CABINET

Tuesday, 6th March, 2018, 6.30 pm - Civic Centre, High Road, Wood Green, N22 8LE

Members: Councillors Claire Kober (Chair), Jason Arthur, Eugene Ayisi, Ali Demirci, Joe Goldberg, Alan Strickland, Bernice Vanier, Elin Weston, Joseph Ejiofor and Peter Mitchell

Quorum: 4

1. FILMING AT MEETINGS

Please note that this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on.

By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items of Urgent Business will be considered under the agenda item where they appear. New items of Urgent Business will be dealt with under Item 24 below. New items of exempt business will be dealt with at Item 28 below).

4. DECLARATIONS OF INTEREST

A Member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

(i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
(ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A Member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct.

5. NOTICE OF INTENTION TO CONDUCT BUSINESS IN PRIVATE, ANY REPRESENTATIONS RECEIVED AND THE RESPONSE TO ANY SUCH REPRESENTATIONS

On occasions part of the Cabinet meeting will be held in private and will not be open to the public if an item is being considered that is likely to lead to the disclosure of exempt or confidential information. In accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 (the "Regulations"), members of the public can make representations about why that part of the meeting should be open to the public.

This agenda contains exempt items as set out at **Item** *[25]* **: Exclusion of the Press and Public.** No representations with regard to these have been received.

This is the formal 5 clear day notice under the Regulations to confirm that this Cabinet meeting will be partly held in private for the reasons set out in this Agenda.

6. MINUTES (PAGES 1 - 26)

To confirm and sign the minutes of the meeting held on 13 February 2018 as a correct record.

7. MATTERS REFERRED TO CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE

To consider matters referred to Cabinet from Overview and Scrutiny Committee

8. DEPUTATIONS/PETITIONS/QUESTIONS

To consider any requests received in accordance with Standing Orders.

9. HIGH ROAD WEST LEASEHOLDER OFFER (PAGES 27 - 62)

[Report of the interim Strategic Director for Planning, Regeneration and Development. To be introduced by the Cabinet Member for Housing, Planning and Regeneration.] The purpose of this report is to set out the next steps for developing a leaseholder offer for Love Lane leaseholders, following the recent engagement and consultation on the 'Enhanced Love Lane Leaseholder Offer document' (Appendix 1) which set out the Council's proposed offer to Love Lane leaseholders.

10. QUARTERLY BUDGET MONITORING REPORT (PAGES 63 - 86)

[Report of the Interim Chief Finance Officer. To be introduced by the Cabinet Member for Finance and Health.]This report will provide Cabinet with an update on budget performance for the year to date and likely financial outturn position for 2017/18.

11. CORPORATE PLAN DELIVERY NON KEY (PAGES 87 - 144)

[Report of the Chief Executive. To be introduced by the Leader of the Council.] Cabinet will receive an update on Corporate Plan delivery.

12. HOMELESSNESS STRATEGY (PAGES 145 - 218)

[Report of the Director of Housing and Growth. To be introduced by the Cabinet Member for Housing, Regeneration and Planning.] This report sets out the new Homelessness Strategy which has been developed following that consultation and subsequent further work with the Homelessness Forum. This new strategy sits alongside a new Rough Sleeping Strategy.

13. ROUGH SLEEPING STRATEGY (PAGES 219 - 284)

[Report of the Director of Housing and Growth. To be introduced by the Cabinet Member for Housing, Regeneration and Planning.] This report sets out the new Rough Sleeping Strategy, which has been developed that consultation and subsequent further work with the Homelessness Forum, service users and other strategic partners. This new strategy sits alongside the new Homelessness Strategy.

14. HOUSING ALLOCATIONS UPDATE (PAGES 285 - 368)

[Report of the Director of Housing and Growth. To be introduced by the Cabinet Member for Housing, Regeneration and Planning.] Cabinet will be asked to agree minor amendments to the Allocations Policy which are

required to ensure that the Council's policies are fully compliant with the new Homelessness Reduction Act and support the delivery of aims set out in the new Homelessness Strategy.

15. GOOD GROWTH FUND - CONNECTING WOOD GREEN (PAGES 369 - 450)

[Report of the Interim Strategic Director for Planning, Regeneration and Development. To be introduced by the Cabinet Member for Economic Development. Social Inclusion and Sustainability.] The report will be seeking authority to enter into a grant agreement with the GLA, subject to successful grant application.

16. PLANNING OBLIGATIONS SPD (PAGES 451 - 570)

[Report of the Assistant Director for Planning. To be introduced by the Cabinet Member for Housing, Regeneration and Planning.] Cabinet are asked to adopt the Planning Obligations Supplementary Planning Document.

17. HARINGEY TRANSPORT STRATEGY (PAGES 571 - 630)

[Report of the Assistant Director for Planning. To be introduced by the Leader of the Council.] To agree a new transport strategy that clearly sets out the transport objectives and priorities that will provide the context for preparing more detailed plans, policies, and bids for investment and works over the next 10 years. Decision to adopt the Transport Strategy following public consultation.

18. RESPONSE TO THE JOINT TARGETED AREA INSPECTION AND CONSEQUENT REQUIRED ACTIONS (PAGES 631 - 660)

[Report of the Interim Director for Children's Services. To be introduced by the Cabinet Member for Children and Families.]

This report makes a number of recommendations based on the need to address and incorporate recent findings from the Joint Targeted Area Inspection (JTAI) of the multi-agency response to abuse and neglect in Haringey, which took place in December 2017 and the vision referred to in the letter published by the JTAI on 30 January 2018, with the "Future Operating Model for Children's Services" approved in March 2015, and with reference to legislative changes which will replace Local Safeguarding Children's Boards with new local partnership arrangements.

The report also seeks agreement to review commissioning activity which brings together all Council services currently contributing to children's well-being in Haringey, including services provided to or commissioned for their parents' needs so that in time the fully developed operating model increasingly reflects a whole authority collaboration that maximises outcomes for vulnerable children and their families in Haringey.

19. LAC SUFFICIENCY STRATEGY 2018-21 (PAGES 661 - 708)

[Report of the Interim Director for Children's Services. To be introduced by the Cabinet Member for Children and Families.] Refresh of LAC Sufficiency Strategy for 2018-21 setting out how Haringey Council will ensure there is sufficient and appropriate accommodation for children in care.

20. DISPOSAL OF SITE ON BERNARD ROAD (PAGES 709 - 726)

[Report of the Interim Strategic Director for Planning, Regeneration and Development. To be introduced by the Cabinet Member for Corporate Resources.] Disposal of site on Bernard Road in order to bring forward a workspace led development.

21. HARINGEY'S COMMITMENT TO BECOMING AN LGBT+ INCLUSIVE BOROUGH NON KEY (PAGES 727 - 742)

[Report of the Director of Public Health. To be introduced by the Cabinet Member for Housing, Regeneration and Planning.] A strategic commitment to LGBT+ inclusivity with an action plan for delivery.

22. MINUTES OF OTHER BODIES (PAGES 743 - 754)

To note the minutes of the following:

- Cabinet Member signing 2nd February 2018
- Cabinet Member signing 6 February 2018 10am
- Cabinet Member signing 6th February 2018 1.30pm
- Cabinet Member signing 7th of February 2018 10.30am

23. SIGNIFICANT AND DELEGATED ACTIONS (PAGES 755 - 762)

To note delegated and significant actions taken by Directors in February 2018.

24. NEW ITEMS OF URGENT BUSINESS

To consider any items admitted at Item 3 above.

25. EXCLUSION OF THE PRESS AND PUBLIC

Note from the Democratic Services &Scrutiny Manager

Item 26, 27, and 28 allow for the consideration of exempt information in relation to items 9, 20 & 3 respectively.

TO RESOLVE

That the press and public be excluded from the remainder of the meeting as the items below contain exempt information, as defined under paragraph, 3 and 5 , Part 1, schedule 12A of the Local Government Act 1972.

26. HIGH ROAD WEST LEASEHOLDER OFFER (PAGES 763 - 766)

As per item 9

27. DISPOSAL OF SITE ON BERNARD ROAD (PAGES 767 - 772)

As per item 20.

28. NEW ITEMS OF EXEMPT URGENT BUSINESS

To consider any items admitted at Item 2 above.

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Published 26 February 2018

Agenda Item 6

MINUTES OF THE MEETING OF THE CABINET HELD ON TUESDAY, 13TH FEBRUARY, 2018, 6.30pm

PRESENT:

Councillors: Claire Kober (Chair), Jason Arthur, Ali Demirci, Joe Goldberg, Alan Strickland, Bernice Vanier, Elin Weston and Peter Mitchell

Also, present – Councillors Carter, Brabazon, McNamara and Rice.

161. FILMING AT MEETINGS

The Leader referred to agenda item 1, as shown on the agenda in respect of filming at the meeting and Members noted this information.

162. APOLOGIES

There were apologies for absence from Cllr Ejiofor and Cllr Ayisi.

163. URGENT BUSINESS

There were no items of urgent business.

164. DECLARATIONS OF INTEREST

There were no declarations of interest put forward.

165. NOTICE OF INTENTION TO CONDUCT BUSINESS IN PRIVATE, ANY REPRESENTATIONS RECEIVED AND THE RESPONSE TO ANY SUCH REPRESENTATIONS

There were no representations relating to items on the exempt part of the agenda.

166. MINUTES

The minutes of the Cabinet Meeting held on the 16th of January 2018 were agreed as a correct record of the meeting.

167. MATTERS REFERRED TO CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE

There were no matters referred to the Cabinet from the Overview and Scrutiny Committee.

168. DEPUTATIONS/PETITIONS/QUESTIONS

There were no deputations, petitions or public questions put forward to the meeting.

169. MEDIUM TERM FINANCIAL STRATEGY 2018/19-2022/23

The Cabinet Member for Finance and Health introduced the report which finalised the Council's General Fund and HRA 2018/19 Budgets and the Medium Term Financial Strategy (MTFS) for the period 2018/19 to 2022/23, and proposed approval of the constituent elements of the strategy to Full Council on 26th February 2018, together with the Council's capital budgets for 2018/19.

The Cabinet Member outlined that, since Cabinet consideration of the MTFS in December, the Local Government settlement had been received. The financial position had improved slightly but there were still significant challenges for the budget in 2018/19. The report was proposing, that alongside the £15m General Fund reserve allocation, a budget resilience reserve of £7.2 million be added to provide capacity to help manage the risk in the budget.

The Cabinet Member thanked participants for their contributions in the public consultation on budget proposals for 2018/19. There had been a lower response rate than last year but this was due to the 2018/19 proposals building on the budget proposals agreed in 1207/18 budget process.

RESOLVED

1. To consider the outcome of the budget consultation as set out in Appendix 8, to be included in the report to Council. Having considering this, this report does not propose any amendments to the budget proposed for 2018/19 nor to the Medium Term Financial Strategy (MTFS) 2018-2023.
2. To approve the responses made to the Overview and Scrutiny Committee recommendations following their consideration of the draft budget proposals as set out in Appendix 7.
3. To note the mitigations identified to deal with projected service budget overspend in 2017/18 set out in table 6.7.
4. To propose approval to the Council of the 2018/19 Budget and MTFS 2018/23 Savings Proposals as set out in Appendix 9
5. To propose approval to the Council of the 2018/19 General Fund Revenue Budget as set out in Appendix 1, including specifically a General Fund budget requirement of £249.228m, but subject to final decisions of the levying and presenting bodies and the final local government finance settlement.
6. To propose approval to the Council of the General Fund Medium Term Financial Strategy (MTFS) 2018-2023 as set out in Appendix 1.
7. To propose approval to the Council of the creation and maintenance of a Budget Resilience Reserve.

8. To propose approval to the Council, subject to any agreed amendments, of the budget proposals for 2018/19 as set out in this report at Appendix 6, including the 3% precept on Council Tax towards funding Adult Social Care pressures.
9. To propose approval to the Council that the overall council tax to be set by London Borough of Haringey for 2018/19 will be £1,281.57 per Band D property, which represents a freezing of the 2017/18 rate but with an additional 3% for the Adult Social Care precept.
10. To note the council tax base of the London Borough of Haringey, as agreed by the Section 151 Officer under delegated authority (Article 4.01(b), Part 2, of the Constitution), as 77,093 for the year 2018/19.
11. To propose approval to the Council of the 2018/19 Housing Revenue Account budget as set out in Appendix 2.
12. To approve the changes to the rent levels for General Needs Homes for Council tenants reflecting the regulations requiring a 1% rent reduction in 2018/19. This will reduce the average weekly rent from £103.89 to £102.85 as set out in Table 14.1.
13. To approve the changes to service charges for leaseholders set out in Table 14.3.
14. To approve the introduction of new service charges as set out in Table 14.3
15. To propose approval to the Council of the 2018/19 – 2022/23 General Fund capital programme detailed in Appendix 3.
16. To propose approval to the Council of the 2018/19 Housing Revenue Account (HRA) capital programme detailed in Appendix 4.
17. To propose approval to Council of the policy on the use of flexible capital receipts to facilitate the delivery of efficiency savings including capitalisation of redundancy costs (Appendix 11).
18. To note that Fees and Charges in respect of executive functions will be considered under a separate agenda item, and that Fees and Charges in respect of non-executive functions will be considered by the Regulatory Committee in due course but that any impact on the 2018/19 budget proposals is outlined within this report.
19. To propose to the Council, the Dedicated Schools Budget (DSB) allocations for 2018/19 of £255.177m as set out in Appendix 5;
20. To agree the funding to be distributed to primary and secondary schools for 2018/19 based on the figures advised to Schools Forum and submitted to the Education Funding Agency in January 2018 set out in section 15.
21. To agree the central budgets (including the use of brought forward DSG) for the Schools Block, High Needs Block and Early Years Block as per Appendix 5.
22. To delegate to the Director of Children Services, in consultation with the Cabinet Member for Children and Families, the power to amend the Delegated Schools Budget to take account of any changes to Haringey's total schools funding allocation by the Education and Skills Funding Agency.
23. To delegate to the Section 151 officer, in consultation with the Cabinet Member for Health and Finance, the power to make further changes to the 2018/19

budget proposals consequent on the publication of the final local government finance settlement or other subsequent changes up to a maximum limit of £1.0m.

Reasons for Decision

In February 2015, and following extensive consultation, the Council approved its Corporate Plan and Medium Term Financial Strategy (MTFS) covering the three-year period 2015-18. The Council approved the 2017/18 budget in February 2017 and approved a new five year MTFS to 2021/22.

The Council continues to operate under a level of uncertainty in the medium term related to central government financing of local government services. Haringey along with 97% of local authorities accepted the Government's multi-year settlement offer, which will end in 2019-20. However, planned changes on funding baseline revaluation, 100% business rates retention pilot, outcome of Brexit negotiations and the next spending review means that local authorities will continue to operate in an uncertain and changing funding environment in the medium term.

Given the level of uncertainty it is necessary to continue to review the Council's five year MTFS in order to ensure financial plans support and will aid delivery of priorities. Therefore, a refreshed MTFS that runs from 2018/19 to 2022/23 is presented for agreement.

The Strategy considers the estimated revenue funding, from all sources, and estimated expenditure budgets for each of the five years to 2022/23 together with any net funding shortfall and savings proposals that have been developed by officers taking account of the Council priorities.

The report also considers the Council's capital budget, refreshing capital funding and prioritised projects as approved by Council in July 2016 for both the General Fund and the HRA. The report is based on the best available information but is subject to significant uncertainty.

On 12th December 2017, Cabinet considered a revised MTFS, which demonstrated a cumulative funding shortfall of £54.4m over the five years to 2022/23 – the latest position being £30.12m. The decrease in shortfall is due to improved baseline funding announced in the provisional finance settlement in December, the full impact of MRP savings from previous Council decision and the reduction in the estimated cost of levies.

Cabinet also agreed to consult with residents, businesses, partners, staff and other groups as necessary on the draft budget proposals. This report outlines the outcome of that consultation and sets out the Cabinet's responses to this.

The Council's Overview and Scrutiny Committee has already scrutinised budget/savings proposals and this report highlights the recommendations made by the Committee and the Cabinet's responses to it.

On 19th December, the Provisional Local Government Finance settlement was announced which introduced a number of changes to the funding assumptions. These have now been incorporated into the revised MTFS and proposed budget for 2018/19. The final settlement is expected in February 2018.

The level of reserves available in 2018/19 will be dependent on the extent to which the Council utilises its existing reserves to fund its deficit at 2017/18 year-end. This report describes the improved position in 2017/18. As part of the Chief Finance Officer's consideration of the adequacy of reserves and balances, which will be presented to Council on 26th February 2018, the utilisation of reserves and balances will be set out in detail.

The Council will look to maintain reserves and balances to support the financial strategy including the creation and maintenance of a Budget Resilience Reserve to offset any potential non-delivery of planned savings. This establishment of a Budget Resilience Reserve will help ensure that the 2018/19 budget / 2018/23 MTFS is able to withstand unforeseen changes.

Taking all relevant factors into account including, in particular, the outcomes from statutory consultation with business rate payers and residents, the recommendations from the Overview and Scrutiny Committee and any other subsequent changes, this report sets out Cabinet's final budget proposals which, if approved, will be sent for consideration at the Full Council budget setting meeting scheduled for 26th February 2018.

The final budget report to the Council on 26th February will additionally include a number of requirements consequent on the proposals set out in this report and in particular:

- The formal Budget Resolution required in accordance with the Local Government Finance Act (LGFA) 1992 as amended by the Localism Act 2011, which sets the council tax for the forthcoming financial year;

- The Precept of the Greater London Authority (GLA) for 2018/19 in accordance with section 40 of the LGFA 1992 which must be added to the Haringey Council element of the Council tax to give a total Council tax for each category (band) of dwelling in the Council's area;

- The formal assessment of the relevant basic amount of council tax against the principles established by the Secretary of State for the purpose of determining whether any Council tax increase is 'excessive' and therefore is subject to referendum.

- Approval of the Cash Limits for priority areas in 2018/19;

- The Section 151 Officers evaluation of the adequacy of the council's reserves and the robustness of the estimates including the council's reserves policy;

- Approval of the Treasury Management Strategy Statement (TMSS), which has been formulated by the Corporate Committee and subject to the scrutiny review process.

The Council has a statutory requirement to set a balanced budget for 2018/19 and this report forms a key part of the budget setting process by setting out the likely funding and expenditure for that year. Additionally, in order to ensure the Council's finances for the medium term are put on a sound basis, this report also sets out the funding and expenditure assumptions for the following four years in the form of a Medium Term Financial Strategy.

Alternative options considered

Clearly, there are a number of options available to set the budget for 2018/19 and officers have developed the proposals for determining levels of both income and service provision in this report taking account of the Council's priorities and the Council's overall financial position.

The report also describes the assumptions and proposals incorporated into the MTFS update to 2022/23.

170. 2018/19 FEES & CHARGES REPORT

The Cabinet Member for Finance and Health introduced the report, which set out the fees and charges that were proposed to be applied to services for the year 2018/19. This report considered the relevant factors affecting the review of fees and charges identified those services where an increase was being proposed and sought approval to increase the fee or charge rate to those services where an increase is proposed in line with inflation.

The Cabinet Member further advised that there would be a more comprehensive review of fees and charges carried out next year.

In response to Cllr Carter's question on the increase in the concessionary rate charges for pest control, the Cabinet Member outlined that if this was not an inflationary level increase, then increases in rates tended to be put forward further to considering statistical neighbouring borough charges or the London average. The Cabinet Member offered to facilitate the provision of information to Cllr Carter on the rationale and context behind the increase in these charges.

RESOLVED

1. To agree the proposed fees and charges to be levied by the Council with effect from 1 April 2018, unless otherwise stated, and as detailed in Section 8 and related appendices taking into account the findings of equalities assessments as set out in section 8 of the report and available in full at Appendix A;
2. To note the proposed changes in fees and charges arising from previous Cabinet or Cabinet Member decisions as set out in Section 9 and related appendices
3. To note that the Council's MTFS assumes that the changes to Fees & Charges set out in this report are agreed.

Reasons for Decision

It is a requirement to review fees and charges annually. The financial position of the Council supports the view that levels of fees and charges should be maximised taking into account all relevant factors including the effect on service users and any consequent demand for services.

Alternative options considered

This report summarises the conclusions after consideration of a range of alternative approaches dependent on particular services and relevant factors. As such a range of alternative options ranging from no increase to differentiated rates of increases have been considered and reflected in this report.

171. ADMISSION TO SCHOOLS – DETERMINED ADMISSION ARRANGEMENTS FOR 2019/20

The Cabinet Member for Children and Families introduced the report, which sought approval to proposed admission arrangements for the school year 2019/20. These arrangements were in respect of the borough's community and voluntary controlled (VC) schools.

This year the proposed admission arrangements for community and voluntary controlled (VC) schools included a proposal to introduce an additional oversubscription criterion for children of teaching staff to follow after the sibling criterion (such a criterion to be limited to permanent teaching staff who have been employed at the school for at least two years at the time of application, and limited to one place for each form of entry in any year.

This criteria had been added following consultation with parents, teachers and schools as set out at part 6 of the attached report and reflected in the consultation findings at appendix 8. The aim of this additional criteria was to support schools facing increasing challenges in recruiting and retaining teachers.

RESOLVED

1. To consider and take into account the feedback from the consultation undertaken which is set out in summary at paragraphs 6.6-6.23. All the representations are set out in Appendix 8 of this report.

2. To consider and take into account the equalities impact assessment of the proposals on protected groups at appendix 7.

3. To agree the recommendation set out in this report to proceed with a material change to the oversubscription criteria for all Haringey community and VC

schools for the 2019/20 year of entry. This change proposes an additional oversubscription criterion to prioritise children of staff after the sibling criterion.

4. To determine the Council's admission arrangements for the academic year 2019/20 as set out in Appendices 1 – 4.

5. To agree the in-year fair access protocol (IYFAP) as set out in Appendix 5 to come into force from 1 March 2018.

6. To agree that the determined arrangements for all maintained primary and secondary schools in the borough are published on the Council's website by 15 March 2018 with an explanation of the right of any person or body, under the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) Regulations 2012, to object to the Schools Adjudicator in specified circumstances[1].

Reasons for decision

The School Admissions Code 2014 requires all admission authorities to determine admission arrangements every year, even if they have not changed from previous years. Regulation 17 of the School Admissions Regulations 2012 also requires admission authorities to determine admission arrangements by 28 February in the determination year.

In addition, the Regulations require the admission authority (in this case the local authority) to publish on its website by 15 March in the determining year the determined arrangements of all maintained primary and secondary school and academies in the borough, advising the right to object to the Schools Adjudicator, where it is considered that the arrangement do not comply with the mandatory provisions of the School Admissions Code 2014.

The Council consults on its admission arrangements annually irrespective of whether or not there is a proposed change to the arrangements. This is to ensure transparency and openness on the contents of the admission arrangements and to allow all stakeholders to make representations, which can then be considered as part of the determination of the arrangements.

The School Admissions Code 2014 permits all admission authorities to include priority for children of staff in their oversubscription criteria, following the appropriate consultation process. At paragraph 1.39 the Code confirms that oversubscription criteria to children of staff can apply in two circumstances – a) where the member of staff has been employed at the school for two or more years at the time of which the application for admission to the school is made, and/ or b) the member of staff is recruited to fill a vacant post for which there is a demonstrable skill shortage.

The Council consulted on a proposal to introduce an additional oversubscription criterion to prioritise children of staff after the sibling criterion. The proposed change to the criterion seeks to assist schools in recruiting and retaining staff by prioritising the

admission of child(Ren) of staff to the school. Some local academies and a voluntary aided school as well as schools in neighbouring boroughs currently give priority to children of staff and extending this to Haringey community schools may help the schools to compete for the right staff for their school in the current competitive recruitment climate.

Before deciding to publicly consult the Council carried out an informal consultation with all Haringey community and VC schools, earlier this year to explore whether or not there was support from these schools for an additional oversubscription criterion for staff children. The results from the informal consultation indicated that the majority of Haringey community and VC schools support an additional oversubscription criterion, which gives priority to children of staff.

In beginning the public consultation, we were aware of the risk that the change might bring i.e. that it may disadvantage a small number of families by limiting the number of places that can be offered to local residents at Haringey's oversubscribed community and VC schools.

Research from a neighbouring borough (Enfield) who introduced a children of staff criterion in their primary community school's oversubscription criteria in 2013 showed that fewer than one percent (1%) of places have been offered each year under this criterion. In the Cabinet Member signing report (October 2017) that recommended this consultation, we undertook some comparative modelling for Haringey community and VC schools and our analysis shows that we could expect a similar proportion of offers to be made under this criterion. It was concluded that the number of children falling under this criterion is likely to be very small and there is no evidence to suggest that the number will be anything other than single figures across the borough's community schools in the coming years.

An equalities impact assessment (EqIA) is included at Appendix 7 and has identified a disproportionate impact based on gender and ethnicity, likely to favour women and white staff members. However, the overall impact would be low because of the very small proportion of offers likely to be made under this criterion.

Alternative options considered

Consultation on the proposed change to the oversubscription criterion was carried out in response to a small number of representations received last year from schools and teachers through our statutory public consultation on the proposed admission arrangements for community and VC schools for the academic year 2018/19. These representations all focused on introducing an additional oversubscription criterion that gives priority to children of teaching staff employed at the school.

While there are other ways admission arrangements can influence the allocation of school places set out in the Schools Admissions Code 2014 (e.g. designated catchment areas or identified feeder schools) no alternative criterion were being considered at the time of the consultation or when writing this report.

There is a statutory requirement on all admission authorities to determine their admission arrangements each year and for those arrangements to be consulted on if

there is a proposed change or at least once every 7 years if there has been no change in that period.

172. CARE LEAVERS STRATEGY & FUTURE OFFER

The Cabinet Member for Children and Families was pleased to introduce the report, which sought approval of an outline Local Offer for improving support to care leavers in line with requirements of the Children and Social Work Act 2017.

The Council was required to consult with stakeholders in developing the Local Offer to ensure all services that may support care leavers in moving to and sustaining independent living were reflected and that the Local Offer was presented in a way that supports access to information and advice and relevant services for care leavers. Final statutory guidance on the Local Offer was still pending, but the approval of Cabinet to consult was being sought in advance of this to ensure that officers are able to finalise a Local Offer as soon as possible after the Children and Social Work Act comes into force.

RESOLVED

1. To approve for consultation with stakeholders, including children in care and care leavers, a draft Local Offer and Care Leavers Strategy in line with the outline versions in Appendices 1 and 2;

2. To delegate to the Director of Children Services in consultation with the Lead Member for Children Services authority to finalise the draft Local Offer and Care Leavers Strategy for consultation with stakeholders;

3. To agree that a report on the outcome of the consultation be brought back to Cabinet for a final decision on the Local Offer and Care Leavers Strategy.

Reasons for decision

New statutory duties

The *Children & Social Work Act 2017* is the first major change to the existing statutory duties set out in the *Children (Leaving Care) Act 2000*. The focus on care leavers also reflects recent central government policy and is expected to be reflected in the future Ofsted inspection framework for Children's Services. The majority of leaving care duties from the original legislation remain, but in addition, the Act introduces the following:

- **Corporate Parenting Principles** – codifying for the first time the ways in which all-local authority departments, not just Children's Social Care, must have regard for the wellbeing and development of Looked After Children and Care Leavers. These are intended to act as a set of tests for helping the council as a whole to deliver services to looked after children and care leavers in a way that mirrors as far as possible the way a good parent

would support their child. In Haringey, this has already been given consideration through the Corporate Parenting Pledge that was adopted by Haringey's Full Council on 24th July 2017 and further work to reinforce the Pledge across the local authority will be part of the proposed Care Leavers Strategy.

