



Call-In Sub-Committee Agenda

Date: Wednesday 27 September 2023

Time: 8.00 pm (or on the rising of Planning Committee)

Venue: The Auditorium - Harrow Council Hub, Kenmore Avenue, Harrow, HA3 8LU

Membership (Quorum 3)

Chair: Councillor Amir Moshenson

Conservative Councillors: June Baxter
Govind Bharadia

Labour Councillors: Rashmi Kalu
Jerry Miles

Conservative Reserve Members:

1. Vipin Mithani
2. Samir Sumaria
3. Janet Mote

Labour Reserve Members:

1. Dean Gilligan
2. Antonio Weiss

Contact: Rita Magdani, Senior Democratic & Electoral Services Officer
Tel: 07707 138582 E-mail: rita.magdani@harrow.gov.uk

Scan this code for the electronic agenda:



Useful Information

Joining the Meeting virtually

The meeting is open to the public and can be viewed online at [London Borough of Harrow webcasts](#)

Attending the Meeting in person

Directions by car:

Go along Kenmore Avenue and head towards the Kenton Recreation Ground. When approaching the end of the Kenmore Avenue turn right before reaching the Kadwa Patidar Centre.

You will be admitted on a first-come-first basis and directed to seats.

Please:

- (1) Stay seated.
- (2) Access the meeting agenda online at [Browse meetings - Call-In Sub-Committee](#)
- (3) Put mobile devices on silent.
- (4) Follow instructions of the Security Officers.
- (5) Advise Security on your arrival if you are a registered speaker.

Filming / recording

This meeting may be recorded or filmed, and if you choose to attend, you will be deemed to have consented to this. Any recording may be published on the Council website.

Agenda publication date: Tuesday 26 September 2023

Agenda - Part I

1. **Attendance by Reserve Members**
To note the attendance at this meeting of any duly appointed Reserve Members.
2. **Declarations of Interest**
To receive declarations of disclosable pecuniary or non pecuniary interests, arising from business to be transacted at this meeting, from all Members present.
3. **Minutes** (Pages 5 - 10)
That the minutes of the meeting held on 6 July 2022 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 Sub-Committee for the Municipal Year 2023/24.
5. **Protocol for the Operation of the Call-In Sub-Committee** (Pages 11 - 12)
6. **Call in of the Cabinet Decision - 14 September 2023 - Public Space Protection Order (PSPO) Approval for Publication** (Pages 13 - 76)
 - (a) Notice invoking the Call-in;
 - (b) Extract from the Cabinet minutes held on 14 September 2023;
 - (c) Report and appendices submitted to the Cabinet on 14 September 2023.

Reasons 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.

Agenda - Part II - Nil

Data Protection Act Notice

The Council will record the meeting and will place the recording on the Council's website.

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Call-In Sub-Committee

Minutes

6 July 2022

Present:

Chair: Councillor Amir Moshenson

Councillors: June Baxter Rashmi Kalu
Govind Bharadia Jerry Miles

In attendance (Councillors): Simon Brown For Minute 6
Graham Henson For Minute 6
Paul Osborn For Minute 6
Nitin Parekh For Minute 6
David Perry For Minute 6
Natasha Proctor (Online) For Minute 6

1. Attendance by Reserve Members

RESOLVED: To note that there were no reserve Members in attendance at the meeting.

2. Declarations of Interest

RESOLVED: To note that there were no declarations of interests made by Members.

3. Minutes

RESOLVED: That the minutes of the meeting held on 14 June 2021 be taken as read and signed as a correct record.

Resolved Items

4. Appointment of Vice-Chair

RESOLVED: To appoint Councillor Jerry Miles as Vice-Chair of the Call-In Scrutiny Sub-Committee for the 2022/2023 Municipal Year.

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

The Chair advised that the call-in notice had been received and drew attention to the document "Protocol for the Operation of the Call-In Sub Committee" contained in the Agenda pack.

He 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;
- d) wholly in accordance with the budget framework;
- e) the action is not proportionate to the desired outcome;
- f) a potential human rights challenge;
- g) insufficient consideration of legal and financial advice.

Referring to paragraph 8 of the Protocol, the Chair 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:

- 1) that the challenge to the decision should be taken no further and the decision be implemented;
- 2) 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
- 3) that the matter should be referred back to the decision taker (that is, 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.

6. Call In of the Cabinet Decision (23 June 2022) - Investment into Harrow's Tennis Infrastructure

The Sub-Committee received the notices in respect of the call-in submitted by six Members of the Council in relation to a decision made by the Cabinet on 23 June 2022, on Investment into Harrow's Tennis Infrastructure.

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 their reasons for the call-in.

The representative began by explaining that the call in was on the decision to outsource operations of the tennis courts to an external provider and introduce charging, without any prior consultation.

The call in was based on the following five reasons.

1. Inadequate consultation with stakeholders prior to the decision

- a) there had been no consultation with Ward Councillors prior to Cabinet making the decision to outsource the running of the publicly owned tennis courts within the parks in Harrow for profit;
- b) there had been no consultation with the Park User Groups prior to Cabinet making the decision to outsource the running of the tennis courts, as per the contract set out in the Park User Groups – Operational Framework;
- c) there had been lack of adequate consultation with current users of the tennis courts in Harrow and whether they supported or opposed the role out of charging and outsourcing to an external provider;
- d) the Cabinet report ignored and did not take into account the COMPACT agreement with the voluntary and community sector regarding consultation prior to a decision being made that would impact the sector;
- e) there had been lack of consultation with debt advice charities who had more relevant data on Harrow residents and their ability to pay, or not;
- f) the lack of consultation with way the decision was made contradicted the Nolan Principles; in particular, openness and personal judgement. For example, the decision to outsource had been made prior to consultation, therefore, ignored any views that may be made;

- g) the lack of communication or consultation had damaged future partnership working and relationships with residents and community groups.

2. The absence of adequate evidence on which to base a decision

The Cabinet report had insufficient information on the risks associated with the decision to outsource, particularly the potential impact on youth services and groups, spontaneous play, ability to pay, Park User Groups and schools.

Insufficient attention had been paid to potential “unintended consequences” of outsourcing the running of the service:

- there was no evidence base or pricing structure to support the decision. It is noted that the tennis operator would be responsible for the pricing strategy;
- there were no contract limits on profits by the provider; and
- free play would be forced into non-prime times, which would exclude weekends and evenings.

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

The decision contradicted Council agreed policies that ensured there was free access to sports facilities through a joined-up, cross-sector approach to delivery.

Harrow Physical Activity and Sports Strategies, and the Public Health Polices, which were currently being updated, were clear that free access to sport was key for healthier lifestyles. By introducing charges to be set by an unknown provider, prior to any consultation, undermined the basic principle of free access to sports.

4. The action is not proportionate to the desired outcome

- a) there was no mention within the report as to how the decision was proportionate to achieving the Councils agreed vision and priorities as set out in the agreed Borough Plan; and
- b) the sports facilities provided in parks should not be used to raise money or profit.

5. A potential human rights challenge

As part of their Personal, social and emotional development (PSED), Cabinet were required to take due regard of equality implications when making decisions.

The Equality Impact Assessment (EqIA) did not respond to the growing cost-of-living crisis and longer-term inflation predictions, which would have a socio-economic impact on accessibility for an increasing number of residents for many years.

The Equality Impact Assessment (EqIA) did not reference the economic data accessible to the council, which was highlighted within the Young Harrow Foundation HAY report:

- a) that the number of younger people living in poverty was much higher than Office for National Statistics (ONS) were stating;
- b) cost was a growing barrier for many to access gyms and sports facilities – with over 50% did not go to a gym, sports or exercise club at least once a week, and therefore, introducing costs would be a further barrier to access these facilities.

In response, a representative of the Portfolio Holder and Cabinet informed the Sub-Committee that the call in request specifically related to Recommendation 3 in the Cabinet Report and made a number of assertions, which could be broadly grouped under the headings of consultation, compliance with procedure and undertakings with external groups, inadequate evidence upon which to make a decision (including pricing and outsourcing), free access to provision, and the negative impact on residents of implementing the recommendations in the Cabinet Report.

The reasons were spurious. The Cabinet Report included a recommendation for the agreement and implementation of a consultation strategy. There was no evidence of non-compliance with policy and procedure as set out in the Harrow Constitution. If the Cabinet Report was implemented, it would maintain an element of free access to the courts. The free access would provide free coach led sessions and the provision of rackets to play tennis. This would provide access to many people that did not have rackets or where the local tennis court is unplayable. The Cabinet Report did not introduce charging, as fees and charges for hiring tennis courts were annually agreed by previous Labour Administrations. However, the council failed to implement a booking system or collect the fees. The Lawn Tennis Association (LTA) had provided evidence demonstrating demand for tennis in Harrow, and undertaken a technical assessment of the courts in Harrow's parks.

The Cabinet Report was not calling for the introduction of charges, because there had always been a charging regime in place in the Fees and Charges schedule. The last Labour Cabinet agreed in January 2022 to increase fees and charges from £10.70 to £11.20 for adults. Many of the Councillors requesting the call in of the Cabinet Report were members of the last Administration, and agreed to a charge £11.20 an hour for the hire of tennis courts.

Under the past Labour Administrations, there has been no collection fees, or monitoring whether any fees were ever collected. Those failures were consistent with a failure to invest in Harrow's tennis courts. If the Cabinet Report was adopted, there would be investment in the tennis courts, and

residents would have access to free coach led sessions in all the courts in Harrow. This would include the provision of tennis rackets for residents. This would help raise physical activity levels especially to residents on lower incomes.

The Sub-Committee adjourned from 7:55 pm to 8:30 pm for deliberations.

RESOLVED: That the challenge to the decision should be taken no further and the decision be implemented.

(Councillors Rahmi Kalu and Jerry Miles requested to be recorded as having voted against the Sub Committee's resolutions to take no further action on notice reasons 1, 2, 4 and 5, which were agreed by majority of votes. The resolution related to notice reason 3 was agreed unanimously.)

(Note: The meeting, having commenced at 6.30 pm, closed at 8.35 pm).

(Signed) Councillor Amir Moshenson
Chair

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 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.

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

To be completed by Members of the Public, as per the provisions of Committee Procedure Rule 45.2.2.

To: The Director of Legal and Governance Services

1. Notice of Call-In of Executive Decision

In accordance with Committee Procedure Rule 45.2.2, 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: PUBLIC SPACES PROTECTION ORDERS.....

Made by: CABINET.....
(Cabinet/relevant Portfolio Holder)

Published on: 15/9/23.....
(Date)

3. Grounds for Call-In

(Please specify below the grounds for the call-in, in accordance with Committee Procedure Rule 45.5. 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).

- 1. The action is not proportionate to the desired outcome
- 2. It breaches rights contained in the Human Rights Act and consequently is open to challenge
- 3. There is an absence of adequate evidence on which to base the decision

4. There has been inadequate consultation with stakeholders

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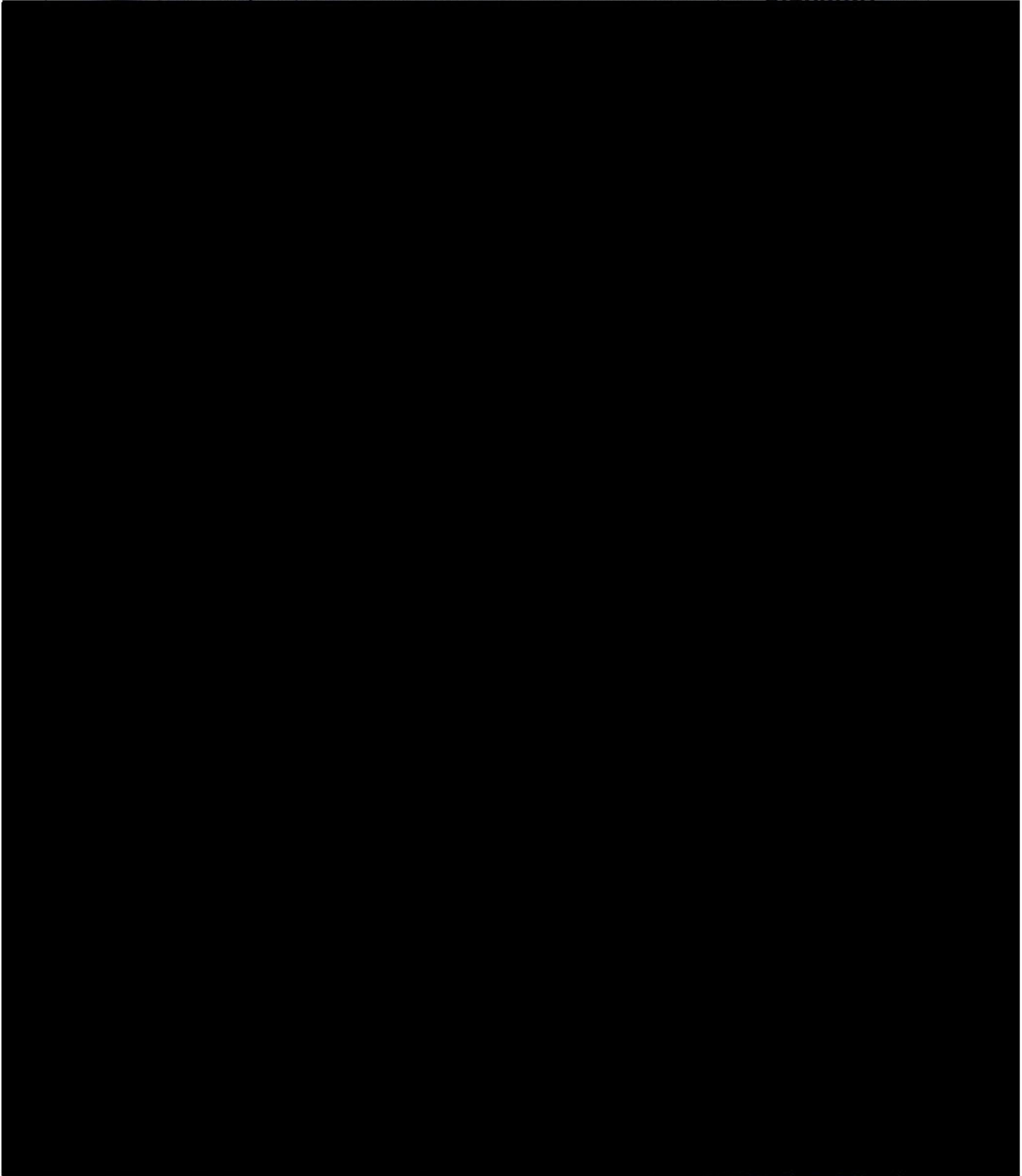
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Once completed, please forward this form to Democratic Services by email: democratic.services@harrow.gov.uk or by post to: Harrow Council, Democratic Services, PO Box 1358, HA3 3QN within 5 clear working days of the date of publication of the decision.

