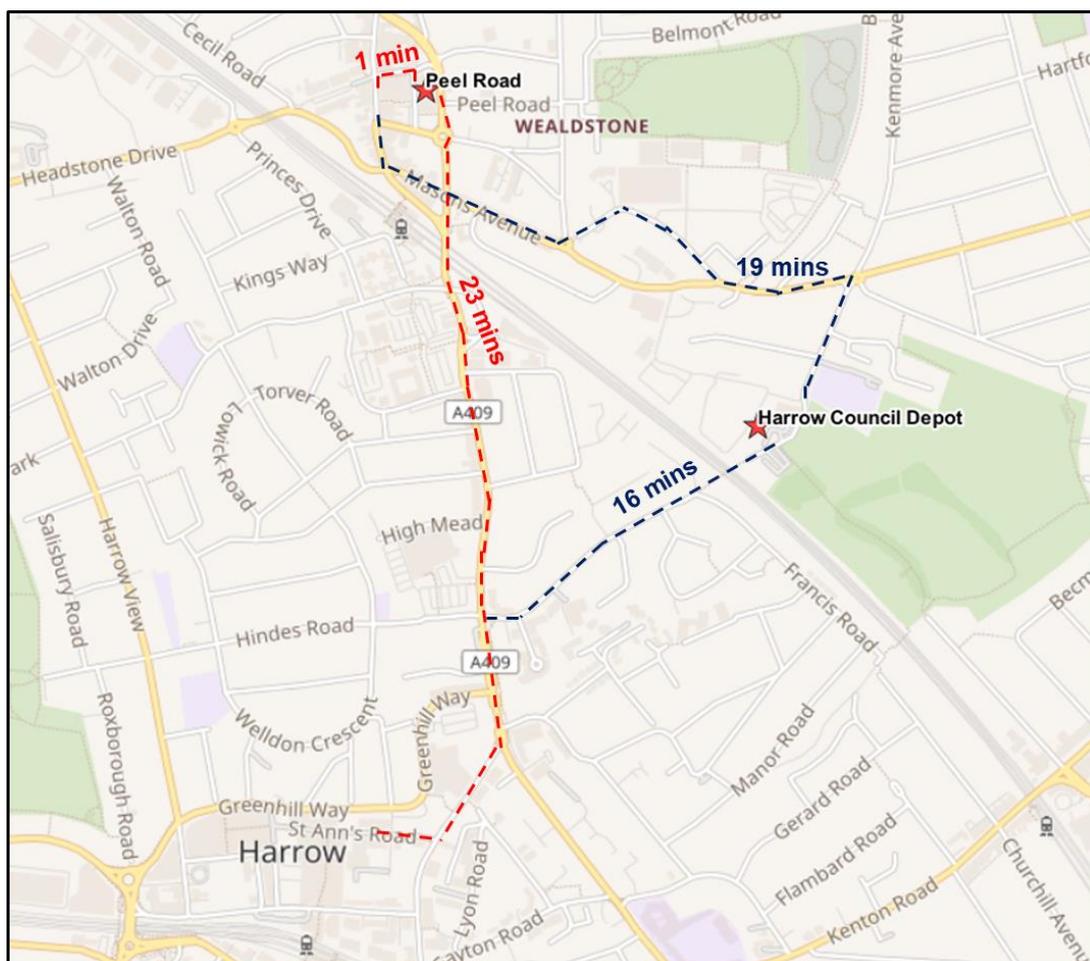
More efficient use of space

- 3.12 Under the previous proposals for the civic centre, the 38,000 sq ft of office space at the council depot would remain underutilised. The new proposals would make use of the depot to accommodate some of the civic centre activities. It would also be the principal location for staff attendance and collaboration. This would result in a more efficient use of council assets by enabling other development at the Peel Road site and utilising the council depot, which cannot be used for alternative occupiers due to the planning condition.

Economic implications

- 3.13 As shown above, the new proposal for an amended civic centre and better utilisation of the council depot will provide sufficient space for the amount of workers who will be onsite at any one time. The number of workers and their expenditure overall is therefore expected to be the same under the existing and current proposals for the civic space.
- 3.14 There will however be some redistribution of the workers compared to the previous proposals. In the proposals for the original civic centre, all workers would be based at HNC. However, in the new proposals these workers would be split between HNC and the depot. Of the average office headcount of approximately 663 FTEs, approximately 100 will be supported at the HNC, with the remainder at the council depot. Walking distances from the two sites to the town centres is illustrated in **Figure 2**. The map shows that the site of the new HNC is located in Wealdstone town centre and the council depot is further away and nearly equidistant between the two town centres of Harrow and Wealdstone. This suggests that workers at the depot are less likely than workers based at Peel Road to spend money in Wealdstone town centre.

Figure 2 Distances to town centres



3.15 Under the new proposals, the workers at the HNC are expected to spend approximately £160,000 in the local area each year (Wealdstone).¹⁵ The workers at the depot would be expected to spend £906,000 in total each year, with approximately half of this expected to be spent in each of Wealdstone and Harrow town centres (£453,000).¹⁶ Overall, there would be a net reduction in worker expenditure in Wealdstone town centre between the two proposals, but the majority of this will be offset by an increase in residential expenditure (explained in the next section).

Table 1 Worker expenditure

	Expenditure in Wealdstone
2005 YouGov survey for UK daily worker spend in local area	£6
Uplifted for earnings growth 2005 - 2020 (43%), earnings differential in London (29%), and earnings differential in the 'public administration' industry (11%)	£12.20

15 A 2005 YouGov survey found that workers in the UK spent on average £6 a day in the local area around their place of work. This figure has been uplifted for earnings growth between 2005 and 2020, as well as for the higher average earnings of workers in different industries in London. We also conservatively assume that 60% of workers spend this amount for 220 days of the year. Given these assumptions, a worker on-site at either the HNC or depot would be expected to spend £12.20 per working day.

16 Workers at the council depot would be expected to visit either of the town centres to spend due to their location between both. Wealdstone town centre has better transport links to the rest of London and also will contain the site of the HNC so there may be higher spending there, but to be conservative, it is assumed that half of depot worker spending will be in Wealdstone town centre and the rest will be in Harrow town centre.

	Expenditure in Wealdstone
Total spend per worker per day	£12.20
Total spend per worker per year (<i>conservatively assumes that 60% of workers will spend this amount for 220 days of the year</i>)	£1,610
Existing proposal – expenditure of Peel Road workers	£1.1m
New proposal – decreased worker expenditure in Wealdstone (fewer workers at Peel Road, half of depot workers' expenditure) plus increased residential expenditure (new residents of Peel Road)	£883,000
Net effect in Wealdstone	- £183,000
Net effect across Wealdstone and Harrow town centres	+ £270,000

NB: Figures have been rounded and may not sum.

- 3.16 There are also visitors to the existing civic centre who support spending in Wealdstone town centre. It is understood that there are four main categories of visitor: contractors/consultants/sales people, members of the public for council services, visitors for case conferences, and registrars. The number of visitors has and is expected to continue to gradually reduce over time. Council services will be provided at other council buildings, such as libraries during the transition. There is expected to be some reduction in visitors over time though it is expected that this is largely a result of general trends in the provision of council services. The number of visitors to the original civic centre is not expected to be materially different to the amended civic centre, nor is their associated expenditure.
- 3.17 Despite the change in the proposals, this assessment has concluded that overall there aren't expected to be material changes in the economic impacts compared to the previous proposals. Whilst the overall worker expenditure in LBH is not expected to change, the above analysis finds that compared to the previous proposals for the civic centre, there would be a reduction in worker expenditure in Wealdstone town centre as the depot is slightly further away. Due to the redistribution of workers, there would be an estimated £453,000 less worker spending in Wealdstone. However, the majority of this would be expected to occur in Harrow town centre instead and, as described in the next section, will likely be offset by additional resident expenditure.
- 3.18 It is worth noting that the redevelopment of the Peel Road site would have a positive effect on Wealdstone town centre compared its existing use as a car park.
- 3.19 The amended civic centre (in combination with the use of the council depot space) would change the council's business rate liabilities. There would be a further benefit to the council in terms of reduced expenditure on business rates but the value of this has not been determined.
- 3.20 The new proposals for the civic centre would also enable affordable housing to be built at the Peel Road site. The economic implications resulting from this are discussed in the following section.

4 PROVISION OF AFFORDABLE HOUSING

4.1 In reducing the amount of floorspace designated for civic uses, the new proposals for Peel Road allow for the addition of 46 London Affordable Rent housing units. This section considers the economic benefits of those additional units. The economic impacts of the PRS accommodation are not considered as it is retained in the current proposals.

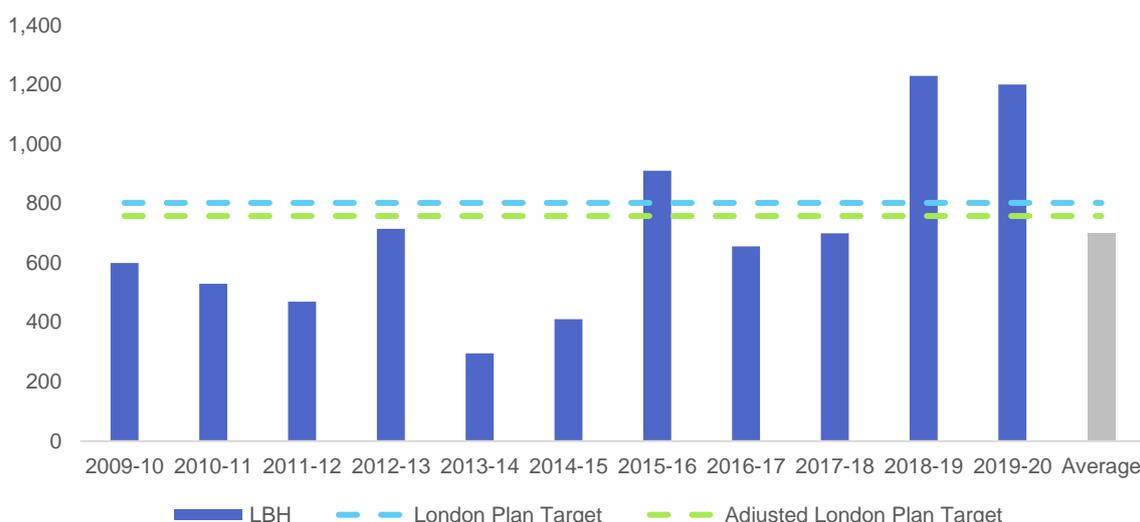
Baseline

4.2 The housing target for the borough established in the Harrow Core Strategy is the delivery of approximately 350 additional residential dwellings per year over the period 2009/10 – 2025/26.¹⁷ Over the last decade, housing delivery has met this target in all but one year, and in most cases exceeded it significantly.

4.3 Looking ahead over the next decade, the Publication London Plan establishes a more up-to-date target for LBH of 8,020 net additional dwellings over the period 2019/20 – 2028/29, based on current demand, supply and the inward and outward flow of residents to the borough.¹⁸ This is equivalent to 802 dwellings per year, more than double the target in the LBH Core Strategy. Taking into account delivery in the most recent year (2019/20), the adjusted London Plan target for the period 2020/21 – 2028/29 stands at a need for 6,820 net additional dwellings, equivalent to 758 each year, as presented in **Figure 3**.