- **Extension of leaving care duty to 25** – amending the previous upper limit for providing support to the age of 25 for all care leavers, where before it had been 21 unless they were in full-time education; this entitles former relevant care leavers to have an allocated Personal Adviser and support to develop and achieve a Pathway Plan until they are 25 if they request it, with the draft guidance indicating that support is likely to taper as they become older. For those whose cases have been closed, the local authority must also contact them annually to remind them of the support available.
- **Requirement to publicise Local Offer** – this requires every local authority to make available to care leavers a clear statement of any support to which they are entitled, as well as discretionary support available locally. It will need to be available in a range of formats and is intended to help them achieve a successful transition to independence. This is similar in nature to the Local Offer requirement for children and young people with Special Educational Needs.

- Also relevant to the experience of Looked After Children (including those looked-after on remand) and Care Leavers in the Children and Social Work Act 2017 are changes to multi-agency arrangements for safeguarding children. These emphasise the joint primary responsibility of the three "safeguarding partners" (the local authority, the clinical commissioning group (CCG), and the police) working with other "relevant agencies" locally to ensure children are safeguarded, including co-commissioning of services and promoting cooperation and integration across the wider system, including early years and education institutions, GP practices, adult services and the voluntary and community sector. These arrangements concern the support for children under the age of 18 and their families, but the impact on local arrangements for working together will need to have regard for looked after children and therefore care leavers beyond the age of 18. This new set of working arrangements is likely to influence and inform the development of a Care Leavers Strategy as outlined in Appendix B.

Consulting on and publishing a Local Offer

As a result of the Children and Social Work Act 2017, the local authority will need to publish a Local Offer for Care Leavers, similar to the existing requirement to produce an SEND Local Offer for children and families. This duty is likely to come into force in April 2018, but draft statutory guidance acknowledged that local authorities would require up to six months to fully implement the requirement.

The legislation requires that: "Before publishing its local offer for care leavers (or any updated version) a local authority must consult relevant persons about which of the services offered by the local authority may assist care leavers in, or in preparing for,

adulthood and independent living". The draft statutory guidance sets out a proposed framework for the Local Offer, which is included in Appendix A, and this will guide the consultation.

Informal engagement with a range of stakeholders, including care leavers, statutory and non-statutory partner agencies and other council departments has already taken place to increase awareness of the needs of care leavers and will inform the formal consultation on a Local Offer.

The consultation will also cover the views and preferences of children in care, care leavers and professionals about the presentation of the local offer and the options available to the service to ensure this is accessible, engaging and user-friendly. Responses of those with care experience will be weighted more highly in analysis and response to the consultation.

Providing a wider strategic response

The Local Offer to be published by autumn 2018 will need to reflect the entitlements and agreed discretionary support that care leavers can access in the borough. However, the Local Offer is not expected to be static and it is recognised that the local authority will need to update it from time to time.

Haringey has taken significant measures to assist Care Leavers, including most recently the introduction of a Council Tax Exemption up to 25. Nonetheless, the recent user engagement we have undertaken and evaluation of our current response to meeting the needs of care leavers has indicated that there are further opportunities to improve the availability of and access to a range of support that extends beyond our statutory duties and often that is provided by stakeholders outside the council. It may not be possible to act upon all of these opportunities in time for the initial publication of the Local Offer and some relate to wider challenges of awareness, identification and practice relating to supporting care leavers. As a result, alongside the Local Offer and informed by the same consultation, there is an intention to set out a Care Leavers Strategy, which represents a borough-wide response to the needs and experiences of care leavers and describe how this needs to develop over time.

Part of the Care Leavers Strategy will be setting out how the awareness of Corporate Parenting and the commitment of council departments beyond Children's Services is being increased in line with the new Corporate Parenting Principles and embedding the Corporate Parenting Pledge adopted by Full Council.

This strategic response will also reflect the development of new models of care for children and families in Haringey, which will have direct and indirect impacts on the design of 'leaving care' services. These will be the subject of other processes for consultation and decision, and the outcomes and strategic priorities set out in the outline Strategy at Appendix B will help to guide the development of these wider changes.

The full Care Leavers Strategy, including a delivery plan for implementing new commitments, will be developed by officers and submitted to Cabinet for approval following the consultation

Alternative options considered

Other options:

Do nothing – in this instance, the 'do nothing' option would result in non-compliance with our statutory duties as a local authority when the Children & Social Work Act 2017 comes into force in April 2018; this would mean that care leavers in the London Borough of Haringey do not receive services and assistance to which they are entitled and which other care leavers would receive from other boroughs and would be a major risk to the local authority at any future Ofsted Single Inspection.

Minimal compliance with statutory duties – it would be possible for the Council to pursue minimal compliance with new duties around provision of Personal Advisers and publication of a Local Offer. This would emphasise actions that are within the control of the local authority and reduce the dependencies with other agencies and stakeholders. However, self-evaluation and service user engagement suggest that there are opportunities and gaps that extend beyond the new duties and would enable us to discharge them more successfully. The role of the wider Council and our partners in preparing young people who have been in care and are leaving care has not yet been maximised and by setting out the Care Leavers Strategy, we expect to be able to manage future demand pressures more effectively.

Delay consultation on a draft Strategy and Local Offer – postponing the decision to consult on the Local Offer and Care Leavers Strategy until full draft versions can be produced is likely to significantly delay the publication date for the Local Offer and would run counter to the statutory guidance that indicates local authorities will need a published offer in place within six months of the Act coming into force on 1st April. It makes sense to combine the consultations for the Local Offer and any wider Care Leaver Strategy to maximise the responses from stakeholders and clearly distinguish existing commitments from future plans or aspirations.

173. APPROVAL OF THE RESPITE CARE POLICY

The Cabinet Member for Adult Social Care and Health introduced the report, which presented the Respite Care Policy, following public consultation for approval. The Policy set out how the Council and the CCG would move towards a consistent and equitable way of supporting people in the provision of respite across health and social care. It provided clarity for all carers, users of all ages and practitioners to ensure that those with eligible needs receive the appropriate respite support.

A response was provided to Cllr Carter in relation to his query on paragraph 11.2 of the policy document.

RESOLVED

1. To consider and take into account the feedback from the consultation undertaken which is set out at 6.6 and in Appendix 3;

2. To consider and take into account the equalities impact assessment of the proposals on protected groups at Appendix 2;

3. To approve the Respite Care Policy, to take effect from 1st April 2018 attached at Appendix 1.

Reasons for decision

The Council and CCG are committed to supporting carers, young carers and the cared for person to access the right respite care in a way that supports carers, contributes to outcomes for the cared for person and aligns with the Corporate Plan. The Council and CCG are also committed to closer integration between health and social care. This policy outlines Haringey Council and Haringey Clinical Commissioning Group's approach to respite care which has the aim of maintaining or improving adults and carers' well-being and, in line with the Care Act 2014, the Children Act 1989 and The National Framework for NHS Continuing Healthcare and NHS- funded Nursing Care 2012.

The Council and CCG recognise the significant contribution that carers – whether family members, young carers or parent carers – make to the care of those with a range of needs who are thereby able to remain living at home for longer, preventing the need for institutionally based care for as long as possible.

The Council's current arrangements for respite care do not rest upon a single clearly stated policy position. Current practice is inconsistent with local variations in different service areas.

The CCG also does not have a single clearly stated policy position.

The aim of a single respite policy is to clearly set out and define what respite care is and isn't, to provide a clear pathway for identifying need and the provision of respite and to set out how charging applies to respite thereby providing clarity and consistency for all carers and cared for across Haringey.

Alternative options considered

Alternative options considered were to continue with separate approaches to respite policies for children, adults, health and social care. This option was not taken forward as this would have been a missed opportunity to encourage joined up working across service boundaries.

The contents of the Policy reflect the wider strategic aims of the Council to give all children the best start in life and empower all adults to live healthy, long and fulfilling lives and also to contribute to the closer integration of health and social care. The option of maintaining the current model for respite was not considered to meet these wider strategic aims due to the lack of consistency across service areas.

174. AWARD OF CONTRACT FOR ADULTS AND CHILDRENS STATUTORY ADVOCACY

The Cabinet Member for Adult Social Care and Culture introduced the report, which sought approval to the award of contracts for the provision of Joint Advocacy Services for the London Boroughs of Barnet, Enfield and Haringey in accordance with Contract Standing Order 9.07.1 (d).

In response to a question from Cllr Carter, there was a high quality threshold for tenderers to progress through to reach this final stage of contract recommendation. Savings were across all three areas and it was important to recognise that this was a demand led service so there was a need to have some capacity. This was in relation to the funded element of the contract but the council would look to use these savings to fund additional advocacy services, in anticipation of future demand and to provide capacity for the service going forward.

Following consideration of the exempt information at item 23.

RESOLVED

1. To approve the award of contracts in respect of the provision of Joint Advocacy Services for the London Boroughs of Barnet, Enfield and Haringey.

2. To enter into contractual agreements jointly with the London Boroughs of Barnet and Enfield, and award contracts to the successful bidders named in Part B of this report.

Reasons for decision

The current contracts for IMHA / IMCA and Care Act and Children expire on 31st March 2018.

A full tender process has been carried out and the recommendation in paragraph 3 is made following the completion of evaluations by a joint team of Council officers from the London Boroughs of Barnet, Enfield and Haringey, as well as officers from Barnet, Enfield and Haringey Mental Health Trust in relation to the provision of IMHA services. Officers from across adults and children's social care were involved because the services being tendered for spanned across adults and children. The recommendation provides best value for the Council.

The lot structure was considered carefully to ensure Lot 1 was for the provision of IMHA services, Lot 2 for the provision of IMCA and Care Act Advocacy services and Lot 3 for Children's Advocacy services. Lot 2 includes two distinct statutory advocacy services for adults (IMCA and Care Act Advocacy) because there is a significant amount of overlap between the statutory requirements for IMCA and Care Act Advocacy. Combining the services together enables service users to be supported by the same advocate/service for IMCA and Care Act Advocacy should they need the input of both. This reduces the need for a person to repeat their story to different advocates and also allows for a more efficient service.

Alternative options considered

Haringey to commission advocacy services independently:
This option was considered but it was deemed more beneficial to jointly commission the services with neighbouring boroughs in order to benefit from economies of scale associated with collaborative procurements.

Do nothing

This is not an option as these are statutory services.

175. LINDEN HOUSE DEVELOPMENT

The Cabinet Member for Adult Social Care and Culture introduced the report, which sought approval for the Linden House site to be converted into a 4-flat adapted supported living unit to enable residents with complex health and care needs to live more independently in the community. This included a number of residents currently living in hospital settings and therefore falling within the Transforming Care cohort.

RESOLVED

1. To agree that Linden House, a Council property, is converted into 4 supported living accommodation flats for adults with a learning disability and/or autism to enable them to live independently in the community. This is subject to the availability of capital funding from NHS England:

2. To enter into a Capital Grant Agreement with NHS England to secure the funding to convert Linden House into a supported living accommodation for people with learning disability and/or autism;

3. That the Deputy Chief Executive following consultation with the Section 151 Officer and the Monitoring Officer, be delegated the authority to finalise and agree the terms of the Capital Grant Agreement with NHS England;

4. That the Council commission and procure a development and construction partner to convert Linden House into the said supported living accommodation;

5. That approximately £65k from the capital programme be committed towards the professional fees costs including the procurement of the construction partner;

6. That a report on the outcome of the procurement process to secure a development and construction partner be brought back to Cabinet for a decision.

7. That on completion of the conversion, the Council enter into lease and management agreement for the property with an externally commissioned provider from the 'Positive Behavioural Support Framework', already approved by Cabinet, to provide specialist accommodation and support provision to adults with a learning disability and/or autism.

Reasons for decision

Linden House was an 8-bedded residential unit, which was closed in July 2017 following a decision by Cabinet taken on 10th November 2015 as part of a Corporate Priority 2 report on a series of proposals pertaining to adult social care and linked to the Medium Term Financial Strategy.

In order to support the discharge of residents with complex needs from hospital, or acute, settings under the Transforming Care programme (outlined in section 6), or indeed to provide supported living provision to other adults with autism and/or a learning disability, the property requires adaptations to support these residents and facilitate the provision of a positive behavioural support service which would effectively meet the needs and achieve good outcomes for the identified residents in the community.

The option recommended here represents the most financially viable means to develop this property to support this client group, principally because the capital funding for the adaptations comes solely from NHSE.

The adapted property will enable the identified residents to be supported in the community and with greater levels of independence, at a lower on-going revenue cost than is currently available within alternative provision in the market. Costs of providing for this client group are high and therefore any provision, which can improve outcomes, strengthen independence, be responsive to individual needs and cost less, is to be pursued.

Alternative options considered

The option not to use Linden Road to support this care group and for the building to remain closed was not considered in any detail as the Council needs to develop appropriate properties to ensure it has suitable accommodation, ideally in borough, for adults with a learning disability and/or autism and behaviours that may challenge. Such an option would either result in the Council being unable to find alternative accommodation for residents currently living in acute settings under the Transforming Care programme, or result in the Council having to commission much more expensive provision, potentially out of borough for these residents.

176. AUTHORITY TO ENTER INTO A FUNDING AGREEMENT TO DELIVER THE STATION SQUARE - BUS STATION PROJECT IN TOTTENHAM HALE

The Cabinet Member for Housing, Regeneration and Planning introduced the report, which sought approval for the Council to enter into a funding agreement for a key infrastructural project, realignment of the Bus Station at Tottenham Hale. This project would unlock key development sites to enable more affordable housing and enable the overall delivery of a new Tottenham Hale District Centre.

The report set out required changes to the location of the Bus Station and associated enabling, which would make the road less complex for better use by cyclists and pedestrians and allow for the development of the new District Centre in line with the Tottenham Area Action Plan. The report further explained how this will work, and the additional spend that would be required.

Cabinet noted that the increased scope of works, and hence costs would be met through pre funding of section 106 and anticipated land receipts, along with an increased grant allocation from the GLA's Housing Zone programme.

In response to questions from Cllr McNamara, Brabazon and Carter, the following information was noted.

- The Cabinet Member outlined that the cost of the scheme had increased largely due to the increase in the scope of works. The benefit of the works would reduce the footprint of the Bus Station, in turn freeing up more land for housing units. When considering plans for the Bus Station with TFL and Council transport engineers, amongst other required improvements, it was found there was a need to allow right-hand turns into the new north entrance to the Bus Station, include provision of new traffic signalling, complete significant upgrades to the junction of Watermead Way, provide new bus laybys relocated from within the bus station itself, along with the widening of Watermead Way itself. Therefore, re-alignment of the bus station had grown into a bigger scheme to accommodate the changes required. It should be noted that the changes to the Bus Station result in overall timesavings to busses using the Stations due to enhanced operational flexibility.

- The Cabinet Member indicated that the capital allocation for this scheme was in the budget papers considered by the Overview and Scrutiny Committee.

- In relation to due diligence undertaken on the scheme, Argent Related, the Council's development partner, went out to the market with a scope of works required to realign the Bus Station and through this process were required to obtain best value. The most competitive value obtained was £7.165m for the scope of works for which funding will be granted. In relation to funding being sought from the Council, this was capped at the above figure and there was a transfer of risk from the Council to Argent Related as the development partner responsible for delivery of this scheme. Argent Related will, therefore, be responsible for any cost overruns and can only draw down funding on evidence of spend being provided.

- The Cabinet were advised that, as this was a funding agreement between the Council and a third party [Argent Related] to deliver open access infrastructure, this was exempt from state aid.

- The Monitoring Officer advised that it was appropriate for Cabinet to give delegated authority to the Strategic Director of Regeneration, Planning and Development after consultation with the Cabinet Member for Housing, Regeneration and Planning, the Chief Financial Officer and the Assistant Director of Corporate Governance, to agree the final amount, the terms and conditions for

providing the grant funding. This delegated decision would be within the parameters set by Cabinet.

- With regards to the funding of the scheme, details were provided at paragraph 6.2 of the attached report. This outlined that, as an option, the Council could leave Argent Related to find the funding independently. However, the drawback would be the impact on viability. This would lead to a disjointed scheme, which was difficult to bring forward, affecting provision of retail and commercial space, and delivery of 950 homes and the Health Centre. The funding and investment partnership arrangements for the overall Tottenham Hale Strategic Development Partnership enabled the Council and Argent Related to move resources around to maximize provision of affordable housing, and community benefits/ facilities. Therefore, by investing in this particular infrastructure scheme meant the Council could secure larger amounts of benefits elsewhere in the district centre (e.g. on Ashley Road).

- The Cabinet Member disputed that the Health Centre was singled out for risk of delivery, should the funding agreement for the station square not go ahead. The report made clear the range of community benefits/facilities potentially impacted by not taking forward this decision and scheme.

  - It was clarified that Argent Related did not own Pocket Homes. Related has interests in both Argent Related and Pocket Homes.

  - In relation to the question on the finance comments and reimbursement of Council capital expenditure, the report made clear that should the developer not be able to conclude the Bus Station works, the Council would have step in rights whereby it would be able to conclude the works thus protecting its investment and allowing for large elements of the District Centre to proceed with another developer.

  - The Cabinet Member disputed the assertion, that there was a sudden extra cost with this scheme. The report clearly set out the narrative of events. The Council had known for some time that there had been issues with the Bus Station and the road works. TFL contractors, which the Council had no direct control over, had completed a lot of the previous work on the Bus Station and they had left issues, which needed resolution in placemaking terms. Since early 2017, the Regeneration team, along with Argent Related, had been working hard to resolve this. This had required a substantial amount of negotiations and joint working with Council engineers, and TFL engineers to establish the required re-alignment works. There had also been a need to consider the impact of the new Ada College. It was important to provide a safe route to the station for Ada's many students and staff. Therefore, there had not been a sense of detailed costs until this detailed investigative work had been completed.

  - In response a question regarding the risks of Argent Related failing for any reason, the funding agreement will allow for step in rights. The Council only pays in arrears and based on evidenced spend. If the developer were to fail

after the delivery of the infrastructure, but before the Council had received its land receipts, the Council would then find itself in ownership of sites where all the enabling work had been done. The Council could then decide to dispose of the sites if it wanted to secure the anticipated land receipts.

- It was important to note that this was one of the sites in Tottenham Hale being taken forward as part of the Council's portfolio approach to sites. The portfolio approach recognises that each site has a job to do in terms of the provision of different uses and different types of housing. The Council has used the portfolio approach to target resources at those sites, which yield the maximum overall community benefits across Tottenham Hale, rather than looking at each site in isolation.

- With regards to changing the emphasis to social homes, the portfolio approach to sites meant that the Council was able to extract significant resources from the Strategic Development Partnership with Argent Related and transfer them to affordable homes with registered provider partners. A housing scheme on Ashley Road was highlighted as an example.

- In relation to the timing of the realignment, the Cabinet Member reiterated that the Council's policies set out a series of changes to Tottenham Hale that explicitly envisage the proposed improvements to the bus station and associated infrastructure. The precise proposals involved substantial joint working with TFL.

- The early work on the Bus Station was compiled following an initial assessment based on land required to realise the vision set out in the Tottenham Area Action Plan. At the time, basic changes to the Bus Station were identified. Then the Council with Argent Related engaged with TFL to undertake substantial additional design work which resulted in a substantially expanded scope of works. This included introduction of new signaling arrangements linked to the junction with Ashley road and a pedestrian crossing at ADA College, and an additional lane to facilitate buses leaving the station to get into the flow of traffic.

- In relation to cost overruns, the key point to keep in mind was that the Council will be providing a set amount of money to Argent Related to complete the works and they in turn will be taking a developer risk in relation to any cost overruns.

- A key part of the work at Tottenham Hale was to create a better environment, for cyclists and pedestrians, and to enhance the quality of the local environment. It was important to recognise that there were two key traffic routes passing through Tottenham Hale. The Tottenham Area Action Plan stresses the importance of the proposed key north / south link, which is a continuation of Ashley Road as part of this approach to create a better environment, especially for pedestrians.

Further to considering exempt information at item 25,

RESOLVED

1. To increase the amount of grant to be given to TH Ferry Island Limited Partnership (Argent Related), its Strategic Development Partner, by a maximum sum of £7.165m (including £2.5m GLA Housing Zone funding), for the purpose of funding the realignment works to be carried out to the Bus Station in Tottenham Hale, subject to the Council's budget setting meeting on the 26th February 2018 and subject to the Council and TH Ferry Island Limited Partnership entering into a funding agreement in respect of the grant.

2. To give delegated authority to the Strategic Director of Regeneration, Planning and Development after consultation with the Cabinet Member for Housing, Regeneration and Planning, the Chief Financial Officer and the Assistant Director of Corporate Governance to agree the final amount, the terms and conditions for providing the grant funding.

Reasons for decision

Bus Station Cost Increases

The District Centre Framework and Streets and Spaces Strategy identified the need for substantial changes to the bus station in order to reshape the District Centre and to release developable land within the Station Square West AAP site allocation. These lands and the works associated with them are a key part of the Council's Strategic Development Partnership with Argent Related. Appendix 1 shows, shaded in yellow and green, the initial proposed scope of works.

These initial works were limited to moving kerbs eastward in order to expand the site area of Station Square West, and opening up the north end of the bus station in order to facilitate entry and exit for buses at both ends, thus releasing land for a mixed-use development to the works.

Throughout 2017 the Council, Argent Related and Transport for London have worked together to refine the designs for a realigned bus station and to have them signed off by the relevant parts of Transport for London, notably London Buses, TfL Surface Transport, London Taxis and others. A further key component of the approvals process is the modelling of the changes on both the bus station and the surrounding road network.

The initial modelling of the 2015 design (with minor modifications) identified substantial challenges in capacity and functionality at the newly created northern exit to the bus station. As a result, mitigations were identified, which have substantially increased the scope of required works. The revised design has resulted in substantial

benefits accruing to bus operations overall, which has been a critical component in the securing the support of key decision makers within TfL.

This enhanced scope of works is shown in the map attached as Appendix 2 and includes:

- Widening of Watermead Way, west of Ashley Road to address congestion issues in the network and allow right-hand turns into the new north entrance to the bus station;
- New traffic signaling;
- Significant upgrades to the junction of Watermead Way, Ashley Road and Station Road in order to improve pedestrian and cycle safety, improve the public realm and address vehicle movements through the town Centre, accommodating future growth at all local development sites;
- Widening further north on Watermead Way and on The Hale accommodating new bus laybys relocated from within the bus station itself;
- The realignment of Station Road, opening this to traffic to allow servicing and enabling the creation of important new pedestrian and cycle links from the station, through the core of the district Centre and beyond to nearby sites.

TfL have now signed off on the design of the realigned bus station, on the condition that the wider scope of works are delivered in parallel.

Argent Related have undertaken substantial work looking at how such works would be delivered. This has also added to the costs, due to need to balance the delivery of highways works on The Hale and Watermead Way with the need to keep the road network and town centre (including the bus station) functioning throughout the works. This detailed delivery work has identified a need for substantial traffic management requirements, which has impacted on cost assumptions.

Housing Infrastructure Fund

To address Bus Station cost increases, the Council put forward an Expression of Interest for CLG's Housing Infrastructure Fund (HIF). However, following discussions with the GLA this was wrapped into a larger, pan-Tottenham bid, which would nonetheless include a sum to support Tottenham Hale infrastructure. The outcome of this bid is currently awaited, but following advice from the GLA, it seems that a determination will not be made by CLG within the originally anticipated timeframe. This risks delaying the whole delivery of the Centre of Tottenham Hale, as the Station Square – Bus Station works are the first piece of enabling works required to unlock the whole central sites at Station Square West and Station Square North (ca. 800-1,000 housing units and associated retail, public realm etc.). These works are programmed to start on site in Spring 2018 and would take a little under a year to implement.

It is also far from certain that Haringey would be successful in securing this funding, as it been heavily oversubscribed and Tottenham Hale is already in receipt of significant GLA funding. Officers will continue working in order to attract as much

external grant funding to Tottenham Hale as possible; however, to secure the delivery of the District Centre in, this paper assumes a scenario where HIF funding is not forthcoming.

Alternative Options considered

Some Highways works (as included in S106 ask) could be stripped out in order to value engineer Bus Station works and reduce the overall funding requirement. However, this would result in disjointed delivery of interventions on the same footprint, and would extend and increase the disruption experienced in Tottenham Hale as its development proceeds. It would also result in higher costs overall.

Funding could be withheld for the Bus Station project, with Argent Related left to find £4.665m independently. However, Argent Related have indicated to the Council that this additional cost would significantly threaten the viability of the SDP sites as a whole. There is a significant risk that the core of the District Centre would therefore not be delivered leaving a very disjointed heart to the District Centre for at least the next decade. This would result in significant retail and commercial space, and in the region of 950 homes not coming forward. The delivery of the Health Centre on the Melbourne Centre would also be put at significant risk, as it is unlikely the Council could identify a replacement developer in the timeframe available.

Argent Related could also be asked to proceed with the delivery of SDP sites without the realignment of the Bus Station. This would result in a substantial loss to the Council as significant receipts flow from the disposal of the bus stand lands thus enabling the delivery of affordable housing and the infrastructure required. The non-delivery of a realigned bus station would be contrary to the Council's established policies in the form of the Tottenham Area Action Plan and the Tottenham Hale District Centre Framework. It would also cause a significant reduction in the number of new homes brought forward.

Benefits of the Proposed Approach

The additional scope has resulted in substantial increased costs; however, they also result in significant benefits for the wider town centre. In particular, the additional crossing at the junction of Station Road (as realigned) and Ashley Road provide a key north-south link from the core of the district centre to Down Lane Park and other adjacent sites, linking to a new east-west connection through the bus station to the Tottenham Hale tube and rail station. A further crossing on the desire line between the new Ada College and the new station will provide a safe route to the station for Ada's many students and staff. The investment will include significant upgrades to road surfaces and pavements. Delivering these works in advance provides significant benefits to the Council's placemaking ambitions for Tottenham Hale.

It has also been recognised that there are logistical benefits to delivering improvements to the Bus Station and its environs ahead of the comprehensive redevelopment of local sites, as this reduces the length of time for which Tottenham Hale will experience significant disruption to its highways and public spaces.

Key Risk – non delivery of SDP sites

It should be noted also that there are significant risks to funding the Station Square – Bus Station project upfront, as both proposed funding solutions (planning obligations and SDP land receipts) depend upon the delivery of SDP sites, which lies partly outside of the Council's control. In the scenario that SDP sites do not proceed for whatever reason but Bus Station works are already carried out, the Council would not be able to recover increased project costs. However, it would be left in control of viable development sites, which it could seek to develop through alternative means in order to recoup all or part of these costs.

177. HOMES FOR HARINGEY - AWARD OF CONTRACT FOR MULTIDISCIPLINARY CONSTRUCTION -RELATED CONSULTANTS

The Cabinet Member for Housing, Regeneration and Planning introduced the report, which set out proposals to appoint a long-term delivery partner to provide these services and work with Homes for Haringey to deliver the capital programme.

Further to considering exempt information at item 24.

RESOLVED

That pursuant to Contract Standing Order 9.07.1(d) to approve the appointment of Ridge and Partners LLP for Multi-Disciplinary Professional Services to Homes for Haringey for a period of up to 5 years, with the option to extend, subject to satisfactory performance, for a further five years.

Reasons for decision

Homes for Haringey require specialist services to deliver capital works programmes. The existing consultancy arrangements for housing capital works finishes at the end of March 2018 and therefore a new arrangement is required.

The award is based on the Most Economically Advantageous Tender (MEAT) i.e. mixture of price and quality and that the bidder scored the highest points.

Alternative options considered

An alternative option would be for Homes for Haringey (HfH) to use various industry frameworks to deliver the capital programme. This option was discounted, as Homes for Haringey require support to deliver external works. These contracts often extend over one year, which means the contract is classed as a long term qualifying agreement. To be compliant with Section 20 legislation, long term qualifying agreements must be consulted with leaseholders before they are established. As external frameworks are already established, it is impossible to consult leaseholders in a manner which complies with Section 20 legislation and a lack of compliance with this legislation could lead to a failure to recover costs from leaseholders.