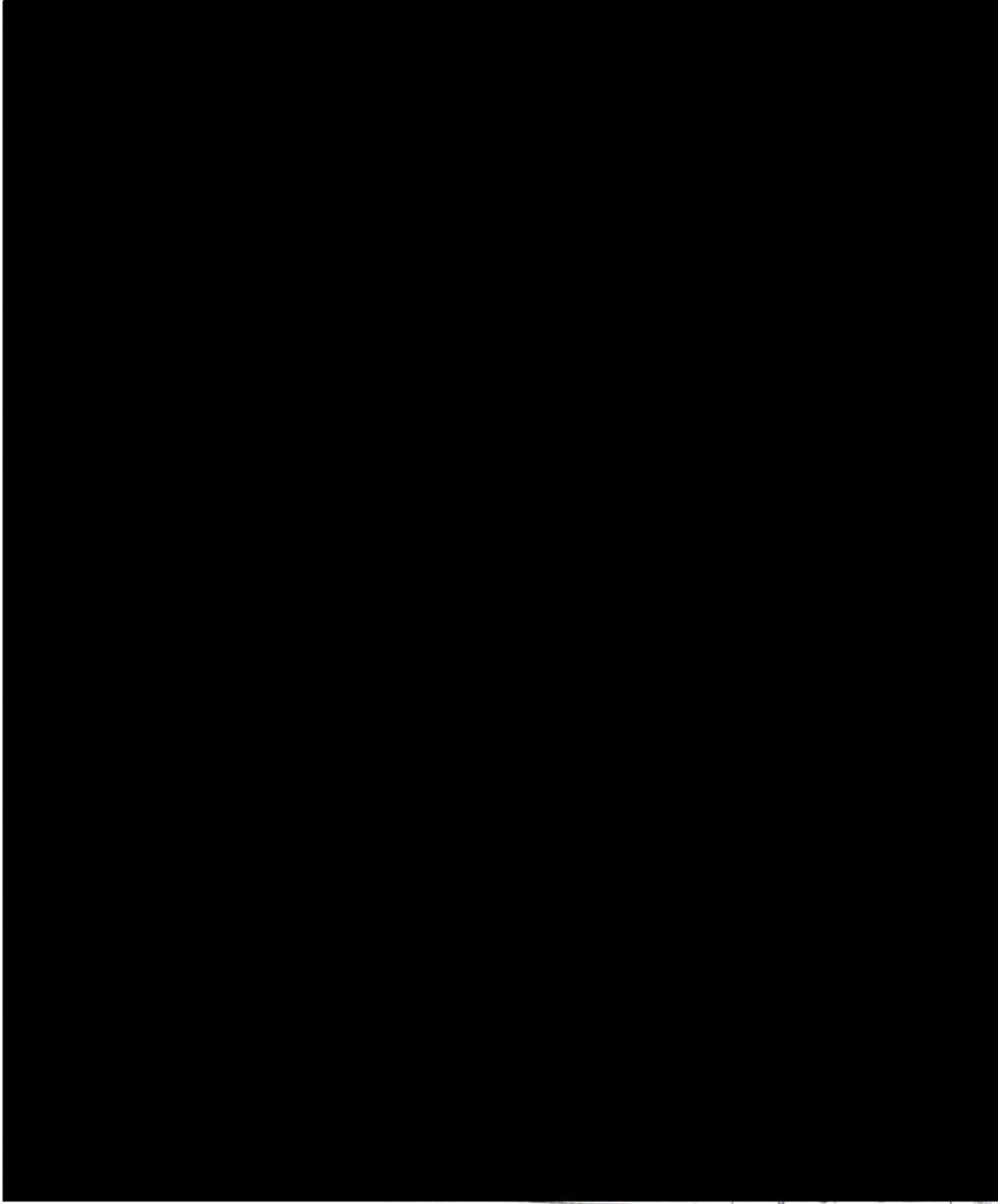
In accordance with Committee Procedure Rule 45, we, the 150 undersigned members of the public registered on the electoral roll of the London Borough of Harrow, hereby give notice that we wish to call-in the decision of the CABINET made on 14/9/23 relating to PSROS

Name (Please Print)	Address	Signature
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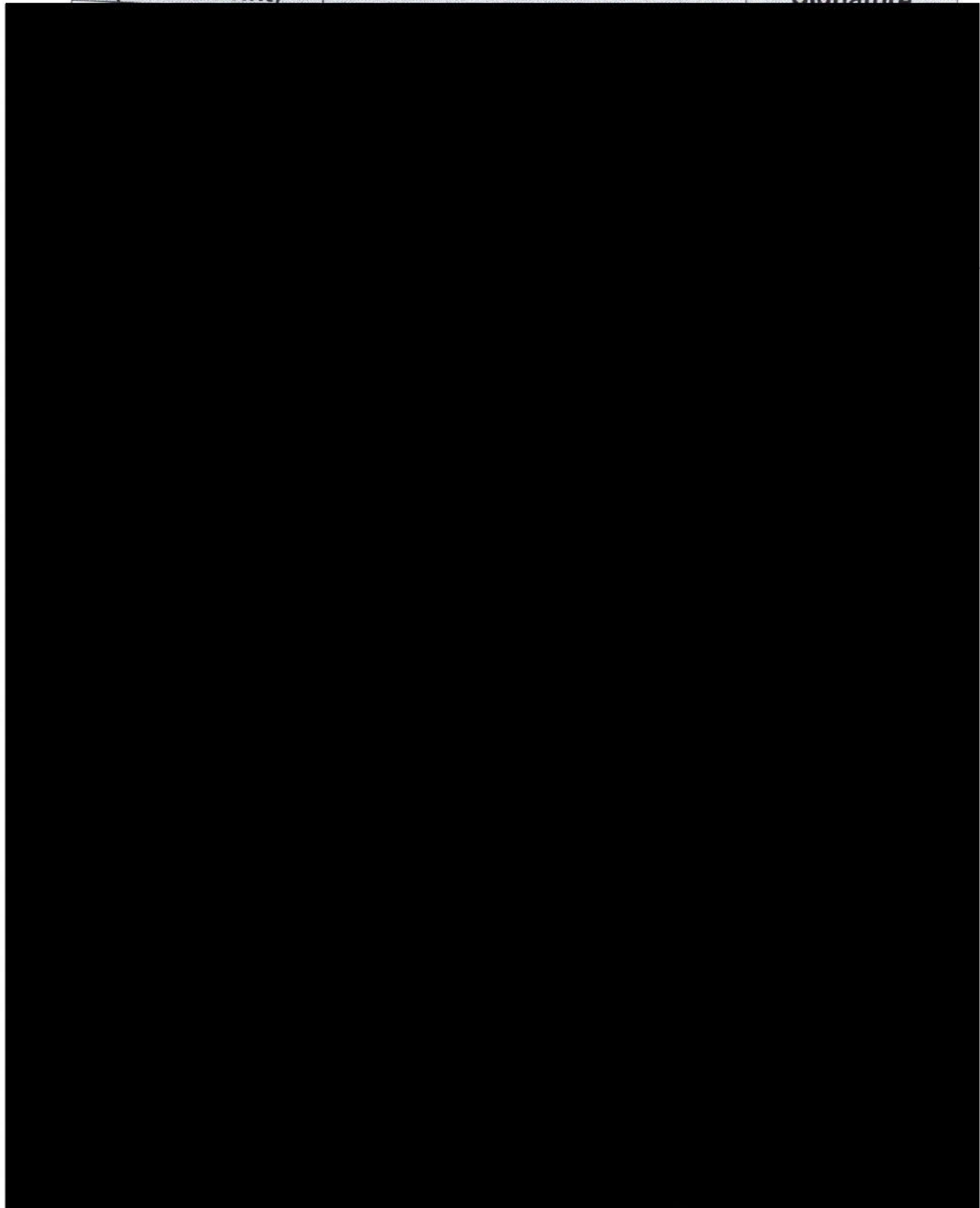
In accordance with Committee Procedure Rule 45, we, the 150 undersigned members of the public registered on the electoral roll of the London Borough of Harrow, hereby give notice that we wish to call-in the decision of the CABINET made on 14/9/23 relating to PSPOS.

Name (Please Print)	Address	Signature
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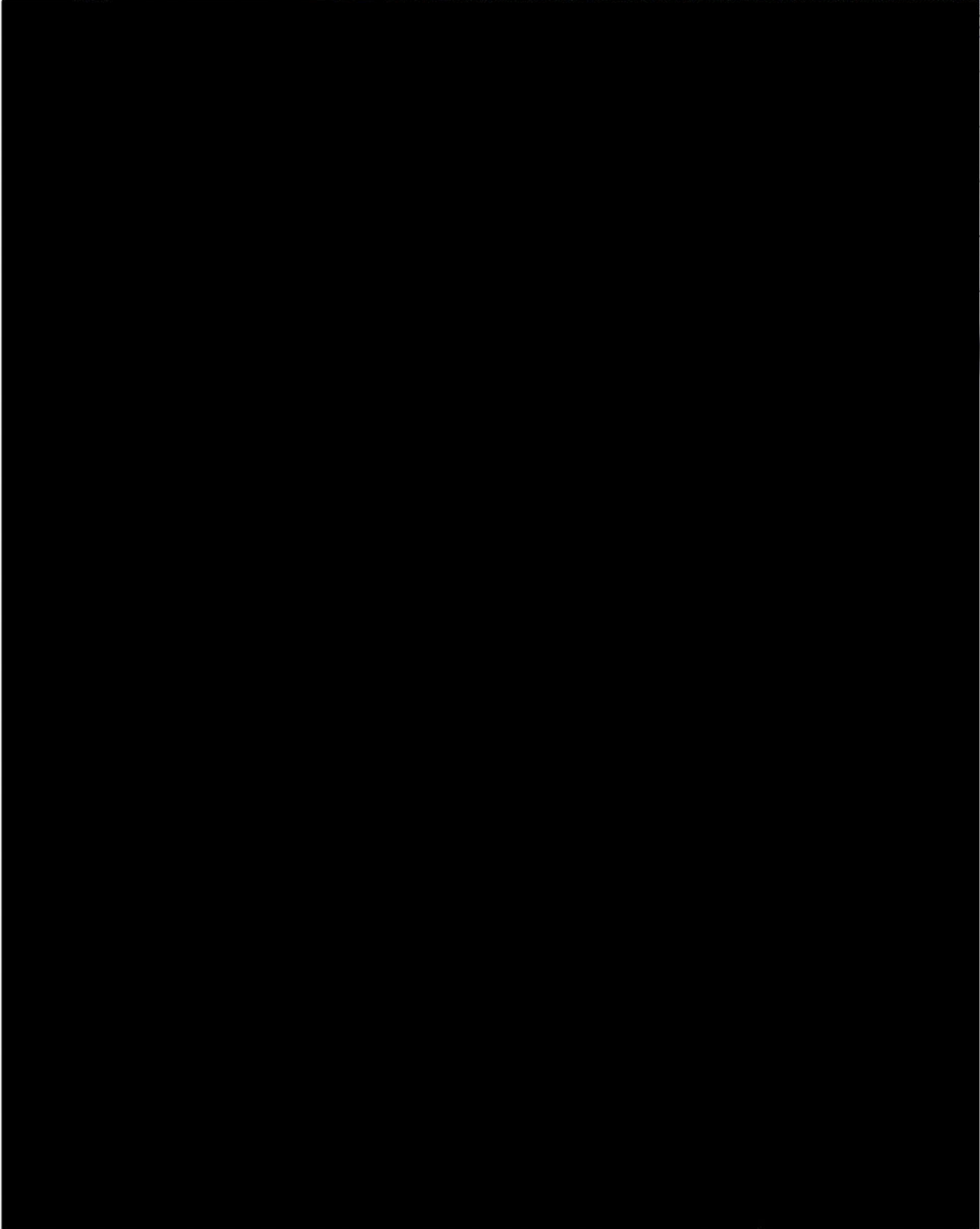
In accordance with Committee Procedure Rule 45, we, the 150 undersigned members of the public registered on the electoral roll of the London Borough of Harrow, hereby give notice that we wish to call-in the decision of the CABINET..... made on 14/9/23..... relating to PSPO.....

Name (Please Print)	Address	Signature
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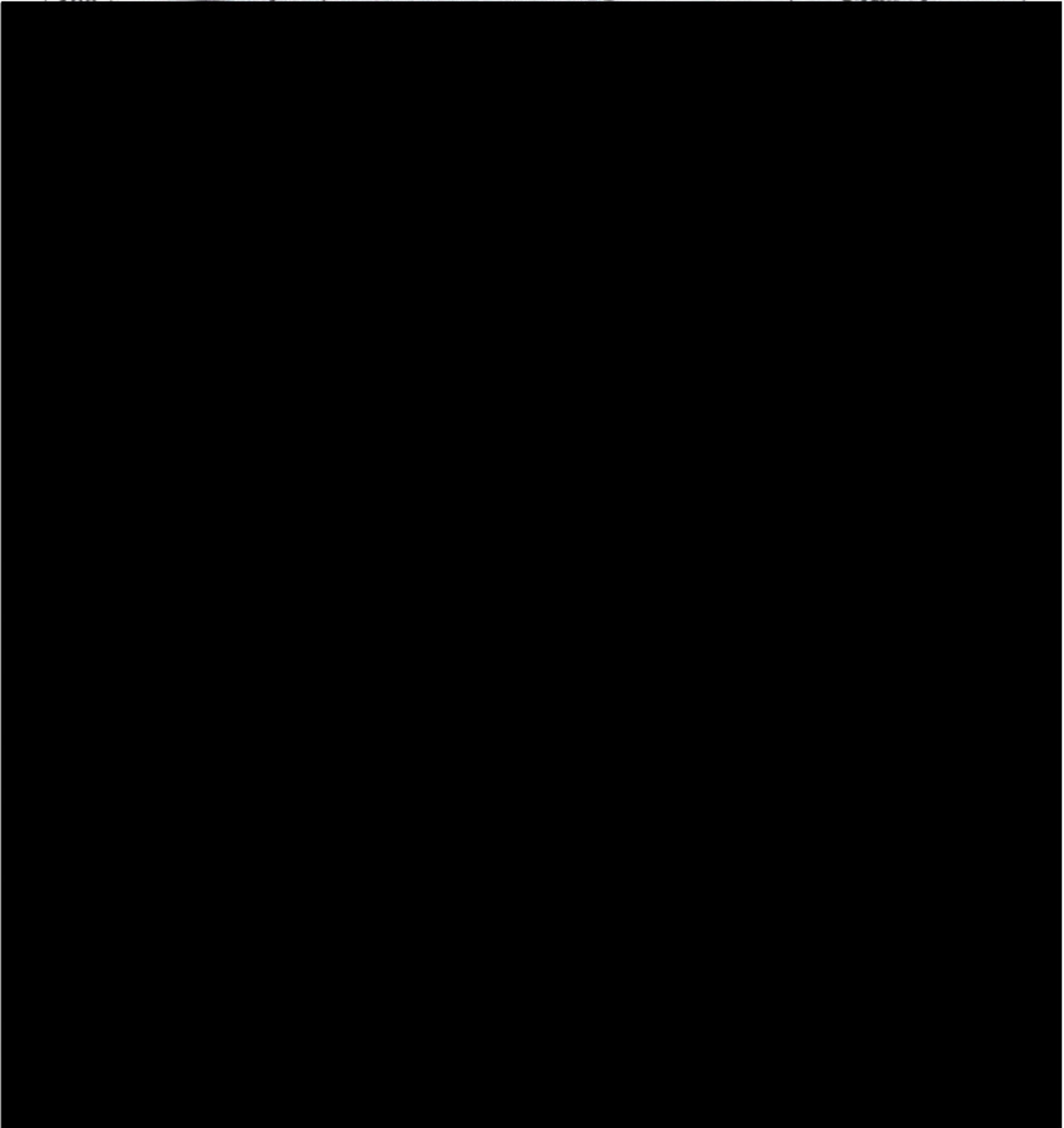
In accordance with Committee Procedure Rule 45, we, the 150 undersigned members of the public registered on the electoral roll of the London Borough of Harrow, hereby give notice that we wish to call-in the decision of the CABINET..... made on 14/9/23..... relating to PSPOS.....