4.4 Over the past decade, an average of 701 dwellings have been delivered in LBH each year, which has been roughly double that of the target outlined in the Core Strategy. However, if current average annual delivery were to continue to 2029, there would be a shortfall in residential dwellings of 508 (based on the updated annual London Plan target of 802 dwellings per year), **meaning that average annual housing delivery would have to increase by 7.5% to meet the target**, indicating a need for additional dwellings. Recent housing delivery has, however, been very good in the borough, with the two most recent years delivering net additional dwellings which exceed the target.

Figure 3 Housing delivery in the LBH, 2009/10 – 2019/20

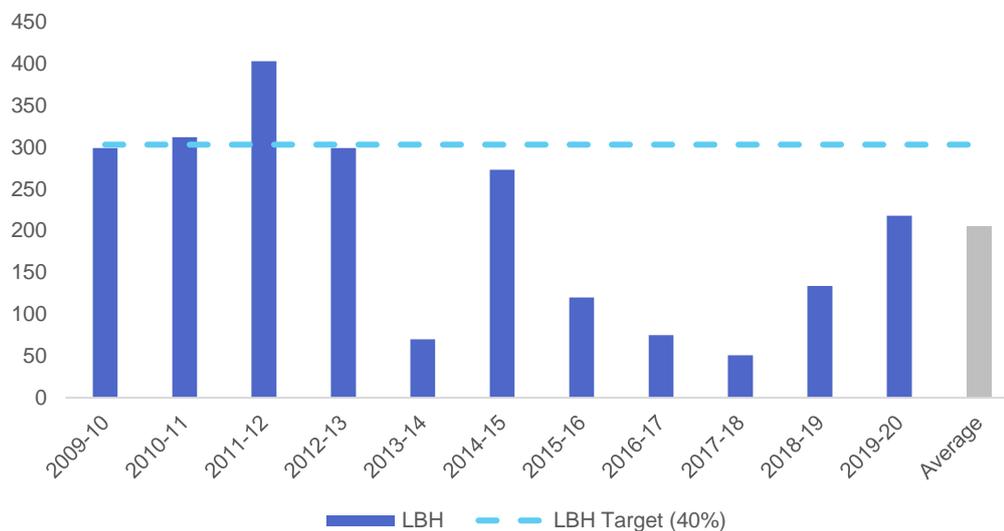


Source: MHCLG, 2020. Live tables on housing supply: net additional dwellings; GLA, 2020. Draft London Plan – Publication Edition

17 Harrow Council, 2012. Harrow Core Strategy
 18 GLA, 2020. Draft London Plan – Publication Edition

4.5 The LBH Core Strategy sets a target that 40% of all net additional dwellings should be genuinely affordable for residents of the borough.¹⁹ For public land, the target increases to 50%. **Figure 4** presents affordable housing delivery in the borough over the last decade, alongside the borough target based on the minimum 40% of the targeted number of additional dwellings per annum.

Figure 4 Affordable housing delivery in the LBH, 2009/10 – 2019/20



Source: MHCLG, 2020. Live tables on affordable housing supply; Harrow Council, 2012. Harrow Core Strategy

4.6 Over the last decade, only 29% of all dwellings were classed as affordable, falling short of both the 40% target and significantly below the 50% target. Affordable housing delivery was mostly strong over the period 2009/10 – 2014/15 (barring 2013-14), but has dropped off in recent years, where an average of 205 affordable units have been built each year (32% below target). **There has therefore been a shortfall of affordable housing in LBH in recent times.**

4.7 This is consistent with house price data. In LBH, median house prices were 11.9 times higher than median incomes in 2019. This has grown by 52% over the last decade from a ratio of 7.8, in line with the growing unaffordability in London. It has been shown that poor housing increases health and education costs, as London has a disproportionate number of households living in overcrowded conditions, homeless or living in temporary accommodation relative to the rest of the country.²⁰ The unaffordability of housing across the capital is reflected in the London Housing Strategy, which states that: *“the housing crisis is the biggest threat to London’s future. It is the main reason why all Londoners cannot share in our city’s success”*.²¹

4.8 Conventional guidelines suggest that households should not spend more than 25% of their net income including benefits on housing. **Figure 5** shows that for social housing tenants, this was 31% in London in 2016, having risen in the past six years.²² Housing costs are also higher for London residents relative to those across the country. The high housing costs therefore have a “negative impact on the public purse”, on the

19 Harrow Council, 2012. Harrow Core Strategy

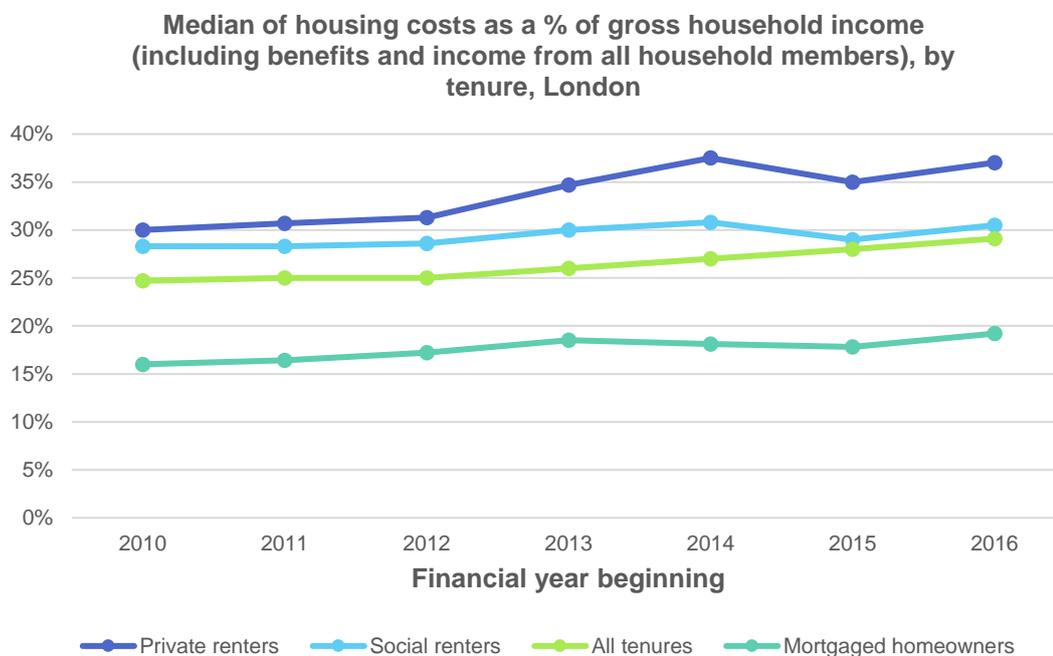
20 LSE, 2011. The case for public investment in affordable housing in London

21 Mayor of London, 2018. London Housing Strategy

22 Mayor of London, 2019. Housing in London 2019

competitiveness of the economy through the impact on work incentives and labour supply, and on the general welfare of households because of their limited resources to pay for their basic living requirements.²³

Figure 5 Housing costs as a % of gross household income



Source: Mayor of London, 2019. *Housing in London 2019*

4.9 Affordable housing helps to begin addressing these issues and support economic growth, particularly in areas where the economic and social payoff is greatest (i.e. where affordable housing is needed the most). It has been found that access to low-cost housing can increase disposable incomes, prevent material deprivation, improve work outcomes, and reduce poverty,²⁴ and so these benefits would be likely to have proportionally greater effects in areas that are more deprived. Moreover, The LSE found that every £1 of public investment in new housing generated £3.50 in economic output,²⁵ and a report in Scotland found that every £100m invested in affordable housing supply via both public and private finance generates £210m of economic output in the wider economy.²⁶

4.10 In recent times, LBH has fallen short of the borough target of 40% of all dwellings to be classed as genuinely affordable (and indeed the 50% threshold for public land), and therefore is in great need of additional affordable residential dwellings.

The proposal

4.11 As a result of the amended civic centre space, the revised proposals for Peel Road include an additional 46 affordable housing units, contributing to both dwellings and affordable dwellings targets in the LBH. **The addition of the 46 affordable dwellings as part of the scheme uplifts the total residential dwellings contribution from 18% of LBH’s annual need to almost a quarter, a significant contribution for a single plot.** The 46 units represent a 35% uplift in residential units compared to the previous plans for the site.

23 Ibid

24 Joseph Rowntree Foundation, 2015. Housing and poverty

25 LSE, 2011. The case for public investment in affordable housing in London

26 Shelter Scotland, 2015. The economic impact of investment in affordable housing

- 4.12 There would also be expected to be several other economic benefits as a result of the scheme changes, namely uplifts in residential expenditure and council tax receipts. The number of residents estimated to be supported at Peel Road would increase by 42% to 355 as a result of the scheme changes. **Residents of the additional households in the revised proposals would spend an estimated £270,000 in the local economies each year** (Wealdstone and Harrow town centre). Council tax receipts would be 35% higher in the new scheme, representing an estimated **£77,000 in additional annual tax receipts**.²⁷ The breakdown of the residential expenditure across both proposals is presented in **Table 2**.

Table 2 Residential expenditure

	Category	Existing proposals	New proposals
PRS	Households	136	137
	Spend per household per week ²⁸	£318	
	Spend per household per year	£16,500	
	Residential expenditure in London ²⁹	£2.2m	£2.3m
	Residential expenditure across Harrow & Wealdstone town centres ³⁰	£1.0m	£1.0m
Affordable	Households	0	46
	Spend per household per week ³¹	£240	
	Spend per household per year	£12,500	
	Residential expenditure in London	£0	£575,000
	Residential expenditure across Harrow & Wealdstone town centres	£0	£0.3m
	Total residential expenditure	£1.0m	£1.3m

Source: ONS, 2019. Detailed household expenditure by countries and regions: Table A35

- 4.13 Across Wealdstone and Harrow town centres, there would be expected to be an increase of £270,000 through an increase in residential spending, as worker expenditure across both town centres remains the same. However, in the context of the sizable development planned in Wealdstone, the decrease in worker expenditure for Wealdstone town centre is insignificant. There are plans for approximately 6,000 additional residential units in Wealdstone (majority are from this scheme and the Kodak scheme), with residents at these units estimated to spend £40m across both towns each year. In the context of the significant uplift in residential expenditure planned, the small loss in worker expenditure is negligible.

27 This is based off the assumption that the new residential units at the Peel Road site would be classified under council tax band C (based on the vast majority of the neighbouring residential developments being classed under band C), meaning that they would contribute £1,648.70 per annum in council tax.

28 Data on spend per household is based on a London spend per household per week, and has been discounted to account for the marginally lower earnings of Harrow residents relative to the London level.

29 This is based on London spends per household from (ONS, 2019. Detailed household expenditure by countries and regions: Table A35), and excludes spending not considered to be contained within London, e.g. mortgage payments and holidays. This has also been adjusted to account for the marginally lower earnings in Harrow relative to the London level.

30 A leakage figure has been applied to the London level of spending to estimate the amount of residential expenditure contained within Harrow & Wealdstone town centres (from NLP, 2009. London Borough of Harrow – Retail Study Review). This was the smallest area for which a leakage figure could be applied, and so a spending estimate for Wealdstone has not been possible to estimate.

31 Expenditure for residents at the affordable housing units is assumed to be slightly lower than expenditure at PRS. This has been discounted by taking the difference in the median earnings for LBH and the earnings of the 25th percentile, representing a 32% difference in weekly/yearly spending.