A do nothing option would mean the service is not able to deliver capital works to the housing stock and the condition of the stock would deteriorate significantly.

178. STEM COMMISSION UPDATE - NON KEY

The Cabinet Member for Children and Families introduced the report which provided an update on progress following the launch of the Haringey STEM Commission report in July 2016.

RESOLVED

To note the progress made against the Haringey STEM Commission recommendations.

179. MINUTES OF OTHER BODIES

RESOLVED

To note the minutes of the following:

Cabinet Member Signing 9th January 2018
Cabinet Member Signing 18th January 2018
Leader's Signing 19th January 2018

180. SIGNIFICANT AND DELEGATED ACTIONS

RESOLVED

To note delegated decisions and significant actions taken by Directors in January.

181. NEW ITEMS OF URGENT BUSINESS

There were no items of urgent business for consideration.

182. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as agenda items 23, 24 and 25 contained exempt information as defined under paragraph 3, part 1 schedule 12A of the local government Act 1972.

183. AWARD OF CONTRACT FOR ADULTS AND CHILDREN'S STATUTORY ADVOCACY

As per minute 174.

184. AUTHORITY TO ENTER INTO A FUNDING AGREEMENT TO DELIVER THE STATION SQUARE - BUS STATION PROJECT IN TOTTENHAM HALE

As per minute 176.

185. HOMES FOR HARINGEY - AWARD OF CONTRACT FOR MULTIDISCIPLINARY CONSTRUCTION -RELATED CONSULTANTS

As per minute 177.

186. NEW ITEMS OF EXEMPT URGENT BUSINESS

None

CHAIR: Councillor Claire Kober

Signed by Chair ……..

Date ……

Report for: CABINET

Title: High Road West – Approval of the next steps for the Love Lane Leaseholder Offer and for delegated authority to agree all valuation and compensation packages for the land interests due to be acquired

Report authorised by: Helen Fisher, Strategic Director for Regeneration, Planning & Development.

Lead Officer: Ed Richards, Acting Head of Area Regeneration, edward.richards@haringey.gov.uk 020 8489 2760

Ward(s) affected: Northumberland Park

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1 The purpose of this report is to set out the next steps for developing a leaseholder offer for Love Lane leaseholders, following the recent engagement and consultation on the 'Enhanced Love Lane Leaseholder Offer document' (Appendix 1) which set out the Council's proposed offer to Love Lane leaseholders.

1.2 This report also seeks a delegation to the Strategic Director of Regeneration, Planning and Development and the s151 Officer to agree all third party acquisitions (including all acquisition prices, costs, compensation packages and fees) within the High Road West Regeneration area (other than any compulsory acquisitions). The costs associated with these acquisitions will be fully indemnified by the Council's development partner for the High Road West Scheme ("Scheme"), Lendlease, through the Compulsory Purchase Order Indemnity Agreement signed on the 20th December 2017.

1.3 The recommendations within this report follow the previous Cabinet decisions in relation to the Scheme, in December 2014 and December 2015, which agreed the High Road West masterplan, the tenant and leaseholder guides, the commencement of the rehousing process for Love Lane residents, the demolition of the Love Lane estate and noted the business case for the preferred delivery structure for the Scheme. They also follow the decisions at Cabinet on 12th September 2017 and subsequently on the 9th October 2017 to appoint Lendlease as the preferred partner for the delivery of the Scheme. The recommendations within this report will support the Scheme, which will deliver:

- Over 2,500 high-quality, sustainable homes.
- At least 750 affordable homes (a net increase of 539), which will meet the Council's housing strategy on affordability, ensuring that the homes will be affordable for local people.

- 191 high quality, safe, Council owned replacement homes for Council tenants and resident leaseholders on the Love Lane Estate, which meet resident aspirations as set out in the Resident Charter and will be built to new fire and safety standards.
- Over £10m of funding for social and economic support for both businesses and residents, including a contribution of c.£8m for supporting the Tottenham People Priority overall commitments.
- A cutting edge new Library and Learning Centre and a refurbished Grange Community Hub which will provide improved community facilities early in the scheme.
- 143,500sqft of green spaces for the community including a large new linear community park with an outdoor gym, children's play area and Grange Gardens; a safe, central green space for local people.
- A welcoming new civic square which will be an important focus of local events and activities, bringing the community together, promoting cultural activities and enhancing activity and safety at night.
- Over 130,000sqft of commercial, retail and leisure space throughout the scheme providing a wide range of leisure, employment space, shops, cafes and restaurants around a new civic square.
- £500k of investment in the town centre and also a £500k fund for events and activities, as well as meanwhile uses which will revitalise the local centre during construction and afterwards.
- Over 3,300 construction jobs and more than 500 end-user jobs once the development is complete.
- High quality new industrial and maker/artisan space to support businesses from the existing Peacock Industrial Estate.

2. Cabinet Member Introduction

2.1 We are absolutely committed to putting residents at the heart of the High Road West Regeneration Scheme- a Scheme which has been encouraged and supported by residents on the Love Lane Estate - 70% of Love Lane residents supported the demolition of the estate and the delivery of new homes in 2014.

2.2 The development of the leaseholder offer for Love Lane residents builds on the previous engagement and consultation completed with Love Lane leaseholders on the Leaseholder Guide, the Resident Charter, ERRPP, the revised ERRPP and the ownership of the replacement homes consultation. Through all of this engagement and consultation we have sought to meet leaseholders' aspirations- such as the Council remaining the landlord of the replacement homes, developing a more generous offer for resident leaseholders, seeking leaseholders' views on the consultation questions and having a different approach to the valuation process.

2.3 In developing the draft offer for Love Lane Leaseholders we have paid close attention to other estate regeneration schemes and ensuring that all resident leaseholders, including elderly leaseholders, families and those who have had a change in their financial circumstances will not be financially worse off and will have, through the range of rehousing options, genuine choice whatever their financial circumstances.

2.4 We have also engaged every resident and non-resident leaseholder several times during the engagement and consultation period and explained, through the workshops held, why some and not all of leaseholders' aspirations were included within the offer.

2.5 Despite all of this work, the recent consultation contained a technical flaw and as such, I am recommending that the Cabinet agree that Officers re-write the consultation and engagement material so that we are clearer on why the draft offer is the Council's preferred set of commitments to leaseholders. This is because, ensuring that leaseholders are clear on the the Council's proposals and fully understand the Council's commitments and the thinking which underlies them, is of utmost importance to enable leaseholders to give a considered view on the consultation.

3. Recommendations

3.1 It is recommended that Cabinet:

i. Given the rationale set out in paragraphs 6.12-6.17 agree that:

   a. the Council undertakes a new consultation on the proposed Love Lane Leaseholder Offer and;
   b. that a further report be presented to Cabinet for decision following that further consultation.

ii. Agrees the acquisition of all third party land interests within the boundary of the High Road West Blue Line Plan within Appendix 2 (other than any compulsory acquisitions), to be acquired by private treaty by the Council pursuant to the terms of the Compulsory Purchase Order Indemnity Agreement ("CPOIA") dated 20 December 2017, to facilitate the High Road West Regeneration Scheme and gives delegated authority to the Strategic Director of Regeneration, Planning and Development and the section 151 Officer to agree the final price (including the land price, costs, compensation and fees) to be paid for each third party land interests provided that the total sum to be spent on these acquisitions shall not exceed the sum referred to in the approved capital programme and mentioned in paragraph 8.6.

4. Reasons for decision

<u>Recommendation 1</u>

4.1 From November 2017 through to January 2018, the Council spent two months working with and engaging leaseholders on the Love Lane Estate on a Leaseholder Offer. The Council's ambition has been to work with resident and non-resident leaseholders to develop an offer, which allows all resident leaseholders to remain in the High Road West area and to ensure all leaseholders are not financially worse off.

4.2 Following this engagement the Council formally consulted on an Enhanced Leaseholder Offer, which sought to deliver the following enhancements from the ERRPP for resident leaseholders:

- A further rehousing option for leaseholders referred to as a leasehold swap;
- An enhanced equity share offer which tackles concerns regarding affordability and allows resident leaseholders to access a new home within the regeneration area; and
- A12 month grace period for family members/ beneficiaries which tackles concerns regarding succession

4.3 Through undertaking this consultation, it has become apparent that the consultation material was flawed in two respects. Firstly, it did not explain clearly why some aspirations of leaseholders have been included in the offer and why some have not. Secondly, it did not explain that the definition of a resident leaseholder in the Love Lane Offer aligned with the definitions set out in the Leaseholder Guide (agreed by Cabinet in 2014) and as such is more restrictive than that in the ERRPP.

4.4 Officers therefore recommend that the Council, redraft the consultation materials and re-consult to ensure leaseholders are fully and properly consulted.

4.5 Officers advise that the Council employs an independent financial advisor ahead of undertaking the consultation to advise leaseholders how the proposed offer will affect them.

Recommendation 2

4.6 The Council entered into a Development Agreement and a CPOIA with Lendlease on 20 December 2017. These legal agreements set out the obligations on each party in relation to the delivery of the Scheme.

4.7 A key obligation on the Council is to secure all of the third party land interests within the Scheme, circa 100 interests, by private treaty if possible. To secure these land interests the Council will be utilising a combination of Housing Zone funding and borrowing. All costs the Council will incur will be reimbursed through the CPOIA with Lendlease.

4.8 At present, the Council's constitution requires that any acquisitions that exceed a £500,000 price should be agreed by the Council's Cabinet, acquisitions between £250,000 (and under) or less than £500,000 can be approved by the Strategic Director of Regeneration, Planning and Development.

4.9 In order for the Council to be able to acquire all of the interests in a timely and efficient manner, it is recommended that the Cabinet grant delegated authority to the Strategic Director of Regeneration, Planning and Development and s151 Officer to agree all third party land acquisitions (including all acquisition prices, costs and compensation) that the Council needs to acquire within the High Road West area pursuant to the CPOIA.

4.10 All land acquisition prices, costs and compensations will be based on a valuation report from a RICS registered valuer and will be based on the commitments set out in the High Road West Business Charter and the Compulsory Purchase Order Code.

5. Alternative options considered

Leaseholder Offer

5.1 Officers have considered not undertaking another consultation with leaseholders on the Love Lane Estate, but have discarded this option. This is because it is clear that the engagement and consultation were flawed as set out above.

Delegated authority for the acquisition of properties within the High Road West area

5.2 Officers have considered not seeking delegated authority to the Strategic Director of Regeneration, Planning and Development and the s151 Officer to agree the acquisition of all third party land interests equalling or exceeding a capital value of £500,000 (including the price, costs and compensation) and relying on the delegations within the Council's constitution to make acquisitions.

5.3 There are a significant number of property interests within the High Road West area, which are anticipated to be above £500,000 and as such, a Cabinet decision would be acquired for every acquisition. Given that each Cabinet decision has a three-month lead in process, seeking Cabinet approval will not only cause time delays, it will also considerably congest the Cabinet agenda. It is absolutely the case that to ensure the successful delivery of the Scheme, Officers need to be able to negotiate and finalise transactions in an expedient manner so that third party interests are happy to transact with the Council. For these reasons, this option has been discounted and Officers are seeking delegated authority.

6. Background information

6.1 There has been significant engagement and consultation with leaseholders on the Love Lane Estate over the past three and a half years on the Council's commitments to them. This has been to ensure that the Council addresses leaseholders' concerns and to ensure that resident leaseholders are able to remain within the High Road West area. This engagement and consultation and the development of the Enhanced Leaseholder Offer is detailed further in the paragraphs below.

The Love Lane Leaseholder Guide

6.2 Through 2014 the Council worked with residents to develop the masterplan and a number of documents including the Tenant and Leaseholder Guides and the Resident Charter, all of which were subject to public consultation and agreed by Cabinet on 16 December 2014. The Leaseholder Guide set out the following for leaseholders:

- The Council's commitments to all leaseholders
- The valuation process
- The re-housing options and compensation
- The compensation available for non-resident leaseholders
- Commitments regarding the new homes in the regeneration area
- The phasing principles

6.3 It also made clear that the offer would be developed once the Council had progressed the regeneration scheme.

The ERRPP

6.4 In 2015 the Council began developing a borough wide policy, the ERRPP, for tenants and leaseholders affected by estate regeneration schemes so that there was a baseline offer to all residents. A consultation was undertaken between 17th November 2015 – 14th February 2016 which included Love Lane leaseholders. The policy was agreed by the Council's Cabinet in July 2016.

6.5 In 2017 the Council decided that the ERRPP should be revised to provide further commitments to tenants and leaseholders and in October 2017, the Cabinet approved a revised ERRPP, following a 10-week consultation.

6.6 By setting out the Council's commitments in more detail than had previously been given, the ERRPP provided a solid baseline for the development of a bespoke offer for Love Lane leaseholders.

Ownership of the replacement homes and shared equity consultation

6.7 In March 2017, the Council undertook a 6 week consultation with resident leaseholders on the Love Lane Estate to determine whether they would prefer a Housing Association or the Council to own the replacement homes and to seek leaseholders' views on the initial terms for the shared equity offer the Council was developing.

Developing an Enhanced Leaseholder Offer

6.8 Through November 2017 to January 2018, Officers have sought to engage with leaseholders on the Love Lane Estate to help develop a more detailed Leaseholder Offer for Love Lane leaseholders. During this time, Officers undertook a door-knocking exercise to speak to leaseholders and held three workshops. Both resident and non resident leaseholders were invited to the workshops. Attendance, specifically from the resident leaseholders, was consistently good with up to two thirds of resident leaseholders attending all three workshops. The Independent Tenant & Leaseholder Advisor was also present at all three workshops as was a Turkish interpreter. The headline objective of each workshop was:

Workshop 1: Set out the offers already in existence (statutory minimum, High Road West Leasehold Offer, Estate Renewal Rehousing & Payment Policy). Invite feedback from leaseholders on their view of these offers and what additional asks and concerns they have.

Workshop 2: Provide an update on initial thoughts over which requests the Council may be able to incorporate into the Leasehold Offer.

Workshop 3: Present the draft leasehold offer and ask for initial thoughts ahead of the final consultation stage and seek feedback on the type and form of questions residents would like to see in the feedback forms relating to the consultation.

6.9 The feedback received through these workshops was utilised to help developed the proposed Love Lane Leaseholder Offer.

What was in the proposed Love Lane Leaseholder Offer?

6.10 The proposed Love Lane Leaseholder Offer set out the Council's draft commitments to Love Lane Leaseholders. The full details of the offer are set out in Appendix 1 and a summary of the additional commitments for resident leaseholders (beyond the ERRPP) are set out below:

- A further rehousing option referred to as a leasehold swap
- An enhanced equity share offer which tackles concerns regarding affordability
- Succession- 12 month grace period for family members/ beneficiaries which tackles concerns regarding succession

6.11 The proposed offer sought to address the concerns raised with leaseholders through engagement. Whilst it met the key concerns raised by leaseholders it does not meet all of their aspirations and the rationale for this was explained during the workshops as the offer developed.

Consultation

6.12 Following the engagement, the Council undertook a 4 week consultation on the leaseholder offer. Unfortunately, the consultation was flawed for the reasons set out in paragrath 4.3. Officers therefore recommend that the consultation is undertaken again so that this can be addressed.

Definition of resident and non resident leaseholder

6.13 As mentioned in paragraph 4.3, the definition of resident leaseholder in the proposed Love Lane Leaseholder Offer aligns is more restrictive that that in the ERRPP.

6.14 This is because the proposed Lane Lane Leaseholder Offer aligned with the Leaseholder Guide, and stated that leaseholders had to be living in their home

since 16th December 2014 to qualify as a resident leaseholder. The ERRPP however defines a resident leaseholder as a leaseholder who has lived in the dwelling, or a substantial part of it, as their only or main residence, for a period of not less than one year ending with the day they have to move out.

6.15 The ERRPP definition creates a risk that speculative buy-to–let landlords could move into their property a year prior to displacement to secure the enhanced offer for resident leaseholders (such as the shared equity/portable loan products). This is likely to create a substantial additional cost for estate regeneration schemes and the HRA, and could reduce the ability to make an enhanced offer to those leaseholders who are living on an estate at the time the decision to proceed with a scheme is made, which is not something which the ERRPP intended. The aim of the ERRPP is to ensure that the existing local community could be kept together, not to allow buy-to-let landlords to profit from the enhanced leasehold offer at the expense of local residents. As such, this is something which is likely to be reviewed in the future.

6.16 The above is of particular concern for the Scheme and the Love Lane Estate. All leaseholders on the estate have known since December 2014, that the estate will be demolished. Whilst the Council secured a development partner in 2017, it still may be a number of years before all of the estate is fully demolished. This means that speculative landlords could potentially take advantage of the Council's rehousing offer.

6.17 To deal with this issue, It is proposed that the revision to the ERRPP definition contained in the proposed Love Lane Leaseholder Offer is fully explained to leaseholders so that they are made aware of the differences through the proposed more detailed consultation.

Next steps

6.18 Given the above, it is proposed that the Council:

- Re-write the engagement and consultation material to ensure that it clearly explains why the proposed offer is the Council's preferred position.
- Ensure that the consultation material explains the rationale for the definition of resident and non resident leaseholder and why the definition amends from that in the ERRPP and aligns with the Leaseholder Guide.
- Undertake another consultation process with leaseholders on the proposed offer.
- Employ an independent financial advisor so that leaseholders are able to speak to the advisor about the proposed offer and their financial circumstances
- Continue to ensure that one-to-one engagement activity is undertaken to explain the details of the proposed Leaseholder Offer.
- Ensure that Independent Tenant and Leaseholder Advisor is available to provide advice to leaseholders.

6.19 Once the Council has undertaken the consultation and analysed the feedback, a report and the feedback received will be presented to Cabinet, for Cabinet to consider and take a decision on the Love Lane Leaseholder Offer.

7. Contribution to strategic outcomes

7.1 As set out in section 4 above, the delivery of the High Road West Scheme will support the Council in delivering all of its Corporate Priorities, as well as supporting the progression of objectives in the London Plan to support regional growth in north London.

7.2 The regeneration at High Road West will help to enhance the area in relation to each of the Council's five priorities: -

(i) Enable every child and young person to have the best start in life, with high quality education
(ii) Enable all adults to live healthy, long and fulfilling lives
(iii) A clean, well maintained and safe borough where people are proud to live and work
(iv) Drive growth and employment from which everyone can benefit
(v) Create homes and communities where people choose to live and are able to thrive

7.3 The Leasehold Offer is particularly relevant to priority five as it allows any resident who wishes to remain in the High Road West area to do so, thus supporting communities who wish to stay together to do so.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

8.1 This reports seeks Cabinet approval to:

i. Given the rationale set out in paragraphs 6.12-6.17 agree that:

a. the Council undertakes a new consultation on the proposed Love Lane Leaseholder Offer and;
b. that a further report be presented to Cabinet for decision following that further consultation.

iii. Agrees the acquisition of all third party land interests within the boundary of the High Road West Blue Line Plan within Appendix 2 (other than any compulsory acquisitions), to be acquired by private treaty by the Council pursuant to the terms of the Compulsory Purchase Order Indemnity Agreement ("CPOIA") dated 20 December 2017, to facilitate the High Road West Regeneration Scheme and gives delegated authority to the Strategic Director of Regeneration, Planning and Development and the section 151 Officer to agree the final price (including the land price, costs, compensation and fees) to be paid for each third party land interests provided that the total sum to be spent on these acquisitions shall not exceed the sum referred to in the approved capital programme and mentioned in paragraph 8.6.

8.2 On the 20th December 2017 the Council entered into a Development Agreement and a Compulsory Purchase Order Indemnity Agreement with Lendlease for the High Road West Scheme ("the Scheme"). The terms of the these agreements were agreed by Cabinet in September 2017 and October 2017 and the final documents were approved by the Director of Regeneration and the s151 Officer in December ahead of the agreements being entered into.

8.3 By entering into these agreements, the Council is obligated to acquire all interests within the Scheme of which there are c.100 property and land interests. All costs the Council will incur as a consequence of acquiring these interests will be reimbursed through the CPOIA with Lendlease.

8.4 The first recommendation within this report will support the Council in meeting its obligations within the agreements, as it will expedite the acquisition process. At present, the Council's policy requires any property/land acquisitions that exceed £500,000.00 to be agreed by the Council's Cabinet. Acquisitions between £250,000.00 or less than £500,000.00 can be approved by the Strategic Director of Regeneration, Planning and Development to agree the acquisition package. The delegation within recommendation 2 will ensure that all land interests can be negotiated and acquired efficiently.

8.5 In June 2016, Cabinet agreed the Council's capital strategy and ten-year capital programme report. This agreed a budget of £98m for the necessary acquisitions for the Scheme.

8.6 This figure has been revised and a capital budget of £87.71m has been set aside – this includes:

Year	Funding Amount £m
2016/2017	0.457
MTFS 2018/19	
2017/2018	2.342
2018/2019	8.19
2019/2020	5.847
2020/2021	26.993
2021/2022	9.352
2022/2023	10.496
Sub Total	63.22
2023/2024	24.033
Total	87.711

8.7 The £63.22m for the years 2017/18-2022/23 for 'HRW business acquisitions' is included in the General Fund Capital Programme 2018/23 in the 26th February Full Council report, and a further £24.033m capital funding for 2023/24, as

included in the above table, will be formally added for 2023/24, when the capital programme is updated for 2019/24. This provides the funding for acquisitions to support the business of the Scheme. The exempt part of this report provides further information with regards to the funding arrangements.

8.8 All land acquisition prices, costs and compensations will be based on a valuation report from a RICS registered valuer and will be based on the commitments set out in the High Road West Business Charter and the Compulsory Purchase Order Code.

8.9 There is provision in the HRW revenue budget for the costs of the re-consultation and use of independent financial advisor during the consultation process.

Procurement

8.11 There are no procurement comments required for this report.

Legal

8.12 The Assistant Director Corporate Governance has been consulted in the preparation of this report and comments as follows:

Leaseholder Offer Consultation (recommendation 1)

8.13 As stated in the body of the report, Cabinet agreed the Leaseholder Guide on 16th December 2014 and adopted the ERRPP on 17 October 2017. The Policy complied with statutory requirements and entitlements, and followed DCLG (now MHCLG) guidance and the Mayor of London's Good Practice Guide; which are not further detailed here.

8.14 The ERRPP envisaged that offers would be brought forward for individual regeneration schemes taking into account the circumstances of each such scheme. It provided what it described as a guaranteed minimum offer, and a clear set of commitments to ensure all existing residents benefit from estate renewal in Haringey, that could not be waived by the Council or developer. It further provided that enhanced offers could be made where this could be accommodated and it was appropriate to do so, subject to cabinet decision. It did however, caution that offers that are overly generous to one group of residents should be avoided where it imposes an unacceptable cost on, or reduces the quality of the scheme for other groups of residents.

8.15 Notwithstanding the guarantees given in the ERRPP, it is nevertheless open to the Council to derogate from its announced policy if it does so fairly and for good reason. In consulting on any such proposal, it must make clear that that is what is doing, and clearly explain the reasons why it is doing so to permit intelligent consideration by consultees.

8.16 The enhancements to the ERRPP within the Enhanced Leaseholder Offer are set out in the body of this report.

8.17 The proposed restrictive qualification as “resident leaseholder” for the purposes of the Offer clearly derogates from the ERRPP.

Revised qualification as “resident leaseholder”

8.18 As noted in the body of the report, the definition of resident leaseholders consulted on for the Enhanced Leaseholder Offer is more restrictive than that provided by the ERRPP. The definition of a resident leaseholder in the Enhanced Leasehold Offer is in line with the definition consulted on for the High Road Leaseholder Guide, agreed at Cabinet in 2014, requiring residence since 16 December 2014; whereas the ERRPP definition is, for all purposes, residence as only or main residence for 12 months before displacement from the property.

8.19 It is proposed that the Leaseholder Offer definition be consulted upon and that it makes clear that this definition will apply, save that for the purposes of payments only the ERRPP definition of resident leaseholder (which follows the statutory definition) will apply.

Consultation and equalities

8.20 Members are reminded that the Moseley principles of consultation require that the Council must consult at the formative stage of policy, give sufficient reasons for any proposal, and time, to permit intelligent consideration and response, and the product of consultation must be conscientiously taken into account in finalising any proposals.

8.21 In approving proposals after consultation, the Council must have regard to the full EQIA and ensure compliance with its Public Sector Equality Duty under section 149 of the Equality Act 2010.

Delegated authority (recommendation 2)

8.22 Members are being asked to give authority to the Strategic Director for Regeneration, Planning and Development and the Section 151 Officer to agree the final price for the acquisition of properties that need to be acquired under the terms of the CPOIA dated 20 December 2017 in respect of the High Road West Scheme. Under the Constitution (Section E Section 2) the Strategic Director’s authority is limited to an acquisition with a capital value of up to £499,999.99. Under the terms of the CPOIA, the Council is responsible for land assembly within the High Road West site. The Council must try and acquire all third party land interest by private treaty and the delegated authority will prevent the members from having to make a decision each time a property has to be acquired with a capital value of £500,000.00 or more.

8.23 Members should note that the Cabinet’s decision and the authority being given to the Director and the Section 151 Officer does not include any compulsory purchases. A separate Cabinet authority will be required on any future decision to use the Council’s compulsory purchase powers.

Equality

8.21 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

8.22 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

8.23 An EqIA is in development, which will set out the implications of the Leasehold Offer for leaseholders of the Love Lane Estate with protected characteristics and which will reflect the findings of the consultation undertaken with leaseholders. We expect the impacts to be broadly positive based on the conclusions of EqIAs that accompany preceding Cabinet reports relating to High Road West. The baseline for the enhanced offer is proved by the Council's Estate Renewal, Rehousing and Payment Policy (ERRPP) which already provides a high degree of support for resident leaseholders in the borough who are impacted by regeneration. A full EqIA was developed for this policy and published with the decision.

8.24 This Enhanced Leasehold Offer is intended to address many of the additional concerns that were identified by current leaseholders on the Love Lane estate during consultation and some of the existing inequalities identified by the High Road West EqIA. The characteristics of the Love Lane residents involved in developing this will be discussed at length in the full EqIA.

9. Use of Appendices

9.1 The following appendices are included:

Appendix 1- Love Lane Enhanced Leasehold Offer
Appendix 2- High Road West Plan
Appendix 3 – Exempt financial information - **NOT FOR PUBLICATION** by virtue of paragraphs 3 and 5 of Part 1 of Schedule 12A of the Local Government Act 1972. This report is not for publication as it contains information classified as exempt under Schedule 12A of the Local Government Act 1972 in that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

10. Local Government (Access to Information) Act 1985

High Road West Cabinet Papers:

- 12th September 2017 Cabinet Report- High Road West Regeneration Scheme – appointment of a preferred bidder and next steps
- 13th September 2016 Cabinet Report- Tottenham Housing Zone Phase 2- North Tottenham
- 15th December 2015 Cabinet Report- High Road West Regeneration Scheme Update and Next Steps
- 16th December 2014 Cabinet Report- High Road West Regeneration Scheme- Masterplan and Next Steps
- 15th July 2014 Cabinet Report- High Road West Regeneration Scheme Consultation.
- 28th November 2013- High Road West Regeneration Project - Master Plan Option Consultation Feedback and Next Steps.

Housing and Estate Renewal, Rehousing and Payments Policy Cabinet Papers:

- 17 October 2017, Revised Estate Renewal Rehousing and Payments Policy following consultation
- 12 July 2016, 12th July 2016 - Estate Renewal, Rehousing and Payments Policy – Final policy for adoption

Tottenham

HIGH ROAD WEST

LOVE LANE
ENHANCED LEASEHOLDER OFFER

Draft Supplementary Policy for Consultation

January 2018



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1. Introduction

This supplementary policy ("enhanced offer") sets out Haringey Council's commitments to leaseholders living on the Love Lane Estate, who are affected by the High Road West Regeneration Scheme.