Name (Please Print)	Address	Signature
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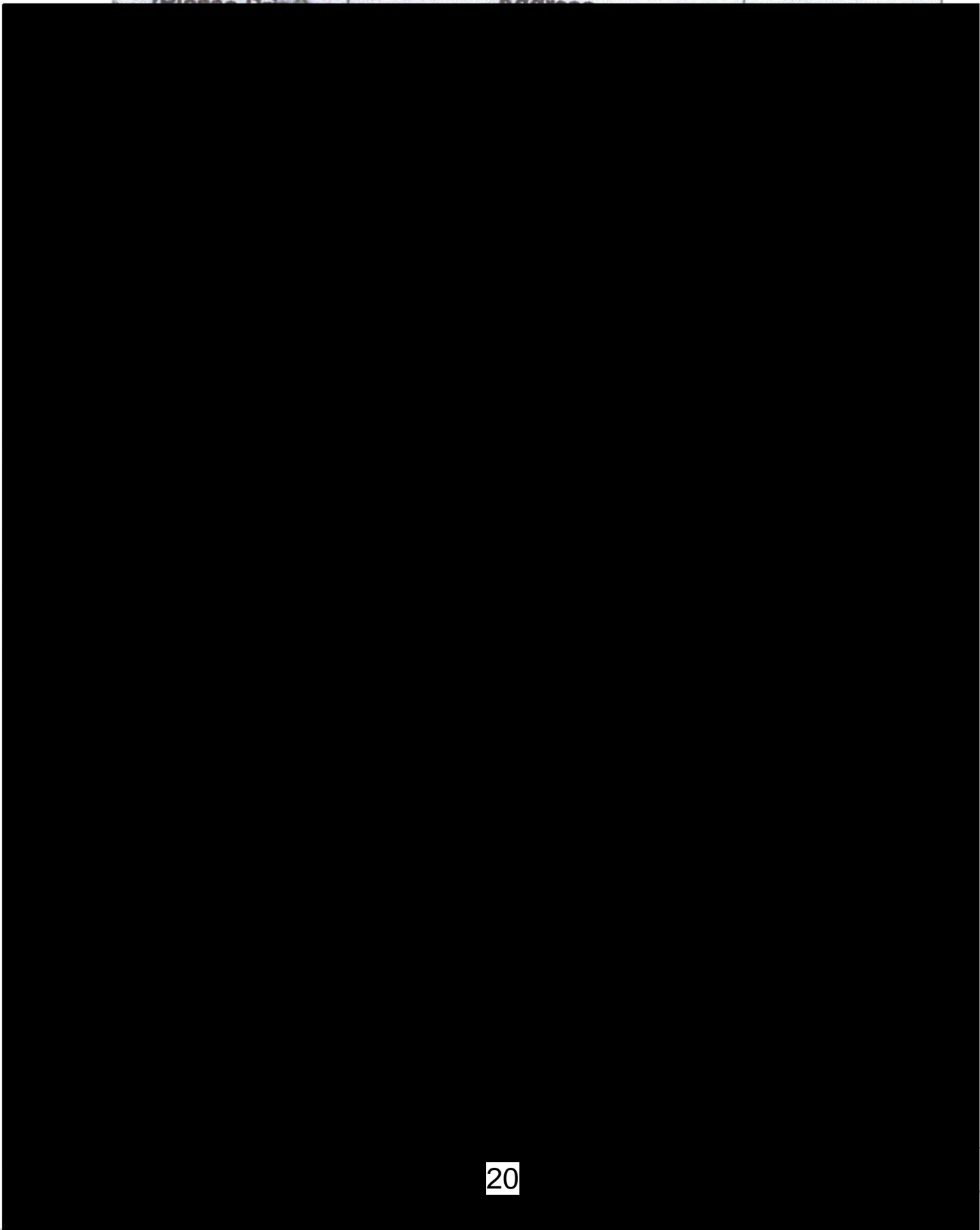
In accordance with Committee Procedure Rule 45, we, the 150 undersigned members of the public registered on the electoral roll of the London Borough of Harrow, hereby give notice that we wish to call-in the decision of the CABINET..... made on 14/9/23..... relating to PSPOS.....

Name (Please Print)	Address	Signature
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In accordance with Committee Procedure Rule 45, we, the 150 undersigned 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 decision of the CABINET..... made on 14/9/23..... relating to PSPOS.....

Name (Please Print)	Address	
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Cabinet

Minutes

14 September 2023

Record of decisions taken at the meeting held on Thursday 14 September 2023.

Present:

Chair: Councillor Paul Osborn

Councillors: David Ashton
Marilyn Ashton
Stephen Greek
Hitesh Karia
Jean Lammiman
Anjana Patel
Pritesh Patel
Norman Stevenson

**Non-Executive
Cabinet Member:** Thaya Idaikkadar
Kanti Rabadia

**Non-Executive
Voluntary Sector
Representatives:** John Higgins
Harrow Youth Parliament
Representative

**In attendance
(Councillors):** Stephen Hickman For Minute 193
David Perry For Minute 188 – 201
Krishna Suresh For Minute 193

**Apologies
received:** Councillor Mina Parmar

Resolved Items

197. Public Space Protection Order (PSPO) Approval for Publication

RESOLVED: That

- (1) the feedback received from the public consultation on the draft PSPO and the revised wording of the PSPOs be noted;
- (2) the final wording of the PSPOs for implementation and publication be approved;
- (3) the Corporate Director Place be authorised to take all steps necessary to publicise and implement the PSPOs.

Reason for Decision: The proposed PSPOs 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.



Report for: Cabinet

Date of Meeting:	14 th September 2023
Subject:	Public Space Protection Order (PSPO) Approval for Publication
Key Decision:	Yes – Impact Borough Wide
Responsible Officer:	Dipti Patel Corporate Director Place Cathy Knubley Director of Environment
Portfolio Holder:	Councillor Anjana Patel, Portfolio Holder for Environment & Community Safety
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All Wards.
Enclosures:	Appendix 1 PSPO Borough Wide Appendix 2 PSPO Town Centre Appendix 3 PSPO Parks Appendix 4 PSPO Housing Estates Appendix 5 PSPO Specific Areas Appendix 6 – Consultation report Appendix 7 – Consultation responses – Charities and organisations

Section 1 – Summary and Recommendations

This report seeks final approval of the wording of 5 new Public Spaces Protection Orders (“**PSPOs**”) to cover the Borough and specific areas with the Borough, pursuant to powers as set out in 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 requested to

1. Consider the feedback received from the public consultation on the draft PSPO and the revised wording of the PSPOs.
2. Approve the final wording of the PSPOs for implementation and publication.
3. Delegate authority to the Corporate Director Community to take all steps necessary to publicise and implement the PSPOs.

Reason:

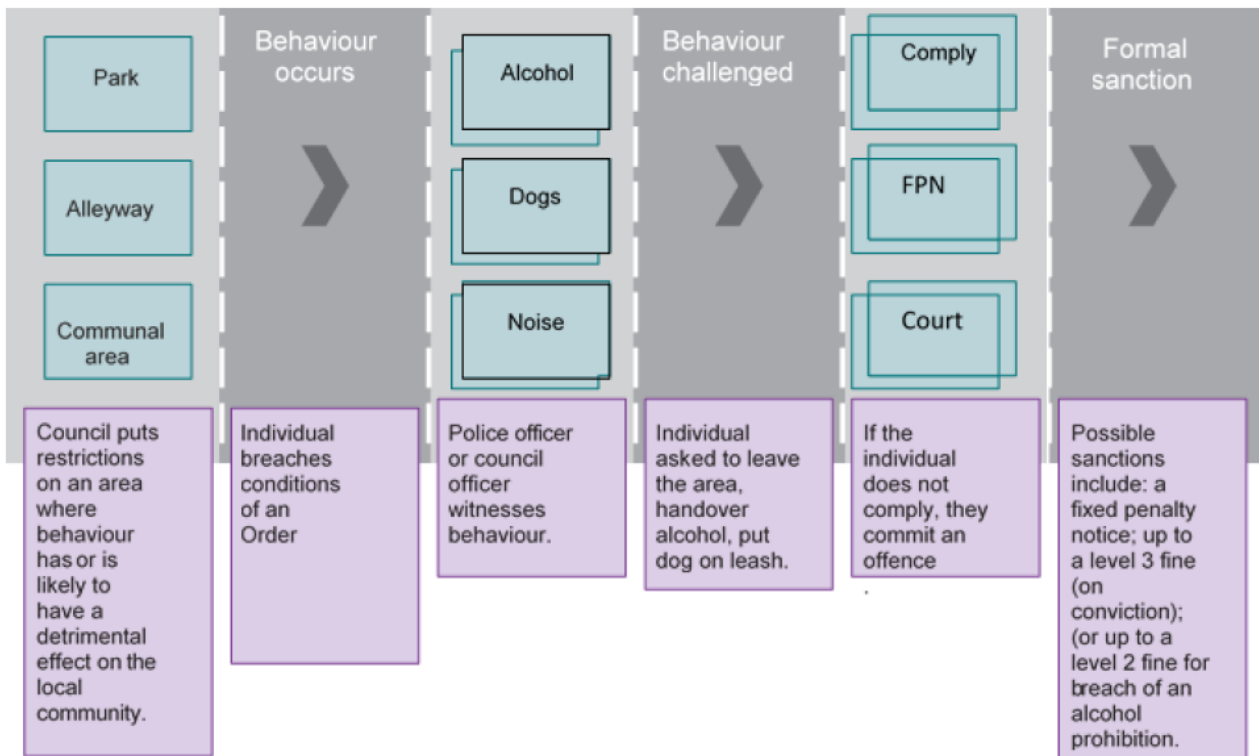
The proposed PSPOs would allow direct action against low level anti-social behaviour, with the benefit of being able to issue fixed penalty notices for breaches, if appropriate.

Section 2 – Report

Introduction.

- 1.1. Harrow Council is committed to improving the environment, reducing low crime, reducing anti-social behaviour and improving community safety. Directly relating to this commitment is the Council’s action to address anti-social behaviour and related complaints.
- 1.2. Introduction of a Public Spaces Protection Order (“**PSPO**”) is a power given to local councils under Anti-Social Behaviour, Crime and Policing Act 2014, (the “**Act**”).
- 1.3. PSPOs are intended to deal with a particular nuisance or problem in a specific area that is detrimental to the local community’s quality of life, by imposing conditions on the use of that area which apply to everyone. They are intended to help ensure that the law-abiding majority can use and enjoy public spaces, safe from anti-social behaviour.
- 1.4. An overview of the process is shown below, taken directly from the Home Office Statutory guidance on the Act for frontline professionals (March 2023 edition).

Public Spaces Protection Order



2.5 The Council can make a PSPO if satisfied, on reasonable grounds that the following conditions are met in relation to the activities sought to be regulated:

- That they are or are likely to be carried on in a public place within the Borough;
- That they have had, or are likely to have, a detrimental effect on the quality of life of those in the locality;
- The effect, or likely effect, of the activities, is or is likely to be, persistent or continuing in nature;
- The effect, or likely effect, of the activities is or is likely to be, such as to make the activities unreasonable; and
- The effect, or likely effect, of the activities justifies the restrictions sought to be imposed by the order.

2.6 As with all the anti-social behaviour powers, due regard should be given to issues of proportionality: is the restriction proposed proportionate to the specific harm or nuisance that is being caused? It is essential that the restrictions being introduced are reasonable and will prevent or reduce the detrimental effect continuing, occurring, or recurring.

2.7 In addition, the PSPO must be appropriately worded so that it targets the specific behaviour or activity that is causing nuisance or harm and thereby having a detrimental impact on others' quality of life.

- 2.8 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 (level 3 currently being £1,000). 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 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.
- 2.9 In line with the normal approach taken with the PSPOs already in place, as well as other matters of low-level environmental significance, education and engagement will be the initial approach, which involves explaining to those potentially breaching the PSPO what the requirements are and how to meet them. Persistent offenders or those who refuse to heed advice will lead to escalation.
- 2.10 If the PSPOs are approved then information will go on the Council Website, be publicised through local and social media, new signage will be erected in relevant areas and our communications team will help to maximise publicity of the PSPOs.
- 2.11 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 PSPOs are sought for 3 years.
- 2.12 Currently there are two active PSPOs in the Harrow, a Borough wide PSPO which is in effect until January 2024 (Appendix 2) and a Town Centre PSPO which is in effect until July 2024 (Appendix 3). The proposal is to replace both of these orders with five separate orders to cover the Borough and the specific areas of concern identified.
- 2.13 The current PSPOs have been reviewed in relation to action taken for each offence. In 2022 a total of 6,158 offences were witnessed related to the PSPOs, each of these offences resulted in a fixed penalty notice being served on the offender.

	2022
PSPO-Amplification	26
PSPO-Birds feeding	44
PSPO-Dog fouling - failure to carry a bag	68
Littering-Cigarette	2313
PSPO-Defecating	4
PSPO-Dog Fouling	4
PSPO-Street Drinking	403
PSPO-Driving over footpath	2402
PSPO-Financial Agreement in street	1
Littering-Food	40

PSPO-Leaflets	21
PSPO-Obstruction	6
Littering-Other	91
Littering-Printed Literature	13
PSPO-Smoking in parks	12
PSPO-Spitting	425
Littering	64
LLA-Street Trading	173
PSPO-Street trading	7
PSPO-Tables stand without permission	10
PSPO-Urinating	31
Total:	6158

2.14 Enforcement activity over the last year demonstrates that these anti-social behaviours still exist and that there is a place for enforcement.

2.15 The proposed PSPOs (which can be found in the Appendices 1-5) have been drafted based on information and evidence gathered across several Council Departments and from key partners and has been amended following the outcome of the consultation and on advice from the legal team.

3 What are the activities that the proposed PSPOs seek to address?

3.1 In recent years Harrow has seen a rise in low level crime and antisocial behaviour including but not limited to:

- Groups of mainly men loitering and drinking in public places
- Litter and waste being dropped or left behind on the street
- Delivery waste and food packaging left in any open spaces
- Dog control and fouling related incidents in alleys and streets
- Dogs out of control and causing nuisance in parks and nature reserves
- Wildlife attacks and harassment
- Fly tipping and litter from vehicles
- Nuisance vehicles parked on the verges and repairs in the street
- Issues with delivery drivers riding and parking on pavements
- General anti-social behaviour in parks and open spaces

3.2 As with all enforcement, this is about having the powers to tackle individuals who will not engage with a reasonable request and not simply about targeting generally law-abiding members of the public.

3.3 A PSPO should not be a blanket ban or set of restrictions but should be bespoke to the issues in each area. In light of this the proposed PSPOs look to address anti-social behaviour in five areas:

- issues that are common throughout the Borough

- issues that occur in our housing estates and housing land
- issues that occur in all of our parks and open spaces
- issues that occur in our town and district centres
- issues that occur in specified public places

3.4 Across the whole area of the Borough the following areas have been included as requirements/prohibitions:

- Street drinking having been asked to stop
- Consumption, use, and/or possession of psychoactive substances
- Controlling and clearing up after dogs
- Urinating/defecating and/or spitting in public
- Careless disposal of cigarettes and other material
- Preventing nuisance noise from vehicles
- Depositing damaged and poorly maintained vehicles on the highway
- Smoking in Play Areas
- Illegal advertising or running events
- Fires and fireworks
- Congregating groups engaged in anti-social behaviour

3.5 For housing estates and housing land the following areas have been included as requirements/prohibitions:

- Disperse from an area when asked
- Causing an obstruction which prevents or hinders the free passage of pedestrians or vehicles
- Leaving waste outside the bins
- Leaving food exposed for wildlife and attracting vermin

3.6 For all parks and open space the following areas have been included as requirements/prohibitions:

- Dog Control
- Driving vehicles on park land without prior permission
- Unauthorised activities as set out in the PSPO

3.7 For the town and district centres (Harrow Town Centre, Pinner, Stanmore, Wealdstone, Hatch End, Harrow Weald, Rayners Lane, Belmont, South Harrow, North Harrow, Sudbury Hill, Kenton, Kingsbury, Edgware and Burnt Oak) the following areas have been included as requirements/prohibitions:

- Intimidating and/or aggressive begging
- Obstructing access to business premises during opening hours
- Leaving commercial waste in public spaces for an unreasonable length of time
- Use of amplification equipment for speaking or playing music
- Financial Agreements on the Street
- Placing of tables, stands, or other furniture / fittings
- Distribution of leaflets
- Illegal or Unauthorised Street Trading
- Feeding of Birds and Vermin

- 3.8 For specified public places (Bentley Priory and the Viewpoint) the following areas have been included as requirements/prohibitions:
- Bentley Priory Nature Reserve - Dog control
 - The Viewpoint - Indecent behaviour and causing damage

4. Consultation

- 4.1 The Act and the Home Office's "*Anti-social behaviour powers Statutory guidance for frontline professionals*"⁵ (the "**Statutory Guidance**") sets out the requirements for consultation around a PSPO.
- 4.2 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. This occurred, with consultation being shared with the Borough Commander and local policing team.
- 4.3 The Council must also consult whatever community representatives they think appropriate. In this case, a consultation took place on the Council's consultation platform from 13th July to 12th August 2023, additional time was allowed towards the end of the consultation period for conversations with local and national representative groups to ensure that the broadest opinion possible was achieved. The communications team publicised the consultation locally and some of the proposals considered received national press interest. Public visits were made to Town and District Centres and to parks and public areas to seek immediate feedback from the public.
- 4.4 The Statutory Guidance states that where a local council is considering making a PSPO which will impose restrictions on the use of specific types of land such as registered common land, a registered town or and village green, and open access land, or on public rights of way, it should consider discussing the proposal with relevant interested groups. This proposal does include land which is open to public as right of way, land which is managed as a nature reserve and by committee, in order to consider the views of these representatives meetings were attended to discuss the practicalities of the controls proposed.
- 4.5 Correspondence was also sent to relevant parties to the PSPO including charities or representatives of affected groups. Including;
- *Park user groups
 - *animal welfare charities
 - *Town Centre BID
 - *Local business representatives
 - *Local Angling representatives
 - *Harrow volunteers and charitable groups
 - *Other Neighbouring Authorities & the GLA
 - *Representatives of minority groups

- 4.6 The proposed PSPO was consulted on to ensure residents and businesses are aware of the content and support the need for the proposed restrictions to help address anti-social behaviour.
- 4.7 The purpose of the consultation was to take all these matters to residents and businesses to assess whether they agree that these issues exist are happening in a persistent way across the Borough and are causing nuisance. Only where residents support these assertions have the offences been put forward for adoption in the final version.
- 4.8 Appendix 3 provides a report of the feedback and summary of issues raised in the consultation and the full feedback received for information. There is wide support for all aspects of the proposed PSPOs.