- 4.14 There are many ways in which affordable housing supports social outcomes. Frontier outline the following benefits that can arise from the provision of affordable housing:³²
- Improved self-rated health (32% of tenants reported their overall health as excellent or very good after moving into affordable housing, compared with 26% previously);
 - Crime prevention (particularly for young homeless people);
 - Higher life satisfaction (83% of housing association tenants reported to be satisfied with current home, with 70% also reporting to be satisfied with their lives overall);
 - Improved education (a number of surveys have established the link between stressed overcrowded parents and a lack of educational support for children, as well as increased risk of dropping out of school); and
 - Community cohesion (evidence finds changes to aspects such as adult socialising and child development following home improvements, as well as feelings of safety).
- 4.15 According to Oxford Economics and Regeneris, *“perhaps the firmest evidence on the economic role of housing is in relation to the more enduring impact it has on human capital formation and life chances. Put simply, families living in poor quality, less desirable housing stock face lower life chances and health costs associated with poorer quality stock itself”*.³³

³² Frontier Economics, 2014. Assessing the social and economic impact of affordable housing investment

³³ Ibid

5 CHANGES TO CAR PARK PROVISION

- 5.1 The original scheme for Peel Road proposed to retain 40 car parking spaces in the basement. However, the new plans would remove these, meaning that there would be no car parking provision onsite. This section considers the current usage of the car park and the literature on the need for car parking spaces in a town centre with good public transport links.

Current usage and accessibility

- 5.2 A transport assessment was undertaken for Wealdstone town centre in 2017, which considered the provision and demand for parking in the town centre.³⁴
- 5.3 The existing site consists of Peel House multi-story car park, which is the main car park in the town centre and contains 257 car parking bays. Occupancy data per hour was collected in October 2015, showing that the minimum occupancy recorded over the period was 12 vehicles (5% capacity) and the maximum recorded over the period was 173 vehicles (69% capacity). The average weekday occupancy recorded over the period was 33%, and the average weekend occupancy was 38% of the car park capacity. The Peel House car park also had a lower level of occupancy compared to the other main car park in the town centre, the Palmerston Road car park. **These figures show that parking at the Peel House multi-storey car park is heavily underutilised, with only one third of the car park occupied during the week.**
- 5.4 The plans to redevelop Poet's Corner and plans for Wealdstone town centre will also result in a loss of car parking.
- 5.5 The site of the car park is highly accessible by public transport. The Public Transport Access Level (PTAL) rating – a measure of public transport accessibility in London – is 6a, the second highest rating, which is very high for a site in an outer London borough, one of the most accessible parts of the borough.³⁵ The public transport accessibility is due to the proximity of the site and town centre to Harrow & Wealdstone Underground station, which is located within 350m. This underground station provides access to the Bakerloo line, the London Overground, and National Rail services, with links through to Wembley, Baker Street, and Waterloo. There are also quick main line services through to Euston and Watford Junction.
- 5.6 There are also planned to be additional improvements to transport infrastructure and accessibility within the town centre in the years ahead, with approximately £2.7m allocated to major transport infrastructure projects for Wealdstone in the most recent Infrastructure Funding Statement.³⁶ Specifically, this involves a town centre improvement scheme improving the High Street corridor and the bus network through the town, as well as improvements to reduce the dominance of traffic and increase the levels of walking, cycling and public transport use in the town.³⁷ Furthermore, Harrow council have been provisionally awarded £7.4m from the High Street fund to improve Wealdstone, which is envisaged to be primarily spent on walking and cycling improvements.³⁸
- 5.7 There is also a general trend towards reduced car ownership in London. Whilst there is evidence for growth in car ownership in the rest of the UK, this is not the case in London, where, despite the population increasing, car ownership has decreased.³⁹ TfL looked at

³⁴ Atkins (on behalf of the London Borough of Harrow), 2017. Wealdstone Town Centre – Transport Study

³⁵ TfL, 2021. WebCAT planning tool

³⁶ Harrow Council, 2020. Harrow Infrastructure Funding Statement 2019/20

³⁷ Harrow Council, 2019. Information Report – Wealdstone Transport Infrastructure Projects

³⁸ Healthy Streets for Harrow, 2020. Wealdstone town centre consultation – Feb 2020

³⁹ Ibid

how people travelled to major retail destinations in London, and found that the most popular mode was found to be walking, followed by bus, and then tube.⁴⁰ This research also found that those opting to use car as a means of travel to retail destinations has steadily decreased over time, whilst walking has increased.

- 5.8 There has been shown to be a statistical relationship between cars per household and public transport accessibility: the average number of cars per household rises as public transport accessibility decreases.⁴¹ In the case of Wealdstone town centre, public transport accessibility is very good, and set to improve, indicating that the average number of cars per household is likely to decrease.
- 5.9 There is also significant development planned in Wealdstone and Harrow. Harrow Council's vision for the Harrow and Wealdstone Intensification Area is the delivery of at least 2,800 net new homes, as well as 3,000 additional new jobs, over the period 2013-2028.⁴² The increase in density of homes in the area is likely to increase the number of people walking or cycling to Wealdstone town centre. A number of sizable developments are planned, including the addition of approximately 3,000 units as part of the Kodak scheme, 187 units in the Origin scheme, and 222 additional units as part of the Palmerston Road scheme.

Literature

- 5.10 Pedestrianisation (removing or restricting vehicle access in a public area for the use of pedestrians) mostly has a positive or neutral effect in economic terms.⁴³ Research has found that some of the main beneficiaries of pedestrianisation are retailers and businesses, **as vacancy rates are five times higher on streets with high levels of traffic,⁴⁴ and retail turnover in areas with a lower prevalence of traffic, and are more pedestrianised as a result, generally out-perform non-pedestrian areas.⁴⁵** A review of Exeter, having had motor vehicle traffic removed from several streets in the city centre between 2000 and 2010, showed that there was:
- Increased investment in the public realm of existing shopping centres;
 - An increase in footfall of around 30% across these shopping areas; and
 - An increase in retail rents from £220/sqft in 2006 to £225/sqft in 2008, compared with declining rents in other towns in the region.⁴⁶
- 5.11 It is common that **retailers significantly overestimate how many of their customers travel by car** and the number of parking spaces their customers require,⁴⁷ sometimes up to a factor of 400%.⁴⁸ This is reflected in the significantly low usage of the Peel Road car park.
- 5.12 Evidence also shows that **cycle parking delivers five times higher retail spend than the same area of car parking.⁴⁹** This is further reiterated in evidence in a US context, where it was found that the conversion of a paid parking spot to a bike share facility had the potential to increase total commercial spending in retail centres from \$220/day to \$334/day (52% increase).⁵⁰

40 TfL, 2011. Transport for London Town Centre Study 2011

41 GLA, 2013. The future of London's town centres

42 Harrow Council, 2013. Harrow and Wealdstone Area Action Plan

43 Sustrans, 2020. What are the economic impacts of making more space for walking and cycling?

44 Wiggins, P. 1993. Streets, Traffic & Trade: A Survey of Vacant Shop Sites in Leicester City Centre

45 Lane, B. 2001. The Impact of Pedestrianisation on Retail Economic Activity: A Review of the Evidence

46 University of the West of England, Bristol, and Cavill Associates, 2011. Making the case for Investment in the Walking Environment – A review of the evidence

47 Sustrans, 2020. What are the economic impacts of making more space for walking and cycling?

48 British Parking (on behalf of London Councils), 2012. The relevance of parking in the success of urban centres

49 Department for Transport, 2016. The value of cycling: rapid evidence review of the economic benefits of cycling

50 The CUNY Social Policy Simulation Center, 2013. The economic impacts of transferring curb space from car parking to bike share docks

- 5.13 Other evidence shows that car drivers spend more on a single trip, whereas those walking and opting for public transport spend more over a week or a month due to regular repeat trips.⁵¹ Spending by public transport users (18% increase from 2004-11) and pedestrians (2% increase from 2004-11) has risen over time, whereas spending by car users has decreased (-13% from 2004-11).
- 5.14 In relation to footfall, some literature concludes that there is a lack of robust evidence that can be used to link car parking strategies to town centre footfall.⁵² Town centres economies are also highly localised and are hyper-specific, meaning that towns differ economically, and different factors are at play in different locations, such as business activity and a town centre's retail offering. It is therefore hard to disentangle the impact of the car park on the town centre's performance.
- 5.15 Overall, there is relatively little research that has been carried out on the link between the prevalence of car parks and urban centre success. A good mix of shops and services and a quality environment are the most improvement factors in attracting visitors to town centre. However, it is clear that more parking in a town centre does not necessarily mean greater commercial success. Indeed, there is evidence that the removal of car parks and associated reduction in traffic can result in economic benefits for urban centres.

The proposal

- 5.16 The transport assessment for the town centre notes that the reduction in the quantity of public car park spaces in the development at the new civic centre site may encourage an increase in travel to Wealdstone by sustainable modes of transport, but also may present a significant risk that on-street parking will increase due to the reduced number of car park spaces being provided in the future.⁵³ Wealdstone town centre is already very accessible by public transport, having the second highest rating of nine, and there are future plans to improve the accessibility and walkability of the town centre, which will improve this further.
- 5.17 The Publication London Plan sets a target of reducing the use of and reliance upon car travel.⁵⁴ It notes that comprehensive redevelopment for retail spaces should aim to reduce car use and dependency whilst simultaneously improving access to walking, cycling and public transport. In urban settings in particular, the provision of car parking is discouraged, and the plan sets out that this should be restricted where existing and future levels of public transport connectivity are good.
- 5.18 Parking at the Peel Road multi-storey car park is significantly underused, with an average capacity of about one third during the week. The literature has also shown that reductions in traffic within urban centres can lead to economic benefits in the form of increased investment, footfall and retail rents. For car parks specifically, it has been shown that retailers tend to overestimate how many of their customers use a car, sometimes even up to a factor of 400%. However, other studies conclude that there is a lack of evidence supporting the link between increased footfall and reduced car parking, and that factors that contribute to the economic success of towns differ from town to town, and there is no 'one size fits all' approach.
- 5.19 Overall, **there are limited economic arguments in favour of retaining 40 car parking spaces at the site.** Existing parking is underutilised and there are plans to improve the bus network, reduce the dominance of cars and increase the levels of walking, cycling and public transport use within the town centre. The removal of the car park is consistent with all these changes. The evidence is not clear on the economic implications of the loss

51 British Parking (on behalf of London Councils), 2012. The relevance of parking in the success of urban centres

52 MRUK, 2015. Assessing the Impact of Car Parking Charges on Town Centre Footfall

53 Atkins (on behalf of the London Borough of Harrow), 2017. Wealdstone Town Centre – Transport Study

54 GLA, 2020. Draft London Plan – Publication Edition

of car parking spaces. However, it does suggest that any costs are unlikely to be material and there may be positive impacts associated with reduced car use.

- 5.20 Overall, there is expected to be a large loss of car parking in Wealdstone town centre and the immediate surroundings as a result of the schemes and anticipated town centre improvements, and this may disadvantage some shoppers, most notably those who frequently travel by car and/or are reliant upon car travel. However, the literature is inconclusive that a decrease in car parking will translate to a decrease in consumer spending. Furthermore, in the context of the large amount of growth planned for Wealdstone town centre and surroundings, this is not likely to have an overall materially adverse effect.