It provides additional Council commitments, most notably relating to the rehousing options for resident leaseholders, above and beyond those set out in the Council's Estate Renewal, Rehousing and Payments Policy ("Estate Renewal Policy"), which was subject to a public consultation process and agreed by Cabinet in October 2017. It also reflects and provides more detail to the commitments set out in the Leaseholder Guide, which was subject to consultation with Love Lane residents, and agreed by Cabinet in 2014. The enhanced offer should be read in conjunction with these documents.

This enhanced offer has been developed following two months of engagement with leaseholders on the Love Lane Estate and through a series of workshops held between November 2017 and January 2018 where leaseholders' aspirations and concerns around the offer were discussed.

The development of the enhanced offer demonstrates our commitment to working with leaseholders and ensuring residents can stay within their community and benefit from the High Road West Regeneration Scheme, which will bring significant new facilities and opportunities to the area. This includes high quality replacement homes for residents, new community facilities including a new Library and Learning Centre and new parks and open space, a new local centre with shops, restaurants and workspace, all within a safe and welcoming neighbourhood.

We are now seeking leaseholders' views on this draft enhanced offer, ahead of the offer being considered by the Council's Cabinet.

Please note: For the purposes of this enhanced offer, resident and non-residents on the Love Lane Estate are defined as set out below:

- You are a resident leaseholder if you live in your property and have lived in your property since the 16 December 2014- the date the High Road West Masterplan was agreed
- You are a non-resident leaseholder if you do not live in your property and have not lived in the property since 16 December 2014

2. Commitments to all leaseholders on Love Lane

This enhanced offer sets out the payment guarantees that Haringey Council has made to resident and non-resident leaseholders living on the Love Lane Estate.

It also sets out the rehousing options that we guarantee for resident leaseholders.

The aim of this enhanced offer is to achieve the following two key commitments set out below:

- To ensure that there is an offer of a home in the High Road West area that is affordable to resident leaseholders
- To ensure that the High Road West Scheme does not disadvantage existing residents

The offer also seeks to combine the commitments the Council has set out in the Love Lane Leaseholder Guide and the Estate Renewal Policy. These commitments are set out below.

The Leaseholder Guide

The Leaseholder Guide set out a number of commitments to leaseholders, which we are still committed to. This includes:

Regular, honest communication

We will provide you with regular, honest communication about the regeneration proposals throughout the regeneration period. We will also provide you with dedicated points of contact so you know who you can go to with any questions or queries you may have.

Working together

We have been, and will continue to be, committed to working with residents to ensure that you influence and benefit from the regeneration proposals.

Dedicated officer

We will ensure that each household has a dedicated officer to help with every step of the purchasing process. The officer will meet with you on a one-to-one basis to get to know you and your family's needs and requirements, inform you of the advice you may wish to seek and how to access this advice and answer any questions or queries you may have.

Independent advice

We will continue to fund the Independent Tenant and Leaseholder Advisor (ITLA) for the Love Lane Estate. The ITLA will continue to work with you to provide impartial advice and support about the regeneration and re-housing process. We will also ensure that you have access to the appropriate independent, professional and technical advice that you may require throughout the process - this may include valuation and legal advice.

Additional support for you and your family

We recognise the stress that the regeneration process can put on you and your family. We are therefore committed to providing additional support – beyond the dedicated Re-housing Officer and Independent Advisor, to ensure that you and your family are fully supported throughout this process. This will include organising events and activities, such as organising for you to talk to people who have been affected by similar regeneration schemes, organising skills and training opportunities and working with other services such as schools and the health service to ensure you and your whole family are supported.

You will not be financially worse off

We are committed to the principle that leaseholders should not be in a financially worse position as a result of the regeneration scheme. As the Council will be purchasing your property it is important that you do not have to incur any costs because of the process.

Developing a range of affordable housing products

We have developed a range of rehousing options for resident leaseholders and we will ensure the High Road West Scheme delivers a range of affordable housing.

Being equitable and transparent

We are committed to being open, equitable and transparent in the process of purchasing your property.

The Estate Renewal Policy also sets out a number of commitments to resident and non-resident leaseholders, which we are committed to. These include:

All resident leaseholders and freeholders will have a guaranteed Right to Return – this means that if you are a resident leaseholder you will be able to either remain on the estate until your new home is ready, or move away and return when your new home is built.

All resident leaseholders who wish to move away will be supported to do so – this means that if you are a resident leaseholder, you will be offered practical support to find a new home on the open market. Qualifying resident leaseholders will also have the option to seek financial support to acquire a new home within the borough with an equity loan.

No resident and non-resident leaseholder will be financially worse off as a result of the estate renewal - this means leaseholders will receive the market value of their property, compensation for the loss of their property and a payments to cover relevant costs.

As set out in the Estate Renewal Policy, we committed to ensuring that no resident should be financially worse off as a result of the regeneration scheme. But this does not necessarily mean that every leaseholder will pay exactly the same housing costs after the move as they did before the move. More information on this can be found in section 7.





3. The valuation and property purchase process

As set out in the Estate Renewal Policy, all leaseholders will be entitled to receive the full market value of their property. The Council will enter into negotiations with leaseholders to seek a voluntary arrangement to buy their home. During the process of negotiation, it is expected that in many cases the following will also be discussed and decided on:

- The rehousing options available to resident leaseholders
- The financial advice and general support available to help assess those options (to the extent available)
- Compensation entitlements and how to claim them
- The Council's procedures for acquiring properties

Leaseholders will be given sufficient time to consider their options and will be advised of any dates by which they need to decide if they want to sell their property by agreement. All offers relating to this enhanced offer will be set out in writing and the leaseholder will need to accept or reject them. Resident leaseholders will be given reasonable time to decide which rehousing option they prefer.

Who will value my property?

The Council will appoint a qualified independent valuer to act on its behalf to undertake a valuation of the property on the Love Lane Estate to determine the market value. The appointment of an independent valuer/s will be made through an open and transparent process.

Leaseholders can also appoint a qualified valuer to act on their behalf and reasonable costs associated with this will be reimbursed by Haringey Council.

Valuations will take into account any improvement works undertaken before the valuation date and are on the basis of open market valuations which, in effect, do not take into account any increase or decrease attributable to the estate renewal or the fact that the purchase is, or may be, compulsory.

What happens if there is no agreement on the valuation?

If the Council valuer and leaseholder valuer cannot reach agreement the matter may be referred for dispute resolution.

If the leaseholder does not accept the valuation agreed between their valuer and the Council's valuer, or the valuation following any dispute resolution, they will be determined to have rejected the Council's offer to buy by agreement. They will in these circumstances have the statutory right to have the matter referred to Lands Chamber of the Upper Tribunal. Information on the Lands Chamber of the Upper Tribunal can be found at **www.gov.uk/courts-tribunals/upper-tribunal-lands-chamber**



4. Compensation

The amount of compensation you will receive will depend on whether you are a resident or a non-resident leaseholder. The boxes below summarise the compensation available.

If you are a resident leaseholder, you will be able to claim:

- Market value of your property
- A 10% Home Loss Payment
- Disturbance payment - to cover the costs of your move
- Additional Disturbance Payments (see page 9)
- Decent Homes works compensation (where applicable)

Non-Resident leaseholders will be able to claim:

- The market value of your home
- 7.5 % Basic Loss Payment
- Compensation for any reasonable costs incurred as a result of purchasing a new property in the UK
- Decent Homes works compensation (where applicable)

What is a Home Loss Payment?

Resident leaseholders are entitled to receive a Home Loss Payment to compensate them for the loss of their home. This figure is set by the government and is currently assessed at 10% of the market value of the property, with a minimum of £6,100 and a maximum payment of £61,000 as at January 2018.

To claim home loss compensation, you must have lived in your property as your sole and principal home since 16 December 2014.

Where a leaseholder does not qualify for a statutory Home Loss payment, for example, because the property has not been their only or main residence since 16 December 2014, the Council may, in exceptional circumstances, make a discretionary Home Loss payment not exceeding the statutory amount.

What is a Basic Loss Payment?

Non-resident leaseholders are entitled to receive a basic loss payment of 7.5% of the agreed value of the property, up to a maximum of £75,000 as at January 2018.

How will these Payments be made to me?

The Home Loss and Basic Loss Payments will be made in the following way:

- Payments will be made directly to leaseholder
- Claims can be made for up to six years after the offer of accommodation, and must be paid within three months of receiving the claim. Under the Land Compensation Act 1973, there is a right of appeal to the Lands Tribunal
- Payments will normally be made only after the return of keys to the property the tenant is vacating and, for leaseholders and freeholders, the sale completion. However, an earlier advance payment of at least part of the total payment may be considered in exceptional cases of financial hardship
- All arrears will normally be offset against these payments. This includes service charge or major works arrears. Deductions may also be made for any Council Tax arrears.

What is the Disturbance Payment?

Disturbance Payments are made to financially compensate resident leaseholders for expenses associated with the need to move. Disturbance Payments will be made under the Land Compensation Act 1973.

The list below, sets out the items which will be covered by the Disturbance Payment and are considered reasonable under the Land Compensation Act 1973:

- Removal costs from the current home to the new home, which will be paid directly to the Council's approved removal firm or to the tenant/leaseholder's removal firm where the tenant/leaseholder obtains two estimates which have been approved by the Council prior to the move. For vulnerable residents, this might include additional support, such as furniture packing and unpacking
- Redirection of mail for each authorised surname living at the address

- Telephone and internet disconnection and reconnection, including additional lines
- Disconnection of any television aerials or satellite dishes connected either to an existing television or that allows the proper operation of television equipment. Reconnection will only apply with the express approval of the landlord at the new address. New homes may have television aerials and systems installed as part of the specification
- Washing machine, cooker, dishwasher and plumbed fridge disconnection and reconnections to be carried out by the removal firm's operatives (who must be suitably qualified to the appropriate trade standards). In some cases, payments may also be made for replacing white goods or furnishings owned by the tenant where the existing white goods/furnishing do not fit into the new property
- Curtain and carpets
- Special locks and alarm refitting if these are currently fitted at the old property. They must be dismantled and refitted by a qualified locksmith or recognised alarm company and all locks and alarms must meet the relevant British standard for security. Front door and window grilles would not be covered
- Dismantling and re-fitting of fitted resident owned furniture (such as kitchen units and wardrobes)
- Any extra costs of new school uniform if moved to a different area, which necessitates a change of school (supported by letters from the respective schools)
- Reimbursements for wage or salary loss on the day of the removal, provided loss of earnings is certified by the employer, for up to two members of the household
- Reasonable costs incurred by the tenant/leaseholder if approved in writing by the Council prior to the cost being incurred, for example travel to viewings, replacement of sheds, additional childcare paid for pre-school children on the day of the move and outside furniture which cannot be dismantled, etc. Redecoration may also be payable in particular circumstances and that this will be considered on a case by case basis. In the unlikely event that a leaseholder needs to move off the Love Lane Estate before moving to their new home in High Road West, the Disturbance Payments may need to be paid twice

For leaseholders not moving into one of the new home in the High Road West area, Disturbance Payments will need to be claimed within one year of their property being acquired unless there are exceptional circumstances.

Non-resident leaseholders and freeholders are not entitled to any disturbance payments.

How will the Disturbance Payment be made to me?

Disturbance payments will be made directly to the leaseholder. Disturbance payments will only be made in respect of one replacement property so in cases where joint leaseholders are not purchasing another property together, they will need to decide who will claim.

Resident leaseholders will be offered two payment method options:

Option 1- A claim option

Resident leaseholders using this option can claim disturbance payments by submitting a Disturbance Payment claim form for any legitimate expenses they incur in relation to moving home, enclosing receipts or proof of expenses.

All disturbance claims must be supported by receipts and invoices bearing the name and address of the company providing such receipts and invoices, the details of which will be verified by the Council.

Claimants should note that the level of payment assessed by the Council may be less than the "fixed payment" quoted under the Fixed Payment option below.

Payments listed as "Additional payments available to resident Leaseholders" will need to be claimed through receipts regardless of whether a fixed payment has been requested for all other costs.



Option 2- A fixed payment option

Resident leaseholders can also choose to receive a fix sum payment instead of claiming for each expense.

Payment levels are based on the size of the property being vacated, updated periodically. These fixed payments do not cover the "additional payments available to resident Leaseholders/Freeholders" which will need to be claimed separately through the "claim option" described above.

The current fixed payment levels (as of September 2014) are set out below:

- One-bedroom property - £1,650
- Two-bedroom property - £2,000
- Three-bedroom property - £2,400

For all three-bedroom plus properties £380 will be added to the 3-bedroom figure above (i.e. £2,400) for each additional bedroom.

Please note: where and payments set out in this offer are made in advance of completion of a transaction, and the transaction does not take place, payments received will need to be returned to the Council within three months.

Can I receive any additional disturbance payments?

Yes, resident leaseholders can claim for 'Additional Disturbance Payments' in addition to the Disturbance Payment listed above. Additional Payments are any additional costs associated with selling their current property and purchasing a new one. The new home can be outside the renewal area, but must be within the UK and the property must be purchased and the claim made, within one year of the Council purchasing the property on the Love Lane Estate, to be eligible for this payment.

The payment of these additional costs is dependent on the option taken by each individual leaseholder and freeholder in regards to rehousing, and can include:

- Early mortgage redemption fees at the existing property
- Conveyancing costs
- Mortgage and lender fees arising from the purchase of a replacement property
- Stamp duty land tax arising from the purchase of a replacement property
- Solicitor/legal fees arising from the purchase of a replacement property
- In some cases, payment for replacing white goods or furnishings owned by the leaseholder where the existing white goods/furnishing do not fit into the new property
- Removal and reinstatement of disabled adaptations as agreed by Haringey Council's Occupational Therapist

In addition to these payments, additional support may be available to assist in the purchase of a new home.

What if I need payment upfront?

Emergency payments may be made available to those who will need this payment to secure a new home. If the leaseholder is moving into one of the replacement homes within the High Road West area, Disturbance Payments may include expenses associated with moving twice if this involves first living in temporary housing. This will not apply if the leaseholder has chosen to move into and fund their own temporary housing, because they want to return to a particular block or location and in these circumstances Haringey Council will only fund costs relating to one move.

The Leaseholder Guide mentioned Decent Homes Work reimbursements- is this still available?

Yes. Leaseholders will be able to claim for compensation for Decent Homes Work which was carried out before the Council's Cabinet agreed to demolish the Love Lane Estate in December 2014 and is not captured in the valuation of your property. The compensation will be calculated on a sliding scale, for example if leaseholders paid £18k for new windows which were due to last 30 years, but the leaseholder only had the enjoyment of the windows for ten years they will be compensated for the twenty-year loss, i.e., paid back £12k.

What if I want to appeal against the payments made to me?

The Council has a two-stage complaints process, which can be used in relation to appeals against the application of this policy.

Where the appeal is regarding the compensation payment in respect of property acquired, leaseholders and freeholders have the statutory right to apply to a specialist tribunal to determine the appropriate level of compensation. Further advice on this can be provided by the Independent Tenant Advisor appointed to the renewal scheme.

5. Rehousing options for resident leaseholders

Within the Leaseholder Guide and the Estate Renewal Policy the Council has set out a number of rehousing options for residents to ensure that leaseholders' choice is maximised and that resident leaseholders who want to remain in the regeneration area are able to do so.

The rehousing choices for residents are summarised below:

1. **Purchase a new home within the High Road West regeneration area with financial support from the Council** - the Council's equity loan offer allows all resident leaseholders to have access to a new home within the regeneration area. The equity loan arrangements are set out in detail below
2. **Complete a Leasehold swap** - leaseholders can swap their property for an existing council owned property of equivalent size and value
3. **Purchase a home within the borough on the open market with financial support from the Council** - qualifying leaseholders can receive financial support in the form of an equity loan to acquire a new home within Haringey
4. **Purchase a new home within the High Road West area without Council financial support** - leaseholders can use the money from the sale of their property to buy a property within the High Road West area without an equity loan from the Council
5. **Purchase a property outside of the regeneration on the open market within Haringey** - leaseholders can use the money from the sale of their property to buy a property within Haringey on the open market without an equity loan from the Council
6. **Purchase a property outside of Haringey on the open market** - leaseholders can use the money from the sale of their property to buy a property on the open market without an equity loan from the Council

Please note:

The Leaseholder Guide makes reference to leaseholders being able to purchase a low-cost ownership home built by the Council as part of its new build programme. The Council is reviewing its new build programme but will keep residents informed if and when new properties become available.

Option one - purchase a new home in the regeneration area (with an equity loan from the Council)

As set out in the Estate Renewal Policy, the Council has committed to providing financial support in the form of an equity loan to you, if you require help to purchase a new home in the regeneration area.

The equity loan means:

- The Council will contribute money to help the leaseholder buy their new home
- You will NOT have to pay any rent or interest on this loan
- The loan is only repaid when the home is sold or transferred to another owner, unless inherited by a resident partner
- For example, if the Council has contributed 10% of the price paid for the home when the you acquired it, then you will need to pay the Council 10% of the value of the property when you sell it.

The Estate Renewal Policy offers an equity loan option for leaseholders purchasing a new property in the High Road West area providing the following two criteria are met:

- The full market value of the leaseholder's existing property and the Home Loss Payment are put into the new property
- The share held by the leaseholder equates to at least 60% of the value of the new property

Following recent engagement with leaseholders, this draft enhanced offer suggests more flexibility on both these criteria. This is to reassure any leaseholders whose circumstances have changed or who may struggle to raise a mortgage for the same value as their current mortgage that the Council will take their circumstance into account and adjust the level of equity share offered accordingly.

This enhanced offer proposes that all leaseholders will qualify for an equity loan offer providing that they put in the same amount they received from the sale of their



home on the Love Lane Estate plus their Home Loss Payment.

Where a leaseholder is unable to invest the full amount received for their existing home and their Home Loss Payment (e.g. because of a change in financial circumstances), the maximum amount they can reasonably contribute towards the new home will be determined by an independent financial advisor. Providing this amount is put into the new property the Council will provide an interest free equity loan for the remainder.

In exceptional circumstances, where the maximum amount the leaseholder could reasonably contribute towards the new home is extremely low (less than 25% of the value of the new property) then an assessment will be made on that leaseholder's individual circumstance, to find the most appropriate way of enabling the resident to stay in the area without adversely affecting their financial situation.

The financial advisor will be there to support and advice leaseholders. They will be able to support the leaseholder determine how much they can afford, including how much mortgage they could afford and provide help in accessing mortgages.

More information on the equity loan can be found in section six of this document.



Example One A - A new home within High Road West with an equity loan

- Mr and Mrs Osman live on the Love Lane Estate
- They are in their 80's
- They have no mortgage on their home
- They want to stay in the High Road West area to be near their community and the local shops



Their property is valued at £350k
They receive £35k in homeloss



They use the £385k to buy the new home in the scheme



The Council will put in £115k



Mr & Mrs Osman own 100% of the property

They will have no mortgage

They Council will contribute £115k (a 23% equity loan) which is only repaid when the property is sold

No rent or interest is paid on the equity loan



Mr & Mrs Osman decide to sell their home in 2030.

The home is valued at £550k and sold for that amount.

The Council receive their 23% share (£126.5k)

Mr & Mrs Osman receive their 77% share (£423.5k)

Please note the values used in all the examples are indicative, not real life examples

Example One B - A new home within High Road West with an equity loan

- Mr and Mrs Smith have a mortgage for £200k
- Mrs Smith is no longer working and therefore their income has reduced
- They can now only get a new mortgage for £50k
- They want a new home in the High Road West area as their children are at local school



Their property is valued at £350k
They receive £35k in homeloss
So they have £385k in total

£200k is paid back to the mortgage company

Leaving £185k to reinvest

The bank gives Mr and Mrs Smith a mortgage for £50k

They add this to their £185k

They have £235k to reinvest



The Council will put in £265k



Mr & Mrs Smith own 100% of the property

They will have a mortgage for £50k

The Council will contribute £265k (53% equity loan) which is only repaid when the property is sold

No rent or interest is paid on the equity loan



Mr & Mrs Smith decide to sell their home in 2040.

The home is valued at £600k and sold for that amount.

The Council receive their 53% share (£318k)

Mr & Mrs Smith receive their 47% share (£282k)

Please note the values used in all the examples are indicative, not real life examples



Option two - purchase a home within the borough on the open market with financial support from the Council

As set out in the Estate Renewal Policy you will be able to acquire a new home within the borough with financial support from the Council in the form of an equity loan.

The equity loan means:

- The Council will contribute money to help the leaseholder buy their new home
- You will NOT have to pay any rent or interest on this loan
- The loan is only repaid when the home is sold or transferred to another owner, unless inherited by a resident partner.
- For example, if the Council has contributed 10% of the price paid for the home when the you acquired it, then you will need to pay the Council 10% of the value of the property when you sell it

To qualify for this equity loan, the resident leaseholder must:

- Find a property on the open market in Haringey that is no more than 1.83 times the value of their current property or the value of the replacement property they would be offered on the new development (whichever is lower). This is because these loans are not intended to help purchase more expensive properties off the estate or to be used to fund very high value properties. There is therefore a double cap on the value of the replacement home
- Invest the same amount of money as they received for the value of their home on the Love Lane Estate and the 10% Home Loss Payment

More information on the equity loan can be found in section six of this document.





Example Two

- Mr John wants to move closer to his family in Wood Green
- He wants to live in a house with a garden
- He has an existing mortgage of £250k
- His bank have agreed to give him a new mortgage for £200k



Mr John's property is valued at £350k

He receives £35k in homeloss

So he has £385k in total



£200k is paid back to the mortgage company

Leaving £185k to reinvest



The bank gives Mr John a mortgage for £200k

He adds this to his £185k

He has £385k to reinvest in a property in the borough

The Council will put in £115k



Mr John owns 100% of the property

He will have a mortgage for £200k plus an additional £185k equity

The Council will contribute £115k (23% equity loan) which is only repaid when the property is sold

No rent or interest is paid on the equity loan



Mr John decides to sell his home in 2020.

The home is valued at £500k and sold for that amount.

The Council receive their 23% share (£115k)

Mr John receive their 77% share (£385k)

Please note the values used in all the examples are indicative, not real life examples

Option three - leasehold swap

As set out in the Leaseholder Guide, you will be able to complete a leasehold swap with an existing Council owned property.

The new property will need to be the same size, or smaller, than the existing property and be of equivalent value.

If the values are significantly different, then that difference in value will need to be funded by the you or refunded by the Council - depending on whether the new property is more or less expensive than the existing one.

To access the leasehold swap, you will need to complete a leasehold swap assessment form with their Rehousing Officer. Once completed leaseholders will be given access to suitable properties. A valuation of their existing property and any property they successfully select will need to take place.

Example Three

- Ms Ivy wants to do a leasehold swap
- She has found a Council property in a block next to her daughter
- Mrs Ivy does not have a mortgage



Her property is valued at £350k
She receives £35k in homeloss
So has £385k in total

The Council property Ms Ivy would like to move to, is valued in the same way as her existing property
The property is also valued at £350k

Ms Ivy owns 100% of the property
Ms Ivy keeps her homeloss payment



Option four, five and six - leasehold swap

Options four, five and six - purchase a new home on the open market within the High Road West Regeneration area, or within Haringey or within the UK without an equity loan from the Council.

As set out in the Estate Renewal Policy you can choose to use the full market value you receive for your property on the Love Lane Estate and the compensation to buy a new property on the open market.

However, you should note that the costs of purchasing a new home will only be met if the replacement property is in the UK.

As also set out in the Estate Renewal Policy, leaseholders wanting to acquire a property on the open market can receive the following:

- **Practical help with buying another property outside Haringey** - the Council can provide practical, non-financial help to assist leaseholders buy another property outside of Haringey. The need for this will be assessed on a case by case basis and will be limited to information on how to purchase a property on the open market such as finding solicitors, surveyors etc.
- **Practical help with buying a property in another part of Haringey** - the level of help to be provided will be assessed on a case by case basis, in accordance with individual needs, and may include (but is neither guaranteed to include nor restricted to) the provision of:
    - Information on how to purchase a property on the open market such as finding solicitors etc.
    - Information on any other leasehold properties Haringey Council knows are for sale
    - Advice on intermediate housing options in Haringey
- **Additional Support to purchase a new property in another part of Haringey** - additional, more intensive support may be provided where the Council assesses that you would have difficulty purchasing a new home on the open market – for example, if you have support needs. This support may include practical assistance and help in arranging a new mortgage, arranging surveys and providing advice and support on the legal steps needed to complete a purchase. In exceptional cases, and where required, the Council may purchase a property on behalf of the leaseholder. Any offer of additional support and the level of support given will be at the Council's discretion

What if I can't raise enough funds to acquire a home?

Where a resident leaseholder is unable to raise sufficient funds to qualify for an equity loan the Council will sympathetically review the options available to each leaseholder to provide the most suitable offer they can afford. This may include alternative financing, smaller properties or a rental offer on the estate renewal scheme.

Where a rental offer is required to enable a resident leaseholder to remain in the renewal area, their application will be assessed in line with the Council's Housing Allocations Policy in force at the time of the assessment.

The application of any income or savings thresholds, or restrictions preventing leaseholders or home owners from joining the Housing Register, will be considered as necessary by the Estate Renewal Rehousing and Payments Discretion Panel. Rental offers will not normally be made outside of the renewal area unless the applicants meet the income and saving thresholds, and restrictions on home ownership. Any temporary moves off the estate will be held under a license.

Tenants can ask for a review of the property allocated to them under the Choice Based Lettings scheme or as a direct offer. This review will follow the procedure laid out in the Housing Allocations Policy. There will be no further right of appeal from the decision on review.

6. Equity loans

If I take an equity loan to either by a property within the High Road West area, or within the borough, will I own and be responsible for the property?

Yes. Properties bought using an equity loan are generally leasehold properties, meaning that there is a lease for a fixed period of time. As the leaseholder, you will be responsible for repairs, service charges and all other costs associated with the new property, but there is no interest payable on the equity retained by the provider.

You will be able to repay part of the equity loan at any time. In order to do so a new valuation of the property will need to be obtained and each partial repayment of the loan must be for at least 10% of the property's current value. This valuation, and any associated administrative costs, will be the responsibility of the leaseholder.

Under the equity loan arrangement, you will be the sole legal owner and are able to sublet the property subject to the usual requirements to notify the freeholder or any other relevant terms in the lease.

In addition to the value of my existing home and my Home Loss Payment can I contribute other funds I have to acquiring a new property and an equity loan?

Yes. You may contribute any other capital or savings, but these additional funds can only be used to reduce the size of the equity loan and cannot be used to purchase a higher value property. Equity loans will not be available for the purchase of properties that are more expensive than these limits.

It should be noted that if your existing property was purchased using a mortgage, a further mortgage to at least the same value as the one held on the existing property being purchased by Haringey Council will need to be raised before (or at the same time as) the purchase of the new property can take place. Haringey Council and the independent financial advisor can assist leaseholders in finding a new mortgage. For a new property in the High Road West Area, where an independent financial advisor confirms that the maximum mortgage available to the leaseholder is lower than their existing one, the leaseholder will be required to obtain a mortgage for the maximum amount identified.

When do I need to repay the loan?

The equity loan only needs to be repaid upon sale of the property. Any increase or decrease in the value of the property will be apportioned between you and the Council or its appointed agent in line with their original contributions and any stair casing, which are calculated as percentages.

Prior to any sale the Council or its appointed agent will require a further valuation to be obtained so that the amount that is due to be repaid to the Council can be calculated. All of the administrative costs connected with the sale will need to be paid for by you.

Will I be able to pass on the equity loan if I die?

In the event of your death, you will be able to pass on the equity to loan to your spouse, civil partner or a person living with you as your partner, as long as your partner resided at the home with you at the time of your death and as long as they can afford to retain the same level of equity in the property as you did.

The equity loan will not be able to be passed on to anyone other than a partner and will need to be repaid in full when the property is transferred to another owner.