5. Performance Issues

- 5.1 There are no performance implications.

6. Environmental Implications

- 6.1 The PSPO is expected to have a hugely positive impact on the environment, by putting in place a proactive scheme that addresses low level environmental damage including issues such as vehicles idling, dog fouling and additional controls around depositing litter and causing damage.
- 6.2 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.

7. Data Protection Implications

- 7.1 Enforcement of the PSPO is currently delivered by the Tri-Borough contract. The contract covers data protection and ensure that the services are delivered in compliance with data protection legislation.

8 Risk Management Implications

- 8.1 Risks included on corporate or directorate risk register? **No**
- 8.2 Separate risk register in place? **No**
- 8.3 Relevant risks contained in the register are attached/summarised below. **n/a**
- 8.4 The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
If the recommendation is not agreed, low-level anti-social behaviour in the borough will continue at its present level and potentially increase	<ul style="list-style-type: none"> ▪ Agreement to the proposed recommendations in the report will mitigate the risk 	GREEN
<p>Reputational risk Residents and businesses may not agree with all terms.</p>	<ul style="list-style-type: none"> ▪ Following consultation the PSPO has been reviewed and worded to take in to account all feedback and the restrictions included are those supported and the legal grounds are satisfied for adoption. 	GREEN

9 Procurement Implications

9.1 There are no implications.

10 Legal Implications

10.1 The power for a local authority to make a PSPO is set out in Part 4, Chapter 2 of the Act. The Council can make a PSPO if satisfied, on reasonable grounds that the following conditions are met in relation to the activities sought to be regulated:

- That they are or are likely to be carried on in a public place within the Borough;
- That they have had, or are likely to have, a detrimental effect on the quality of life of those in the locality;
- The effect, or likely effect, of the activities, is or is likely to be, persistent or continuing in nature;
- The effect, or is likely effect, of the activities, is or is likely to be, to be such as to make the activities unreasonable; and
- The effect, or likely effect, of the activities justifies the restrictions sought to be imposed by the order.

10.2 A PSPO can prohibit and/or require things to be done in an area, but this must be to prevent or reduce detrimental effect on the quality of life of those in the area. A PSPO can be limited to apply by time/circumstances, etc but it must be clear for people to understand what is required and/or prohibited.

The Act sets out the requirements for the content of a PSPO and publication requirements that must be followed.

- 10.3 Under Section 60 of the Act, a PSPO cannot have effect for longer than 3 years unless extended.
- 10.4 Sections 62 of the Act states that prohibitions in a PSPO on consuming alcohol does not apply to certain premises, such as premises, clubs or other areas authorised or otherwise permitted to supply alcohol, . Section 63 of the Act covers aspects relating to PSPOs prohibiting the consumption of alcohol.
- 10.5 Sections 64 and 65 of the Act deal with orders restricting public rights of way over the highway.
- 10.6 Section 66 of the Act 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.
- 10.7 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.
- 10.1 When considering any proposed PSPOs, the Council must consider any equality issues pursuant to its duty under section 149 of the Equality Act 2010.
- 10.2 Section 72 of the Act also requires the Council, in deciding whether to make, vary, extend or discharge a PSPO, o have particular regard to the rights of freedom of expression and freedom of assembly as set out in articles 10 and 11 of the European Convention for the Protection of Human Rights and Fundamental Freedoms.

11 Financial Implications

- 11.1 The costs so far have been met from within the Licensing & Enforcement service budget.
- 11.2 If approved:
 - Costs of publicity, training and implementation will have to be found within existing budgets.
 - The enforcement will be carried out within the service as well as the use of the Council's third-party enforcement contractor which operates on the basis of no cost to the Council.

12 Equalities implications / Public Sector Equality Duty

- 12.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010.
- 12.2 In summary, the Council must in the exercise of all its functions, “have due regard to” the need to comply with the three arms or aims of the general equality duty. These are to:
- eliminate discrimination, harassment, victimisation and any other conduct prohibited by or under the Equality Act 2010;
 - advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it; and
 - foster good relations between people who share a relevant protected characteristic and people who do not share it.
- 12.3 Having due regard means to consider the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.
- 12.4 An Equality Act Impact Assessment has been carried out which finds that the proposed PSPO is likely to have a positive impact on the general population of Harrow, including those from protected groups such as mobility impaired, victims of hate related ASB (due to gender, sexuality, religious or disability), and it will apply to the whole population and its use will be determined by the behaviour occurring rather than the protected group.
- 12.5 The exception is young people who cannot be issued with a FPN if they are under 18 years of age.
- 12.6 Following the consultation a decision is needed whether to make the proposed PSPOs, Section 72 of the Act requires Cabinet as decision maker for the Council for these PSPOs, to pay particular regard to rights of freedom of expression and freedom of assembly set out in articles 10 (the right to freedom of expression) and 11 (freedom of assembly and association) of the European Convention on Human Rights (the “**ECHR**”) in considering the making any such order.
- 12.7 It would also have to be concluded that the making of the proposed PSPOs is proportionate and would fulfil a legitimate aim of curbing anti-social behaviour in public places for the benefit of the law-abiding majority and hence would not infringe article 11 of the ECHR.

13 Council Priorities

- 13.1 Harrow Council’s priority is to restore pride in Harrow by ensuring it is:
- A place that is clean and safe

- A council that puts residents first
- A place where those in need are supported.

13.2 Well drafted and fully consulted PSPOs will help to tackle anti-social behaviour which is having a detrimental effect on the quality of people's lives. Introduction and enforcement of the PSPOs will help to tackle low level crimes, clean up and reclaim Harrow's streets and public spaces, to enhance them and make them safer for residents, visitors and legitimate business operators.

Section 3 - Statutory Officer Clearance

Statutory Officer: Neil Hooper

Signed on behalf of the Chief Financial Officer

Date: 18/08/2023

Statutory Officer: Baljeet Virdee

Signed on behalf of the Monitoring Officer

Date: 25/08/2023

Chief Officer: Dipti Patel

Signed off by the Corporate Director

Date: 01/09/2023

Head of Procurement: Nimesh Mehta

Date: 16/08/2023

Head of Internal Audit: Signed off by Neale Burns

Date: 17/08/2023

Has the Portfolio Holder(s) been consulted? Yes

Mandatory Checks

Ward Councillors notified: NO, as it impacts on all Wards

EqIA carried out: Yes

EqIA cleared by: Yasmeen Hussain

Section 4 - Contact Details and Background Papers

Contact: David Gilmour, David.Gilmour@Harrow.gov.uk

Background Papers:

Anti-social Behaviour, Crime and Policing Act 2014: Anti-social behaviour powers Statutory guidance for frontline professionals [\[Title\]](#) (publishing.service.gov.uk)

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

NO

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**THE WHOLE AREA OF LONDON BOROUGH OF HARROW
PUBLIC SPACES PROTECTION ORDER 2023**

This Order relates to the whole borough of the London Borough of Harrow, as shown edged black on the attached plan

1. In this Order:

'Anti-Social Behaviour' refers to section 59 (2) (a)-(b) of the Anti-Social Behaviour, Crime and Policing Act 2014 and means: activities carried out, or which are likely to be carried out, in a public space which have a detrimental effect on the quality of life those in the locality. This also means behaviour likely to cause harassment, distress or alarm to one or more other person. This can include, but is not limited to, littering, verbal abuse, obstructing the highway, illegal drug use, urinating or, spitting

'The designated area' refers to any public space to which the public or a part of the public has access (S 74(1) of the Anti-Social Behaviour, Crime and Policing Act 2014). This can be with payment, or with express or implied permission. This can include businesses and communal areas of housing blocks but excludes residential premises.

'Authorised officer' refers to: police officer, police community support officer, or any other person designated to enforce the Order by London Borough of Harrow. You can require any authorised officers to produce authorisation before enforcing the Order.

'Psychoactive substances' refers to section 2(1) and section 2(2) of the Psychoactive Substances Act 2016: "any substance which –

- (a) is capable of producing a psychoactive effect in a person who consumes it, and
- (b) is not an exempted substance"
- Laughing gas (nitrous oxide or balloons), khat, spice, and mephedrone (drone) are non-exhaustive examples of psychoactive substances referred to in this Order.

'Proper control' means a dog being on a lead or muzzled if the dog requires it, or otherwise being at heel / close enough to the person in charge that it can be restrained if necessary or responding immediately to voice commands

'A receptacle' is defined as any object capable of holding faeces for disposal and does not include an item of clothing, handbag, or purse.

'Removal of faeces from land' will include placing the faeces in a receptacle on the land which is provided for the disposal of waste

'Footpaths and Verges' Applies to any footway or footpath, maintainable at the public expense, or any grass verge managed by the Local Authority, and which is adjacent to the carriageway or footway of a highway, including adjoining footpaths within the restricted area. This prohibition will not apply where the reason is for permitted access or for emergency vehicles gaining access to, or attending to, an incident

'Illegal advertising' includes anyone Fly-posting including the unlawful posting of notices, signs or banners to street furniture or a person or body who benefits from the fly posting.

'Illegal or Unauthorised Street Trading' includes persons selling from bags, trolleys, Vehicles or any other mobile means.

'Repairing or storing vehicles' will not include legitimate parking of private vehicles in the street or undertaking minor maintenance and repair of private vehicles at the road side.

2. The London Borough of Harrow, in accordance with Section 59 (7)(a) of the Anti-Social Behaviour, Crime and Policing 2014, identifies the following activities in the designated area, highlighted in section 3 to 12 of this Order, as having had a detrimental impact on the quality of life of those in the locality, or it is likely that they will have such an effect.

3. **The Whole Borough as shown edged black on the attached map in Appendix 1 (the designated area)**

- Street drinking having been asked to stop

- Consumption, use, and/or possession of psychoactive substances
- Controlling and clearing up after dogs
- Urinating/defecating and/or spitting in public
- Careless disposal of smoking material into a bin without first fully and properly extinguishing them.
- Disturbing materials/items left as recycling or donations at charity shops or recycling points
- Highways and Vehicles
- Smoking in Play Areas
- Illegal advertising or running events
- Fires and fireworks
- Congregating groups engaged in anti-social behaviour

Due to the volume of reports of these activities and behaviours, the Council is satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and these activities are unreasonable and justify the restrictions imposed by the notice and that it is in all the circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

The requirements and prohibitions set out below will relate to either the whole borough or parts of the London Borough of Harrow and will be stated as such.

The London Borough of Harrow, being thereby satisfied that the conditions in Section 59 of the Act have been met, hereby makes the following Order:

4. The Whole Borough

As shown edged black on the attached plan in Appendix 1 ('the designated area')

Requirements - In all public spaces within this designated area, you are required to:

4.1 Prohibition on Alcohol consumption

- a. Stop drinking alcohol other than within a licenced premises, or anything which the authorised officer reasonably believes to be alcohol, if asked to do so by an authorised officer.
- b. If you have been asked to stop drinking alcohol by an authorised officer and have not, without reasonable excuse, complied with their request, you must surrender any cans, bottles, or other containers of alcohol or what is reasonably be believed to be alcohol

4.2 Possession of controlled drugs or psychoactive substances

- a. Surrender any psychoactive substances or controlled drugs or associated paraphernalia you possess, or any items reasonably believed to be such by an authorised officer.

4.3 Controlling and clearing up after dogs

- a. Anybody in charge of a dog at any time must remove the dogs' faeces forthwith from land within the "the designated area", unless they have a reasonable excuse for failing to do so. Not being in possession of a suitable receptacle to remove or dispose of the faeces does not constitute a reasonable excuse.
- b. Anybody in charge of a dog at any time must have in their possession, and produce on request by an authorised officer, a receptacle suitable for removing and disposing of dog faeces from land
- c. To put a dog(s) on a lead where an Authorised Officer deems a dog(s) to not be under proper control and likely to cause nuisance, injury or disturbance to any other person, or to a bird or another animal

Prohibitions - In all public spaces within this designated area, you are prohibited from:

4.4 Dog(s) control

- a. Allowing a dog(s) under your control to enter and remain in an area where a London Borough of Harrow notice specifies that dogs are not allowed.
- b. Allowing a dog(s) under your control to remain in an area when asked to remove them from that area by an Authorised Officer.

- c. To be solely in charge of more than 4 dogs at the same time in a public place, whether on leads or not. Unless you have been granted a professional dog walkers permit or special dispensation from London Borough of Harrow Licensing Team.

4.5 Psychoactive substances (legal highs)

- a. Consuming whether by smoking, injecting, inhaling, or any other method any psychoactive substances

4.6 Urinating/defecating and/or spitting in public

- a. Urinating and/or defecating in a public and/or communal space without reasonable excuse.
- b. Depositing saliva, mucus, or any other product from the mouth or nose without attempting to collect or eradicate the saliva or product without reasonable excuse.

4.7 Careless disposal of cigarettes and other material

- a. Disturbing materials/items left as recycling or donations at charity shops or recycling points and spreading or leaving as fly tip or waste.
- b. Disposing of any cigarettes/cigars/roll-ups into a bin without first fully and properly extinguishing them.

4.8 Highways and Vehicles

- a. Causing an unnecessary obstruction or limiting legitimate access to any shared access or path without reasonable excuse.
- b. Repairing or storing vehicles for repair or sale in the street or other location as part of a business or for commercial purposes without the landowner's express permission will be an offence
- c. Depositing any unroadworthy vehicle, these being any vehicles that are untaxed, uninsured, and/or without a valid MOT. Any vehicles declared with a Statutory Off-Road Notification (SORN) cannot be deposited unless there is prior permission.
- d. Being in charge of any vehicle left idling unnecessarily when parked whether attended or otherwise without reasonable cause, unless as part of an official examination or assessment by a mechanic.
- e. Use of or riding any bike or scooter, including e-bikes and e-scooters, in a manner which causes or is likely to cause nuisance, annoyance or alarm on pavements, paths and pedestrian only areas
- f. Causing nuisance by inappropriate use of vehicles racing; performing stunts (including but not limited to performing doughnuts, skidding, handbrake turns, wheel spinning)
- g. Causing or allowing a nuisance from loud amplified music emitted from a motor vehicle when stationary/stopped but not in traffic
- h. Causing or allowing a nuisance from loud amplified music emitted from a portable device in a public place

NB: This excludes loud amplified music being emitted in the town centre area where permission has been granted by Harrow Business Improvement District team or with permission from the London Borough of Harrow

- i. Driving over or parking on any footway, footpath or verge without reasonable excuse unless for the purpose of emergency vehicles gaining access to, or attending to, an incident

4.9 Smoking in Play Areas

- a. Smoking of any tobacco or tobacco related product, smokeless tobacco product including electronic cigarettes, herbal cigarettes or any similar substance, within the boundary of any children's designated play areas.

4.10 Illegal advertising or running events

- a. Whether directly or indirectly placing an advertisement on the highway or roadside without the Authority's or landowner's prior written permission.
- b. Promoting or running a musical/entertainment event for commercial or charitable purposes within the designated area which is not approved by the Safety Advisory Group or licensed by London Borough of Harrow

4.11 Fires and fireworks

- a. Lighting of fires or using barbeques in a public place not designated for such use or as part of an organised event approved through the responsible authority.
- b. Use of fireworks in a public place, in streets or adjacent to a public park or nature reserve without the written consent of the responsible authority

4.12 Congregating groups engaged in anti-social behaviour

- a. Loitering within the restricted area if you are causing, or reasonably perceived to be causing, intimidation, harassment, alarm or distress, or using or dealing drugs when part of a group of 3 or more people.
- b. Remaining in the specified vicinity or returning within 24 hours, when asked to disperse by an authorised officer because you have been congregating in a group of 3 or more people, where one or more person/s have been engaging in anti-social behaviour and at least one member of that group is within the designated area

5. Duration

The Order comes into effect on [date 2023] and will be in effect for a period of three years, [Date 2026].

If there is need to do so, the Council may shorten, extend or vary the order at any time in the three years. If the Council wants to extend or vary the Order, they must consult appropriate community representatives, the police and owners of the affected land on the variation.