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You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	Harrow New Civic Centre and Accommodation Strategy	Date EqIA created May 2021
Name and job title of completing/lead Officer	Julian Wain – Interim Commercial Development Director	
Directorate/ Service responsible	Communities	
Organisational approval		
EqIA approved by Directorate Equalities Champion	Name	Signature <input type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed after you have completed sections 2 - 5)

a) What is your proposal? The proposal is to establish the Council's Accommodation Strategy for the future including the development of the Harrow New Civic Centre. The Council has resolved to develop three Core sites in Wealdstone, and to erect a new Civic Centre at Peel Road to replace the dated and soon to be obsolete Civic Centre at Poets Corner.

The Council plans to locate its principle staff area at Forward Drive Depot, which is the Council's newly redeveloped depot and office space. This will be the principal area for staff to work, meet and collaborate. This will begin to be occupied from completion in October 2021. Staff will be able to work on an agile basis from the office, from other Council sites, from home and in non-specific locations to suit. It is anticipated that they will attend the main office on average 2.5 days per week.

In the short-term public facing services will be delivered from other existing Council sites, as well as predominantly by digital channels. When the new Civic Centre opens in 2025 this will be the Council's public face and transactions with the public will take place there.

Staff will visit the Civic Centre as and when required for meetings, for interaction with the public and for interaction with elected members.

b) Summarise the impact of your proposal on groups with protected characteristics

The Council's approach to flexible and agile working has a generally overall positive effect and given the state of the art design of new buildings the approach will have benefits for all staff and client groups. For some groups there is no impact. There are no major negative impacts and all minor impacts can be mitigated.

c) Summarise any potential negative impact(s) identified and mitigating actions

Negative impacts and actions to mitigate are set out in detail in section 2 and in summary in section 3.

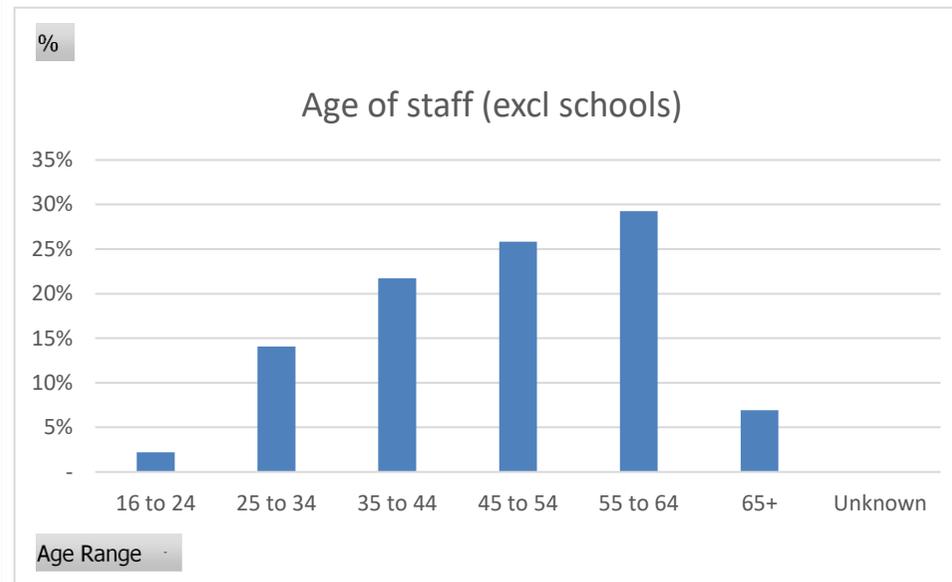
2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p><u>Residents</u></p> <p>Harrow profile:</p> <p>20 per cent of Harrow's residents are aged under 16 (48,200).</p> <p>65.9 per cent (158,400) of Harrow's population fall within the working age bracket (16 to 64) and 14.1 per cent (33,900) of Harrow's residents are 65 years of age and older.</p> <p>The average (median) age in Harrow is approximately 36 years, which ranks Harrow 284th out of 348 local or unitary authorities for age, depicting a younger average than the majority of local authorities.</p> <p>A high percentage of our customers are on housing benefit and council tax support, the breakdown below is relevant for this assessment.</p> <p>The Housing Benefit /Council Tax Support caseload is made up of 15,032 (73%) working age households and 5,652 (27%) pensioner.</p> <p>An average of 5,500 new claims are made every year of which 85% are made by working age households, and 15% by pensioners.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less than 250 residents visit the Civic Centre to access a service and supported self-service offer will be initially be available at Greenhill library with a view to operate across the library network when appropriate. A suitable location for Homelessness, Adult Social Care and Childrens' Services is being assessed.

The new HNC will have facilities designed to accommodate people with disabilities and mobility issues and will be user friendly.

There may be some minor impact on residents as a result of the reduction of available car parking spaces in Wealdstone. However, the Council is mitigating this by exploring the development of such additional parking spaces as is feasible. Wealdstone in general, and Peel Road are well served with public transport. In the short term the interim facilities will be in suitable existing Council buildings and will be those with existing car parking and associated facilities. Individual equality impact assessments will be carried out on each of these locations.

Staff

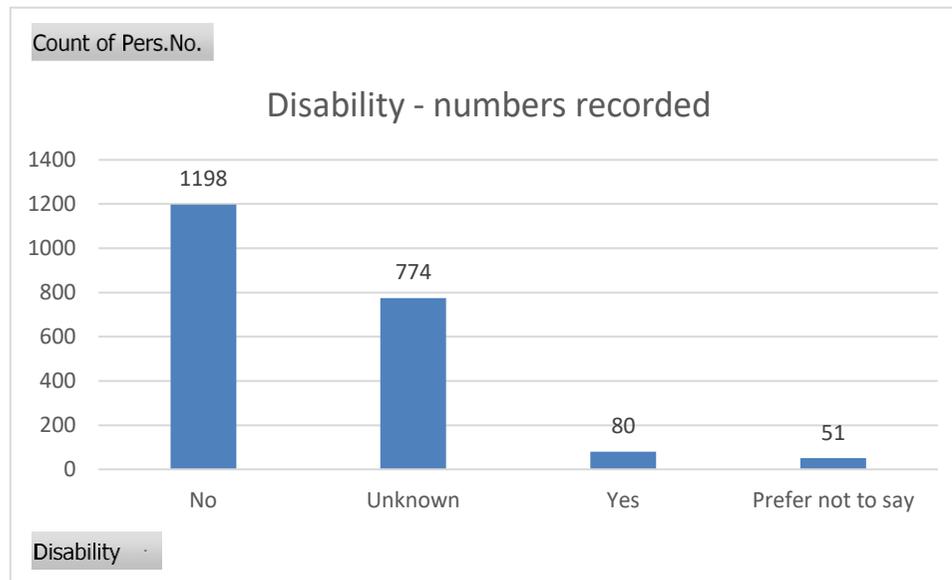


	<p>Any minor impact on staff as a result of the reduction of car parking will be mitigated by the spaces available at Forward Drive, together with the potential provision of pool cars. Forward Drive has adequate public transport and Peel Road is in the highest PTAL rating.</p> <p>The adoption of flexible and agile working may give rise to minor impacts on older staff who may struggle with new IT when working at home without a support network around them. This will be mitigated by the IT adoption officer available through IT.</p> <p>Younger (more junior) staff are more likely to be in shared accommodation and therefore not have a suitable area to work in. However, it should be remembered that the policy is not to require staff to work from home but to offer a mixed opportunity of work from home, Forward Drive, other Council spaces and non specific venues outside the Council estate subject to the requirements of their role.</p>				
Disability	<p>Harrow profile:</p> <p>17.3% of Harrow's working age population (16-64) classified themselves as disabled within the 2011-12 period (July to June), a total of 26,600 individuals. This signifies a decrease of 4.6% for the same period in 2010-11.</p> <p>13,800 (17.3%) are men and 12,900 (17.7%) are women</p> <p>Housing Benefit/Council Tax Support claimants in receipt of Disability Living Allowance, Severe Disablement Allowance or Employment Support Allowance (Support Component) are classified disabled under the regulations. 4,826 households fall under this category.</p> <p>The proposals for office/collaboration space are likely to have a positive impact on this group. Both buildings are being designed and built to current disability standards and disabled parking will be available at both venues. This will also be true of additional touchdown space and service delivery points, each of which will be assessed to ensure that they meet relevant standards and have the appropriate facilities for all client groups and all staff needs.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For public facing services the public areas will be fitted out to meet the needs of all client groups. This is likely to include

- Adjustable desk heights
 - Seating area for those who require seats.
 - Wheelchair accessible .
 - Hearing Loop
 - Plasma Screen meeting audio and visual needs
 - Larger computer screens with the ability to increase the size of the text on screen
 - Fully functioning keyboards and mice. Ergonomic workstations (2)
 - Access to disabled toilets.
 - Rooms available for privacy.:

Staff



	<p>Forward Drive, as the main collaboration workspace, is being designed with access in mind. Touchless building controls for doors, etc, will make moving around the building easier for those with physical disabilities. Ergonomic chairs that will better meet the needs of the majority of staff are being purchased minimising the need for specially adapted chairs, while the range of work settings and the limited time period that staff are expected to use them should help reduce physical strain on people. Hearing loops are proposed for all the main group collaboration areas. The use of a dyslexia friendly font for signage is being considered. The access procedures for shared workplace are being developed and will be consulted on with DAWN and MADG. The personal risk assessment process will need to be followed for those with more specific accessibility needs that cannot be met through these measures. Similar considerations will apply in the HNC at Peel Road.</p> <p>For those periods of time when staff with disabilities are working from home individual risk assessments will be carried out and reasonable adjustments to facilitate their adopting the agile working made as necessary.</p> <p>There are currently 6 disabled parking bays at Palmerston Road, and this number of surface spaces will be replicated in surface parking for the new HNC. In addition there will be 5 disabled spaces at Forward Drive. While this is a reduction on the 12 available at the present Civic Centre, and thus a minor negative impact, this should be mitigated by the new working patterns of agile working. In addition demand for spaces will be monitored on an ongoing and continuous basis, and the option is available to increase the number of disabled spaces available should this be necessary.</p>				
<p>Gender reassignment</p>	<p>The proposals for office/ collaboration space will have a minor impact on this group as at present there are no gender neutral toilets or showers at Forward Drive Depot and this is an area of concern that will require monitoring. In the longer term the new HNC will be designed to modern standards and will have gender neutral toilets. Consideration will be given to the allocation of existing toilets and the situation monitored for further review six months from opening.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