We understand that there may be some cases where you have an adult child living with you in the property. If this is the case, your adult child will be given 12 months to sell the property and will be able to use the proceeds to find alternative accommodation. Alternatively they could pay off the equity loan (e.g. by obtaining a mortgage for that amount) and remain living in the property as a leaseholder.



Example Four

- Mr Pressman received an equity loan from the Council for 20% of his property
- He has died and leaves his daughter, Fiona, who had been living with him
- He had no mortgage when he died and his home is now worth £400k



There is £400k equity in the property that is due to Fiona

There is £100k equity in the property that is due to the Council

12 months

Fiona has 12 months to make arrangements



Fiona sells the property and has £400k which she can use to purchase a property elsewhere

£100,000

Fiona takes out a mortgage for £100k, pays off the equity loan to the council and continues living in the property as a leaseholder



7. Further information

Ensuring leaseholders are not financially worse off

As set out in the Estate Renewal Policy we committed to ensuring that no resident should be financially worse off as a result of the regeneration scheme. But this does not necessarily mean that every leaseholder will pay exactly the same housing costs after the move as they did before the move.

For resident leaseholders, it is noted that lending rates and criteria are subject to change over time, and are beyond the control of the Council, so the cost of the same value mortgage may be different at different properties. This means that housing costs will change for some leaseholders and freeholders, particularly if they move to larger or smaller homes. The commitment that no resident leaseholder will be financially worse off as a result of the High Road West Scheme is deemed as being met by the provision of Home Loss and Disturbance payments to cover the costs of moving and the commitment to ensuring there is always an offer available that is affordable to them, enabling them to stay within the original area. This offer may be open market purchase, with an equity loan either within or outside the estate renewal scheme (but within Haringey).

For leaseholders, other costs, such as utilities, insurance, service charges, Council Tax and mortgage rates will also change – some falling, some rising. The Council will work hard with Lendlease to keep service charges in particular as low as possible. But any changes in these charges, which are outside the control of the Council, are not covered in, or part of, the commitment that no tenant or leaseholder will be financially worse off a result of the renewal scheme.

For non-resident leaseholders and freeholders, the commitment that no leaseholder or freeholder will be financially worse off as a result of the renewal scheme is deemed as being met by the statutory provisions.

This offer does not seek to resolve leaseholder problems, which are not caused by the scheme itself, such as people's existing financial problems or costs that are beyond the Council's control.

The Estate Renewal Rehousing and Payments Discretion Panel

In individual cases, the Council may need to apply discretion where the application of this policy would lead to an inequitable or unfair outcome for an individual resident, or to an outcome which is not in keeping with the principles above.

Any such decision on the use of discretion will be made by the Estate Renewal Rehousing and Payments Discretion Panel, and will be at the request of the resident affected. The Panel will have authority to apply or amend the application of this policy on individual cases where the specific circumstances would lead to outcomes which are not in keeping with these principles.

Appeals

The Council has a two-stage complaints process, which can be used in relation to appeals against the application of this offer. For more information visit **www.haringey.gov.uk/contact/council-feedback/complaints-about-council**

Where the appeal is regarding the compensation payment in respect of property acquired, leaseholders have the statutory right to apply to a specialist tribunal to determine the appropriate level of compensation.

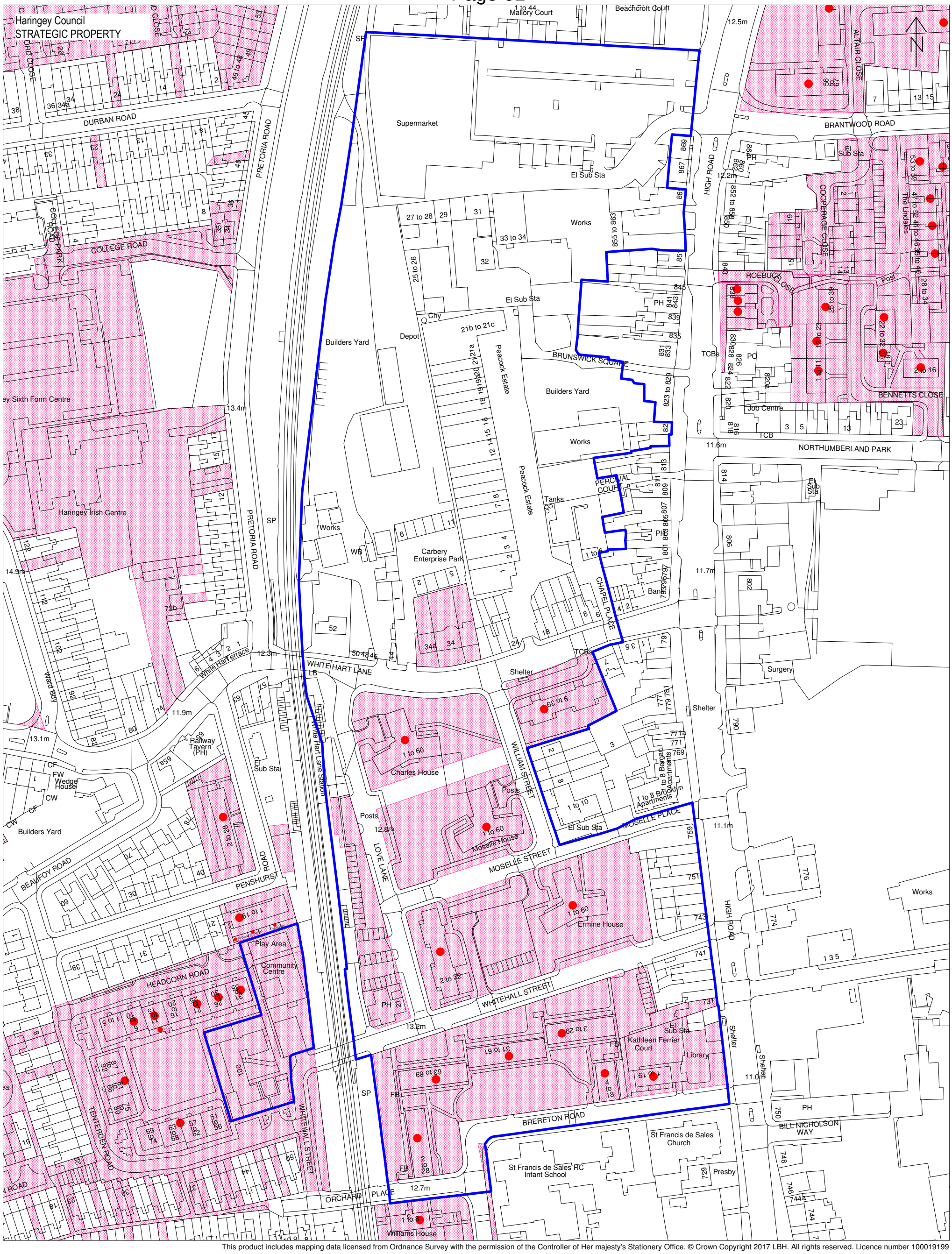
Further advice on this can be provided by the Independent Tenant Advisor appointed to High Road West.

Discretion and exceptional circumstances

There may be limited circumstances when the Director of Housing & Growth, or duly delegated persons, may exercise discretion in relation to this policy due to exceptional individual circumstances and will do this by taking into account all the circumstances considered relevant.

Updating the offer

Haringey Council reserves the right to amend the policy in any way in the future as a result of any changes in legislation, circumstances or otherwise.



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HARINGEY COUNCIL OWNERSHIP in vicinity of

HIGH ROAD WEST

Scale
0 10 20 30 40 50 m

Shaded pink - Haringey Council freehold ownership.
Shaded green - Haringey Council leasehold ownership
Red dot - Over 21yr lease out
Green dot - Over 21yr lease in
Shaded brown - Other Council interest (right of way, held in trust etc.)
Hatched grey - Query

Blue verging - High Road West boundary

Overlay : PropTerLive + RegenJAD
Plan produced by Janice Dabinett on 30/08/2017

Scale 1:1750@A3
BVES Drawing No. BVES A3 misc.

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Agenda Item 10

Report for: Cabinet 6th March 2018

Title: Quarter 3 (December) 2017/18 Budget Monitoring Report

Report authorised by: Clive Heaphy – Interim Chief Finance Officer

Lead Officer: **Frances Palopoli** – Head of Finance Operations

1. Introduction

1.1. This report sets out the 2017/18 Quarter 3 (Q3) financial position for the Council; including the Revenue, Capital, Housing Revenue Account (HRA) and Dedicated Schools Grant (DSG) budgets.

1.2. It also enables Members to consider the proposed management actions set out in this report and approve the budget adjustments (virements) in Appendix 4 as required by Financial Regulations.

2. Cabinet Member Introduction

2.1. Haringey Council, like others, faces significant challenges in delivering high quality but financially sustainable services. By focussing on our key priority areas and driving improved outcomes at lower cost, we aim to achieve that balance in spite of increased demand across all of our services. We have a well-developed savings plan across all Council services which is managed and monitored to ensure that it is delivered effectively.

2.2. This budget monitoring report covers the financial year position for Q3 of 2017/18. The report focuses on significant budget variances including those arising as a result of non-achievement of Cabinet approved Medium Term Financial Strategy (MTFS) savings.

2.3. The report provides a snapshot of the revenue position at Priority level and for the Council as a whole. It highlights budget pressures, budget risks and significant over/under spends. Where there are budget pressures, the directors and assistant directors are expected to identify mitigating actions and develop action plans to bring overspend positions back in line with approved budgets.

2.4. At the end of Quarter 3 (Period 9), the Council is projected to overspend by £3.7m in 2017/18. The General Fund is projecting an overspend of £5.4m and underspend in HRA of £1.8m. The majority of the overspend in the General Fund relate to demand pressures in key frontline services such as:

i. Priority 1 (Children's) - £3.8m;

ii. Priority 2 (Adults) - £2.9m;

iii. Priority 5 (Temporary Accommodation) - £0.8m.

However, mitigating strategies have been identified which should enable the Council to deliver an outturn in line with the approved 2017/18 budget. These are set out in sections 6 and 7.

2.5. The Council has implemented a risk-based approach to budget monitoring across its services this financial year. The approach ensures the Council focuses effort on monitoring those higher risk budgets due to their value, volatility and social impact along with the monitoring of Cabinet approved savings.

2.6. Each Priority area has provided commentary that explains the reason for significant variances where the difference between forecast outturn and approved full year budget is more than £100k or higher than 10% of approved budget.

2.7. Given the level of savings proposals identified to be delivered in 2017/18, there is a RAG rating specifically related to the delivery of the savings. The RAG status takes account of risk of delivering the full savings in the year and risk of delay to give an overall risk rating. The rating is as follows:

Green:	The risk is tolerable and requires no action unless status increases.
Amber/Green:	The risk requires active monitoring but does not currently require mitigating action.
Amber/Red:	Mitigating action is required and active monitoring should take place with immediate escalation if the position does not improve or deteriorates.

3. Recommendations

3.1. That Cabinet:

i. Note the Q3 forecast revenue outturn for the General Fund of £5.4m overspend, including corporate items *and the proposed mitigation to deliver a balanced outturn position*. (Sections 6 & 7, Table 1 and Appendix 1);

ii. Note the net HRA forecast position of £1.8m underspend. (Section 7, Table 2 and Appendix 2);

iii. Note the position on DSG spend during 2017/18 and forecast closing reserve figure (Section 8, Table 3);

iv. Note the latest capital position with forecast capital expenditure of £97.3m in 2017/18. (Section 9, Table 4);

v. Note the risks and mitigating actions identified in the report in the context of the Council's on-going budget management responsibilities/savings, as detailed in Appendices 3 (a) (g);

vi. Note the measures in place to reduce overspend in service areas; and

vii. To approve and note the budget virements set out in Appendix 4 of this report.

4. Reason for Decision

4.1. A strong financial management framework, including oversight by Members and senior management, is an essential part of delivering the Council's priorities and statutory duties.

5. Alternative Options Considered

5.1. This is the 2017/18 Quarter 3 budget monitoring financial report. As such, there are no alternative options

6. Background Information

Budget Monitoring Overview

6.1. As at 31st December 2017 (Quarter 3) of the financial year ending 2017/18, the Council's projected overspend on its revenue budget is £3.7m (including £1.8m underspend in HRA). *Strategies to mitigate down the General Fund overspend and deliver a balanced outturn position were presented to Cabinet in February and are outlined in more detail in section 7.32.*

6.2. Table 1 below sets out financial performance at priority level. A detailed analysis at directorate level is attached at Appendix 1.

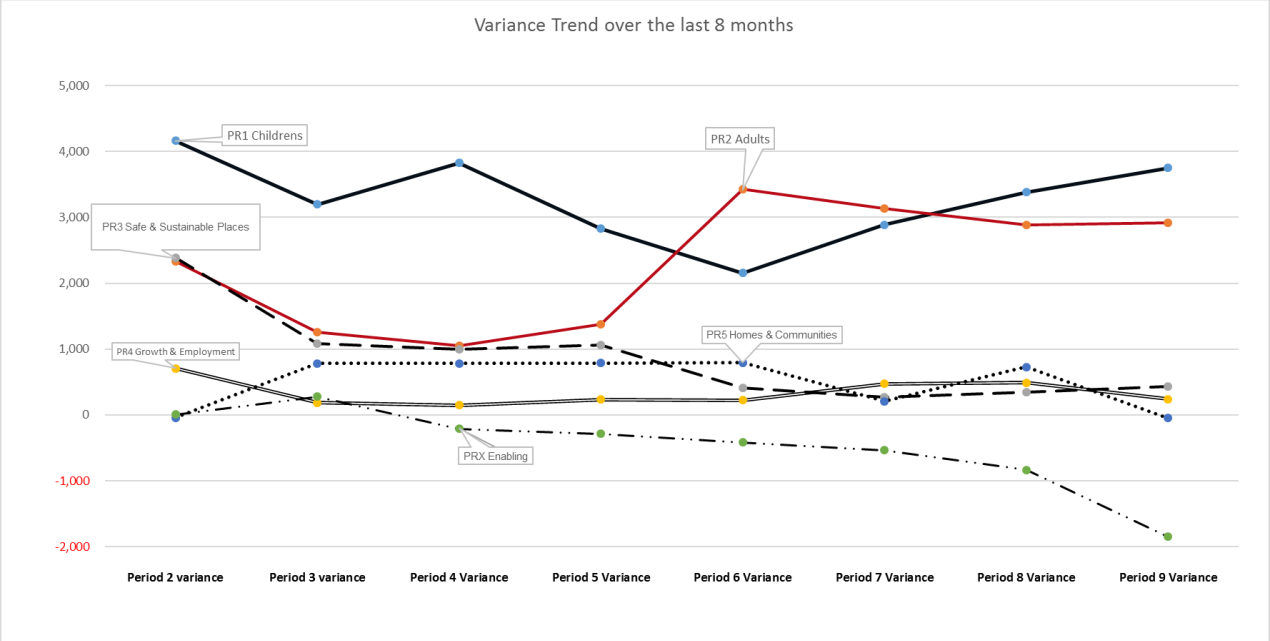
Table 1 – Revenue Budget Monitoring Forecast for Q3 (2017/18)

Priority	Revised 2017/8 Budget	Quarter 3 Outturn Forecast	Quarter 3 Forecast to Budget Variance	Quarter 2 Forecast to Budget Variance	Forecast Variance Movement between Q2 and Q3	
	£'000	£'000	£'000	£'000	£'000	
PR1 Childrens	65,486	69,236	3,750	2,157	1,593	▲
PR2 Adults	95,442	98,358	2,916	3,429	(513)	▼
PR3 Safe & Sustainable Places	26,561	26,995	434	412	23	▲
PR4 Growth & Employment	12,262	12,500	239	223	16	▲
PR5 Homes & Communities	20,538	20,490	(47)	796	(843)	▼
PRX Enabling	35,624	33,774	(1,850)	(419)	(1,431)	▼
General Revenue Total	**255,912**	**261,354**	**5,442**	**6,598**	**(1,156)**	▼
PR5 Homes & Communities(HRA)	0	(1,785)	(1,785)	(169)	(1,616)	▼
Haringey Total	**255,912**	**259,569**	**3,657**	**6,429**	**(2,772)**	▼

▼ Denotes reducing overspend/increasing underspend

6.3. Diagram 1 below illustrates the trend and volatility of forecast outturn by priority area up to Q3 (31st December 2017). It shows that outturn forecast for all but one (Priority 1 - Childrens) of the priority areas are broadly stable or trending downward in terms of overspend or upward where an underspend has been forecast.

Diagram 1 – Revenue Budget Forecast Trend to Q3



7. Revenue Finance Overview

7.1. A summary of outturn position including comments on each priority area budget are set out below along with proposals to mitigate down the forecast GF overspend of £5.4m by year end

PRIORITY 1 **Overspend £3.8m**

7.2. Priority 1 is projecting overall spend of £69.2m against approved budget of £65.5m resulting in forecast overspend of £3.8m as at Q3. This is an adverse movement of £1.6m on the outturn position forecast at Q2.

7.3. The areas with material variances are detailed below.

7.4. **Placements** are forecast to overspend by £1.1m, a significant increase of £0.8m against Q2. This is largely due to increase in the LAC cohort from 398 to 413; with the main cost driver being the increase of residential/secure package average weekly cost by £407, against Q2. There is a continued focus on the "top 20" high cost placements; with a view to stepping down care packages or negotiating lower fees, whilst also managing demand through Family Group Conferencing and Targeted Response initiatives.

7.5. **Other social Care Agency Worker costs** are forecast to overspend by £0.8m which is an increase of £0.1m compared to Q2 reflecting the market difficulties in recruiting permanent staff into these areas of operation. Work is also continuing to ensure that workforce numbers are within the currently agreed and budgeted establishment level.

7.6. **Early Help and Targeted Response** is forecast to overspend by £0.4m an increase of £0.1m from Q2. This is as a result of the childcare element of children's centre service delivery incurring more than budgeted building costs and lower than anticipated occupancy levels.

7.7. **Children & Young People with Additional Needs** is forecasting to overspend by £1.1m which is consistent with previous forecasts, see breakdown below:

- Inclusion Service - the traded income will about £0.2m less than budget as this is a fairly new service which started in September 2017, however the service continues to expect bookings from schools.

- SEND - £0.4m overspend of which £0.3m is the shift in funding stream for transport back to the general fund from the High Needs Block (DSG). The service continues to work on refining transport costs but is unlikely to make significant changes until the next financial year.

- Family Support - the overspend position of £0.5m is due to packages for complex children. Going forward the service is working with Brokerage and Commissioning to look at more cost effective ways of supporting families and children. The plan will include recovery of contributions from CCGs for joint funded placements, and income relating to services provided to other London boroughs and the adoption of a targeted approach to reviewing high cost placements and ensuring the integrity of data used to forecast future costs.

7.8. **Schools and Learning** is forecasting an increase of £0.6m on Q2 as a result of staffing cost pressures and underachievement against its traded services target (£0.3m) and slippage on the closure of the PDC which is now scheduled for the end of March 2018 (£0.3m).

7.9. Following the recent Joint Targeted Area Inspection of the multi-agency response to abuse and neglect undertaken in December, a number of gaps were identified and subsequently a business plan has been developed that will bring the quality of the service offer currently to the standard expected, pending the upcoming Ofsted Inspection. The proposal requests an injection of resources (£1.2m) to areas where weaknesses were identified with the appropriate corrective action to be undertaken over the next six months. The funding will be provided from the transformation fund.

PRIORITY 2 **Overspend £2.9m**

7.10. Priority 2 is projecting overall spend of £98.4m against approved budget of £95.4m resulting in a forecast overspend of £2.9m as at Q3. The overspend position of £2.9m represents an improvement of £0.5m compared to Q2 which is largely as the result of increased capitalisation. The three main directorates within Priority 2 are Adult Social Care, Commissioning and Public Health.

7.11. The entire £2.9m overspend is in Adult Social Care Services which is forecasting outturn spend of £84.2m against a budget of £81.3m. Commissioning and Public Health, together, are forecasting underspend of £0.03m against budget in 2017/18.

7.12. The two main pressure areas in Adults Services are detailed below.

7.13. **Osborne Grove Nursing Home (OGNH)** is projecting a budget pressure of £1.0m (unchanged from Q2). The net revenue budget for Osborne Grove in 2017/2018 is £1.0k. This is made up of expenditure budgets relating to staffing and premises costs, plus income budgets including client contributions and NHS funding, relating to an 8-bed contract. The Home currently has an occupancy rate of 53% and the 8 -bed contract with the CCG has lapsed following quality concerns and a placement embargo. Total loss of income is approximately £0.46m.

7.14. Additional staffing has been appointed at a cost of £0.49m above the budgeted level to improve the quality of care and bring improved leadership to the Home. Additional

maintenance and new equipment costs have resulted in a further £0.06m being spent to improve the quality of care. The combination of the additional costs and the loss of income means the budget will be overspent by £1.01m at the end of March 2018.

7.15. **Adult Social Care Packages** is projecting a budget pressure of £4.2m on care packages due to demand above trajectory (£0.7m) and planned MTFS savings largely around prevention and diversion strategies which have not been realised (£3.5m). In the latter case the service now believes that the initial assessment of achievable savings was overly optimistic and a review is being undertaken to seek alternative ways to mitigate this going forward.

7.16. The £4.2m budget pressure is spread across all key client groups – older clients with physical support needs £1.3m; clients with Learning disabilities £1.9m; and clients with mental health needs £1.0m.

7.17. Capitalisation of appropriate revenue spend totalling £0.9m has enabled some in year pressures in directly provided services and care packages to be offset .

7.18. A further £0.5m of revenue savings from the capitalisation of community equipment has also been achieved with the budget reallocated across care packages and directly provided services and included within the variances reported above. This takes the total capitalisation of spend to £1.8m in this financial year.

7.19. In-year pressures are being further mitigated through the release of two provisions totalling £1.3m, the two provisions being:

- Haynes Centre (£0.7m) - relating to historic rental costs at the Haynes Centre, liability for which is being disputed with Haringey CCG. The current advice from Legal and Property Services is that the council is not liable for these costs;

- Care packages (£0.6m) - the provision, established in 2016/17, relates to potential liabilities for committed homecare hours but is no longer required as the liability no longer exists.

PRIORITY 3 **Overspend £0.4m**

7.20. At Q3, Priority 3 is projecting total expenditure of £27.0m against approved budget of £26.6m for 2017/18. This forecast overspend of £0.4m is in line with that reported at Q2.

7.21. The variance is made up of a number of non-material underspend/overspends. In addition, a number of budget pressures are being managed within this priority area most notably the loss of on-street parking income due to the absence of Spurs football matches this season (£0.3m) and increased contractual costs associated with clamping removal (£0.2m) which are being managed through a reduction in spend of £0.5m within the concessionary travel service.

PRIORITY 4 **Overspend £0.2m**

7.22. At the end of Q3, Priority 4 is projecting total expenditure of £12.50m against planned budget of £12.26m resulting in a forecast overspend of £0.2m in line with the £0.2m overspend reported in Q2.

7.23. The main area of forecast overspend within this priority remains additional costs for staffing, consultancy fees and legal recharges all related to the delay in transfer of properties to HDV. This however is being offset by an underspend in consultant fees across the Tottenham and Wood Green regeneration schemes following a review of planned consultancy spend in Period 9.

PRIORITY 5 (General Fund) **Underspend £0.05m**

7.24. The forecast for Priority 5 is projecting total expenditure of £20.49m against a planned budget of £20.54m resulting in an underspend of £0.05m. This represents an improvement of £0.8m on Q2.

7.25. The improvement reflects the allocation of £0.8m from the Flexible Homelessness Support Grant to cover the overspend on temporary accommodation.

7.26. Actions continue to be taken to manage the demand for temporary accommodation including the implementation of a pilot Assured Short-hold Tenancy scheme with guaranteed rent and the development of 20 infill sites by Sanctuary Housing.

PRIORITY 5 (HRA) **Underspend £1.8m**

7.27. The HRA is currently forecasting underspend of £1.8m against its approved (net nil) budget which represents an improvement of £1.6m.

7.28. The underspend and improved reporting position is primarily the result of the £1.46m of housing strategy budget carry forward from 2016/17 now not being projected to spend in 17/18. This budget is used to develop new supply initiatives and the service will therefore bid to carry forward part of this underspend into 18/19

7.29. The forecast HRA outturn summary is set out in Table 2 below.

Table 2 – HRA Budget Forecast (Q3)

HRA Budget (2017/18)	2017/18 Revised Budget	Q3 Forecast Outturn	Q3 Forecast to Budget Variance	Q2 Forecast to Budget Variance	Movement – Q2 to Q3 Forecast to Budget
	£'000	£'000	£'000	£'000	£'000
Managed Services Income	(107,736)	(107,984)	(248)	(231)	(17)
Managed Services Expenditure	12,492	12,541	49	158	(109)
Retained Services Expenditure	95,244	93,658	(1,586)	(96)	(1,490)
Surplus	0	(1,785)	(1,785)	(169)	(1,616)

PRIORITY X **Underspend £1.9m**

7.30. At Q3 Priority X is currently forecasting total expenditure of £33.8m against budget of £35.6m giving underspend forecast of £1.9m equating to a favourable movement of £1.5m when compared to underspend of £0.4m forecast at Q2. The make-up of the over/underspend is spread out across a number of services in Priority X but the main variances are:

7.31. **Transformation and Resources** – This area is forecast to overspend by £0.8m at Q3, an adverse movement of £0.2m compared to Q2 forecast. The overspend is largely due to continuing reliance on temporary staff in Finance to fill vacancies in key areas and unfunded posts in Corporate Project Management Office (CPMO) carried over from previously committed project work.

7.32. **Non Service Revenue (NSR) –** The forecast underspend within NSR is £2.1m at Q3 representing an improvement of £1.4m on Q2 following a reforecasting of debt financing costs as a result of projected slippage in the Capital Programme.

7.33. **Mitigating Strategies to achieve a balanced outturn** – the MTFS report to Cabinet in February 2018 set out in detail the proposed strategy to mitigate down the forecast services overspend. This has been summarised below:

- Reduced Expenditure (£3.4m) – a reduction in the minimum revenue provision (MRP) requirement needed to finance council assets and the application of the Governments approved flexible capital receipts to finance transformational type expenditure which will deliver sustainable revenue savings
- Funding Changes (£4.4m) – release of earmarked corporate reserves no longer required; capitalisation and the application of government grants received above the budgeted figures

8. Dedicated Schools Grant (DSG)

8.1. The Dedicated Schools Grant is broken down into three funding blocks; Schools, Early Years and High Needs. Excluding school's balances, the carried forward surplus on the DSG Reserve from 2016/17 is £2.8m. However, whilst Schools and Early Years carried forward surpluses, the High Needs block carried forward a deficit of £1.3m.

8.2. Table 3 below sets out the projected movement on the DSG Reserve for 17/18.

Table 3 – DSG Reserve

DSG as at Q3	Opening DSG at 01/04/17	Loan	In year position at Q3 2017/18	Forecast Closing DSG 2017/18
	£'000	£'000	£'000	£'000
Schools block	(815)	0	63	(753)
Early years block	(3,325)	1,340	1,146	(839)
High needs block	1,340	(1,340)	571	571
Total	**(2,800)**	**0**	**1,779**	**(1,021)**

8.3. The Early Years block projection includes £0.7m to mitigate the loss of subsidy to maintained childcare settings and a further anticipated drawdown of £0.4m for 2-year old free entitlement.

8.4. A paper on the current financial position for the High Needs Block (HNB) was presented to Schools Forum on 17th January 2018, stating that the £571k overspend was the most likely scenario. Therefore, a proposal was tabled and agreed, whereby the surplus in the Schools Block at the end of this financial year will be used to subsidise the HNB. Further work is currently being undertaken to ensure that the HNB is self-sustaining in 2018/19.

9. Capital Budget

9.1. This section sets out progress on the capital programme against the approved capital budget at priority level.

9.2. The table below show a forecast underspend position of £93.9m on the general fund and £20.9m on the HRA with a combined underspend of £114.8m. Most of this underspend on capital expenditure is expected to slip into 2018-19 financial year.