6. Appeal

If any 'interested person' (a person living in, working in, or regularly visiting the affected area) wishes to appeal this Order, they must do so on one of two grounds (s 66 of the Anti-Social Behaviour, Crime and Policing Act 2014):

- 1) The Council did not have the legal power to make the Order.
- 2) The Council did not follow all the requirements listed in Chapter 2 of the Anti-Social Behaviour, Crime and Policing Act 2014.

The interested person(s) must appeal the Order with an application to the High Court within six weeks of the Order being made.

7. Information

Further information about the PSPO and matters related within it, can be found at www.harrow.gov.uk/licensing

8. Appendices

- 1 Designated area – Whole Borough

Appendix 1
Designated area – Whole Borough



- Belmont,
- Canons,
- Centenary,
- Edgware,
- Greenhill,
- Harrow on the Hill,
- Harrow Weald,
- Hatch End,

- Headstone,
- Kenton East,
- Kenton West,
- Marlborough,
- North Harrow,
- Pinner,
- Pinner South,
- Rayners Lane,

- Roxbourne,
- Roxeth,
- Stanmore,
- Wealdstone North,
- Wealdstone South,
- West Harrow.

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**THE TOWN AND DISTRICT CENTRES, LONDON BOROUGH OF HARROW
PUBLIC SPACES PROTECTION ORDER 2023**

This Order relates to the Town and District Centres in the London Borough of Harrow, highlighted on the attached plan

1. In this Order:

'Anti-Social Behaviour' refers to section 59 (2) (a)-(b) of the Anti-Social Behaviour, Crime and Policing Act 2014 and means: activities carried out, or which are likely to be carried out, in a public space which have a detrimental effect on the quality of life those in the locality. This also means behaviour likely to cause harassment, distress or alarm to one or more other person. This can include, but is not limited to, littering, verbal abuse, obstructing the highway, illegal drug use, urinating or, spitting

'The designated area' refers to any public space to which the public or a part of the public has access (S 74(1) of the Anti-Social Behaviour, Crime and Policing Act 2014). This can be with payment, or with express or implied permission. This can include businesses and communal areas of housing blocks but excludes residential premises. Prohibitions/requirements may vary for each designated area and will be highlighted accordingly on the attached plans.

'Authorised officer' refers to: police officer, police community support officer, or any other person designated to enforce the Order by London Borough of Harrow. You can require any authorised officers to produce authorisation before enforcing the Order.

'Illegal or Unauthorised Street Trading' includes persons selling from bags, trolleys, vehicles or any other mobile means.

2. The London Borough of Harrow, in accordance with Section 59 (7)(a) of the Anti-Social Behaviour, Crime and Policing 2014, identifies the following activities in the designated areas, highlighted in section 3 to 12 of this Order, as having had a detrimental impact on the quality of life of those in the locality, or it is likely that they will have such an effect

3. Town and District Centres as shown highlighted on the attached plan in Appendix 1 ('the designated area')

- Intimidating and/or aggressive begging
- Obstructing access to business premises during opening hours
- Leaving commercial waste in public spaces for an unreasonable length of time
- Use of amplification
- Financial Agreements on the Street
- Placing of tables, stands, or other furniture / fixings
- Distribution of leaflets
- Illegal or Unauthorised Street Trading
- Feeding of Birds and Vermin

4. Town and District Centres

As shown highlighted on the attached plan in Appendix 1 ('the designated area')

Requirements - In all public spaces within this designated area, you are required to:

4.1 Intimidating and/or aggressive begging

- a. Disperse from the area for 24 hours if asked to do so by an authorised officer because you have been begging in a manner reasonably believed to be intimidating, aggressive or causing distress, or pose a risk to their safety or the safety of others.

4.2 Obstructing access to business premises during opening hours

- a. Disperse from the area if asked to do so by an authorised officer because they reasonably believe that you have been obstructing the entrance of a commercial business without reasonable excuse during the course of its opening hours.

4.3 Leaving commercial waste in public spaces for an unreasonable length of time

- a. Remove from the public space any commercial waste deposited or left there for the purposes of collection when asked by an authorised officer, because they reasonably believe that waste has been left in a public space for an unreasonable length of time or where applicable, outside of the specified timed collection slots.

4.4 Use of amplification

- a. Seek permission in advance from the Business Improvement District (BID) or London Borough of Harrow to use a microphone, loudspeaker, megaphone, loud hailer or any other similar equipment designed to, or which has the effect of amplifying the volume of speech or music.

NB This does not prevent free speech if carried out without the use of any equipment stated above.

4.5 Financial Agreements on the Street

- a. If stopping people for the purpose of getting them to enter into financial agreements for charitable or other purposes, only operate from a set stand and approach people a maximum 2 metres from the stand.

4.6 Placing of tables, stands, or other furniture / fittings

- a. Seek written permission in advance from the Business Improvement District (BID) or London Borough of Harrow to place any table, stand, furniture or other fittings in any part of the public areas within the Town Centre Restricted Areas.

4.7 Distribution of leaflets

- a. Seek permission in advance from the London Borough of Harrow Licensing Team to distribute any free leaflet, pamphlet or written word within the Town Centre Restricted Areas

NB This does not apply to charity, religious or political literature.

4.8 Illegal or Unauthorised Street Trading

- a. Seek permission in advance and obtain any necessary licence from the London Borough of Harrow Licensing team to sell any product or item in outdoor public spaces within the Town Centre Restricted Areas.

Prohibitions - In all public spaces within this designated area, you are prohibited from:

4.9 Feeding of Birds and Vermin

- a. No person shall purposely deposit food or animal feed on the ground or on any structure or building in the public area to attract or feed wildlife, or vermin, within the Town Centre Restricted Areas.

5. Duration

The Order comes into effect on [date 2023] and will be in effect for a period of three years, [Date 2026].

If there is need to do so, the Council may shorten, extend or vary the order at any time in the three years. If the Council wants to extend or vary the Order, they must consult appropriate community representatives, the police and owners of the affected land on the variation.

6. Appeal

If any 'interested person' (a person living in, working in, or regularly visiting the affected area) wishes to appeal this Order, they must do so on one of two grounds (s 66 of the Anti-Social Behaviour, Crime and Policing Act 2014):

- 1) The Council did not have the legal power to make the Order.

2) The Council did not follow all the requirements listed in Chapter 2 of the Anti-Social Behaviour, Crime and Policing Act 2014.

The interested person(s) must appeal the Order with an application to the High Court within six weeks of the Order being made.

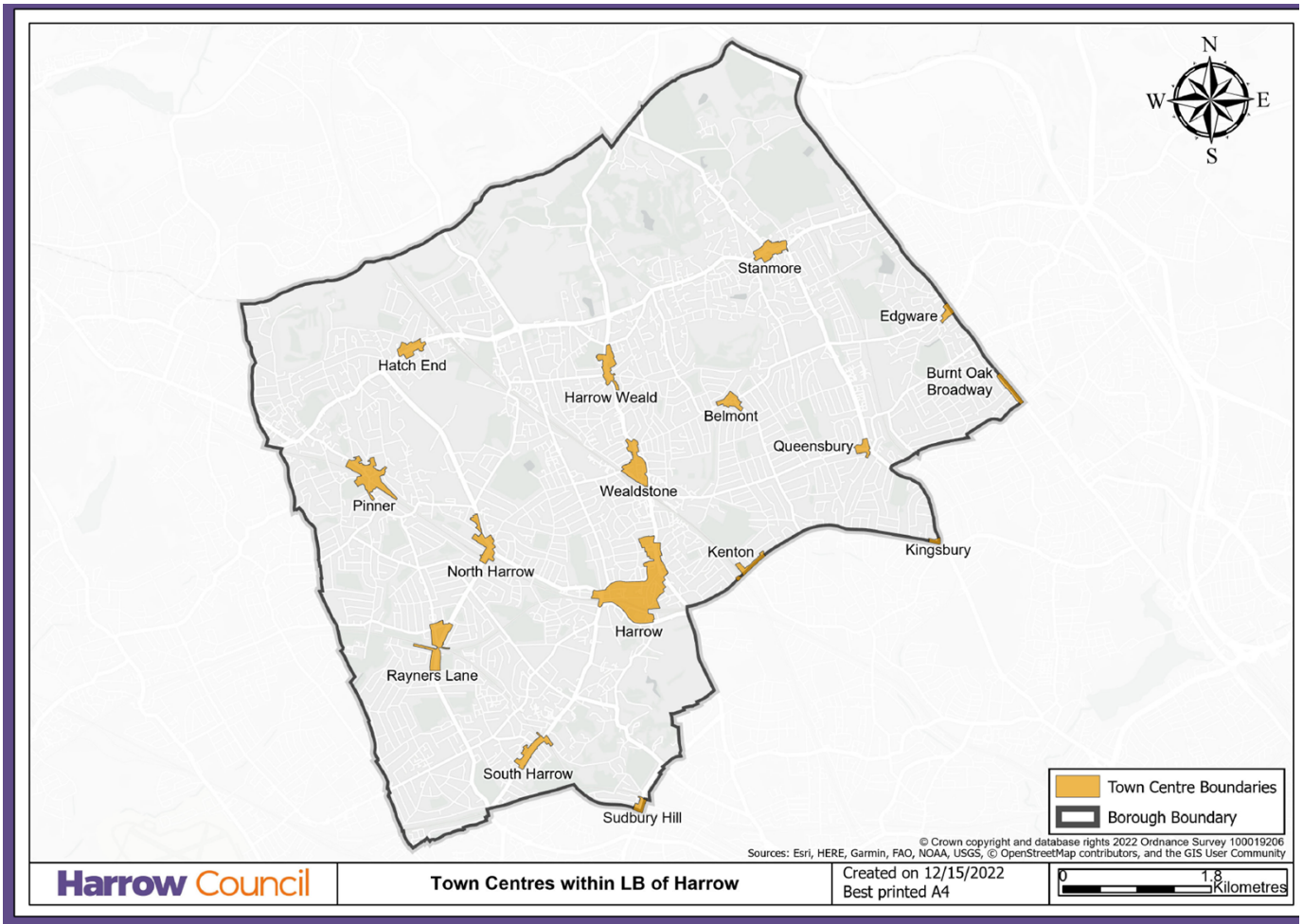
7. Information

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

8. Appendices

1 Designated area - Town and District Centres

Appendix 1 Designated area - Town and District Centres



- Harrow, Pinner, Stanmore, Wealdstone, Hatch End, Harrow Weald, South Harrow, North Harrow, Rayners Lane, Belmont, Sudbury Hill, Kenton, Kingsbury, Edgware and Burnt Oak.

**THE PARKS AND OPEN SPACES, LONDON BOROUGH OF HARROW
PUBLIC SPACES PROTECTION ORDER 2023**

This Order relates to specified parks and open spaces in the London Borough of Harrow

1. In this Order:

'Anti-Social Behaviour' refers to section 59 (2) (a)-(b) of the Anti-Social Behaviour, Crime and Policing Act 2014 and means: activities carried out, or which are likely to be carried out, in a public space which have a detrimental effect on the quality of life those in the locality. This also means behaviour likely to cause harassment, distress or alarm to one or more other person. This can include, but is not limited to, littering, verbal abuse, obstructing the highway, illegal drug use, urinating or, spitting

'The designated area' refers to any public space to which the public or a part of the public has access (S 74(1) of the Anti-Social Behaviour, Crime and Policing Act 2014). This can be with payment, or with express or implied permission. This can include businesses and communal areas of housing blocks but excludes residential premises.

'Authorised officer' refers to: police officer, police community support officer, or any other person designated to enforce the Order by London Borough of Harrow. You can require any authorised officers to produce authorisation before enforcing the Order.

2. The London Borough of Harrow, in accordance with Section 59 (7)(a) of the Anti-Social Behaviour, Crime and Policing 2014, identifies the following activities in the designated areas, highlighted in section 3 to 12 of this Order, as having had a detrimental impact on the quality of life of those in the locality, or it is likely that they will have such an effect

3. Parks as shown highlighted on the attached plan in Appendix 3 ('the designated area')

- Dog Control
- Driving vehicles on park land without prior permission
- Unauthorised activities

Due to the volume of reports of these activities and behaviours, the Council is satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and these activities are unreasonable and justify the restrictions imposed by the notice and that it is in all the circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

The London Borough of Harrow, being thereby satisfied that the conditions in Section 59 of the Act have been met, hereby makes the following Order:

4. Parks (in addition to Whole Borough requirements and prohibitions)

As shown highlighted on the attached plan in Appendix 3 ('the designated area')

Requirements - In all public spaces within this designated area, you are required to:

4.2 Dog control

- a. Put the dog/s on a lead if directed by an authorised officer because they reasonably believe that the dog/s are causing distress to any other person or animal, or damage to any Council structure, equipment, tree, plant or turf

Prohibitions - In all public spaces within this designated area, you are prohibited from:

4.3 Dog Control

- a. As a person who is in charge of a dog(s), permitting the dog(s) to cause damage to any Council structure, equipment, tree, shrub, plant, turf or other Council property

4.4 Driving vehicles on park land without prior permission

- a. Driving or riding any vehicle, motorcycle, moped, caravan or any other motor propelled vehicle in park grounds without prior permission from the Council. This does not include any space in the grounds set aside for use by vehicles, indicated by signs placed in conspicuous positions. This restriction shall not apply to any electrically powered scooter designed for people with restricted mobility, including those who are elderly or disabled.

4.5 Unauthorised activities

- a. Fishing, magnet fishing, removing fish, being in possession of fishing tackle or setting up for fishing in any of the designated area, without express approval from the parks team
- b. Setting up or using a camp site or sleeping area for the purposes overnight fishing outside of any area that may be designated for the purpose
- c. Lighting a fire or barbecue in any of the designated areas, unless prior express written consent has been provided by the Local Authority for a barbecue or fire to be lit and used at a particular time and place
- d. Any feeding of birds (including ducks or waterfowl) or depositing of food or animal feed, except in any area marked for this purpose. This does not apply to the feeding of any animals that you may own or be responsible for.
- e. Interfering with or causing damage to site signage, bins, fences, gates, stiles or other site amenity provisions within any of the designated areas
- f. Using or being in possession of metal detectors and/or digging implements in any of the designated areas shall be guilty of an offence unless they can show express approval from the parks team.
- g. Being responsible for placing and use of CCTV/trail cams, lighting units or other fixed filming devices.
- h. Using the ponds and lakes for open water swimming, boating or wading without prior permission from London Borough of Harrow.
- i. Any unauthorised felling or damage to trees and shrubs
- j. Any foraging for fungi, or fruit, flowers or other plant material in any of the identified nature reserves

5. Duration

The Order comes into effect on [date 2023] and will be in effect for a period of three years, [Date 2026].

If there is need to do so, the Council may shorten, extend or vary the order at any time in the three years. If the Council wants to extend or vary the Order, they must consult appropriate community representatives, the police and owners of the affected land on the variation.

6. Appeal

If any 'interested person' (a person living in, working in, or regularly visiting the affected area) wishes to appeal this Order, they must do so on one of two grounds (s 66 of the Anti-Social Behaviour, Crime and Policing Act 2014):

- 1) The Council did not have the legal power to make the Order.
- 2) The Council did not follow all the requirements listed in Chapter 2 of the Anti-Social Behaviour, Crime and Policing Act 2014.

The interested person(s) must appeal the Order with an application to the High Court within six weeks of the Order being made.