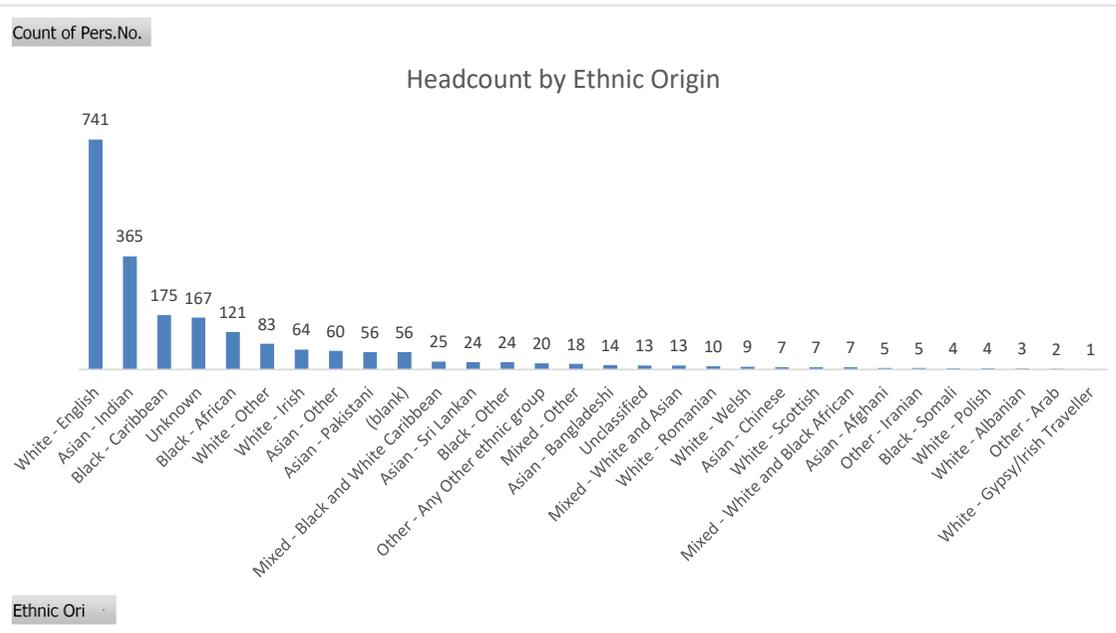
	The proposals for public facing services will have no impact on this group				
Marriage and Civil Partnership	<p>The proposals for office/ collaboration space will have no impact on this group.</p> <p>Consideration is currently being given to the site for the registrar service on an interim basis. It is likely that this will also be the site for this service to be relocated on a permanent basis, to an improved site owned by the Council and in the long term this may have a positive impact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy and Maternity	<p>The Council's flexible and agile approach to working will have a positive impact on this group, allowing work from home and at Council offices and where feasible at non Council sites. Staff in this category may receive personal risk assessment for the provision of car parking where necessary. Adequate public transport is available to Forward Drive Depot and excellent public transport to Peel Road in the longer term. Facilities will be available for nursing mothers.</p> <p>For public service there will be no impact in the short or long term as in the period until the opening of Peel Road HNC services will be available from Council locations with suitable transport and parking. Peel Road has excellent transport links and the highest PTAL rating. Consideration is currently being given to the location of registrar services for registration of births, and this will be located in an accessible existing Council building. It should also be noted that there is a low level of birth registration within Harrow, as the main maternity hospital is located outside the Borough.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Race/
Ethnicity

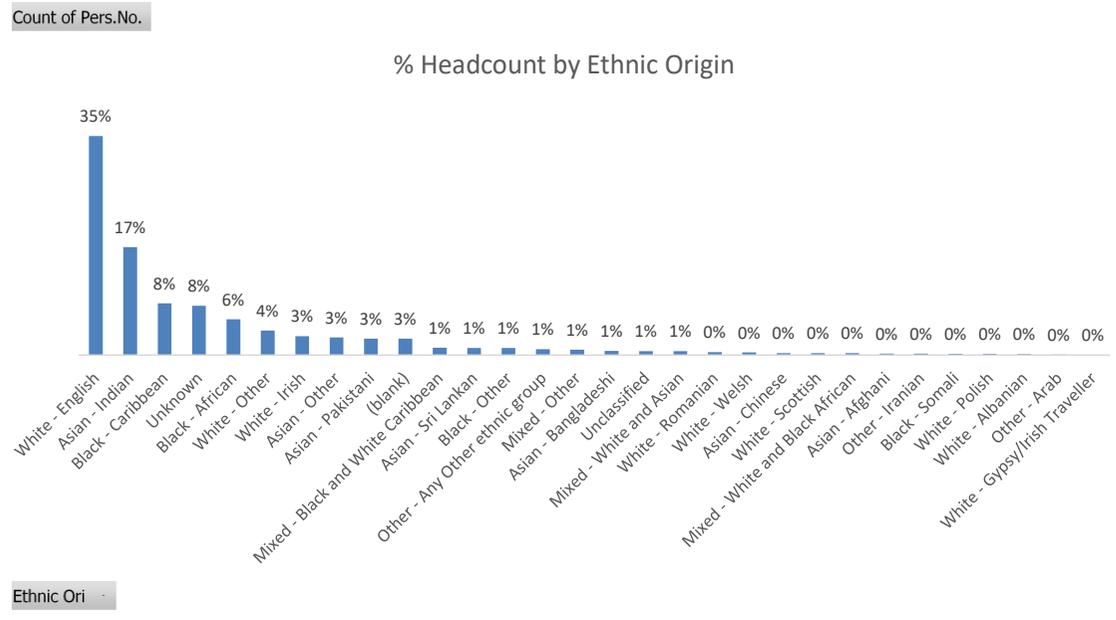
Ethnicity overview – employees:

The breakdown of Council staff by ethnic origin is set out below as at March 2020.

Composition of staff group by ethnic origin (highest level of detail)



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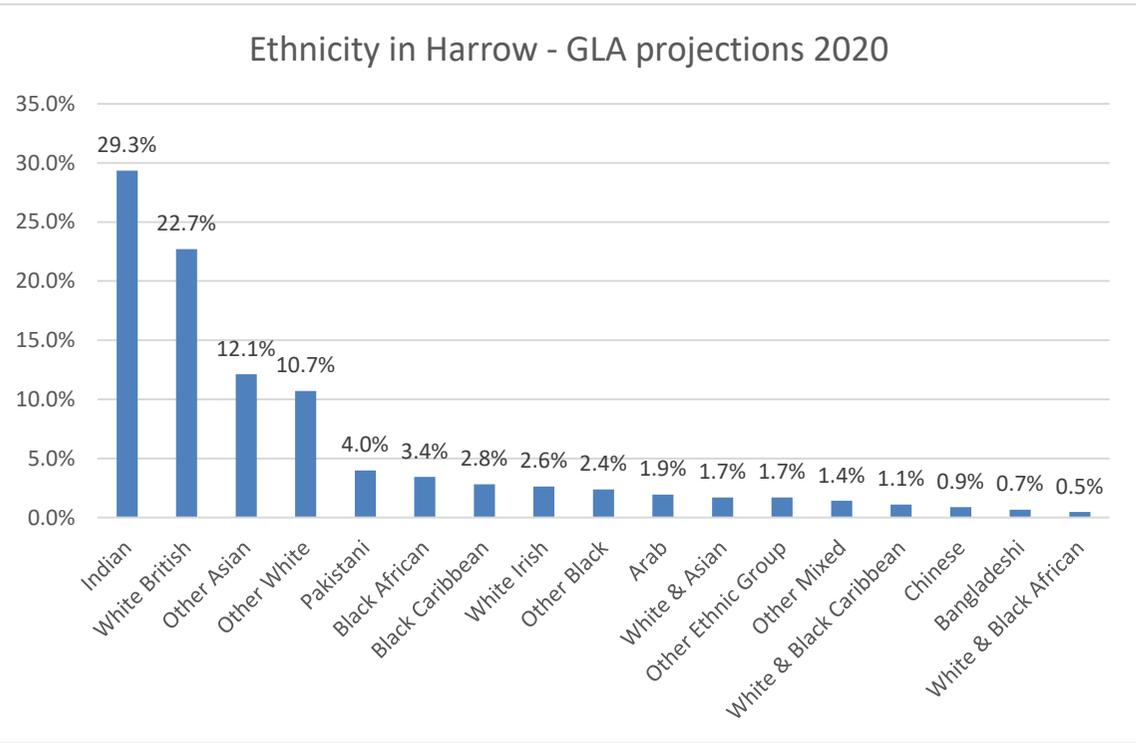
The largest group by ethnic origin is White English, followed by Asian Indian, then Black Caribbean.

It is likely that the Council's flexible and agile approach to working will have a positive impact on all staff allowing work from home and at venues to suit. The venues at Forward Drive and Peel Road are Wealdstone based and are well served by public transport with appropriate feasible car parking.

There will be no impact on this group in terms of the proposals for office/ collaboration space.

It may be that staff within this protected group are more likely to be in shared or multi generational accommodation and therefore not have a suitable area to work in. However, it should be remembered that the policy is not to require staff to work from home but to offer a mixed opportunity of work from home, Forward Drive, other Council

spaces and non specific venues outside the Council estate subject to the requirements of their role. This should mitigate any minor negative impact.



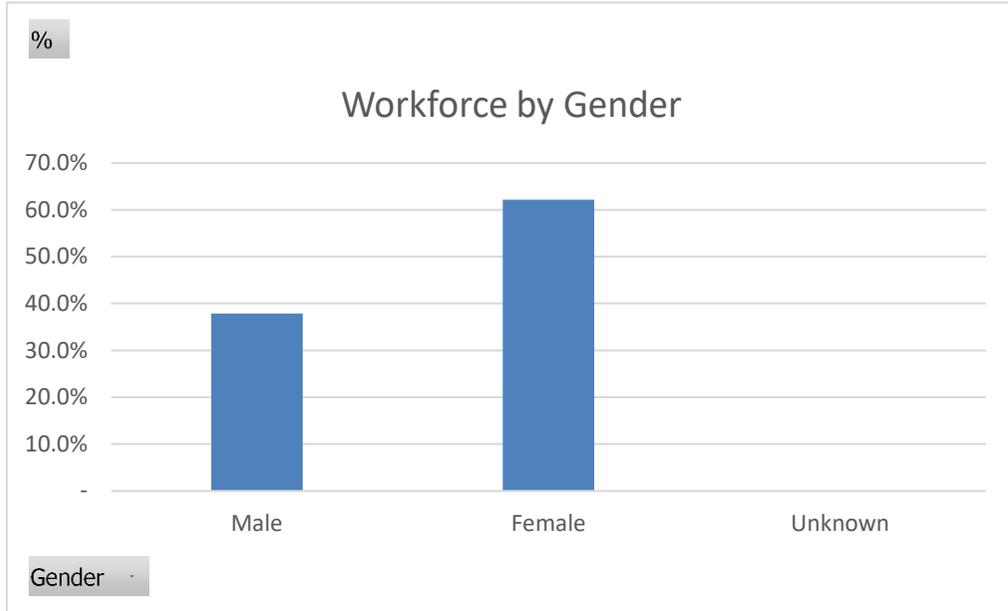
For public service there will be no impact in the short or long term as in the period until the opening of Peel Road HNC services will be available from Council locations with suitable transport and parking. Peel Road has excellent transport links and the highest PTAL rating.

A venue for citizenship ceremonies is currently under consideration. This will be based in existing Council buildings with good public transport links and is not expected to have any negative impact

Religion or belief	<p>The proposals for public facing services will have a minor negative impact on this group. The removal of car parking at Poets Corner will have an effect on those attending the Harrow Central Mosque in Station Road as it will no longer be available for use, although there is no contractual right for this. Mitigation is being provided through discussions of alternative solutions, potentially park and ride from a town centre site or from dispersed sites.</p> <p>Similar considerations will apply to the ISSC Temple as a result of the redevelopment of Peel Road and Palmerston Road Car Parks. The ISSC are in ongoing discussions with the Council as part of their relocation and have been part of a landswap deal with the Council.</p> <p>As noted above the location for the registrar service is currently being considered. This will be located in existing Council buildings with all appropriate facilities and access.</p> <p>For staff there is no impact on this group.</p> <p>Space will be devoted at Forward Drive and at the HNC enabling multi faith prayer for staff who wish to utilise this facility.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Sex

The proposals for public facing services will have no impact on this group.