9.3. Since Q2 the overall general fund 2017/18 budget has increased by £2.171m. The majority of this increase relates to the acceleration of spend on the relocation of the Civic Centre (£2.08m), additional TfL LIP funding for the White Hart Lane Public Realm scheme (£0.49m), offset by a number of other scheme re-profiling's. The revised Q3 budget is set out in the table below as well as the Q2 forecast outturn, the Q3 forecast outturn and the variance between the two forecasts.

Table 4 – Capital Outturn Forecast Q3 (2017/18)

Priority	2017/18 Revised Budget	2017/18 Q3 Forecast Outturn	2017/18 Forecast to Budget Variance	2017/18 Q2 Forecast Outturn	Movement in Forecast Variance
	£'000	£'000	£'000	£'000	£'000
Priority 1 - Children's	13,576	5,870	(7,706)	9,227	(3,358)
Priority 2 - Adults	3,078	1,610	(1,468)	2,485	(874)
Priority 3 - Safe & Sustainable Places	17,242	11,859	(5,383)	12,475	(616)
Priority 4 - Growth & Employment	75,993	25,903	(50,090)	19,047	6,856
Priority 5 - Homes & Communities	16,431	1,107	(15,324)	3,522	(2,415)
Priority 6 - Enabling	16,873	2,963	(13,909)	5,392	(2,428)
General Fund Total	**143,192**	**49,312**	**(93,880)**	**52,147**	**(2,835)**
HRA Priority 5 - Homes & Communities	68,901	47,995	(20,905)	49,440	(1,444)
Total	**212,093**	**97,307**	**(114,786)**	**101,587**	**(4,279)**

9.4. Overall the forecast outturn has decreased in Q3 when compared to Q2: £2.8m on the general fund and £1.4m on the HRA. The main reasons for this movement from the last quarter are set out below at priority level.

Priority 1

9.5. Scheme 101 Primary School - modernisation & enhancement (inc. SEN) is reporting a lower forecast outturn by £2.137m. The delays to the detailed survey reports which will enable a prioritised programme to be prepared have meant delaying the preparation of an evidence based programme. Similar issues apply to Scheme 114

Secondary School - modernisation & enhancement (inc. SEN) which is reporting a lower forecast outturn by £0.525m.

Priority 2

9.6. The reduced forecast outturn relates to the disabled facilities grant (DFG) spend. The outturn has reduced by £0.874m. At the time of the Q2 forecast it was anticipated that four contractors would be appointed to the framework for this type of work. Whilst two were appointed in line with the Q2 expectation, two were not thus reducing the amount of work done.

Priority 3

9.7. The reduction in the forecast outturn by £0.616m is in part related to the re-profiling of Scheme 303 Highways Structures (£0.252m) but the majority of the reduction in the forecast outturn relates to Scheme 316 Asset Management of Council Buildings which has reduced by £1.241m.

Priority 4

9.8. The forecast outturn has improved by £6.856m. Scheme 429 Strategic Acquisitions has improved by £4.050m due to the anticipated completion on a number of property transactions. Scheme 438 relocation of Civic Centre has accelerated spend of £2.040m. Scheme 444 Marsh Lane has improved its outturn by £1.658m due to the completion of the relocation of certain facilities in advance of the main scheme. These improvements have been off-set by a number of minor adverse movements. As part of the concluded negotiation for the Borough Intervention Agreement between the Council and the GLA that supports the High Road West scheme the GLA have allocated the Council the following funding: £16.2M Affordable Housing Grant; and £6.36m of Mayors Regeneration Fund (MRF). These budgets will be added to the agreed capital programme.

Priority 5 (General Fund)

9.9. Due to the impending creation of an alternative delivery model for temporary accommodation expenditure in this priority has been largely suspended.

Priority 5 (Housing Revenue Account)

9.10. The forecast outturn has deteriorated by £1.444m since Q2. The main reasons for this are in Scheme 590, where delays in the Decent Homes programme generated slippage of £0.743m due to the delay in the signing of the approval reports and the compiling of cost information to enable the Section 20 Notice to be served; Mechanical & Electrical Budget slippage of £0.447m is due to procurement requirements which delayed the tenders going out; and Fire Protection Works slippage of £0.6m is due to the delay in the signing of the approval reports. A number of small positive movements in other schemes have offset the slippage in Scheme 590.

Priority X

9.11. There has been a deterioration in the forecast outturn by £2.428m. This is primarily due to delays in the spend on the shared digital budget of £1.7m. In addition, given the lateness of the financial year it has been forecast that there will be no further calls on the contingency budget so is now showing as underspend at £0.775m. The

contingency will be recommended for carry forward at the appropriate time. There are a number of other minor movements that largely offset each other.

10. MTFS Savings 2017/8

10.1. The MTFS savings target for 2017/8 is £20.73m. As at Q3, services are projecting that that £11.14m (54%) of planned savings will be achieved compared to £10.17m (49%) at Q2. This is an improvement in forecast savings of £0.97m with favourable movements relating to Adults Social Care savings and Corporate savings offsetting a revision downwards of previously projected savings within Priority 1.

10.2. The Chief Finance Officer has engaged with service directors to encourage delivery of planned savings or where this is not possible, for services to come up with alternative savings to ensure that overall services are delivered within planned budgets.

10.3. Table 3 below summarises the savings position at priority level and Appendix 3 has a detailed breakdown of savings with the relevant RAG rating.

Table 4 – Summary Savings at Priority Level

	New MTFS	Old MTFS	**Total**	**Savings Projected to be Achieved in Q3 2017/18**	**Savings Shortfall in Q3**	**% Achieved**	Movement in achieved savings since last quarter	**Savings Projected to be Achieved in Q2 2017/8**
	£'000	£'000	**£'000**	**£'000**	**£'000**	%		**£'000**
Priority 1	1,437	2,696	**4,133**	**960**	**3,173**	23%	▼	**1,288**
Priority 2	2,737	5,233	**7,970**	**5,070**	**2,900**	64%	▲	**4,264**
Priority 3	1,685	930	**2,615**	**2,540**	**75**	97%	▶	**2,540**
Priority 4	503	325	**828**	**578**	**250**	70%	▶	**578**
Priority 5	-	765	**765**	**765**	**-**	100%	▶	**765**
Priority X	612	116	**728**	**511**	**217**	70%	▼	**569**
Corporate Savings	2,036	1,650	**3,686**	**719**	**2,967**	20%	▲	**167**
Total	**9,010**	**11,715**	**20,725**	**11,143**	**9,582**	54%		**10,171**

10.4. The major factors that have contributed to the projected shortfall in the savings programme for each priority area are summarised below.

Priority 1

10.5. Priority 1 is reporting that only 23% (£0.96m of £4.13m) of approved savings will be delivered this year compared to 31% (£1.29m) in Q2. The movement between Q2 and Q3 is due to savings relating to the new model for social care delivery and services to schools, not being achieved this financial year.

10.6. Other planned saving not being achieved this financial year includes £0.6m of savings relating to supported housing which the Service has requested to be deferred

to the next financial year. Appendix 3a provides a full RAG rated list of savings within this Priority.

Priority 2

10.7. Priority 2 is now reporting that it will deliver 64% (£5.1m of £7.9m) of planned savings in 2017/18 compared to £4.3m projected achievement at the end of Q2. The revision upwards is mainly due to £600k savings achievable through new models of care and an increase in achievable savings in transformation and promoting independence reviews. Appendix 3b provides a full RAG rated list of savings within this Priority.

Priority 3

10.8. Priority 3 is reporting a projected shortfall in savings achievable in 2017/18 of £75k – same as Q2. This projected non-delivery relates to the delay in the scoping exercise for the move to cashless parking payment project. Appendix 3c provides a full RAG rated list of savings within this Priority.

Priority 4

10.9. The shortfall of £0.25m in priority 4 relates to the transfer of functions/assets to the HDV – the projection remains the same as Q2. Appendix 3d provides a full RAG rated list of savings within this Priority.

Priority 5

10.10. Priority 5 is currently projecting that all its savings will be achieved which is similar to projection at the end of Q2. Appendix 3e provides a full RAG rated list of savings within this Priority.

Priority X

10.11. Priority X is currently projecting that 70% (£0.51m out of £0.73m) of approved savings will be achieved. Q2 projection was 78% (£0.57m). The reduction relates to projected non-delivery of accounts payable restructure which is under pressure due to continuing delays in implementing the new Procurement Contract System. Appendix 3f provides a full RAG rated list of savings within this Priority.

Council Wide Savings

10.12. A corporate savings target of £3.6m relates to council wide savings on redundancy (£1.5m), bad debt provision (£0.70m), procurement (£0.95m), and senior management savings (£0.40m). A significant shortfall of 80% is currently projected for these savings – but a favourable movement from Q2 of 15%. The relevant services are working to develop action plans to deliver savings relating to bad debt provision and procurement, and there has been an improvement in projected achievable savings of £0.56m in procurement (£0.25m), redundancies (£0.25m) and £0.06m in senior management savings (£0.06m). Line by line comment on individual savings, where provided, are detailed at Appendix 3g.

11. Budget Virements

11.1. Budget virements are set out in Appendix 4. One-off virements (£98.76m) are budget movements affecting this financial year, whilst permanent virements (£91.04m) are budget movements which will permanently affect the cash limit of the priority.

12. Contributions to strategic outcomes

12.1. Adherence to strong and effective financial management will enable the Council to deliver all of its stated objectives and priorities.

13. Statutory Officers Comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance and Procurement

13.1. This is a report of the Chief Finance Officer and concerns the Council's financial position.

Legal

13.2. The Assistant Director of Corporate Governance has been consulted on this report.

13.3. Section 28 of the Local Government Act 2003 imposes a statutory duty on the Council to monitor during the financial year its expenditure and income against the budget calculations. If the monitoring establishes that the budgetary situation has deteriorated, the Council must take such action as it considers necessary to deal with the situation. This could include, as set out in the report, action to reduce spending in the rest of the year.

13.4. The Council must act reasonably and in accordance with its statutory duties and responsibilities when taking the necessary action to reduce the over spend.

13.5. The Cabinet is responsible for approving virements in excess of certain limits as laid down in the Financial Regulations at Part 4 Section I, and within the Executive's functions at Part 3 Section C, of the Constitution.

Equalities

13.6. The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

- Tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- Advance equality of opportunity between people who share those protected characteristics and people who do not;
- Foster good relations between people who share those characteristics and people who do not.

13.7. This report provides an update on the Council's financial position in relation to planned MTFS savings and mitigating actions to address current budget overspends. Given the impact on services of savings targets, all MTFS savings were subject to equalities impact assessment as reported to Full Council on 27th February 2017.

13.8. Any planned mitigating actions that may have an impact beyond that identified within the MTFS impact assessment process should be subject to new equalities impact assessment.

14. Use of Appendices

Appendix 1 – Directorate Level Forecast (Q3)

Appendix 2 – HRA Forecast (Q3)

Appendix 3 – Detailed MTFS Savings Monitor (Q3)

Appendix 4 – Revenue and Capital Virements (Q3)

15. Local Government (Access to Information) Act 1985

15.1. For access to the background papers or any further information please contact Frances Palopoli – Head of Finance Operations

Revenue Budget Forecast as at Q3 (2017/18)

APPENDIX 1

Priority for Report	Directorate	Revised 2017/8 Budget	Period 9 Outturn Forecast	Period 9 Forecast to Budget Variance	Period 8 Forecast to Budget Variance	Movement in Forecast Variance	
PR1 Childrens	CM Assistant Director for Commissioning	2,250,784	2,000,492	-250,292	-232,075	-18,217	▼
	CY Director Of Children Services	51,210,548	54,549,681	3,339,133	3,056,628	282,505	▲
	PH Director for Public Health	6,650,723	6,650,637	-86	-86	0	▼
	SCH Assistant Director for School	5,373,570	6,034,820	661,250	556,416	104,834	▲
PR1 Childrens Total		**65,485,626**	**69,235,631**	**3,750,005**	**3,380,883**	**369,122**	▲
PR2 Adults	AS Director for Adult Social Services	81,249,835	84,195,836	2,946,001	2,893,458	52,543	▲
	CM Assistant Director for Commissioning	3,029,703	3,072,927	43,225	54,906	-11,681	▼
	PH Director for Public Health	11,162,129	11,089,255	-72,874	-62,874	-10,000	▼
PR2 Adults Total		**95,441,666**	**98,358,018**	**2,916,352**	**2,885,490**	**30,862**	▲
PR3 Safe & Sustainable Places	OPS Director for Commercial & Operations	26,357,021	26,757,985	400,964	308,117	92,846	▲
	PH Director for Public Health	202,766	237,288	34,522	34,522	0	▶
PR3 Safe & Sustainable Places Total		**26,559,787**	**26,995,273**	**435,486**	**342,639**	**92,846**	▲
PR4 Growth & Employment	CM Assistant Director for Commissioning	1,057,360	1,032,154	-25,206	-20,369	-4,836	▼
	Alexandra Palace	1,900,200	1,950,000	49,800	49,800	0	▶
	PLAN Assistant Director of Planning	1,674,175	1,601,617	-72,558	-82,988	10,430	▲
	RGEN Director for Housing and Growth	3,091,866	3,733,263	641,397	698,010	-56,613	▼
	RPD02 Director of Regeneration	4,005,853	3,762,020	-243,833	-43,313	-200,520	▼
	V00001 Dir of Regeneration Planning,Development	533,352	421,352	-112,000	-112,000	0	▶
PR4 Growth & Employment Total		**12,262,806**	**12,500,407**	**237,601**	**489,139**	**-251,539**	▼
PR5 Homes & Communities	AH03 Community Housing Services	10,904,203	11,662,891	758,688	739,893	18,796	▲
	AH05 Housing Commissioned Services	9,633,556	8,827,403	-806,153	-65,175	-740,978	▼
	RGEN Director for Housing and Growth	0	0	0	51,400	-51,400	▼
PR5 Homes & Communities Total		**20,537,759**	**20,490,294**	**-47,465**	**726,118**	**-773,583**	▼
PRX Enabling	C00002 Deputy Chief Executive	440,357	438,257	-2,100	-84,400	82,300	▲
	CE01 Chief Executive Officer	2,600	13,529	10,929	10,929	0	▶
	COM Assistant Director for Strategy & Communication	659,046	608,446	-50,600	-23,272	-27,327	▼
	COOOO F00001 Chief Operating Officer	-112,951	-84,001	28,950	28,950	0	▶
	CUS Assistant Director for Customer Services	5,864,540	5,856,874	-7,666	-6,407	-1,259	▼
	GOV Assistant Dir of Corporate Governance	2,530,383	2,228,883	-301,500	-278,500	-23,000	▼
	Non Service Revenue	17,122,976	14,795,646	-2,327,330	-1,321,055	-1,006,275	▼
	Year End Adjustment Reserves	1,989,981	1,989,981	0	0	0	▶
	Other Non Service Revenue	1,700	1,700	0	0	0	▶
	RES Director for Transformation & Resources	322,745	1,099,636	776,891	815,019	-38,128	▼
	Shared Digital Services	1,518,803	1,276,980	-241,823	-227,073	-14,750	▼
	SSC Assistant Director for Shared Service Centre	5,284,148	5,548,446	264,298	253,689	10,609	▲
PRX Enabling Total		**35,624,328**	**33,774,377**	**-1,849,951**	**-832,121**	**-1,017,830**	▼
General Revenue Total		**255,911,972**	**261,354,000**	**5,442,028**	**6,992,149**	**-1,550,121**	▼
	HSE Housing Revenue Account	0	-1,785,014	-1,785,014	-1,201,411	-583,603	▼
Haringey Total		**255,911,972**	**259,568,986**	**3,657,014**	**5,790,738**	**-2,133,724**	▼

HRA Budget Forecast as at Q3 Appendix 2

HRA BUDGET 2017/18	2017/18 Revised Budget	Forecast Spend	Q3 Forecast Variance	Q2 Forecast Variance	Forecast Variance Movement
	£000's	£000's	£000's	£000's	£000's
UE0721 Managed Services Income					
H39001 Rent - Dwellings	(81,838)	(82,031)	(193)	(158)	(34)
H39101 Rent - Garages	(858)	(733)	125	121	4
H39102 Rent - Commercial	(2,139)	(2,139)			
H39201 Income - Heating	(336)	(342)	(6)	(2)	(4)
H39202 Income - Light and Power	(1,204)	(1,201)	3	3	
H39301 Service Charge Income - Leasehold	(7,143)	(7,560)	(417)	(417)	
H39401 ServChgInc SuppHousg	(1,488)	(1,497)	(9)	(10)	
H39402 Service Charge Income - Concierge	(1,554)	(1,546)	8	6	2
H39405 Grounds Maintenance	(1,922)	(1,919)	3	3	()
H39406 Caretaking	(1,544)	(1,541)	3	3	()
H39407 Street Sweeping	(1,626)	(1,623)	3	4	(1)
H40102 Water Rates Receivable	(6,295)	(6,063)	232	217	15
H40404 Bad Debt Provision - Leaseholders	210	210			
	(107,736)	**(107,984)**	**(248)**	**(231)**	**(17)**
UE0722 Managed Services Expenditure					
H31300 Housing Management WG	23	23			
H32300 Housing Management NT	28	28			
H33400 TA Hostels	237	237			
H34300 Housing Management ST	9	9			
H35300 Housing Management BWF	11	11			
H37210 Under Occupation	123	123			
H39002 Rent - Hostels	(1,996)	(1,967)	29	49	(20)
H39404 Service Charge Income - Hostels	(341)	(336)	5	11	(6)
H40001 Repairs - Central Recharges	2	2			
H40004 Responsive Repairs - Hostels	342	342			
H40101 Water Rates Payable	5,277	5,030	(247)	(247)	
H40104 HousMgmntRechg Cent	107	107		(2)	2
H40111 Other RentCollection	162	162			
H40206 HousMgmntRechg Energ	1,417	1,050	(367)		(367)
H40208 Special Services Cleaning	2,100	2,670	570	400	170
H40209 Special Services Ground Maint	1,680	1,760	80		80
H40212 HRA Pest Control	277	277			
H40303 Supporting People Payments	1,851	1,831	(21)	(53)	32
H40309 Commercial Property - Expenditure	221	221			
H40401 Bad Debt Provision - Dwellings	664	664			
H40405 BAd Debt Provision - Commercial	80	80			
H40406 Bad Debt Provisions - Hostels	68	68			
H40801 HRA- Council Tax	150	150			
	12,492	**12,541**	**49**	**158**	**(109)**
UE0731 Retained Services Expenditure					
H38002 Anti Social Behaviour Service	736	575	(161)	(161)	
H39601 Interest Receivable	(115)	(1)	114	114	
H40112 Corporate democratic Core	777	777		(13)	13
H40301 Leasehold Payments	(507)	(139)	368	317	51
H40305 Landlords Insurance - Tenanted	288	302	14	14	
H40306 Landlords - NNDR	132	42	(90)	(90)	
H40308 Landlords Insurance - Leasehold	2,017	1,355	(662)	(662)	
H40501 Capital Financing Costs	12,400	12,400			
H40601 Depreciation - Dwellings	18,000	18,000			
H40805 ALMO HRA Management Fee	40,032	40,154	122	27	95
H49000 Housing Revenue Account	15,673	15,673			
H60002 GF to HRA Recharges	2,990	2,999	9	(195)	204
H60003 Estate Renewal	1,876	100	(1,776)		(1,776)
H60004 HIERS/ Regeneration Team	810	859	49	49	
S11100 Emergency Response Management		311	311	388	(77)
S14400 Supported Housing Central	135	250	115	115	
	95,244	**93,658**	**(1,586)**	**(96)**	**(1,490)**
(Surplus) for the year on HRA Services		**(1,785)**	**(1,785)**	**(169)**	**(1,616)**

MTFS Savings - **P1 – Children's** Appendix 3a

Ref	Proposal	Savings Target 2017-18 £000's	Risk of delay	Risk of delivering full saving	Overall risk RAG	Overall risk RAG	Firm Commitment for savings achieveable for 2017/18 £'000
	P1 - Childrens						
1.1	**Service Redesign & Workforce**	300	5	5	25	Red	-
1.2	**Early Help & Targeted Response**	62	5	4	20	Red	-
1.3	**Family Group Conferencing**	200	2	1	2	Green	200
1.4	**Family Based Placements**	100	5	4	20	Red	-
1.5	**Care Leavers - Semi Independent Living**	25	5	5	25	Red	-
1.6	**Adoption and Special Guardianship Order payments**	150	5	5	25	Red	-
1.7	**Supported Housing**	600	5	5	25	Red	-
	Subtotal (New MTFS)	1,437					200
	OLD MTFS (GREEN SAVINGS)						
1	**Early Years** - remodel Childrens Centres - review borough wide provision of childcare	150	5	5	25	Red	-
3	**Public Health - 5-19** - recommissioning of services with improved efficiency including school nursing and health visiting	376	1	1	1	Green	376
	Pendarren	220	5	5	25	Red	-
	New Model for Social Care Delivery	900	5	5	25	Red	-
9	**Services to Schools** - Increasing trading activity and providing high quality services. - Review service offer	148	4	5	20	Red	-
	Restructure in DCT (Family Link) Restructure around Family Link will yeild this saving, although likely to be delivered across two years	120	5	3	15	Red/Amber	50
	Self funded EP Service Through development of a traded service model in Education Psychology stabilised and being tracked, currently able to deliver majority of saving in year 1, with residual delivered in year 2.	350	4	3		Red/Amber	200
	Restructure in SEN and Transport Likely to be delivered across two years	134	-	-	0		134
	Respite Officer (Commissioning) On track for delivery via the recommissioning of Haselmere Respite Centre	168	5	2	10	Amber/Green	-
	Unidentified - Respite/ 0-25 Service Likely to be delivered across 2 years	130	5	5	25	Red	-
	Subtotal (Old MTFS)	2,696					760
	Total for Priority 1	4,133					960

MTFS Savings - **P2 - Adults** Appendix 3b

Ref	Proposal	Savings Target 2017-18 £000's	Risk of delay	Risk of delivering full saving	Overall risk RAG		Firm Commitment for savings achieveable for 2017/18 £'000
	P2 - Adults						
2.1	Supported Housing Review	475	5	5	25	Red	9
2.2	Osborne Grove	-	5	5	25	Red	-
2.3	Fees and charges review	199	5	5	25	Red	44
2.4	Technology Improvement	750	5	5	25	Red	-
2.5	Market efficiencies	1,313	5	5	25	Red	50
2.6	New Models of Care	-	5	5	25	Red	600
	Subtotal (New MTFS)	**2,737**					**703**
	OLD MTFS (GREEN SAVINGS)						
16	**New Model for Care Management** - increased integration with health and other agencies	970	-	-	0		970
14	**Promoting Independence Reviews**	2,477	5	5	25	Red	1,611
	Subtotal (Old MTFS)	**3,447**					**2,581**
	PUBLIC HEALTH						
19	**Voluntary Sector** - review support to Voluntary Sector - provide help to local organisations to be more self sufficient and find other funding	200	1	1	1	Green	200
20	**Healthy Life Expectancy** - Bringing separate services (stop smoking, exercise etc) together to improve value for money	47	1	1	1	Green	47
21	**Substance Misuse - Public Health/Other** - Maintain core clinical services with efficiency savings - focus on recovery with more reliance on peer support and mainstream services - reduce support to hospitals to manage alcohol related admissions and detoxification	386	1	1	1	Green	386
24	**Public Health** - restructure the Public Health team to improve efficiency	336	1	1	1	Green	336
	Sexual Health - GUM, local enhanced services, prevention & promotion	742	1	1	1	Green	742
	Other Public Health	75	1	1	1	Green	75
	Total Public Health	**1,786**					**1,786**
	TOTAL ADULTS	**5,233**					**3,284**
	Total for Priority 2	**7,970**					**5,070**

MTFS Savings - **P3 - Cleaner and Safer Communities** Appendix 3c

Ref	Proposal	Savings Target 2017-18 £000's	Risk of delay	Risk of delivering full saving	Overall risk RAG		Firm Commitment for savings achieveable for 2017/18 £'000
	P3 - Cleaner and Safer						
3.1	Charge Green Waste - income generation	375	2	4	8	Amber/Green	375
3.2	Charging for Bulky Household Waste	300	4	4	16	Red	300
3.3	Charging for Replacement Wheelie Bins	100	1	1	1	Green	100
3.4	Charging for recycling bins and increasing residual bins for RSLs, Managing Agents, Developers etc...	50	1	1	1	Green	50
3.5	Flats Above Shops –Provision of bags - Service reduction	120	1	1	1	Green	120
3.6	Reduce Outreach/ Education team - Service reduction	50	1	2	2	Green	50
3.7	Closure of Park View Road R&R - Service reduction	115	2	2	4	Green	115
3.8	Veolia Operational Efficiencies	200	2	2	4	Green	200
3.9	Rationalisation of Parking Visitor Permits	125	1	1	1	Green	125
3.11	Relocation of Parking/CCTV processes and appeals	-	1	3	3	Green	-
3.12	Move to Cashless Parking	150	3	4	12	Amber /Red	75
3.13	Move to Online Parking Permit Applications & Visitor Permits	-	1	1	1	Green	-
3.14	Parking New IT Platform	-	1	1	1	Green	-
3.15	Increase in CO2 Parking Permit Charge	100	1	1	1	Green	100
	Subtotal (New MTFS)	**1,685**					**1,610**
	OLD MTFS (GREEN SAVINGS)						
25	Increasing parking debt recovery	150	1	1	1	Green	150
28	Efficiency savings and delivery review of the Parks	200	1	1	1	Green	200
43	Increase in Parking Charges	50	1	1	1	Green	50
37	Restructure of the Emergency Planning Team	50	1	1	1	Green	50
35	Reorganisation of Community Safety and Antisocial Behaviour Team (ASBAT)	150	1	1	1	Green	150
60	Unification - Streamline and integrate housing and related functions.	55	1	1	1	Green	55
	Increased income from licensing and enforcement action	25	3	3	9	Amber /Green	25
34	Reductions in back office technical and administrative support	250	1	1	1	Green	250
	Subtotal (Old MTFS)	**930**					**930**
	Total for Priority 3	**2,615**					**2,540**

MTFS Savings P4 Growth and Employment Appendix 3d

Ref	Proposal	Savings Target 2017-18 £000's	Risk of delay	Risk of delivering full saving	Overall risk RAG		Firm Commitment for savings achieveable for 2017/18 £'000
	P4 - Growth & Employment						
4.1	**Tottenham Regeneration programme**	213	-	-	0		213
4.2	**Planning service** - Increase in planning income	40	2	1	2	Green	40
4.3	**Corporate projects** - Transfer of functions to HDV	250	5	5	25	Red	-
	Subtotal (New MTFS)	503					253
	OLD MTFS (GREEN SAVINGS)						
48	**Planning - Wider restructure reducing to core service**	75	-	-	0		75
49	**Restructure Economic Development Team to deliver new Strategy**	250	-	-	0		250
	Subtotal (Old MTFS)	325					325
	Total for Priority 4	828					578

MTFS Savings - **P5 - Housing** Appendix 3e

Ref	Proposal	Savings Target 2017-18 £000's	Risk of delay	Risk of delivering full saving	Overall risk RAG		Firm Commitment for savings achieveable for 2017/18 £'000
	P5 - Housing						
	OLD MTFS (GREEN SAVINGS)						
59	Housing Related Support commissioning efficiencies	470	3	3	9	Amber /Green	470
60	Unification - Streamline and integrate housing and related functions.	95	3	3	9	Amber /Green	95
61	Achieve year on year efficiencies	200	3	3	9	Amber /Green	200
	Total for Priority 5	765					765