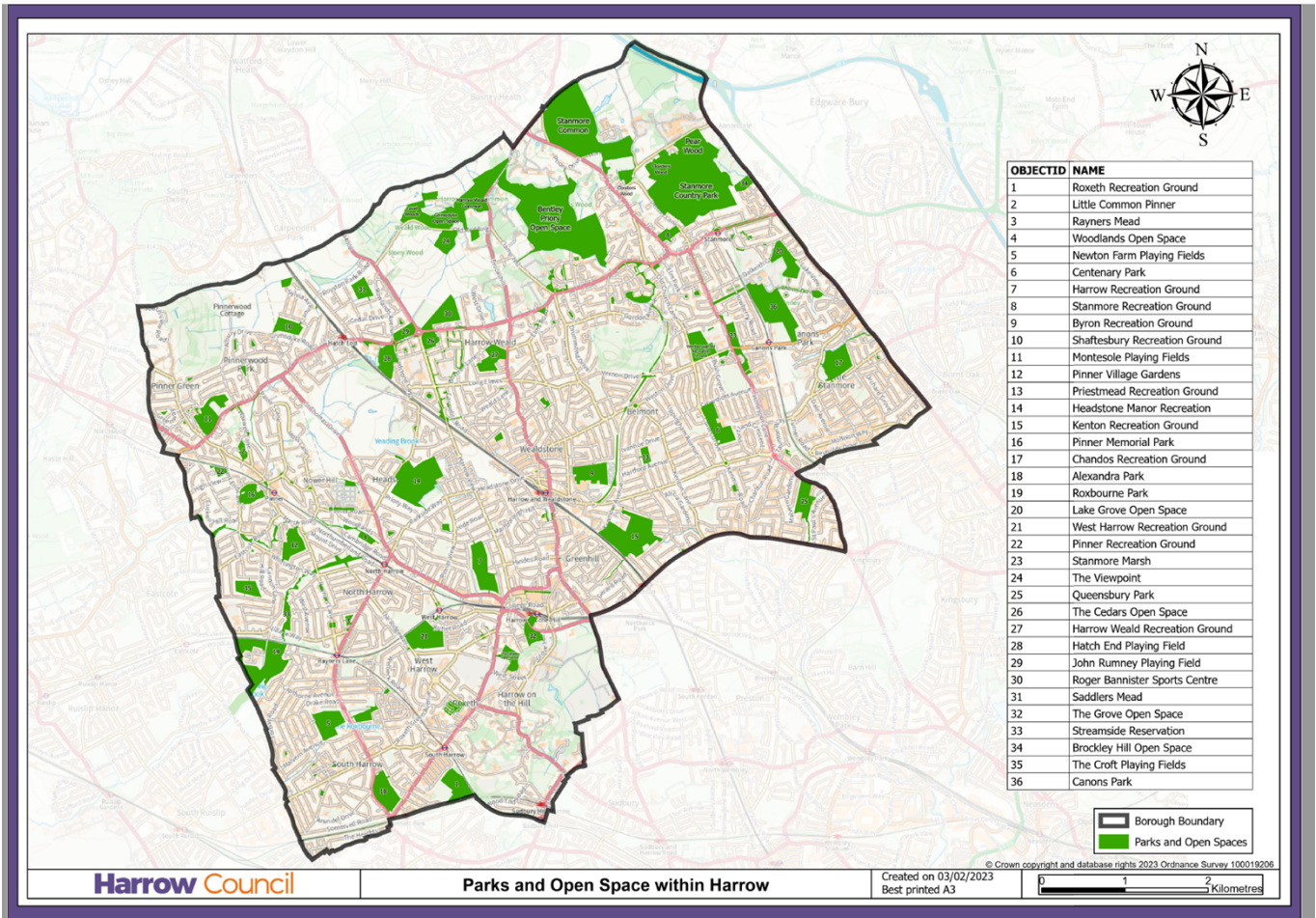
7. Information

Further information about the PSPO and matters related within it, can be found at www.harrow.gov.uk/licensing

8. Appendices

1 Designated area - Parks and open spaces

Appendix 1
 Designated area -Parks and open spaces



**THE HOUSING ESTATES AND HOUSING LAND, LONDON BOROUGH OF HARROW
PUBLIC SPACES PROTECTION ORDER 2023**

This Order relates to Housing Estates and Housing Land in the London Borough of Harrow, as shown highlighted on the attached plan.

1. In this Order:

'Anti-Social Behaviour' refers to section 59 (2) (a)-(b) of the Anti-Social Behaviour, Crime and Policing Act 2014 and means: activities carried out, or which are likely to be carried out, in a public space which have a detrimental effect on the quality of life those in the locality. This also means behaviour likely to cause harassment, distress or alarm to one or more other person. This can include, but is not limited to, littering, verbal abuse, obstructing the highway, illegal drug use, urinating or, spitting

'The designated area' refers to any public space to which the public or a part of the public has access (S 74(1) of the Anti-Social Behaviour, Crime and Policing Act 2014). This can be with payment, or with express or implied permission. This can include businesses and communal areas of housing blocks but excludes residential premises.

'Authorised officer' refers to: police officer, police community support officer, or any other person designated to enforce the Order by London Borough of Harrow. You can require any authorised officers to produce authorisation before enforcing the Order.

2. The London Borough of Harrow, in accordance with Section 59 (7)(a) of the Anti-Social Behaviour, Crime and Policing 2014, identifies the following activities in the designated areas, highlighted in section 3 to 12 of this Order, as having had a detrimental impact on the quality of life of those in the locality, or it is likely that they will have such an effect.

3. Housing Estates and Housing Land as shown highlighted on the attached plan in Appendix 1 ('the designated area'):

- Disperse from an area when asked
- Causing an obstruction which prevents or hinders the free passage of pedestrians or vehicles
- Leaving waste outside the bins
- Leaving food exposed for wildlife and attracting vermin

Due to the volume of reports of these activities and behaviours, the Council is satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and these activities are unreasonable and justify the restrictions imposed by the notice and that it is in all the circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

The London Borough of Harrow, being thereby satisfied that the conditions in Section 59 of the Act have been met, hereby makes the following Order:

4. Housing Estates (in addition to Whole Borough requirements and prohibitions)

As shown highlighted on the attached plan in Appendix 1 ('the designated area')

Requirements - In all public spaces within this designated area, you are required to:

1) Disperse from an area when asked

- a. Disperse from an area when asked by an authorised officer because they reasonably believe that you have been or are obstructing the entrance to or exit from any building or, you have obstructed the free passage of people on or in communal areas without reasonable excuse.

2) Cease causing an obstruction when asked

- a. Cease to cause an obstruction if asked to do so by an authorised officer because they reasonably believe you have been causing an obstruction.

- b. Remove all items/vehicles/structures if asked to do so by an authorised officer because they reasonably believe you have been causing an obstruction by leaving or allowing the leaving of items/vehicles/structures in an area where they prevent or hinder the free passage of pedestrians or vehicles.

Prohibitions - In all public spaces within this designated area, you are prohibited from:

3) Leaving waste outside the bins

- a. leaving and/or depositing any rubbish or waste, including but not limited to household waste, and builders waste outside of any bin or receptacle provided for this purpose.

4) Leaving food exposed for wildlife and attracting vermin

- a Purposely depositing food or animal feed to attract or feed wildlife in an area identified 'no feeding' by signage. This does not apply to the feeding of any animals that you may own or be responsible for

5. Duration

The Order comes into effect on [date 2023] and will be in effect for a period of three years, [Date 2026].

If there is need to do so, the Council may shorten, extend or vary the order at any time in the three years. If the Council wants to extend or vary the Order, they must consult appropriate community representatives, the police and owners of the affected land on the variation.

6. Appeal

If any 'interested person' (a person living in, working in, or regularly visiting the affected area) wishes to appeal this Order, they must do so on one of two grounds (s 66 of the Anti-Social Behaviour, Crime and Policing Act 2014):

- 1) The Council did not have the legal power to make the Order.
- 2) The Council did not follow all the requirements listed in Chapter 2 of the Anti-Social Behaviour, Crime and Policing Act 2014.

The interested person(s) must appeal the Order with an application to the High Court within six weeks of the Order being made.

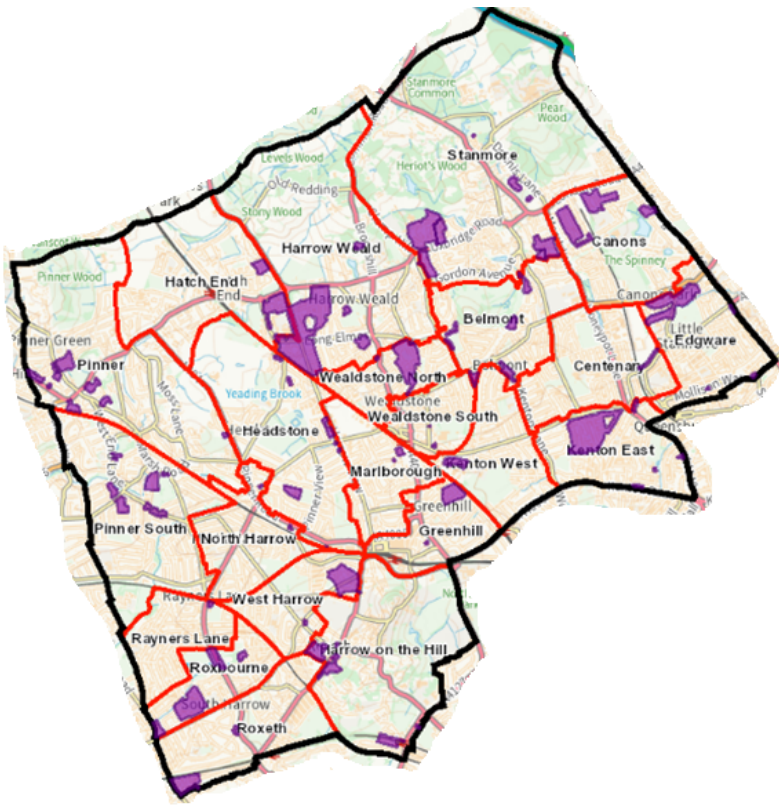
7. Information

Further information about the PSPO and matters related within it, can be found at www.harrow.gov.uk/licensing

8. Appendices

- 1 Designated area - Housing Estates and Housing Land

Designated area - Housing Estates and Housing Land



- Chaucer House Estate
- Arrowhead Parade Estate
- Mercer Place Estate
- Anmer Estate
- Edgware Golf Course Estate
- Oxhey Lane Estate
- Canon Croft Estate
- Anthoneys Estate
- Belmont Lodge Estate
- Belmont Circle Estate
- Byron Road Estate
- Canons Park Estate
- Christchurch Avenue Estate
- Churchill Place Estate
- Chigwellhurst Estate
- Dennis Lane Estate
- Cullington Close Estate
- George V Close Estate
- Elmgrove Estate
- Grove Estate
- Harrow View Estate
- Harrow Weald Park Estate
- Headstone Lane Estate
- High Road Estate
- Honister Place Estate
- Kenmore Park Estate
- Kenton Lane Estate
- Kingsfield Estate
- Little Common Estate
- Marsh Road Estate
- Mountside Estate
- Pinner Hill Estate
- Pinner Road (301) Estate
- Wealdstone House Estate
- West End Lane Estate
- Wolverton Road Estate
- Headstone (GLC) Estate
- Glebe Estate
- Manor House Estate
- Mill Farm Close Estate
- Moat Drive Estate
- Parkfield Estate
- Pinner Green Estate
- College Hill Road Estate
- Towers Estate
- Weald Village Estate
- Wealdstone House Estate
- Whittington Way Estate
- Woodlands Estate
- Woodlands Drive Estate
- Cottesmore Estate

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**THE SPECIFIED PUBLIC PLACES, LONDON BOROUGH OF HARROW
PUBLIC SPACES PROTECTION ORDER 2023**

This Order relates to Specified Public Places of the London Borough of Harrow, as listed and highlighted on the attached plan

1. In this Order:

‘Anti-Social Behaviour’ refers to section 59 (2) (a)-(b) of the Anti-Social Behaviour, Crime and Policing Act 2014 and means: activities carried out, or which are likely to be carried out, in a public space which have a detrimental effect on the quality of life those in the locality. This also means behaviour likely to cause harassment, distress or alarm to one or more other person. This can include, but is not limited to, littering, verbal abuse, obstructing the highway, illegal drug use, urinating or, spitting

‘The designated area’ refers to any public space to which the public or a part of the public has access (S 74(1) of the Anti-Social Behaviour, Crime and Policing Act 2014). This can be with payment, or with express or implied permission. This can include businesses and communal areas of housing blocks but excludes residential premises.

‘Authorised officer’ refers to: police officer, police community support officer, or any other person designated to enforce the Order by London Borough of Harrow. You can require any authorised officers to produce authorisation before enforcing the Order.

2. The London Borough of Harrow, in accordance with Section 59 (7)(a) of the Anti-Social Behaviour, Crime and Policing 2014, identifies the following activities in the designated areas, highlighted in section 3 to 12 of this Order, as having had a detrimental impact on the quality of life of those in the locality, or it is likely that they will have such an effect

3. Bentley Priory Nature Reserve and The Viewpoint as shown highlighted on the attached plan in Appendices (‘the designated areas’)

- Bentley Priory Nature Reserve - Dog control
- The Viewpoint indecent behaviour and causing damage

Due to the volume of reports of these activities and behaviours, the Council is satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and these activities are unreasonable and justify the restrictions imposed by the notice and that it is in all the circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

The requirements and prohibitions set out below will relate to specific locations in the London Borough of Harrow and will be stated as such.

The London Borough of Harrow, being thereby satisfied that the conditions in Section 59 of the Act have been met, hereby makes the following Order:

4. Bentley Priory Nature Reserve and The Viewpoint

As shown outlined in red on the attached plans in Appendices (‘the designated areas’)

Requirements - In the following specified public spaces within this designated area, you are required to:

4.1 Bentley Priory Nature Reserve - Dog control

- a. Keep dog(s) on a lead at all times within the designated area

Prohibitions - In the following specified public places within designated area, you are prohibited from:

4.2 Bentley Priory Nature Reserve – Dogs not allowed in Boot Pond and Summer House Lake

- a. Allowing a dog(s) to enter or remain in Boot Pond or Summerhouse Lake

4.3 Viewpoint and Viewpoint Car Park - Engaging in indecent behaviours and causing damage.

- a. Engaging in any indecent behaviours in the open or within a vehicle in the designated area

- b. Causing damage by forcing vehicle entry/exit or driving over grassed areas in any part of the designated area without permission of the authority.

5. Duration

The Order comes into effect on [date 2023] and will be in effect for a period of three years, [Date 2026].

If there is need to do so, the Council may shorten, extend or vary the order at any time in the three years. If the Council wants to extend or vary the Order, they must consult appropriate community representatives, the police and owners of the affected land on the variation.

6. Appeal

If any 'interested person' (a person living in, working in, or regularly visiting the affected area) wishes to appeal this Order, they must do so on one of two grounds (s 66 of the Anti-Social Behaviour, Crime and Policing Act 2014):

- 1) The Council did not have the legal power to make the Order.
- 2) The Council did not follow all the requirements listed in Chapter 2 of the Anti-Social Behaviour, Crime and Policing Act 2014.

The interested person(s) must appeal the Order with an application to the High Court within six weeks of the Order being made.