For staff any negative impact from the loss of the extent of car parking will be mitigated by the Council's approach to the improvements of Wealdstone town Centre including lighting, the provision of car parking spaces as feasible and appropriate and the secured by design approach to both buildings. Female staff may be more likely to have caring responsibilities to to head up single parent families, therefore more flexibility in terms of working from home and other locations is expected to have a positive impact.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sexual Orientation	<p>The proposals for office/ collaboration space will have a minor impact on this group as at present there are no gender neutral toilets or showers at Forward Drive Depot and this is an area of concern that will require monitoring. In the longer term the new HNC will be designed to modern standards and will have gender neutral toilets. Consideration will be given to the allocation of existing toilets and the situation monitored for further review six months from opening.</p> <p>The proposals for public facing services will have no impact on this group</p>				
<p>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</p> <p><input type="checkbox"/> Yes, No <input checked="" type="checkbox"/></p>					
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p>					
<p>2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?</p> <p><input type="checkbox"/> Yes, No <input checked="" type="checkbox"/></p>					
<p>If you clicked the Yes box, Include details in the space below</p>					

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer
Reduction of car parking	Consideration of pool cars Assessment of feasibility for further spaces Individual risk assessment for buildings Secured by Design Town centre improvements Monitoring of take up and demand for disabled parking Search for alternative solutions for the Harrow Central Mosque	Ongoing risk and equalities impact assessments	To be reviewed in 6 months	Mike Butler/ HSDP Project Team/Rahim St.John
Lack of IT support at home	IT Support officer Remote IT control	Ongoing risk and equalities impact assessments	To be reviewed in 6 months	Ben Goward
Difficulty in finding suitable work space at home	Mixed opportunity for work space	Ongoing risk and equalities impact assessments	To be reviewed in 6 months.	Tracey Connage

		Actions arising from the risk assessments relating to the building including making of reasonable adjustments	As above	Rahim St John
Absence of gender neutral toilets in Forward Drive	Potential reallocation of toilets on certain floors	Ongoing monitoring and further risk and equalities impact assessments	To be reviewed in six months of opening	Tracey Connage/ Rahim St. John

4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

Include details in the space below

The Council's Accommodation Strategy will provide high quality modern office accommodation for staff and public alike which will enable flexible and agile working for people from all the different groups and equality of access to services for all.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies **Outcome 1**

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

 Outcome 2

Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4

 Outcome 3

This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.