MTFS Savings – Priority X

Appendix 3f

Ref	Proposal	Savings Target 2017-18 £000's	Risk of delay	Risk of delivering full saving	Overall risk RAG		Firm Commitment for savings achieveable for 2017/18 £'000
	PX - Enabling						
6.1	**Legal Services** - Reduction in staffing and other related expenditure	-	2	1	2	Green	-
6.2	**Audit and Risk Management** - reduction in cost on the external audit contract	11	1	1	1	Green	11
6.3	**Democratic Services** - reduction in staffing	40	1	2	2	Green	40
6.4	**Shared Service Centre Business Support** - reduction in staffing	300	1	1	1	Green	300
6.5	**Shared Service Centre** - new delivery model for shared services	-	2	2	4	Green	-
6.7	**Shared Service Offer for Customer Services**	-	3	3	9	Amber/ Green	-
6.10	**Translation and Interpreting Service - new contract**	41	1	1	1	Green	41
6.11	**Closure of internal Print Room**	-	3	1	3	Green	-
6.12	**Communications - reduction in staffing**	53	1	1	1	Green	-
6.13	**Income generation – Advertising and Sponsorship**	15	1	1	1	Green	15
6.15	**Insurance**	152	1	1	1	Green	104
	Subtotal (New MTFS)	**612**					**511**
	OLD MTFS (GREEN SAVINGS)						
73d	**Accounts Payable Restructure (Mark Rudd)**	116	4	4	16	Red	-
	Subtotal (Old MTFS)	**116**					**-**
	Total for Priority X	**728**					**511**

MTFS Savings – Council Wide

Appendix 3g

Ref	Proposal	Savings Target 2017-18 £000's	Risk of delay	Risk of delivering full saving	Overall risk RAG		Firm Commitment for savings achieveable for 2017/18 £'000
	Corporate Savings						
6.8	Senior Management Savings	400	3	5	15	Amber /Red	174
6.9	Alexandra House - Decant	-	4	2	8	Amber /Green	-
6.14	Professional Development Centre	136	5	5	25	Red	-
6.16	Voluntary Severance Savings	1,500	2	5	10	Amber/ Green	296
	Subtotal (New MTFS)	**2,036**					**469**
	OLD MTFS (GREEN SAVINGS)						
74	BIP Commercial/ Organisation Wide: Barry Phelps	950	3	4	12	Amber/ Red	250
	Bad Debt Provision	700	4	4	16	Red	-
	Subtotal (Old MTFS)	**1,650**					**250**
	Total for Corporate Savings	**3,686**					**719**

Virements for Approval

Virements							
Period	**Priority**	**Service/AD Area**	**Rev/ Cap**	**One-off**	**Permanent**	**Reason for budget changes**	**Description**
4,7,8	1	Children's, Commissioning, Schools and Learning	Revenue	46,671,524	46,317,524	Budget Realignment	DSG budget realignment as per DSG allocation letter
4	2	Adult Social Services	Revenue	3,104,900	3,104,900	Budget Realignment	Adults Social Services salary realignment
5	4	Regeneration, Planning and Development	Revenue	916,800	916,800	Budget Realignment	Realigment of Housing General Fund budget to restructure
6	1	Children's	Revenue	1,245,000	1,125,000	Budget Realignment	Budget realignement as per projections
6	2	Adult Social Services	Revenue	4,407,329	4,407,329	Budget Realignment	Adults budget re-alignment 2017/18
7	All	Council-wide	Revenue	454,000	454,000	Budget realignment	Legal budget realignment as per agreed SLA
7	3	Commercial and Operations	Revenue	781,000		Budget Realignment	MOPAC Grant Funding to offset expenditure
7	1	Children's	Revenue	275,000	275,000	Budget Realignment	Contribution from Housing for Leaving Care porportion of DCLG Supporting People Grant
7	All	Council-wide	Revenue	991,240	991,240	Centralisation of IT budgets	Centralisation of IT budgets
7	All	Council-wide	Revenue	1,143,000	1,143,000	Budgeted Pay Inflation	Budgeted pay inflation for 17/18
7	All	Council-wide	Revenue	424,300	424,300.00	Budgeted Contract Inflation	Budgeted contract inflation for 17/18
7	4	Regeneration, Planning and Development	Revenue	539,346	299,700	Budget Realignment	Budget realignment to align with service restructure/reorganisation within Corporate Property and Special Projects.
8, 9	1	Schools and Learning, Children's	Revenue	24,240,214	22,622,946	Budget Realignment	Technical virement to create separate DSG cost centres
8	5	Housing & CE for HFH	Revenue	1,462,000		Carry Forward underspend	HRA Estate Renewal - Carry forward underspend from 16/17 to 17/18
8	1	Children's	Revenue	3,198,600	3,198,600	Budget Realignment	Budget realignment - merging transports cost centres in SEND area
8	3	Commercial and Operations	Revenue	433,786	433,786	Energy Inflation	Fuel, Electricity and Gas inflation + redundancy
8	2	Adult Social Services	Revenue	686,882		Budget Realignment	Adults' Budget Realignment 2017-18
8	2	Public Health	Revenue	2,552,930	2,552,930	Budget Realignment	Public Health budget realignment
9	1	Children's	Revenue	433,300	433,300	Budget Realignment	Children's Budget Realignment as per P8 projections
9	All	Council-wide	Revenue	319,800		Corp overheads readjustment	Corporate overheads HFH SLA adjustment
9	2	Adult Social Services	Revenue		266,600	Budget Realignment	Adults budget realignment
9	2	Adult Social Services, Public Health, Commissioning	Revenue	1,838,216	1,838,216	Budget Realignment	Adults budget realignement to align with staff movement due to closure and re-organisation of cost/profit centres
9	1	Children's	Revenue	545,000	235,200	Budget Realignment	Re-alignment of Secure Remand Service within External Placements in-line with Mosiac Payments.

Transfers from Reserves - for noting

Reserves							
Period	**Priority**	**Service/AD Area**	**Rev/ Cap**	**One-off**	**Permanent**	**Reason for budget changes**	**Description**
5	1	Commissioning	Revenue	700,000		Transfer to reserves	Drill down from DSG reserve for Early Years Block
7	1	Commissioning	Revenue	1,400,000		Transfer from reserves	Reversal and correction of Drill down from DSG reserve for Early Years Block

		Total		**98,764,167**	**91,040,371**		

Report for: Cabinet 6th March 2018

Title: **Update report on delivery of the Corporate Plan 2015-18**

Report authorised by : Zina Etheridge, Chief Executive

Lead Officer: Erica Ballmann, Assistant Director Strategy & Communications

Ward(s) affected: N/A

Report for Key/ Non Key Decision: **Non Key**

1. Describe the issue under consideration

1.1 In February 2015, full Council approved Haringey's Corporate Plan 2015-18 "Building A Stronger Haringey Together" which set out the organisation's 5 key priority outcomes for the borough.

1.2 The launch of this strategy followed consultation with residents and stakeholders in which more than 1,000 people shared their views.

1.3 As we are approaching the end of the life-span of this strategy and reaching the last months of the current electoral term, it is right to report back to Cabinet on progress and delivery against those objectives set out in 2015.

2. Leader of the Council Introduction

2.1 The vision we set out in 2015 was to make Haringey an even better place to live; and our approach to encourage investment in our neighbourhoods and create more opportunities for all to share in.

2.2 Set out alongside the 2015-18 medium term financial strategy, we were determined that whilst the savings we outlined then made the context very challenging, we would not be in the business of managing decline. As we now approach the end of the current electoral cycle and the local elections in May, it is important to reflect on the significant amount of progress that has been achieved in the three years since we launched the plan.

2.3 Working with, central and regional government; neighbouring boroughs; our health and police partners and our voluntary and community sector partners - in particular the Bridge Renewal Trust – we have delivered against all five priority outcomes.

2.4 There has been investment in health services; improvements in our protection and support for vulnerable adults and children; and we have attracted a range of new organisations into borough including Ada, the national code college and the London Academy of Excellence.

2.5 There has been over £1 billion worth of inward investment into the borough which has transformed out ability to deliver affordable housing and attract new businesses to improve the local economy and provide new job opportunities. We have built new and better new homes, including over 1,500 affordable; created 1,250 new job opportunities and exceeded targets set for attracting new businesses into the borough.

2.6 Working with students, teachers and partners, our schools have made fantastic progress to the extent that almost all of our schools are now rated 'good' or 'outstanding' by Ofsted. It is clear that everyone in our borough – schools, the voluntary sector, police, health partners, businesses and residents – has pulled together over the past three years to help make Haringey the place that it is today. I am immensely proud to have led the borough through this period of transformation with my Cabinet colleagues. This report and the appendices attached set out in detail just how has been achieved together.

3. Recommendations

3.1 That Cabinet note the key achievements made in the period covered by Haringey Council's Corporate Plan 2015-18.

4. Background information

4.1 The council has made great strides in ensuring that all of Haringey's children have the best possible start in life, not only compared to other children in London, but also to their peers nationally. We committed to supporting all Haringey schools to earn 'good' or 'outstanding' Ofsted ratings, and 99% of the borough's nursery, primary, secondary and special schools have met that standard. Haringey's children are also achieving at a higher level than most across the UK; in 2017, 99% of provisional A-levels or equivalents achieved grades A* - C and 37% were A* or A, well ahead of the 26% national average.

4.2 Our support for young people does not stop in school – we work with our partners to offer high quality training and employment opportunities for young people. During the past two years, Haringey has run Careers Fairs, engaging with more than 1,000 local young people annually and ensuring they have access to the best advice about their future options and prospects.

4.3 We have also been working hard to improve the health and welfare of children in the borough, and the majority of Haringey's schools now have Healthy School status. We want all children and young people to be safeguarded from abuse. Outcomes for Haringey's most vulnerable children are improving; in 2016 our attainment scores for 'looked after' children were the highest for any borough in the UK.

4.4 We set ourselves challenging targets to ensure that all adults and older people in Haringey can live healthy and fulfilling lives. We recognised that loneliness is an increasingly serious social issue, which is why we have taken steps to tackle it in the borough, successfully reducing the number of people in Haringey considered to be in 'social isolation'.

4.5 Adult social care is a nationwide problem, with reductions in central government funding creating challenges for all local authorities. Despite an ageing population, spending on adult social services has fallen by 13.5% per adult in England since 2010. Against this backdrop, Haringey has continued to prioritise protection of vulnerable adults and close to 90% of adults safeguarded from abuse in the borough reported that the council's services made them feel 'safe and secure' – significantly higher than the 81% London average.

4.6 We want to raise this figure even further through working hard to improve the quality of the borough's care homes and establishing Haringey as an innovator in adult social care standards. Haringey will be expanding its supply of supported living units and working with providers to develop more cost-effective models for supporting people within their communities, including using Positive Behaviour Support, to enable people to enjoy greater independence.

4.7 The safety and wellbeing of Haringey residents is of utmost importance. Through effective partnerships with community groups and close working with the police, fear of crime is over 30% lower amongst residents.

4.8 We have made equal efforts to improve safety on the roads and make Haringey one of the most cycling and pedestrian friendly boroughs in London. We have promoted cycling and walking by implementing a borough-wide 20 mph limit, increasing dedicated cycle lanes, and encouraging sustainable modes of transport through a smarter travel campaign including the formation of special travel plans for 65 local schools. This proactive approach has helped achieve a 73% reduction in the number of fatalities and serious injuries on Haringey roads.

4.9 We want all residents to be able to enjoy and appreciate their local environment, which is why we have introduced ambitious programmes to significantly reduce carbon dioxide emissions, as well as decreasing litter levels by 10% through a targeted street sweeping programme, resulting in cleaner air and cleaner streets for all. We have also increased the number of Green Flag Parks in the borough to 25 – the fourth highest in London.

4.10 Haringey is open for business. We have promoted the borough to attract investment and support businesses in locating, growing and creating jobs in Haringey. The council has achieved exceptional growth in outside investment in the borough, with more money secured for health, education, transport and environmental programmes. Haringey commerce is also thriving, with more businesses in the borough than ever before, 12,600 active businesses registered as of 2017. This has created more local jobs for local people, with the number of new employment opportunities increasing and exceeding targets. We have directly supported more than 900 local people into jobs and apprenticeships.

4.11 We want all local people to have opportunities to train and work in technology and creative industries that will shape our future economy. That's why we're proud to have achieved a nationwide first in Haringey through the launch of the UK's first Fashion Technology Academy (FTA) in Harringay. The Academy gives more than 200 people a year a unique opportunity to work in paid fashion apprenticeships and gain highly sought-after professional qualifications in the industry. By 2019, the FTA will be able to train to more than 1,000 people annually.

4.12 Ensuring that all people in Haringey have a place to live in that suits their needs is one of our core responsibilities. In 2017 in Bounds Green we delivered the first new council homes in Haringey for over 30 years.

4.13 We know significant challenges remain, including finding solutions for the approximately 9,000 people on the temporary accommodation list. The council will be proactively working with partners to reduce that number; we've already managed to attract £500m public sector and £3billion private sector investment to build new homes.

4.14 A £1bn High Road West development in Tottenham has been confirmed and will have a positive and transformative effect on the area. The scheme will deliver 1,400 new

homes, a new library and learning centre, a new public square, community park and all-new restaurants, retail and business spaces.

4.15 We are also seeking to improve the quality of the borough's privately-rented accommodation through measures such as increasing the number of households in safer licensed conditions and introducing a Landlord List for tenants to perform background checks and prevent themselves falling victim to rogue landlords.

4.16 Haringey is also protecting its heritage, having guaranteed the future of the historic Grade II* listed Hornsey Town Hall through a multi-million pound refurbishment project to restore the Hall's former majesty. We have also attained close to £20 million in finance from the Heritage Lottery Fund to deliver ambitious improvements and restorations to Alexandra Palace, one of the borough's foremost and famous landmarks.

5. Contribution to strategic outcomes

This report contains a summary of the strategic outcomes set out in the Corporate Plan 2015-18. A more detailed breakdown is listed in Appendix A.

This detailed summary also includes an update of the 'performance wheels' which set out our progress against the ambitious targets set out in 2015 notwithstanding the challenging context that local government and the public sector have been operating in within recent years.

Our ambition for the borough and the challenging context in which we are operating inevitably creates a tension in our ability to achieve all our original targets. Some are longer term ambitions that will no doubt a constant in future strategies, such as the delivery of affordable homes. Others, such as improving universal services are more difficult to achieve with less available funding.

6. Statutory Officers comments

6.1 Comments of the Chief Financial Officer and financial implications

6.1.2 The robustness of the Council's financial plans is critical to the delivery of strategic outcomes set out in the Corporate Plan. Therefore, it is imperative that finance and service colleagues continue to work in a collaborative manner that ensures that budget proposals, having been sufficient risk assessed, are realistic and achievable.

6.1.3 Over the past three years, the Council's financial plans have been adapted to support the delivery of priorities set out in the 2015-18 Corporate Plan. Implementation of agreed budget proposals have led to significant efficiency gains across the Council, which have helped closed a recurring budget shortfall that was estimated at approximately £25m (£70m cumulative over 3 years) in 2015.

6.1.4 As well as delivering efficiency gains, a number of critical council services, (Adults and Children's Social Care, Temporary Accommodation), that have yielded positive outcomes in the past three years, have benefited from significant investments. This has been achieved against a backdrop of a period of severe central government funding reduction. Despite, these funding cuts, the Council has been able to invest in these services by rebalancing the deployment of financial resources between front and back office functions, so that front facing services now account for an even bigger share of the Council's overall budget.

6.1.5 The 2018/19 budget and (2018/19 – 2022/23) MTFS set out the Council's financial plans for the next five years. It details areas where the Council will look to make further efficiency gains and also areas where it will be investing (including capital investments). As the Corporate plan is refreshed, the Council will work to update financial assumptions in the MTFS to reflect latest plans and priorities of the Council.

6.2 **Comments from the Assistant Director for Corporate Governance and Legal**

6.2.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report. There are no legal implications arising from this report.

6.3 Equality

6.3.1 The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation;
- Advancing equality of opportunity;
- Fostering good relations;
- In addition, the Council complies with the Marriage (same sex couples) Act 2013.

6.3.2 The Act covers nine protected characteristics, which are:

- Age
- Disability
- Gender and gender reassignment
- Pregnancy and maternity status
- Marriage and civil partnership
- Ethnicity
- Religion or belief
- Sexual orientation

6.3.3 The Public Sector Equality Duty came into force on 5 April 2011. The broad purpose of the equality duty is to integrate consideration of equality and good relations into the day-to-day business of public authorities – in shaping and delivering services.

6.3.4 Every person can identify with a combination of these characteristics; we all have an age, a disability status, a gender, our own beliefs and a sexual orientation. The purpose of the equalities monitoring process is to identify where proposals disproportionately impact on those characteristics and to mitigate the impact, ensuring that the Council eliminates discrimination, harassment and victimisation; advances equality of opportunity; fosters good relations.

6.3.5 Haringey Council believes the Equality Impact Assessment process is an important way of informing our decision making process.

6.3.6 The Corporate Plan 2015-18 set out how we planned to support Haringey's residents to build a stronger future through five priorities:

- Outstanding for all: Enabled every child and young person to have the best start in life, with high quality education;
- Empower all adults to live healthy, long and fulfilling lives;
- A clean and safe borough where people are proud to live, with stronger partnerships and communities;

- Drive growth and employment from which everyone can benefit;
- Create homes and communities where people choose to live and are able to thrive.

6.3.7 These are underpinned by six cross-cutting principles:

- Prevention and early intervention – preventing poor outcomes for children, young people and adults and intervening early when help and support is needed;
- Tackling inequality – tackling the barriers facing the most disadvantaged where people are able to help themselves and support each other;
- Value for money – achieving the best outcome from the investment made;
- Customer focus – placing our customers' needs at the centre of what we do;
- Working in partnership – delivering with and through others.

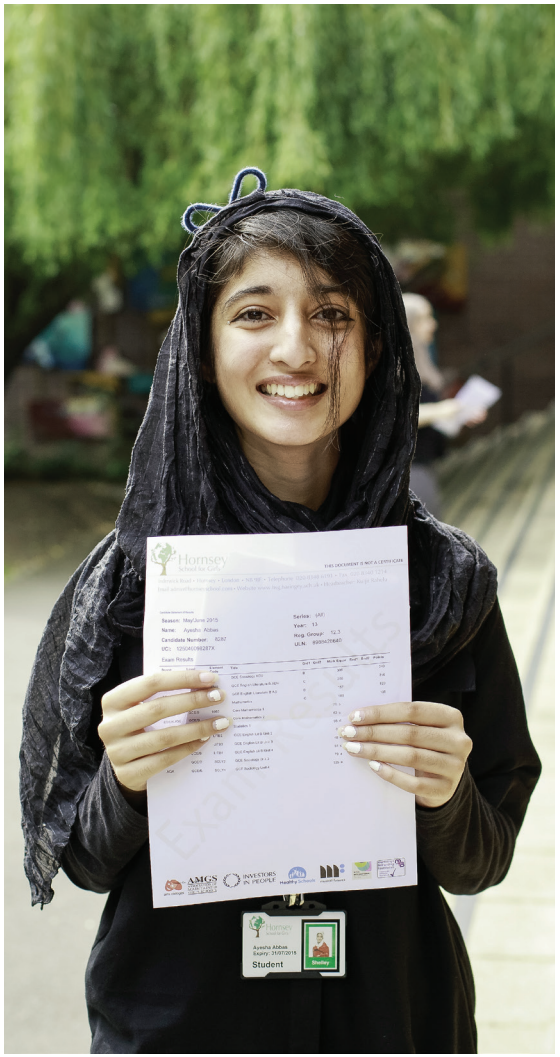
6.3.8 The Corporate Plan priorities and cross-cutting themes provide the framework for the Council's implementation of the Equality Act. Specifically, the Council's commitment to reduce inequality is reflected in the delivery and performance of the Corporate Plan. During the period of the Corporate Plan, policy decisions that have had major impacts on staff or residents have been subject to thorough assessments, ensuring that the Council's commitments to the Equality Act are embedded in the decision making process.

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Corporate Plan 2015-18
Status Report February 2018

Priority 1:
Outstanding for all













Haringey LONDON

Corporate Plan 2015-18

Status Report February 2018

Priority 2:

Empower all adults to live healthy, long and fulfilling lives





HARINGEY OBESITY ALLIANCE







Haringey LONDON

Corporate Plan 2015-18

Status Report February 2018

Priority 3:

Clean and Safe















Haringey
LONDON

Corporate Plan 2015-18
Status Report February 2018

Priority 4:
Drive growth and employment











Haringey LONDON

Corporate Plan 2015-18
Status Report February 2018

Priority 5:
Housing transormation











Haringey LONDON

Corporate Plan 2015-18

Status Report February 2018

Priority X













Haringey LONDON

Corporate Plan Priorities: Update Status Report

Corporate Plan Priority [1, 2, 3, 4, 5]	1
Priority Name	Outstanding for all
Priority Lead	Samantha Rostom
Priority Owner	Margaret Dennison
Date	February 2018

Priority Summary
Enable every child and young person to have the best start in life, with high quality education “We will work together with families to ensure that every child in Haringey has the very best start in life, including world class education.” • Early Help Strategy (PDF, 372KB) • Young People's Strategy (PDF, 129KB) • Education Excellence Policy (PDF, 334KB)

Priority Objectives



Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
1	**All children will have the best start in life supported by strong relationships and be ready for school**					
a	**Quality of early years setting**	**All Children's Centres and at least 85% of childminders and PVIs to be rated good or outstanding by Ofsted by 2018**	Overall 94% 100% children centres (with childcare) 86% PVIs 96% childminders	Development of comprehensive risk register and Early year monitoring group Development of network learning communities to enhance setting to setting support Targeted work with identified 'at risk' settings.	Ongoing management of risk register to monitor quality and support settings. Quality supplement introduced to develop system leadership support. Childminder Champions model is being developed.	Hard to reach providers- lack of capacity to engage.
b	**Good level of development**	**75% of children achieve a good level of development at early years foundation stage by 2018**	74% - 2017 data National 71%	Development of regular network learning community moderation meetings Comprehensive data packs available to each school Data analysis with Head teachers and coordinators at local and central level Targeted schools for moderation.	Provide training to schools to support them to identify pupils that are exceeding in the Good Level of Development. Targeted work with identified groups of children.	None identified.
2	**Children and young people across Haringey excel at school, making the most of their potential**					
a	**5 A*-C GCSCs inc English and Maths**	**London top quartile by 2017 and reduce by half the gap between Free School Meals (FSM)and the overall result**	Haringey's **Attainment 8** score is 49.3 against a national average of 48.2. This provisional score is a slight reduction on last year. The Progress 8 figure is 0.28. This means that the average student scores ¼ a grade better in each of the 8 subjects compared to pupils with the same starting point. The national figure was -0.03	Haringey Education Partnership has been established and registered with Companies House.	Formal decision to proceed with Haringey Education Partnership via Cabinet. With HEP established by Sept 18.	
b	**Ofsted ratings of schools**	**All primary and secondary schools to be good or outstanding by 2016**	98% of all schools are currently rated good or outstanding. 12 primary schools are outstanding. 5 secondary schools are outstanding.		Formal decision to proceed with Haringey Education Partnership via Cabinet. With HEP established by Sept 18.	
c	**Key Stage 1 results**	**Reading, Writing and maths level 2B+ to reach the London Top Quartile by 2016 and remain there**	2017 data shows an overall improvement, however, KS1 will in future be measured by expected standards with national and London quartile information available in the spring.		Formal decision to proceed with Haringey Education Partnership via Cabinet. With HEP established by Sept 18.	

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
d	**Key Stage 2 results**	**KS2 combined reading, writing and maths to reach London Top Quartile by 2017 and remain there**	Haringey 65%; London 66% and National 61%, For the percentage with a high RWM score Haringey was 26% against London 24% and England 18%.		Formal decision to proceed with Haringey Education Partnership via Cabinet. With HEP established by Sept 18.	
3	**Excellent education and training opportunities**					
a	**16-19 years in education, employment and training**	**To overtake the England average by 2017 and London average by 2018**	Haringey's NEET rate remains lower (better) than England's, however it is higher when the "not Knowns" are included. A marked improvement in the all England "in learning" rate means despite a strong improvement Haringey is lower (worse), but ahead of the 2018 London based target.	Over the past 2 years there has been an increased focus on obtaining information from all reliable data sources in order to reduce the number of unknowns to an acceptable level. Increased efforts also in phone calls and door knocking have yielded positive results and unknowns has reduced considerably in that time period. Increased activity with secondary school in 2016 and 2017 in emphasising the importance of accurate and timely data submissions have allowed us to identify NEETs earlier and put in provision to support those at risk. In 2016 ESF funding came into the borough and we were able to engage with a number of local community providers to support vulnerable young people. A gradual but significant increase in EETs has meant an increased likelihood of positive outcomes for young people. In 2016 and 2017 we have run a local Careers Fair where we have engaged over 1000 young people each year and given them access to	By March 2018 we will have continued to work closely with schools and colleges in order to ensure as many young people as possible engage in education or employment. We will have engaged much more proactively in engaging with pre-NEETs in order to identify at a much earlier stage those who are at risk of becoming NEET and putting in intervention at an earlier stage.	
b	**Attainment of 18 year olds**	**Average point score of 18 year olds is in the London Top Quartile by 2018**	Provisional 'A' level or equivalent grades for Haringey in 2017 are 99% A*-C with National achieving 97.9% Haringey – 37% A*-A (National 26%). Haringey is ranked 9th nationally and 3rd in London. 2017 data will be available in October.	Good progress has been made in Haringey in improving post 16 educational outcomes, particularly at A-Level. The challenge has been to sustain this progress against the challenge of the new linear examinations.	We are working closely with providers to increase both the choice and quality of vocational qualifications.	
c	**Young people in higher education**	**To be above the national and London average on both**	Annual data released in January. 2017 figures show 60%	The number of students entering HE has increased slightly during the corporate plan reflecting the increase nationally	Continuing active engagement with HE establishments including a strong presence of Universities at the	

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
		measures by 2018	across the borough and 14% attending Russell Group Universities. These are 2015/16 figures.	and driven by success at A-Level as outlined above.	November Careers Event at Alexandra Palace.	
4	**Healthier, happier and more resilient**					
a	**Emotional Health and well-being**	**To show substantial improvements on the two survey questions (pupils satisfied with their life at the moment and that they feel there is someone they can talk to)**	A reported increase from 65% to 72% of pupils feeling satisfied with life. A reported increase from 44% to 48% of pupils feeling they have someone to talk to.	There has been a co-ordinated approach across partners and commissioned services resulting in an increase in prevention and early intervention programmes through the Health Schools Programme, The Anchor Project, the CAMHS Transformation Programme and the new 'CHOICES' Service.	The Schools Health Education Unit Survey will take place in the Autumn term 2017. The findings from the survey will provide; 1.the data for the 2018 trajectory, 2.data and insight to support the development of the Borough Plan and 3.provide services and frontline practitioners with up to date information on the health behaviours of children and young people across Haringey.	
b	**Healthy school status**	**a)35 schools (50%) achieving bronze status by 2018 b)18 schools (26%) achieving silver status by 2018)**	40 schools achieved bronze award 19 schools achieved silver Award 9 schools achieved gold award.	Target achieved and exceeded for both bronze and silver awards.	1.Continue to support schools to achieve a bronze award. 2.Continue to support schools to convert their bronze awards to silver and their silver awards to gold	
c	**Year 6 obesity**	**To reduce the percentage of 10-11 year olds who are overweight or obese to 35% by 2018**	Latest data shows a decrease from the previous year from 38.4% to 37.5% (2016/17 academic year)	1.The Haringey Obesity Alliance was established to lead a partnership approach across Haringey where organisations commit 'a pledge' to tackle obesity. Three priorities were established for partners to focus their efforts; sugar, play and walking. 2.The Health and Wellbeing Board endorsed the Local Government Declaration and committed to 6 development areas across the system	1.A refresh of the child obesity pathway to support frontline practitioners in supporting children, young people and families 2.The commissioned school nursing service will be redesigned and be in a position to lead across the partnership the implementation of the 5-19 year old Healthy Child Programme (a prevention and early intervention programme).	
d	**Teenage pregnancy**	**Teenage conception rate to reach 20 per 1000 females by 2014-16**	The rate of teenage pregnancy has fallen from 25.5 per 1,000 in 2012-14 to 21.5 per 1,000 in 2013-15, representing a 16% reduction.	1.Opened the new sexual health service in July 2017 specifically for young people. 2.Increased provision of LARC in GP settings. 3.The Annual Public Health Report 2016/17 focused on the sexual health needs of young people (including teenage pregnancies). 4.Exposure magazine released the end of 2016, which focused on young peoples' health with a specific section on sexual health. 5.Promotion of the NHS Go App for young people.	1.Develop robust referral pathways between children/young people services and the local sexual health services. 2.Improve 'young people friendly' resources' to support frontline practitioners.	