7. Information

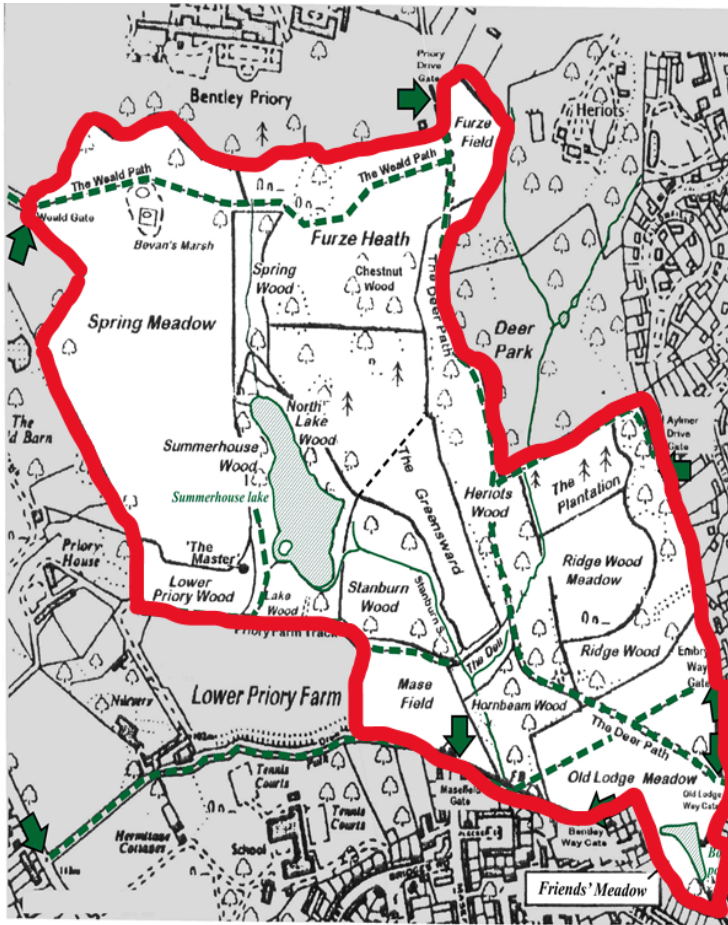
Further information about the PSPO and matters related within it, can be found at www.harrow.gov.uk/licensing

8. Appendices

- 1 Designated area - Bentley Priory Nature Reserve
- 2 Designated Area – The Viewpoint

Appendix 1

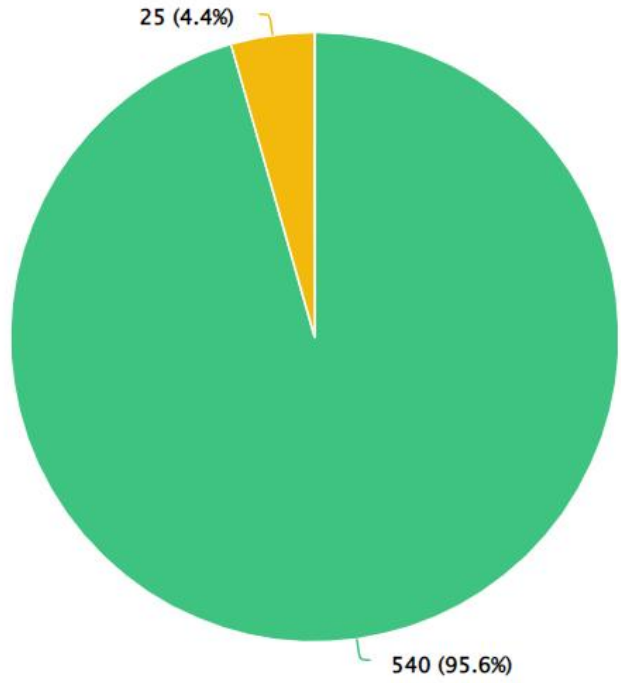
Designated area – Bentley Priory Nature Reserve



Appendix 2
Designated area The Viewpoint



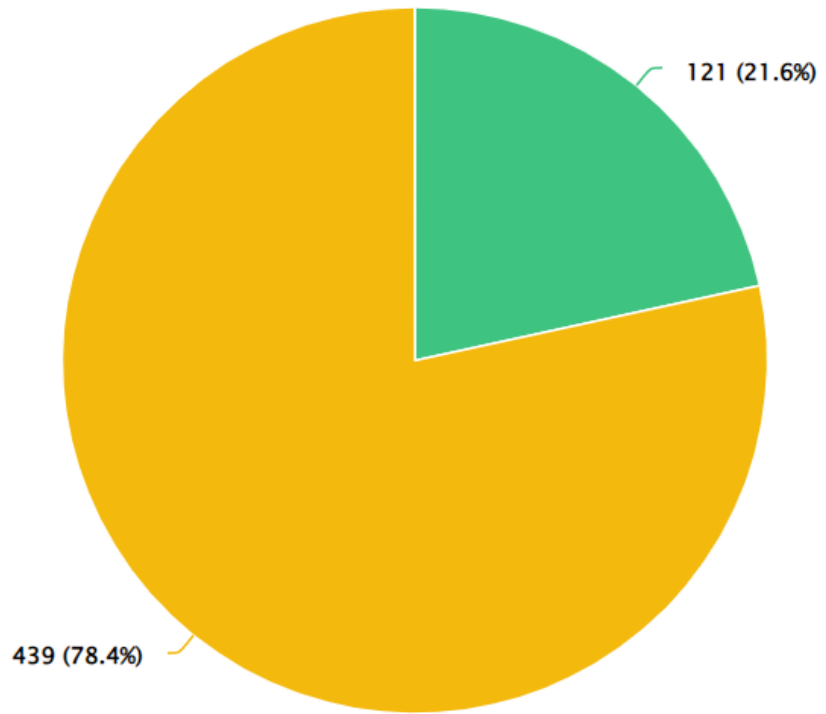
Q1 Do you live in Harrow?



Question options
(Click items to hide)

- No
- Yes

Q8 Do you own a dog?



Question options
(Click items to hide)

● No

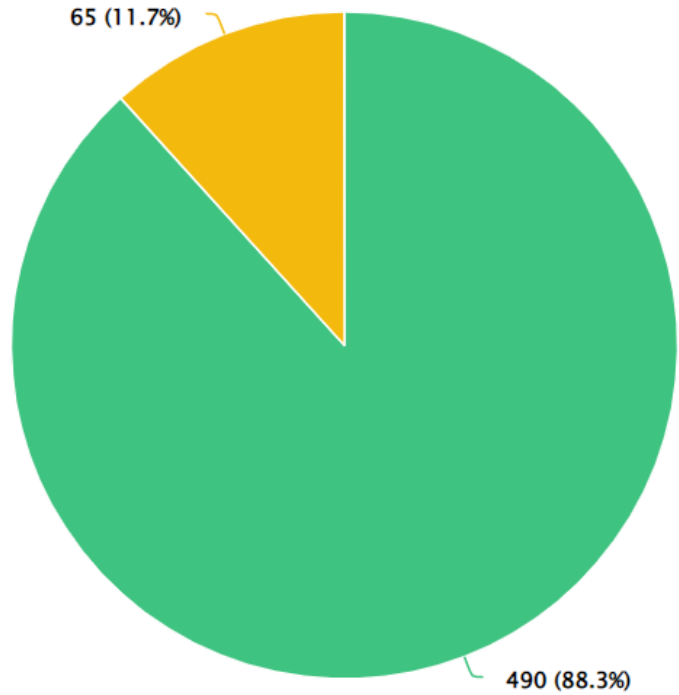
● Yes

Q9 | Your views In recent years Harrow has seen a rise in low level crime and antisocial behaviour. We're interested to know your thoughts on the issues we have identified as being a nuisance from incident reports and other council services.



Q12

The ProposalThe proposal to tackle these behaviours is for an overarching PSPO for Harrow with five distinct localities with individual controls sitting below it. This covers:
The whole borough
Housing estates
Parks and green spaces
Town and urban centres
Bentley Priory Nature Reserve, Pinner Memorial Park and the Viewpoint
When looking at the proposed PSPO do you think it covers the locations you are concerned about?



Question options

(Click items to hide)

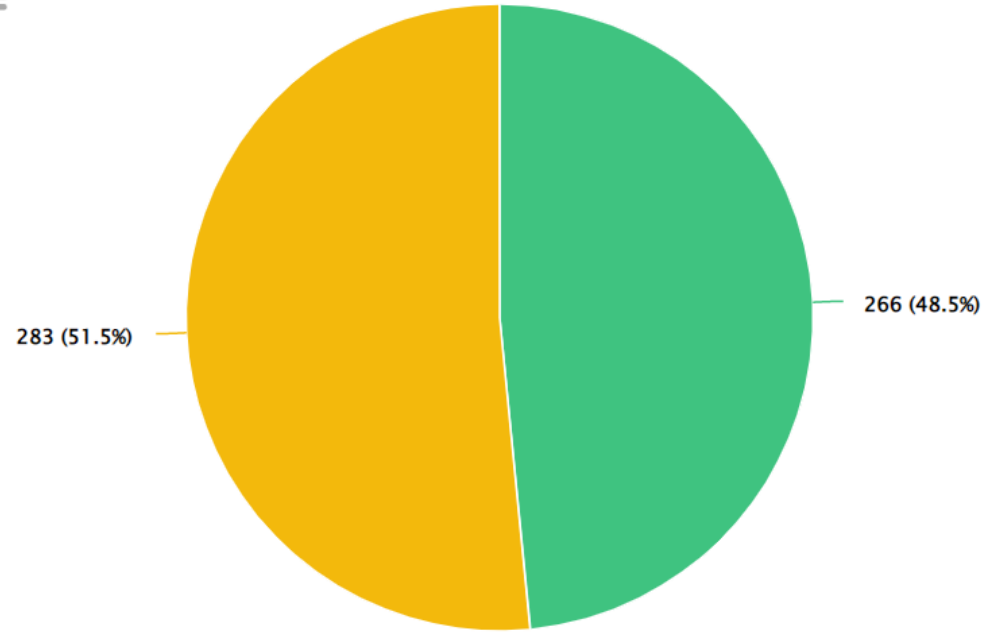
● No

● Yes

Q14 Do you agree or disagree with the proposed prohibitions and requirements for the whole borough in the PSPO? The full detail is in the information document here



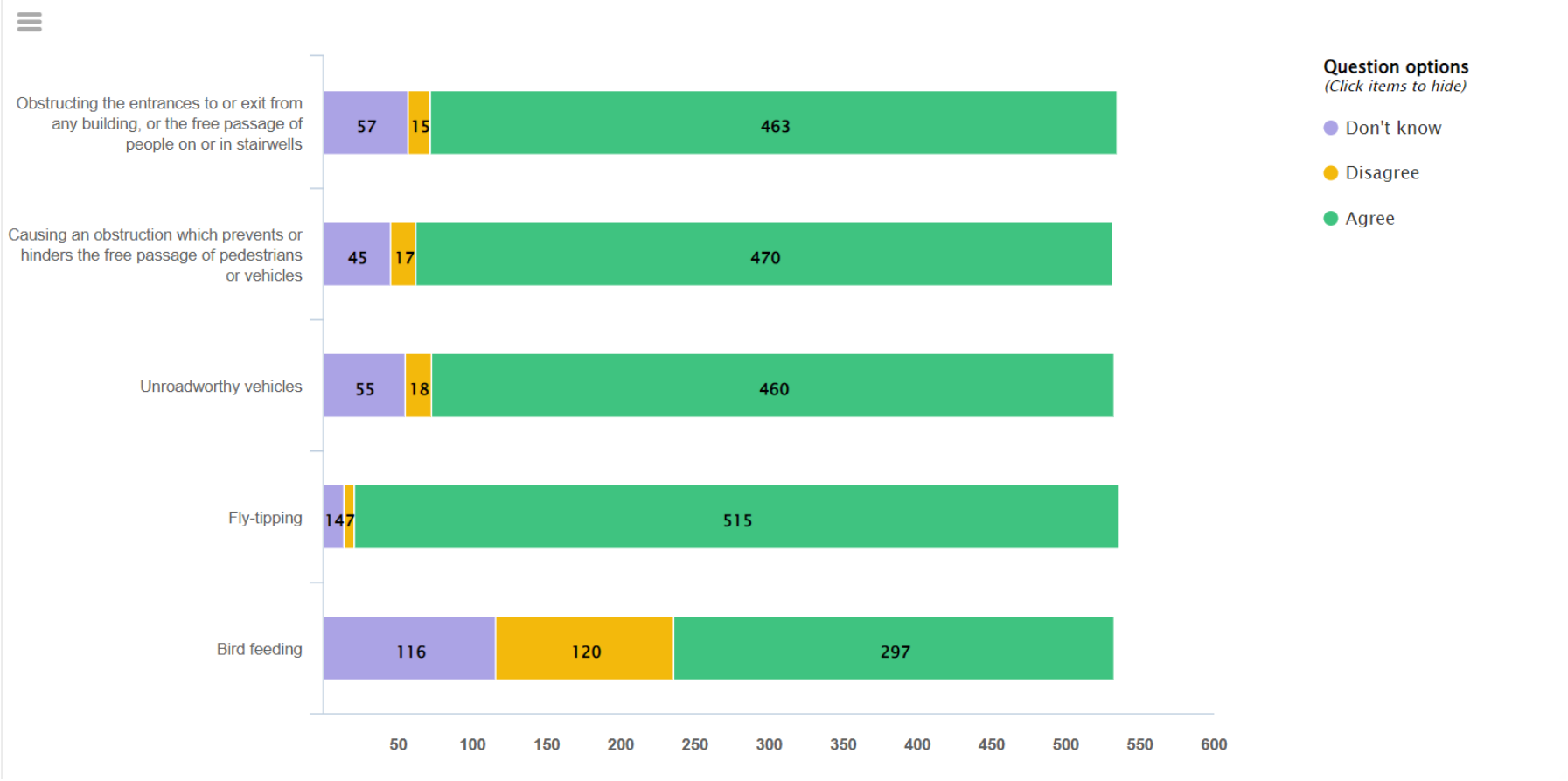
Q15 Should there be any alterations or clarifications to the prohibitions or requirements for the borough wide proposals?



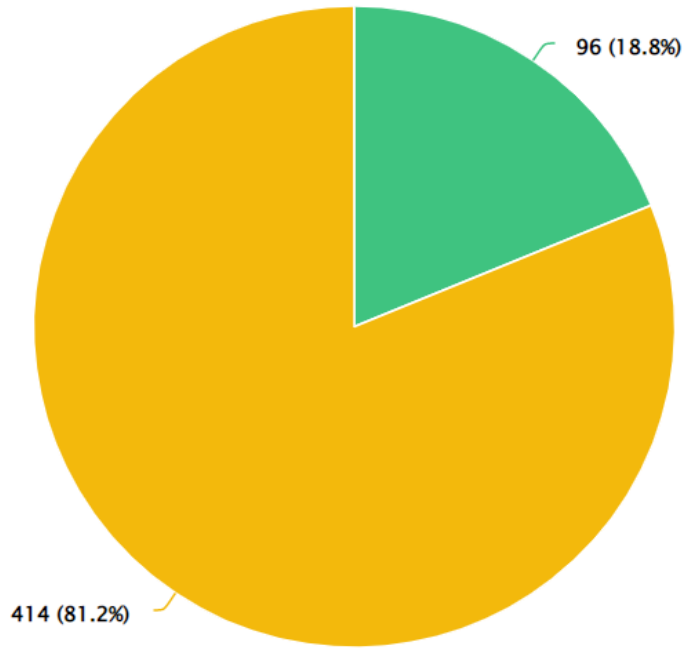
Question options
(Click items to hide)

- No
- Yes

Q17 Do you agree or disagree with the proposed requirements and prohibitions for housing estates in the PSPO? The full detail is in the information document here

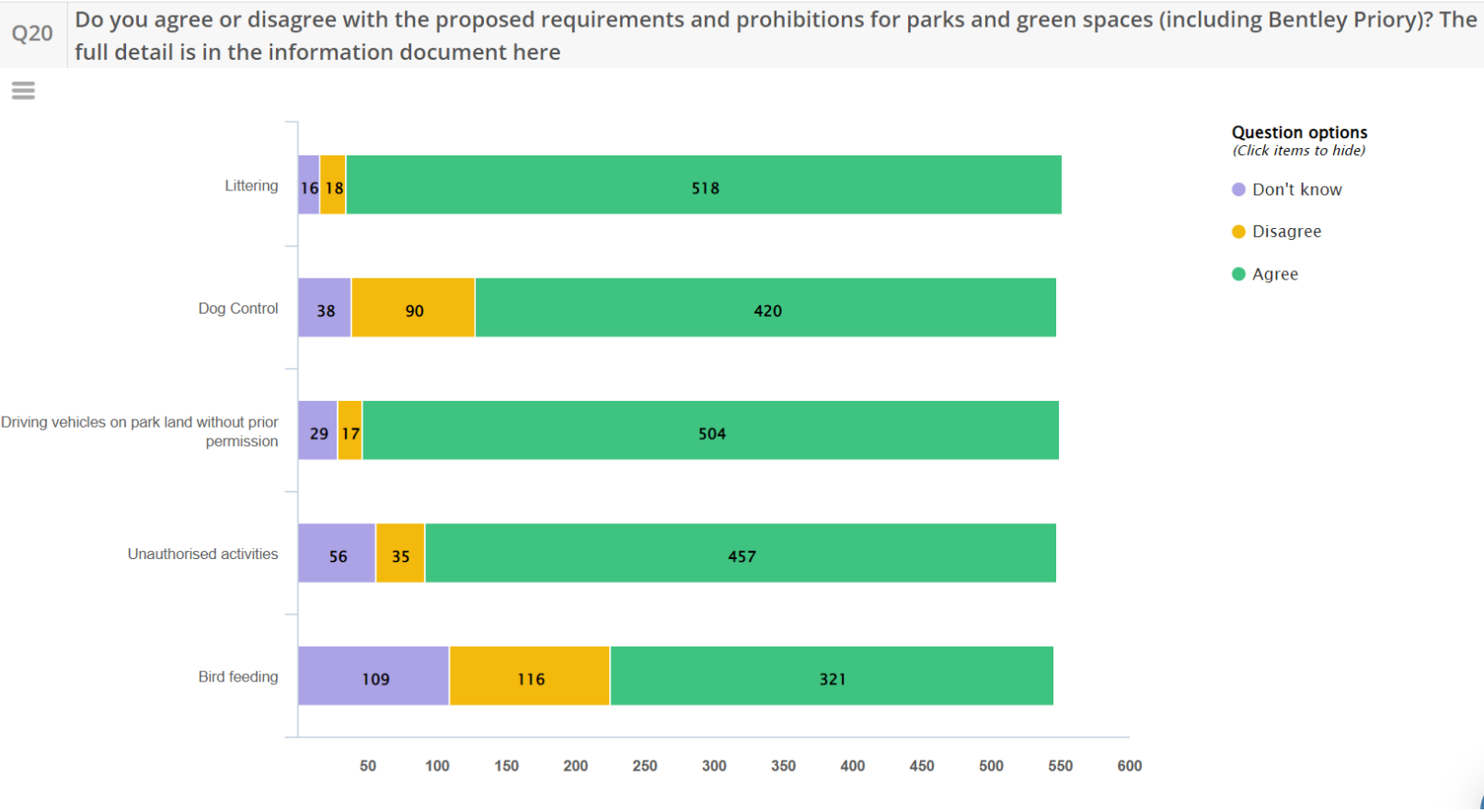


Q18 Should there be any alterations or clarifications to the prohibitions or requirements for the housing estate proposals?