Include details here

Forward Drive Office Fit Out Design Concept

GROUND FLOOR

Colour Palette



Flexible stools



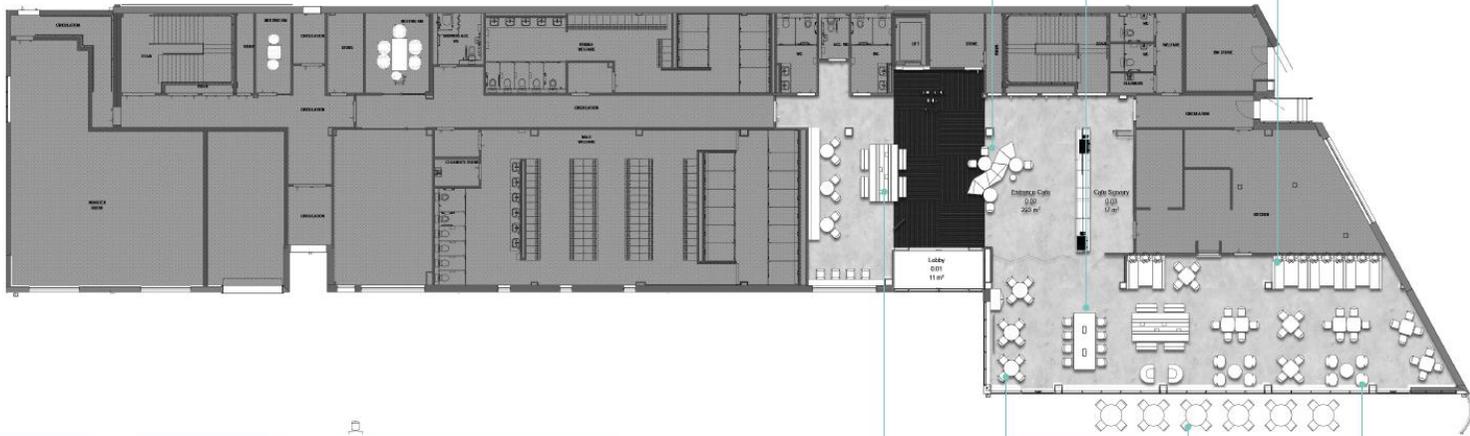
Modular soft seating



High table with stools



Joinery Banquette seating



bright signage



Contrasting Colours



Contemporary Materials



Picnic workbench



Cafe seating



Outdoor furniture



Lounge armchairs

Forward Drive Office Fit Out Design Concept

FIRST FLOOR

218

Colour Palette



High back chairs



High table with stools



Dining chairs



D-Shape tables



Stools



Acoustic workstations



Circular workstations



Acoustic booths



Mobile acoustic screens



Modular soft seating



Flexible stools



Freestanding Charge Points

Forward Drive Office Fit Out Design Concept

SECOND FLOOR

Colour Palette



Ergonomic chairs



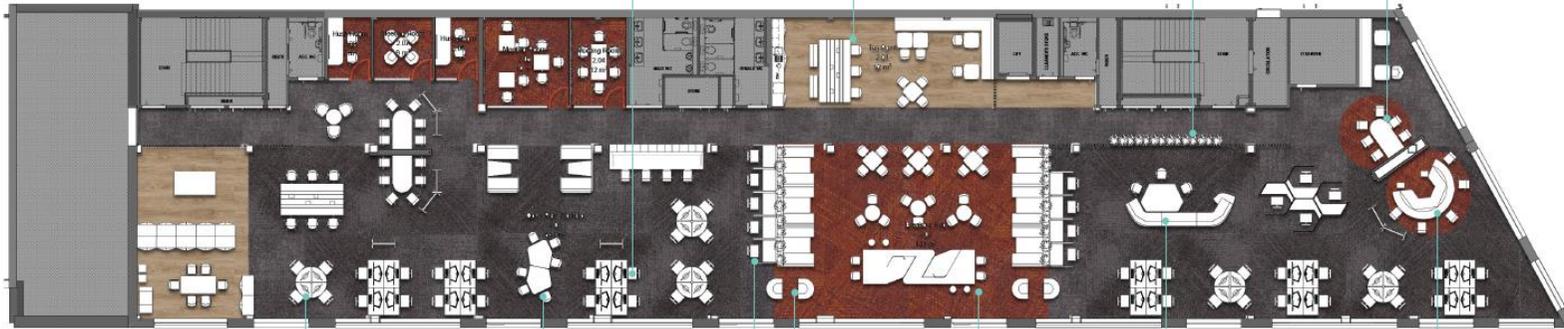
Picnic workbench



Lockers



Media tables



Circular workstations



Diamond work tables



Acoustic workstations



High back chairs



Sit Table



Modular seating system

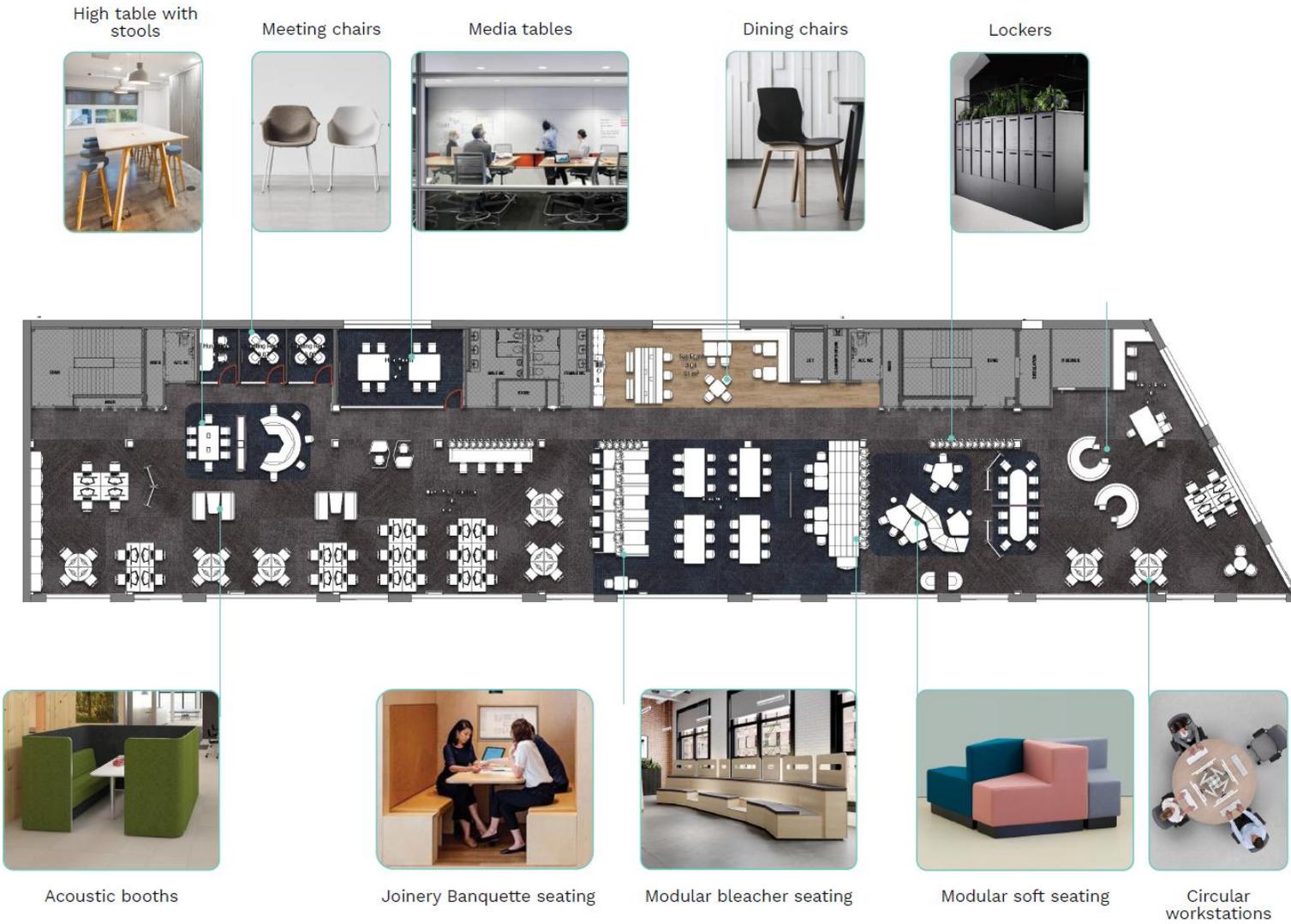


Multi-use high table and soft seating

Forward Drive Office Fit Out Design Concept

THIRD FLOOR

220



Forward Drive Office Fit Out Design Concept

FOURTH FLOOR

Lounge sofas



Meeting chairs



Picnic workbench



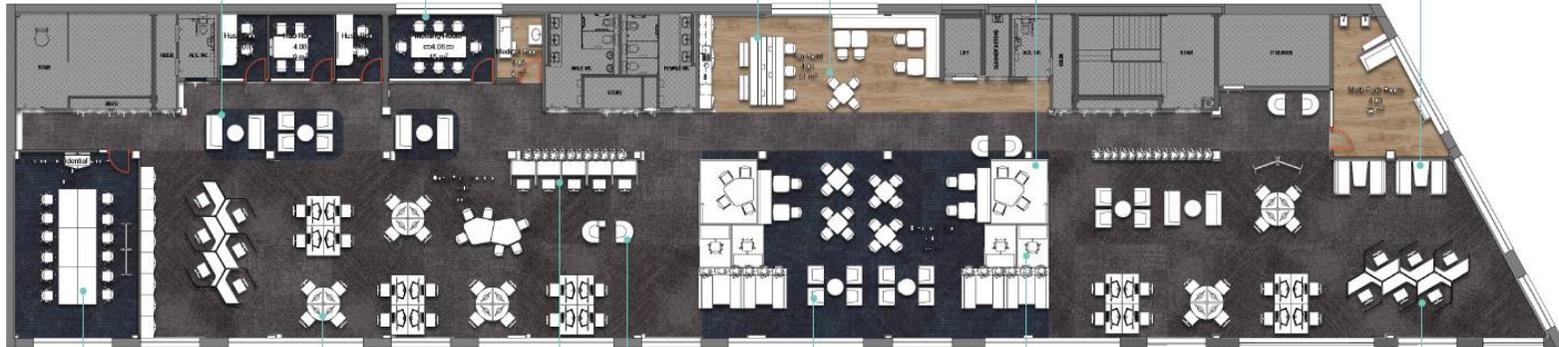
Dining chairs



Meeting pod



Acoustic booths



High table with stools



Circular workstations



Acoustic workstations



High back chairs



Lounge armchairs



1 person pod



Acoustic workstations

Harrow Strategic Development Partnership Peel Road – revised design proposal

1 Introduction

- 1.1 Savills has been asked to comment on revised proposals put forward by Wates (in their role as development manager for the Harrow Strategic Development Partnership JV) for the Peel Road site which was conceived as a civic led site at the tender stage of the JV partner selection process. We have reviewed a document authored by Wates 'Update on Peel Road Affordable Housing 23rd November 2020'. A clarification meeting was held with Robert Pert of Savills and Kate Ives of Wates.
- 1.2 We understand that the Council's requirements for their Civic Centre have changed between bid stage and now. Previously the civic building was 6,828m² and in the proposed revised scheme it is 1,778m².
- 1.3 The footprint has shrunk considerably with land now being available for alternative development. The current proposal is that additional residential development is delivered. We understand the spatial plan for this, and other options, has been tested with Harrow planning authority. The additional residential block will provide 46 homes although we understand this has been assessed on a volumetric and massing approach only; therefore detailed testing will be required.
- 1.4 It is not known whether this is a pure saving or whether some of this capital may need to be spent on the enhancement or adaptation of other Council civic/office buildings in order to achieve the optimized scheme.

- 1.5 In the original scheme the PRS residential element was due to be taken to the market as a forward fund opportunity with the joint venture taking a development margin on this. Therefore for the joint venture as developer the reduction in civic space delivery does not change the commercial position on the basis that the PRS element remains the same.

2 Options

- 2.1 The key questions are around what the joint venture should do with the proposed new residential block and, separate to that, does the Council wish to take a position as purchaser/investor in the new block and the PRS block.
- 2.2 The first consideration is whether a significantly reduced civic/office element is an appropriate strategy. We understand that the Council has done analysis of its occupational requirements and that is what has driven the revised floorspace target. On this basis, a further consideration is therefore whether building a significant quantum of office space speculatively is a reasonable option. This is not considered an office market and therefore our advice would be that developing any significant level of office floorspace, without a pre-let with significant covenant strength, would not be in the Council's commercial interests.
- 2.3 We understand that the joint venture will be content to deliver (via Wates as contractor) the additional residential block as an affordable block for the Council. In this scenario the Council will be buying this at cost which is currently estimated to be £12m. Given the 'savings' being made on the civic element this is an affordable decision without breaching the cost neutrality position that the Council have sought to lock into the overall deal. We understand no other elements of the overall deal are subject to change as a result of the Civic requirements changing; therefore the change is limited to the Peel Road site. So the additional £12m cost of the new residential block can be paid for from the £27m savings. The timing of the 'savings' and 'new expenditure' will need to be understood to assess whether there are any cashflow (and therefore borrowing requirement) implications for the Council. Additionally the Council will need to ensure that the new residential block can deliver the required outputs in terms of tenure, unit sizes, design and specification.
- 2.4 The Council is also considering whether to purchase the PRS block for affordable housing purposes. This block is comprised of one and two bedroom properties and provides 134 homes overall.
- 2.5 As a unit mix for 100% affordable we would question its appropriateness. There may be a rationale for the Council to invest (or co-invest with Wates through the JV, or another funding partner) in this block to deliver PRS homes or sub-market homes. With the right management regime this would seem a more appropriate end use for a block of this scale. Clearly this would be meeting a different need both in terms of returns/outputs for the Council and end consumer need. Such investment would therefore require strategic justification for Council investment and a clear understanding of the funding requirements and anticipated returns.

2.6 It should also be noted that the purchase of both the PRS and new residential block would result in greater expenditure by the Council than in the original scheme where the Council was buying the Civic Centre at a cost of £42.1m. The table below shows this difference:

PEEL ROAD ELEMENTS	TOTAL COST £
Civic Centre	£14,816,188
New affordable block	£12,067,656
PRS block	£31,051,788
TOTAL	£57,935,632
Original cost of Civic Centre	£42,172,353
Additional costs by purchasing aff and PRS blocks	£15,763,279

2.7 The joint venture (including the Council as a shareholder/member) will also need to consider the best course of action. We understand it has already been established, through design work and planning consultation, that a residential block (broadly as currently conceived) is the most appropriate alternative land use. Taking this course of action does not diminish the returns to the joint venture because the development returns on this site were always being derived solely from the PRS block.

2.8 Delivering an affordable block to the Council provides certainty on the exit strategy and could provide some planning benefits in terms of the affordable delivery; for example if the new block provided 100% affordable this could satisfy planning requirements across this site and therefore remove the need for the PRS block to provide affordable housing which is the current position. This may produce benefits in terms of attractiveness to funders/operators if the block is mono-tenure.

2.9 The joint venture will also need to consider that if the Council purchases the PRS block at cost what does this do to overall returns to the JV as it is assumed that the joint venture has been assuming more than simply a cost plus margin.

3 Affordable housing – value and affordability to the Council

3.1 To provide an indication of the likely subsidy levels required we have assessed the average value of a dwelling (based on the 46 unit block with the same values applied to the PRS block) for three tenures: social rent, London Affordable Rent, and shared ownership.

- 3.2 A mono-affordable tenure scheme is unlikely to be desirable across both blocks. A mixed-tenure scheme is likely to be more desirable and financially viable albeit considerable thought will need to be given to how different housing products will be designed in just two blocks.

- 3.3 Consideration should also be given to the optimum grant subsidy mix. The new GLA prospectus does not support grant for LAR which might provide an opportunity for the Council to maximise social rent delivery utilizing GLA grant whilst deploying RTB receipts into affordable rented products at higher rents.

4 Summary of considerations for the Council as investor/purchaser

1. Are the costs for the revised Civic element justifiable given the cost per sqm has risen significantly?
2. If the Council was due to spend £42.1m on the civic element and is now forecast to only spend £14.8m, what are the priorities for those savings?
3. Can the proposed new residential block deliver what the Council requires in terms of affordable housing and is the purchase price (the cost) affordable to the Council?
4. Is purchase of the PRS block viable and fundable either as an affordable block or as a PRS block?

5 Summary of considerations for the Council as a shareholder/member of the JV

1. Is a forward sale of the new residential block to the Council at cost in the overall interests of the JV?
2. Is a forward sale of the PRS block to the Council at cost in the overall interests of the JV?

6 Conclusion

- 6.1 The site is not considered suitable for a speculative office-led development. This, alongside with revised Council occupational requirements and potentially viable alternative land uses (subject to planning), mean that the proposed strategy is considered appropriate.
- 6.2 The principle of the proposed change in approach and land-use appears reasonable and affordable housing is likely to be a key priority for any savings that are produced as a result of the reduced civic element. The costs of the affordable housing provided by Wates are not out of kilter with other London schemes we see.
- 6.36 The Council will need to further satisfy itself of the appropriateness of the blocks for affordable housing and value for money. This can only be achieved through further work by the JV to establish the viability and deliverability of the revised scheme, and the Council should not feel it needs to make a firm decision now based on only preliminary information.

Robert Pert
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Cabinet – 27 May 2021

Reference from the Overview and Scrutiny Committee – 17 May 2021

165. The Council's Accommodation Strategy and the Harrow New Civic Centre

Members received a report which presented the proposed approach to the Council's future accommodation, outlined the reasons for this and sought the necessary approvals for carrying out works to the Forward Drive Depot, incorporating the proposals in the Harrow Strategic Development Partnership Business Plan. The Committee were asked to consider the report prior to its submission to Cabinet.

The Leader of the Council introduced the report and highlighted the following:

- Like many organisations, since the pandemic there had been a shift in the way the Council worked with an increased move towards online and remote working. This emphasised that the need for future office-based work had reduced.
- Staff surveys had revealed that being able to work remotely had created a better working environment for many of our staff.
- The current Civic Centre was no longer fit for purpose due to substantial financial costs and approaching the end of life. The Depot site would be able to accommodate all the required staff working in an agile environment.
- 40 carpark spaces were the maximum achievable at the new Civic Centre space.
- The proposals provided the opportunity for more affordable housing as well as staff to being able to work in a more modern working environment.

The Interim Director of Commercial Development advised:

- This was the second of three reports for finalising the establishment of the Harrow Strategic Development Partnership. The first report was the appointment of Wates as preferred bidder and the key part of this report had been for the accommodation strategy to be agreed and the HNC in particular. The recommendations would then inform the final business plan for setting up the partnership.

- The report set out the change of situation, the learning from the wider market, the development of the flexible futures programme and the experience of the pandemic which changed the Council's requirements.
- The Forward Drive Depot was available for high quality offices. There were constraints on the depot letting and noted that it would nevertheless be an improvement on the existing buildings.
- As the Forward Drive Depot was not necessarily an appropriate space, the report also addressed the identification of ancillary spaces.

The Director of Finance highlighted the financial implications of the report including:

- The accommodation strategy, fitting out the Forward Drive Depot for staff which would cost circa £7.6m in terms of capital which had already been accounted for in the Council's capital programme. This meant that no extra capital would need to be added to the existing budget.
- There was an associated revenue cost of £725,000 which was primarily for ancillary spaces which had been accounted for in the 2020/21 outturn report.
- The financial implications for the Council in relation to the Harrow Strategic Development Partnership, highlighted that, based on the current Business Plan model, there would be no impact on the general fund.
- The Council's total capital investment over the initial 12-year period of the scheme would be £48.6m. This covered the Council's investment in the Harrow Strategic Development Partnership and the new Civic Centre. The financial model also showed that the Council would receive capital receipts from the Harrow Strategic Development Partnership which would cover the Council's capital investment leaving the Council with a net borrowing requirement estimated at £10.2m.
- The Council would receive a series of interest payments from the Harrow Strategic Development Partnership to cover capital financing cost.
- Consideration should be given to using dividends received from the arrangement and will be used to clear any debt from this arrangement.