Question options
(Click items to hide)

- No
- Yes

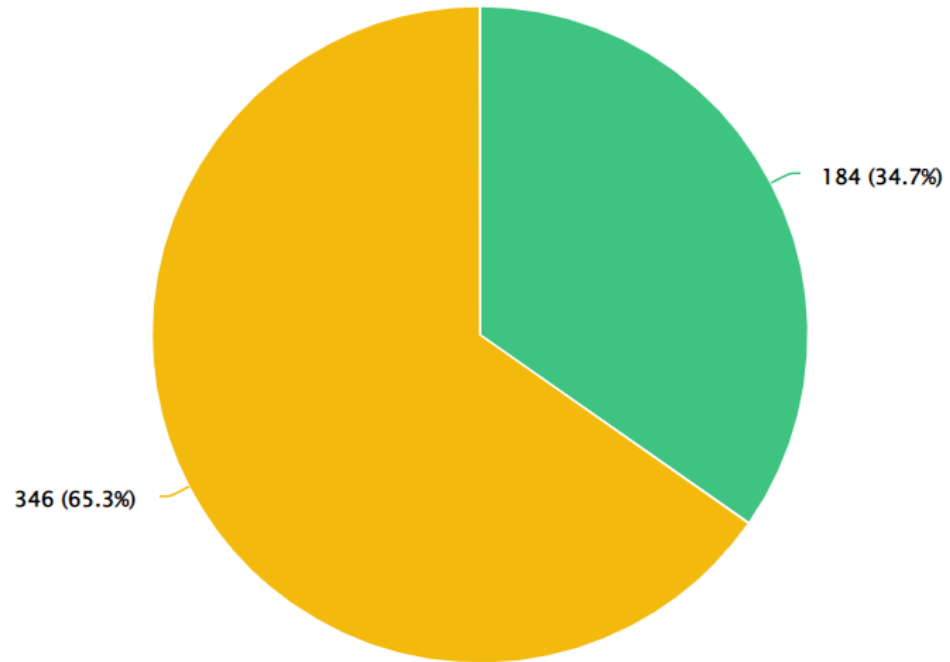


Q21 Should there be any alterations or clarifications to the prohibitions or requirements for parks and green spaces?



Question options
(Click items to hide)

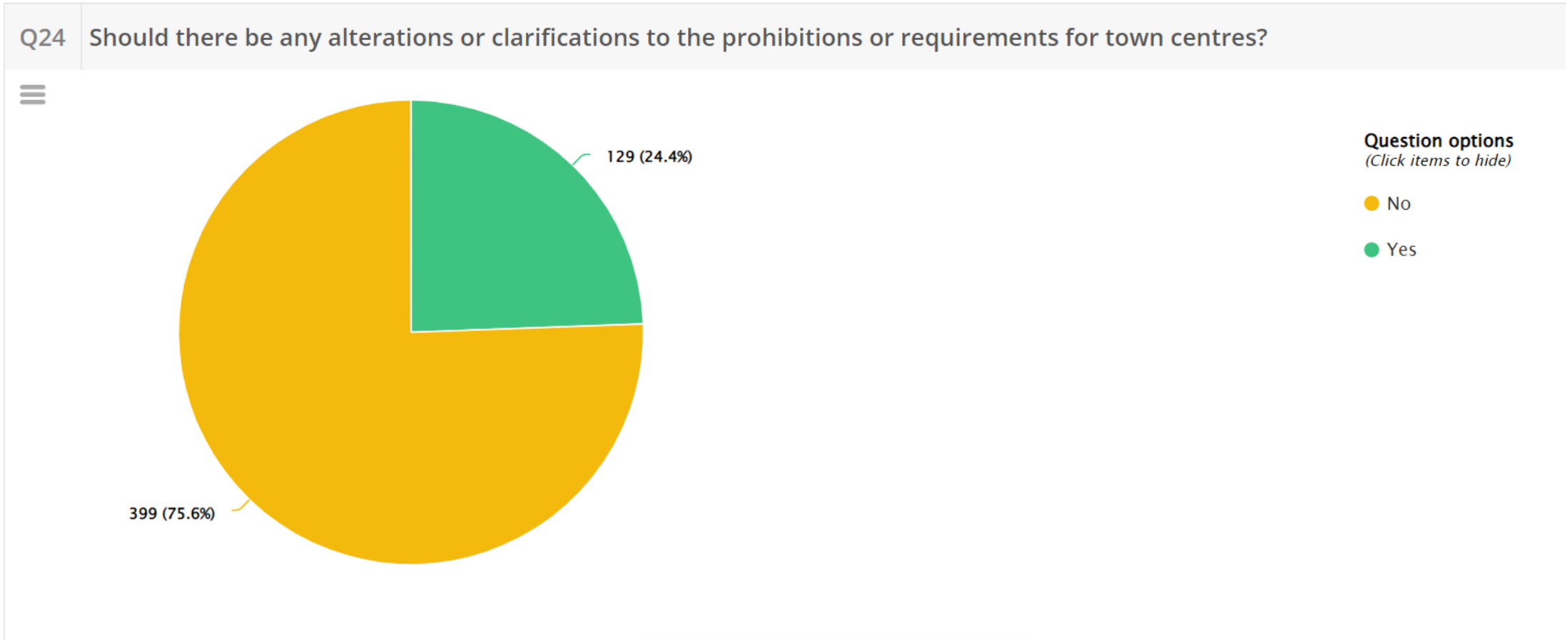
- No
- Yes



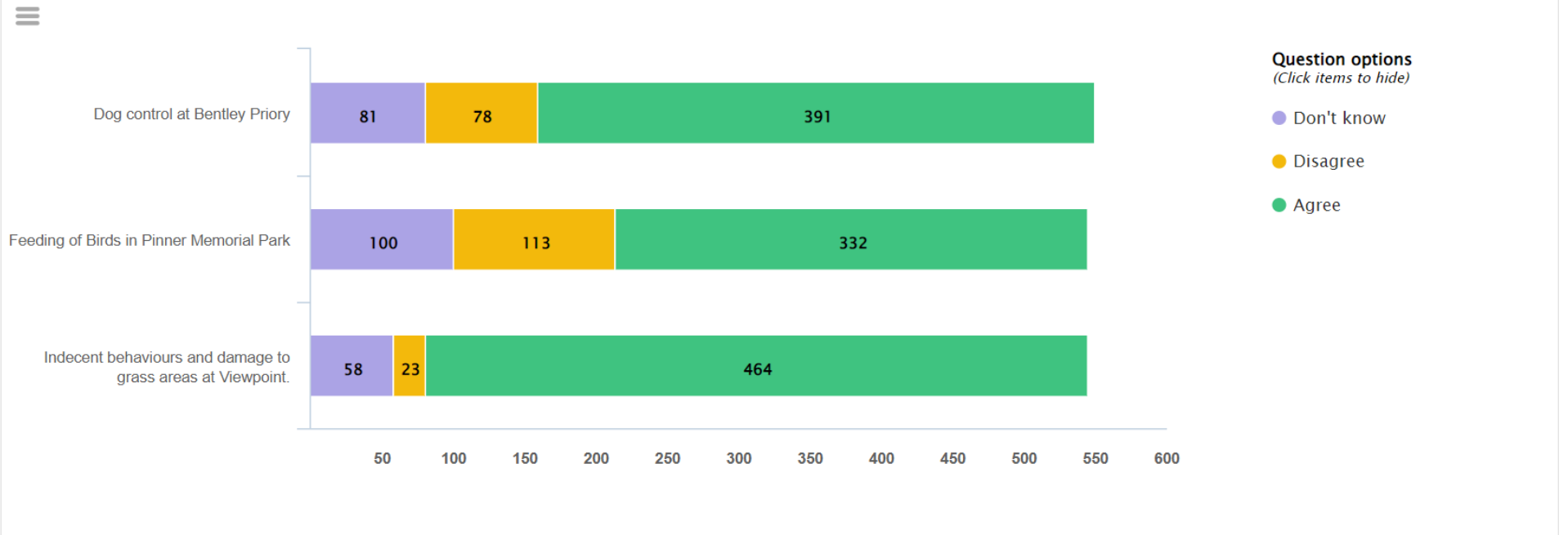
Overview Pulse Responses

Q23 Do you agree or disagree with the proposed requirements and prohibitions for town centres in the PSPO? The full detail is in the information document here.



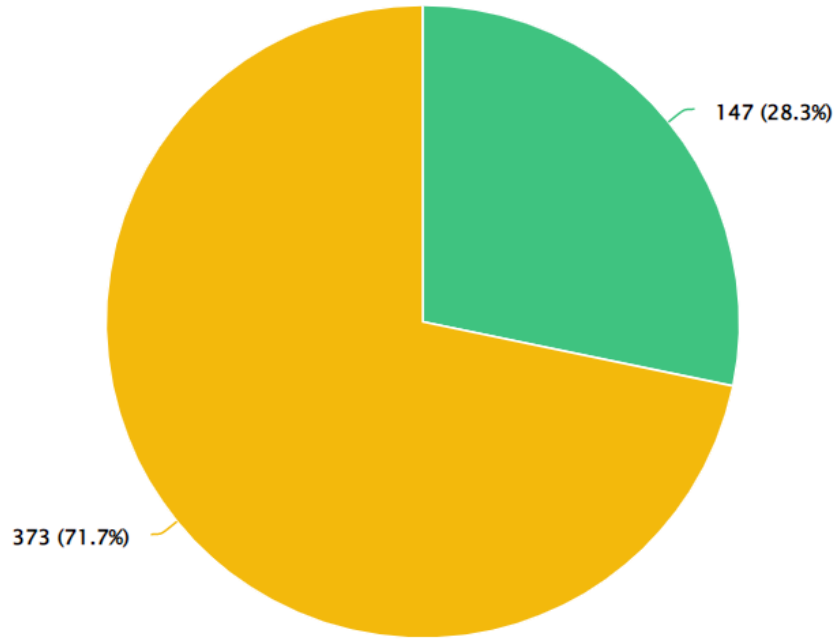


Q26 Do you agree or disagree with the proposed prohibitions and requirements for Bentley Priory, Pinner Memorial Park and the Viewpoint?
The full detail is in the information document here



Q27

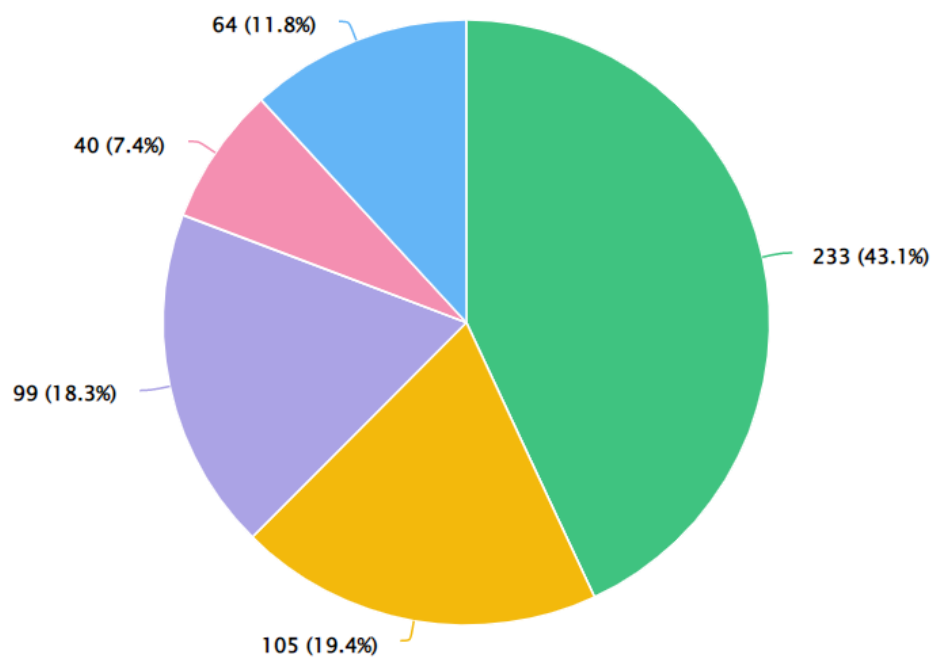
Should there be any alterations or clarifications to the prohibitions or requirements for Bentley Priory, Pinner Memorial Park and the Viewpoint?



Question options
(Click items to hide)

- No
- Yes

Q29 Enforcement What should our approach be to enforcement? Please choose an option where 1 is Zero Tolerance to 5 for Educational and Advisory



- Question options**
(Click items to hide)
- 5 = Educational/Advisory
 - 4
 - 3
 - 2
 - 1 = Zero Tolerance

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Consultation responses from Volunteers and other organisations

Organisation	General comment
RCCT CIC/Romanian HUB	<ul style="list-style-type: none"> • In general it targets certain group/communities, leaving it open to interpretation and is overly controlling and authoritarian
Harrow Association of Somali Voluntary Organisations	<ul style="list-style-type: none"> • Disproportionate level of fines issued to BAME members of the community due to low levels of awareness and a lack of proper signage • Unfair issuance of fines due to unintentional offenses • Growing concern that PSOPs primarily protect certain communities' interests, lacking proper consultation with the wider community • Lack of review and sharing of the impact of previous PSPOs fines on the community • Officers issuing PSPOs fines not being visibly present, making their role more focused on revenue generation rather than a learning opportunity • Failure of PSOPs review to engage the wider community
Harrow Association of Disabled people (HAD)	<ul style="list-style-type: none"> • Want to see proactive action for hate crime and bullying • Enforce A board licences • Proportionate action on dog fouling • Training enforcers in recognising behaviours • Concern about authorising and identifying enforcement officers • Concern about banning scooters for mobility impaired • Unclear on the ASB of People occupying vehicles & distributing leaflets
London Gypsies & Travellers	<ul style="list-style-type: none"> • Raised concern and case law for removal of occupying vehicles and caravans
Horizon Youth and Community Action	<ul style="list-style-type: none"> • Need clarity on 'Illegal running of events', 'Distribution of leaflets' • Concern about minority groups 'Stop and Search' • Asking for names and addresses • Appeals need to be simplified • Education of the public, especially the black and ethnic minorities, • Provide resources to groups to educate our communities
Voluntary Action Harrow Co-operative	<ul style="list-style-type: none"> • Concern about officer training re-discrimination • Concern private enforcement putting profit before fair treatment • Question about the penalties for Kingdom if fine was inappropriate • Concern about time to get permission for leaflet. • Confusion about what areas will be affected. • Also some concern about providing name and address, occupying vehicles, leaflets, stalls and tables, feeding birds, congregating in groups, riding bikes and scooters on pavements
Harrow Open Studios	<ul style="list-style-type: none"> • Illegal advertising or running events- would they be criminalised
Centre for ADHD and Autism Support	<ul style="list-style-type: none"> • concerned around how this will affect the autistic/ADHD community
Cohousing Harrow	<ul style="list-style-type: none"> • Leaflets and posters for events - slow process and training of staff
Metropolitan Police	<ul style="list-style-type: none"> • Already a requirement to give name and address in LLA 2004 • Check wording of street drinking against Brent and Barnet • Caravans- could marginalise travellers • Access to stairwells etc. seek advice if public place • Loitering use railway by-law wording re underpasses – protect W&G
St Georges Shopping Centre	<ul style="list-style-type: none"> • Delivery drivers parking and spitting

Individual EH	<ul style="list-style-type: none"> • Stopping bird feeding and cycling- concerned about rubbish and potholes
Harrow Parks Forum	<ul style="list-style-type: none"> • Update and enforce by-laws • Process needed for rough sleepers
Dog Walker & Sitters	<ul style="list-style-type: none"> • Offer licences with conditions not a ban on more than 4 dogs.