Members asked questions and had a discussion in relation to the following areas:

- The content in the exempt section of the report should be reviewed as it may be possible to make it available to the public.
- Appropriate facilities for services were required. Queries were raised about where various essential front desk services would be located across the borough and how permanent this would be. Concerns were also raised about the level of detail and consistency being provided, and whether the strategy fully met the needs of future service provision.
- Flexible working should meet the needs of the Council. Queries were raised about whether the long-term impact of partial remote working was being considered and accounted for, and the flexibility for any future changes in work patterns. Also, how confidentiality could be maintained in a more open and flexible work setting.
- In response to concerns raised regarding public safety for journeys home in the evening, given the level of parking at the new Civic Centre, it was noted that measures would need to be put in place for staff, Members and residents to ensure this was maintained.
- The planned split between the Council's democratic functions at the new Civic Centre and administrative functions at Forward Drive, the impact on accountability and future running of the council, and where senior officers would be based.
- Financial issues and queries were raised, including the level of borrowing and financial returns, the additional costs of fitting out Forward Drive, the cumulative costs of the new Civic Centre and Forward Drive schemes, and when a business plan would be available to support the Accommodation Strategy.
- The level of parking provision, including whether 40 spaces at the new Civic Centre would be sufficient to support its planned use, and how this would affect its accessibility to members, officers and the local community.

Members went on to discuss and question specific details of the Council's Accommodation Strategy and the Harrow New Civic Centre as follows:

- In response to the challenge that some services had not yet been assigned a designated location from which to operate, Members were advised that this was largely down to delays caused by the pandemic, but that space was available to accommodate them. Locations were being considered which would make services such as homelessness more accessible. Time was available for the optimum scenarios to be considered. It was noted that the current Civic Centre would remain until October 2022.
- Regarding concerns over the practicality of using Libraries and the Art's Centre for council front desk services, it was noted that these

facilities had available rooms that had previously been used to deliver services. Children services access points would be designated to an appropriate location with various options available for consideration. Libraries would be considered for services such as housing benefits and Council Tax.

- The Committee questioned how the needs of staff would be met once the move occurred, an officer advised that focus groups had been collecting information with engagement taking place at several levels of the organisation to ensure accessibility was addressed. The Civic Centre was being used as a pilot prior to the opening of Forward Drive.
- Concern was expressed in relation to the protection of data and was advised that protection for data held electronically had been enhanced with the recent improvements to devices, software and storage. With the reduction in photocopying and printed that had happened through remote working, the risk of a breach for data recorded on paper had also reduced. Officers would work with focus groups to look at further ways data protection could be enhanced in an agile working environment.
- The Committee emphasised the importance of public engagement and the need to ensure that it was still at the forefront, especially in view of the significant changes since the previous civic centre proposals. It was noted that publicity and engagement with the public on this project had started in 2014 and the Council would make sure that services would be accessible.
- Regarding how services would be designated across Harrow, it was highlighted that existing services were already stationed at multiple locations.
- Members sought reassurance as to how the agile working strategy would suit Harrow and its delivery of priorities as well as how the change in attitude towards working from would affect the strategy. It was noted that time worked in the office had been under significant consideration which concluded that 50% would be an optimal ambition. It was found that staff would want the flexibility of working from home but would not want to be completely remote. For this reason, it was planned to reopen the current Civic Centre as the Civic Hub as soon as possible. It was also noted that prior to the Pandemic the Civic Centre had been occupied at a 50-60% capacity. The Volterra report noted that there had been a steady reduction in workspace and suggested 50% time in the office would be optimal.
- In response to the concern that the interaction between Members and Senior Staff would be more difficult maintained when split between two main locations, the Committee were advised that it would be possible for Members and Officers to work from both the Forward Drive Depot as well as the new Harrow Civic Centre. It was expected with this

fluidity and the use of hybrid and virtual meetings, interaction would be increased.

- The point of communication was raised as a potential issue, and the Committee were informed that communication with senior staff had improved since the Council moved to more remote and electronic forms of communication. The arrangement of meetings should not be an issue. It was noted that there would be multiple ways of interacting from desk space, private meeting rooms and public Café space.
- Regarding the concerns over the longevity of the strategy, an officer advised that working remotely had been proven to work during the past year, but that it had highlighted that there were improvements that could be made for staff hence why it would be made possible for staff to work in an office for 2-3 days of week. This would be tested via the Civic Hub.
- Clarification was sought in relation to the location of services in the Borough. In response, it was advised that for many years the Council has had a strategy of moving services on-line which has led to fewer residents visiting the Civic Centre. However, there was a commitment to make sure that services could still be accessible for residents in person from other locations across the Borough.
- Clarification of details within the business plan were requested and the Interim Director of Commercial Development explained that further due diligence would be undertaken with the Housing Revenue Account (HRA) before the costs were agreed, as the current assumptions made by the HSDP (Wates) exceeded the Greater London Authority (GLA) assumed costs.
- In response to a Member's comments that increased understanding of the HRA was required, the Director of Finance explained that the HRA business plan had assumed an average unit price of £325,000 per affordable housing unit. However, the current financial viability model gives a costing of £345,000 per affordable housing unit. This report had highlighted this difference and that due diligence would need to be done to reconcile these unit prices before a decision could be made.
- The Committee challenged how the Borough would handle the taxation of this partnership. The Director of Finance advised that the dividends were defined as the money received from the HSDP as units are sold by the partnership, which would be a share of the sales made. The taxes had been accounted for with the LLP having been set up in the most tax efficient way.
- The Committee sought further explanation/ a breakdown of the fit-out costs for the Forward Drive Depot. The costs broken down covered: local area network arrangements, audio and visual requirements, moving costs and costs for ancillary spaces. The building included 38,000 square feet, this included: furniture, a café, welfare facilities,

reception area, IT and audio, a CCTV room, toilets, showers, muster rooms, building management software and mechanical and electrical fittings.

- It was also noted through discussion that the fit-out costs for Harrow New Civic would include fixtures, fittings and equipment.
- Concern was expressed in relation to parking and the accessibility and safety for visitors. An officer responded that the HNC car park had been planned to provide six accessible spaces on the ground floor with an additional 40 spaces within the basement carpark for visitors, staff and Members. The Harrow New Civic had an excellent rating for Public Transport Accessibility.
- The Committee questioned the commercial prospects at Forward Drive as there were café spaces which had the possibility of being commercially let as well as other units which could be, and in many cases already were being commercially let. Similar considerations applied to the Café at HNC.
- As a result of concerns raised over the issue of public safety the Committee highlighted this as a priority that required serious consideration. In response, Members were advised that commitment to the safety of staff and residents had been taken seriously with options such as taxis provided as a way for those attending evening meetings to travel home safely. Daytime meetings could also be considered. Works in Wealdstone itself had improved public safety.
- In response to a request for clarification in relation to the the funds for Poet's Corner, the Director of Finance explained that the funding for Poet's Corner had already been provided for through the capital programme and any borrowing required would be paid back through the returns of the Harrow Strategic Development Partnership.

The Chair thanked Members for their contributions and questions and officers for their presentation and responses.

RESOLVED: That the Committee's comments in relation to the Council's Accommodation Strategy and the Harrow New Civic Centre be forwarded to Cabinet for consideration.

For Consideration

Background Documents:

Agenda of Overview and Scrutiny Committee – 17 May 2021: Report on The Council's Accommodation Strategy and the Harrow New Civic Centre.

Draft Minutes of Overview & Scrutiny Committee – 17 May 2021

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Risk Management Implications

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No**

The relevant risks contained in the register are attached/summarised below. **No**

The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
By not adopting the strategy, the Council will expose itself to the risk of being unable to let or use two floors of Forward Drive This would also require costly and inefficient extra space to be built at the HNC	<ul style="list-style-type: none"> ▪ The mitigation is to agree this proposed strategy 	Green
The plans for the HNC and the affordable housing are at concept design stage and as design proceeds there is risk of cost escalation	<ul style="list-style-type: none"> ▪ Clear cost and design management by design team ▪ Value engineering as necessary ▪ Close management of planning processes ▪ Close attention to procurement policy and processes ▪ Council refrain from variations and adhere to principles of agile working 	Amber
Cost of the 46 affordable housing units is not affordable within the HRA	<ul style="list-style-type: none"> ▪ The Building Council Homes for Londoners (BCHFL) model assumes an average of £325k per unit which is affordable within the HRA ▪ A robust financial assessment will be undertaken to ensure the final agreed scheme is affordable within the HRA ▪ The current estimated cost from the HSDP is £345k per affordable unit which will be worked through as part of the financial assessment to ensure the final agreed scheme is affordable within 	Amber

Risk Description	Mitigations	RAG Status
	the HRA.	
Risk of insufficient car parking having a detrimental effect on agile working	<ul style="list-style-type: none"> ▪ Maximise feasible car parking spaces ▪ Monitor car parking usage 	Amber
Kier linking the costs of the Cat B fit out works with their current Loss & Expense claims	<ul style="list-style-type: none"> ▪ Adherence to contractual procedures ▪ Close scrutiny of claims and costs 	Amber
Risk of further claims from Kiers if additional work awarded	<ul style="list-style-type: none"> ▪ Strong design management and change control procedures to prevent variations impacting on programme 	Amber
Potential cost increases of fit out works at Forward Drive	<ul style="list-style-type: none"> ▪ Clear change control measures to prevent variations to design 	Amber
Estimate cost of £500,000 to re-house the 'ancillary services' is exceeded	<ul style="list-style-type: none"> ▪ Costs are likely to be capital and we will consider what capital schemes can be stopped to cover the additional costs before a proposal is brought forward. 	Amber
Unable to find suitable locations/sufficient face to face space for 'ancillary services'	<ul style="list-style-type: none"> ▪ Detailed further review is near completion, use of Libraries, Headstone Manor, Children's Centres and Adult NRCs being investigated/piloted as detailed in the report 	Amber
Limited Liability Partnership with Wates not completed	<ul style="list-style-type: none"> ▪ Contract currently being drafted 	Green
Fit out costs of HNC unaffordable	<ul style="list-style-type: none"> ▪ Current capital provision for the three sites ▪ Realistic and approved cost plan for fit out prior to any decisions 	Amber
Changes to the model for the HSDP increase costs/reduced income increasing in the Council's borrowing requirement making it unaffordable	<ul style="list-style-type: none"> ▪ Professional partner (Wates) employed as Development Manager ▪ Ability to adapt Business Plan to revise scheme and manage costs ▪ Governance structure will be in place to support changes 	Amber

Risk Description	Mitigations	RAG Status
	and their implications	
Annual running costs of Forward Drive exceed the combined cost of running the Civic Centre and Depot of £1.6m	<ul style="list-style-type: none"> ▪ New building ▪ Smaller and more modern building ▪ Realistic approach to operating model in light of budget envelop 	Green
Impact on MTFS is not cost neutral.	<ul style="list-style-type: none"> ▪ Robust management of the cash flows, both capital and revenue alongside existing provision in the Capital Programme ▪ Financial performance reporting to Cabinet quarterly as part of revenue budget update ▪ Robust Treasury Management 	Amber

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