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
5	**Right support at the right time**					
a	**Referrals to social care**	**To be top 5 in London for lowest referrals to social care by 2018**	Currently at 702, 38% of these end up as NFA, compared to 9% London Rate	EH offer established and resources in SPA/MASH support appropriate EH allocation Re-referral rate reduced where cases are stepped down through EH EH work in schools and settings to promote understanding of thresholds Increasing collaborative planning around re-designed MASH to support appropriate EH interventions All above are contributing towards reducing demand trend.	In Feb/March the Demand Management Pilot for Early Help will launch with the aim of reducing demand at the Front Door strengthening Triage. QA report in Nov and JTAI Inspection December have demonstrated weaknesses requiring new demand management and MASH Strategies currently in development.	
b	**School attendance**	**Primary school attendance to be higher than the London average & secondary attendance in top quartile by 2018**	Latest whole year (6 half terms) attendance data from DfE: 2015 – 2016: Haringey primary schools: 95.9% attendance Primary schools nationally: 96.0% attendance Haringey secondary schools: 94.7% attendance Secondary schools nationally: 94.8% attendance Compared to London LAs, the most recent whole year (6 half terms) attendance data from DfE 2015-2016: Primary attendance: Haringey 15/33 LAs = 2nd quartile. Secondary attendance: Haringey 27/33 = 4th quartile Special school attendance: Haringey 16/33 LAs = 2nd quartile Link FSWs allocated to every school. Exclusions Panel and the offer of Early Interventi9on meetings with schools ae designed to further reduce exclusions.l	Early Help integrated Troubled Families response provides support for students and families identified as poor attendees. Education Welfare Service Schools are supported to identify and manage pupils whose attendance is a concern, and those schools who have purchased a package of support from the service are allocated an officer to work with referred pupils and their families. Haringey's schools' attendance rates are comparable to national, but are slightly below some London boroughs.	Education Welfare Service It is likely that attendance at Haringey's schools will be broadly in line with the national average, which is a trend that has persisted for a number of years since closing the gap. Closer links between EWS and EH through initiations of TAFs to address the issue of high absence.	Haringey's Education Welfare Service works with schools that have purchased a package of support to allow officers to work with referred pupils & their families. This has resulted in the service having a more limited impact on overall school attendance in the borough than in years prior to 2015-2016, when the decision was made to trade the service in order to generate income. Statutory duties are offered to all schools free of charge. Absence rates in Haringey's schools are heavily influenced by authorised absences (often in primary schools in the west of the borough) and term time holidays. Unauthorised absence is higher in schools in the east of the borough. Most secondary schools and some primary schools have not chosen to purchase a package of support from the service.
c	**First time entrants to Youth Justice System**	**To remain below London levels up to 2018**	Haringey's FTE rate at Quarter 1 2017/18 is 419 (representing 105 young	There were 105 first time entrants in the last year compared to 117 in the previous year and 90 three years ago. A	It is predicted that the FTE rate is likely to fluctuate albeit with similar numbers in the coming year.	The key issue in relation to controlling the rise of FTEs centres around the Mayors Knife Crime Strategy and the

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
			people entering the YJS in the previous 12 months). This compares to an average rate of 408 for London and 450 for our Family (YOTs with a similar demographic).	reduction of 11% since last year and an increase of 15% from three years ago. It is widely recognised that Haringey's rate, as in similar areas, had reached a point that was unlikely to be reduced further over a maintained period due to the progress made in recent years.	The use an Early Help offer in relation to siblings of known young offenders is prioritised action in order to reduce the risk of this group entering the youth justice system.	potential for MOPAC to increase Stop and Search activity will significantly increase FTEs
d	**Secondary school exclusions**	**Exclusions to be below the London average by 2018**	6 Secondary schools need to close a gap of approx. .5% (point 5) to meet national average. Target to reach below London average by March 2018 6 secondary schools have a wider gap to close of an average 2.6% to meet the national average. Target meet London average by March 2018	Alternative Provision Commissioning offer. Improved behaviour and fewer children at high risk of permanent exclusion in four (of 6) primary schools through co commissioned service to address vulnerable children at risk of or experiencing exclusion. Head teachers at Secondary In Year Fair Access scrutinise referrals to the PRU with view to challenge or support threshold. Co commissioned Anchor Project training and intervention with 2 targeted primary and all high excluding secondary schools: Focus Impacting on policy, systems and practice for better outcomes around emotional wellbeing Commissioned service to ensure capture of live exclusion data from all schools for earlier analysis and intervention Autumn 2017. Primary Behaviour Support (Outreach) commissioned to address vulnerable students (CIN/CP/SEND) with multiple exclusions. Focus: YR6 – Behaviour for learning through transition KS1 and KS2 whole class and individual strategies for behaviour and attainment Support accessed via plan for monthly Primary In Year Fair Access Multi agency planning for targeted group via Inclusion Panel EH transition workshops with 4 primary schools monitoring and evaluation will be completed and a broader roll-out will be planned for Spring term.	The EH offer to support pupils identified early as being at risk of exclusion is shared with all settings. Utilising link FSW's to offer family support in collaboration with settings to achieve behavioural change. This EH initiative and the transitions workshops will contribute towards reducing both fixed term and permanent exclusions. A pilot to support students and families with SEMH in community setting has been initiated and has recently agreed a MH Worker from The Tavistock to supplement delivery. Primary school have planned access to behaviour intervention which is timely and not crisis driven. Referral to PRU placement for vulnerable students are reduced. Students are better equipped to cope at transition to secondary. Following the successful transition workshops in 4 primary schools we now plan to run workshops in an additional 24 schools.	
6	**Safeguarded from abuse and offered the best possible care**					

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
a	**Looked after children – 5 or more GCSEs**	**To be in the top 10 Local Authorities in the country consistently through to 2018**	Haringey's attainment 8 score (35.2) was the highest in the country in 2016. London: 23.2 England: 22.8 2017 data to be published in October.	Provisional local data for 2017 suggests 13 children out of a cohort of 35 have achieved the target. Comparison data will be published in October 2017. No specific project, as Virtual School deliver to this outcome as part of BAU.	Procurement and Implementation of E-PEPs (electronic Personal Education Plans) will be completed.	
b	**Timeliness of Adoptions**	**For the average time for children adopted to move in with their adoptive parents to be within the national threshold**	Using a 3 year rolling average, average time has decreased but is still longer than the national threshold. 8 adoptions in 2017/18 so far, averaging below the target.	Improved system and processes with Fostering and adoption service including: • SG & Adoption support policy agreed, new process in place including workflow. • Established in-house fostering team •		
c	**Re-referrals within 12 months**	**To be London Top Quartile by 2018**	20% YTD (Aug 17)	Increase from 15% (2015/16) to 18.6% (16/17). Currently 20% for the YTD. London top quartile: 13.3% • Implementation of Signs of Safety (practice approach) across the workforce. • Reconfiguring MASH to enable more robust and consistent application of thresholds • A number of practice reviews to identify and address practice areas for improvement. Improvement plan developed for social care.	Continued implementation of Signs of Safety aims to improve quality of practice which will have a positive impact on re-referrals due to the quality of work improving to enable more effectiveness and efficiency. Development and implementation of the social care induction programme.	

Additional Comments

There are a number of achievements over the course of the current corporate plan which are not directly aligned to performance measures but do clearly contribute to the Priority objectives. These include:

- Implementation of the 30hrs childcare policy
- Development of HEP model
- Design and implementation of Early Help service (including Targeted response)

- Care Leavers Design review
- Enhancing Contact Centre offer
- Refreshing Sufficiency strategy
- Workforce restructures (YJ, CiC, SEND)

Corporate Plan 2015-18

Status Report February 2018

Priority 2

Corporate Plan Priority [1, 2, 3, 4, 5]	2
Priority Name	Outstanding for all
Priority Lead	Marc Kidson
Priority Owner	Beverley Tarka
Date	13.02.2018

Priority Summary

Enable all adults to live healthy, long and fulfilling lives.

"We will support people to live healthy, long and fulfilling lives with control over what is important to them."

- Health and Wellbeing Board

Priority Objectives



Objectives – Status Report

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
1	**Making the healthier choice the easier choice**					
a	CVD Mortality rates	**Reduce rate to statistical neighbour best of 80.7 deaths per 100,000 by 2016-18**	**84.6 deaths per 100,000 in 2014-16**, which is higher than the London average of 77.4 deaths per 100,000 for London, but lower than our statistical neighbour average of 90.1 deaths per 100,000 people.	There has been a significant improvement in the CVD mortality rate from 90.2 per 100,000 in 2012-14, to **84.6 in 2014-16.** Haringey is now **8th out of 32** London boroughs for early death from stroke, down from 1st out of 32 in 2012-14. This represents a **21% decrease** since 2012-14, bucking the upward trend and moving us closer to our statistical neighbours and London. Smoking, excess weight, physical inactivity, smoking, high blood pressure and excess alcohol intake are all key risk factors for cardiovascular disease. Achievements in tackling these risk factors are described below for outcomes 1b, 1c, 1d and 1e	In May 2017 we agreed a joint programme of work with Haringey CCG on stroke and cardiovascular disease, this has been captured in a new P2 project brief "Stroke and cardiovascular disease prevention". This project brief brings together and strengthens existing work as well as capturing some new initiatives. Key aspects of the project are as follows: • Communicating key messages to our residents about how to prevent strokes and other cardiovascular diseases, • Improving pathways into services that support people to stay well, such as smoking cessation, NHS Health checks and exercise programmes • Consistent, high quality detection and management of people with risk factors for cardiovascular disease in primary care. This will be supported by Locally commissioned services – initially prioritising stroke prevention and diabetes. • Building our "Making Every Contact Count" approach to lifestyle change including across primary, secondary and community health care. • A new programme of community based blood pressure checks	We are on track to achieve our target for this indicator, but as the latest data we have on this indicator is for the period 2014/16 and our trajectory is set until 2016/18, we will need to continue to monitor this indicator The programme of work on CVD prevention is due to continue in 2018/19 and beyond – into the next corporate plan period.
b	Excess weight	**Maintain our current 3-year average of 54.2% by 2016-18**	Excess weight in adults has remained largely stable with 55.5% in 2012-14 and **54.2%** in 2013-15. Currently lower than our statistical neighbours, London and England	The Haringey Obesity Alliance (HOA) was established to lead a partnership approach across Haringey where organisations commit to a 'pledge' to tackle obesity. The Health and wellbeing Board endorsed the Local Government Declaration. Commissioned weight management service redesigned to reduce waiting times.	The HOA will expand to include more local employers The service redesign will reduce the 'drop out' rate from weight management services.	We are on track to achieve this indicator. We only get data on current performance on this metric in arrears, The latest data we have is for 2013-15, so we need to monitor this beyond the end of the current corporate plan phase to see the impact of work we are currently doing and to see if we have achieved our target.
c	Smoking	**Reduce to statistical neighbour best of 15.9% by 2016-18**	Overall smoking prevalence for 2016 was 17.7% and decreased by 4.2% from 2015 to 2016.	Overall smoking prevalence is now at a 5-year low. Haringey's smoking prevalence is now lower than our comparator boroughs but still higher than London and England Re-commissioned a Stop Smoking Service in April 2016 – performance has been variable. Council smoking policy updated and agreed.	Performance of Stop Smoking Service is expected to improve as management has changed. Targeted work will take place jointly with Islington to address cohorts where smoking prevalence remains high.	We are on track to achieve our target for this indicator, The latest data we have is for 2016, so we need to monitor this beyond the end of the current corporate plan phase to see the impact of work we are currently doing and to see if we have achieved our target

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
d	Alcohol hospital admissions	Maintain current downward trajectory to reach 621.5 per 100,000 by 2016-18	Hospital admissions for alcohol-related conditions has reduced slightly from 649.3 per 100,000 in 2013-15 to 642.5 in 2014-16	Focus on prevention and early intervention through challenging new alcohol licence applications and the re-procured alcohol liaison service. New alcohol liaison service fully operational in North Middlesex Hospital funded by Haringey CCG.	Continued focus on prevention and early intervention.	We are amber/green for this indicator, so need to ensure that the interventions we currently have in place are sufficient to achieve the long-term target. We only get data on current performance on this metric in arrears, The latest data we have is for 2014-16, so we need to monitor this beyond the end of the current corporate plan phase to see the impact of work we are currently doing and to see if we have achieved our target.
e	High blood pressure	45% patients with diagnosed and controlled hypertension by 2018/19 (London best).	There has been an increase in the number of patients diagnosed with hypertension, rising from 30,400 in 2015/16 to **31,842** in 2016/17. The proportion of patients with diagnosed and controlled hypertension has improved from 41% in 2015-16 to 42% in 2016-17.	Large scale work to detect people with high blood pressure in primary care through carrying out blood pressure checks at every clinical contact began in 2015. This has resulted in over 2,000 new cases of high blood pressure being identified Over 3,800 NHS Health checks, which include blood pressure detection delivered each year.	We have new areas of work coming on stream now: • Community blood pressure checks (British Heart Foundation grant-funded) - Working with Bridge Renewal Trust, Embrace and THFC foundation to carry out over 2,500 blood pressure checks per year in community settings. • CCG funded stroke prevention scheme to be expanded so that there is a focus on better treatment of high blood pressure as well as identification.	We are amber/green for this indicator, so need to ensure that the interventions we currently have in place are sufficient to achieve the long-term target. We only get data on current performance on this metric in arrears. The 2017/18 end of year performance will not be published until November 2018 – so we need to monitor this beyond the end of the current corporate plan phase to see if we have achieved our target.
f	Sexually transmitted infections	Maintain Haringey's current downward projection to reach a new STI diagnosis rate of 1,417 per 100,000 by 2018	New STI diagnosis rate has remained relatively steady since 2013. The rate for 2016 was**1552.4 per 100,000** and remains higher than London and England but significantly lower than our statistical neighbours at 2,541.6 diagnoses per 100,000.	Over the last 3 years there has been significant redesign of commissioned services both at the local and London level. Channel shifting into our local prevention services i.e. primary care (GP's and pharmacists), community service provision for marginalised vulnerable communities and a dedicated young people STI and women's LARC provision. In addition, we have developed a regional collaborative partnership to expand the provision of complex GUM services. All procurement is complete. All services operational	Last piece of the service redesign will be the E-portal going 'live' across London in a phased implementation. This supports residents to 'self-serve' and avoid the need to attend complex GUM services.	We are on track to achieve our target for this indicator. We only get data on current performance on this metric in arrears, The latest data we have is for 2016, so we need to monitor this beyond the end of the current corporate plan phase to see the impact of work we are currently doing and to see if we have achieved our target.
2	**Stronger communities**					
a	**Social isolation**	**To be in the top London quartile (42.8%) by 2017-18**	Data indicates that Haringey's performance has improved from its previous decline in 15-16, and is now back up to 43.3% in 16-17, slightly above previous performances and now 3% above its statistical neighbour average, which fell in the last year.	Commissioned a VCS strategic partner, Bridge Renewal Trust, to support development of our community and voluntary offer. Mapped community assets and used to improve directories of services on Haricare and BRT website. Promoted opportunities for volunteers to reduce social isolation, such as The Good Gym. Recruitment of two Local Area Coordinators to support people in	Ongoing improvements to the directories and to the Council's webpages to facilitate navigation. Pilot of London Independent Living Service finalised to support work with older people living at home.	New data for this outcome measure will not be available prior to March 2018. Progress will need to be monitored in the new corporate plan period to assess impact of work since 16/17.

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
				identifying and accessing community opportunities.		
b	Resident life satisfaction	No metric identified for future reporting	In 2015 the percentage of adults who had a high or very high level of satisfaction with their life as a whole was actually higher in the most deprived area of Haringey (78.7% satisfaction) compared to Haringey as a whole (77.8%). The majority of Adults responded with a High level of satisfaction (56.3% Haringey, 56.2% Most Deprived Areas).		This topic is expected to be explored in the upcoming residents survey (early 2018) for future data. This will provide a greater range of data from which to derive an outcome measure.	An update on this outcome measure will not be available prior to March 2018. The metric available from the residents survey may not be directly comparable to the original survey.
c	Participation in voluntary work	No metric identified for future reporting	In 2015, the percentage of adults who had participated in voluntary work was slightly lower in the most deprived area of Haringey (14.3%) compared to Haringey as a whole (19.8%).	Commissioned a VCS strategic partner, Bridge Renewal Trust, to support development of our community and voluntary offer. Transfer of the Haringey Volunteering Centre to Bridge Renewal Trust. Two stakeholder workshops with BRT and Voluntary and Community Sector organisations and statutory partners to identify current gaps and barriers.	This topic is expected to be explored in the upcoming residents survey (early 2018) for future data. This will provide a greater range of data from which to derive an outcome measure. Further workshops with Bridge Renewal Trust and the VCS. Priorities for future development of the voluntary sector and the council's role in supporting volunteering in the borough to be agreed. This will inform the People theme under the Borough Plan from 2018.	A direct update on this outcome measure will not be available prior to March 2018.
d	Carer satisfaction with social services	To reach the statistical neighbours average (32%) by 2018-19	Haringey's performance decreased to 25% in the 2016/17 survey, taking it below the performance of London and similar Boroughs. No new data has been available since mid-2016.	Put in place additional capacity as part of service redesign to improve timeliness and effectiveness of carers assessments. Development of improved practitioner guidance and a tiered carer support offer, linked to use of support direct payments, due to go live in spring 2018. Implemented interim changes to the HAIL carers support service to better maintain and utilise the carers register. Full retender of newly specified carers' support service complete and new service due to launch in March 2018. Reviewed processed and identified opportunities to make better use of online registration.	The next Carers survey will be at the end of 2018 and we expect the changes to have made an impact on the way that carers view adult social care: Carers support service recommissioned with an updated service specification, new service due to launch in March 2018. By end of March, the council will roll-out comms about new carers offer, covering: • Identification and registration • Assessment and support planning • Carer Support Service • Community-based support	The next Carers Survey is likely to be after March 2018, therefore we will not have updated data until this time. However, additional data on informal care is expected to be available in the upcoming residents survey (early 2018).
e	Time credits - volunteering	1182 Members by the end of 2017/18	The number of time credits members is increasing over time. In quarter 2 (2017-18), there were 1187 members, meeting the 2017/18 target of 1182.	Engagement with voluntary organisations increasing availability of Time Credits opportunities. Promotion of Time Credits concept to residents, championed by Bridge Renewal Trust as strategic partner.	Exceeded target of 1182 members by March 2018 and expected to continue to increase membership through continued promotion of the Time Credits Network.	

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by March 2018	What will not be achieved and why? (State detailed issues preventing the achievement)
3	**Earlier support to maintain health and wellbeing**					
a	**Reablement**	**80.9% of older people still at home 91 days following discharge into reablement services (in line with BCF Target)**	80.1% of clients still at home 91 days after discharge into reablement. This figure reduced from a high of 91.4% in 2015/16 but more than double the number of users have received Reablement in 2016/17, so the outcomes are still robust.	January 2016 review of Community Reablement Service. May 2016 new service specification expanded the throughput of Reablement, reducing the exception criteria around health conditions such as COPD, deteriorating neurological conditions and recent neurological events. Strengthening links with hospital discharge through rollout of Discharge to Assess pathways from hospital. In 2016-17, there was a 98% increase in the number of clients receiving reablement within the same Community Reablement Service resource. Conservative estimates that Reablement has avoided £1.1m of long-term care this year.	Expect to meet the BCF target of 80.9% success for Reablement. Begin to monitor the primary health diagnosis to measure the impact of medical conditions on outcomes. Continue to work closely with Acute Trust partners on Discharge to Assess and medically optimised as we may see an increase in readmission due to the impact of earlier discharges if not medically stable. We will require immediate response by PCT, GP's and Nursing to manage deteriorating medical needs in the community and reduce risk of conveyance. Explore further options for expanding take-up of Reablement directly from the community front door.	Validated figures for 2017/18 will not be available prior to March 2018 so will need to be monitored in the next corporate plan period.

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by March 2018	What will not be achieved and why? (State detailed issues preventing the achievement)
b	**Falls aged 65 and over**	**1772 per 100,000ppn by 2017/18**	There has been a 3% reduction in the rate of non-elective admissions for falls related injuries between April and November 2017 compared to the same period in 2016/17. There have been 2 fewer non elective admissions for falls related injuries between April and November 2017. This equates to a 1% reduction in actual admissions	A workshop on falls prevention and response was held in July 2017 across Haringey, Islington and Camden. Six areas for recommendation were developed: the development of a falls pathway; developing falls prevention skills within organisations; improving the identification of people at high risk of falls; improving data sharing and communications; improving awareness of falls; and improving patient and public involvement in the falls pathway. Haringey will be considering how it takes these recommendations forward. Further Workshop carried out in January 2018 has identified clear work streams for development of falls pathway for Haringey and Islington patients. Identified development includes definition of Falls pathway and creation of a common falls assessment.	Haringey will be working with Camden and Islington to prioritise and implement the recommendations form the falls workshop.	
c	**Residential admissions**	**Age 18-64: reduction of 3 admissions (rate of 8.1) (2016-17)**	There has been an increase in residential admissions for 18-64 years old, **13 admissions** in the year to date, compared to 8 at the same point last year.	Implemented a policy of finding alternatives to residential for younger adults, including supported living and community homecare. Expanding the availability of Supported Living options. Value for money, including outcomes for the service user, is a key consideration in the decision making process and each care package is considered by a multi-disciplinary Care Authorisation Panel.	Expand and free-up additional Supported Housing units for clients to step-down from residential or for new clients to avoid residential admissions. De-registrations of existing residential providers for LD and MH clients are continuing, with two completed in 2017/18 to date and possible completion of further deregistration in-year.	Given the changing market and the time required to further expand Supported Living accommodation, the council has exceeded the number of new admissions from last year and cannot meet the target of a reduction of 3 admissions from the 2016/17 level.
d	**Non-elective admissions to hospital**	**Target of 3.03% reduction in actual admissions by 2016-17.**	There have been 15,103 non-elective admissions between April and November 2017. This is a 0.45% reduction in actual admissions compared to the same period in 2016/17 or 69 fewer admissions. There have been 5403 non-elective admissions per 100,000ppn this is a 1.69% reduction in the rate of admissions compared to the same period last year.	Haringey has started to reduce non-elective admissions though a combination of community admission avoidance schemes, including increasing care coordination through the Locality Team and increasing numbers through rapid response, and linking to work within the acute trusts to directly avoid admissions.	Haringey will continue to build on and monitor the performance of its admission avoidance services some of which will be included within the redesign of intermediate care.	Current performance is below the 3.03% reduction target and it will be challenging to meet the target by March 2018. However, Haringey's small reduction is in a national context of significant increases in non-elective admissions.

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by March 2018	What will not be achieved and why? (State detailed issues preventing the achievement)
4	**Responsive, high quality services**					
a	**Quality of Care Homes**	**To be in line with the London rate of 78% by 2018/19.**	Haringey currently has 65% of care rated as Good, and 0% rated as Outstanding as at October 2017 This is significantly less than the National picture, where 77% of care homes are rated as Good and 1% as Outstanding.	There have been six closures of residential homes in the past year, with some providers moving instead to develop supported living options. The QA team has a detailed monitoring and support plan for all homes that remain open and that are non-compliant. Commissioning are also actively supporting some homes to move to supported living status as in some cases this gives improved value for money. This is expected to have an impact early in the next financial year.	Implementation of new performance and outcomes monitoring framework for providers from March 2018.	Current performance is lower than the national level, where 77% of care homes are rated as Good and 1% as Outstanding. Over the last 18 months Haringey has seen no significant movement in this measure. It is unlikely that we will achieve the London average by March 2018 due to the timescales for closure or conversion and the capacity in the market locally and regionally. However commissioning QA activity has supported some improvements in improving, including support for care home closure where necessary.
b	**Delayed Transfers of Care**	**3.52% reduction in the rate per 100,000 population of DToC's (3,156) by 2016-17**	Between April and November (the most recent verified and reportable data) the rate of DTOC delayed days per 100,000ppn was 2242 this is a 1% increase in the rate of delayed days. There have been 4913 actual delayed days attributable to Haringey patients. This is a 3% increase on the same period in 2016/17 which equates to an additional 143 days.	Haringey DTOCs in 2016/17 reduced from 2015/16 at a time when London and national averages increased. Remodelling of the discharge process in hospitals has included establishing a social work intervention team in acute setting to reduce unnecessary referrals and undertake joint planning. Discharge to Assess has been piloted and pathways 0,1 and 2 are fully operational at NMUH and Whittington. A Single Point of Access in place for all hospital discharges. The average number of delayed days attributable to Social Care specifically (as a subset of all DtoC) was also below the target set with NHS England for September, October and November 2017. E.g. In October there was an 89% reduction in social care DTOCs. In November there was 48% reduction in social care DTOCs compared to the same period last year.	Work to address inconsistent data capture and reporting across different acute providers, including joint validation. Discharge to Assess Pathway 3 (complex discharges) to be fully operational, which will impact on some challenging DTOC cases. Haringey is leading on roll-out of Discharge to Assess across North Central London.	The more complex discharges are recognised nationally as particularly complicated to resolve. In Haringey the attempt to increase these complex discharges has unearthed a number of interdependencies across all partners that need to be resolved. These are recognised by partners and new ways to address are being progressed.

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by March 2018	What will not be achieved and why? (State detailed issues preventing the achievement)
c	**Satisfaction with care and support**	**Increase to 62% by 2018 (to be in top quartile)**	Haringey's performance has improved slightly in 16-17 with 61.3% overall satisfaction.	Satisfaction with care and support in Haringey is now above the performance of both London and Comparator Boroughs. Improvement has been consistent since 2012. Practice forums and redesign forums have focussed on how practitioners ensure that the process of undertaking assessments is clear to staff and that information is shared, the mosaic system reflects the procedures staff will be following and that where there is a need for advocacy or capacity assessments these are undertaken and service users and carers are involved in the process as required or appropriate	Changes to mosaic work flow system and embedded forms are completed. Redesign forums have produced clear protocols for staff around the function of the new teams and management structure. Audits tools modified to reflect best practice and embedded in management actions	
d	**Long term health conditions**	**55.6% of people with enough support (in line with the Better Care Fund)**	Survey results published in July 2017, using surveys collected between January and March 2017, show that 56.1% of people feel they receive enough support. there has been a 2.3% increase in the proportion of patients reporting that they have received enough support to manage their long term health condition.	Three Haringey **Care Closer to Home Integrated Networks (CHINs)** workshops have been carried out successfully, with excellent attendance and expression of interest from GPs and health/social care providers. **Locality team** managers have also been supporting the bed-based intermediate care Multi-Disciplinary Team at Protheroe House and Priscilla Wakefield Locality teams have continued to develop person-centred integrated working by implementing crisis care plans and 3 and 6-month telephone reviews. **Self-management support** 102 patients completed the Generic Self-management programme. This is 36% above the baseline target. 78 participants completed the Diabetes self-management programme this is 22% above the expected number of course completers. The Generic Self-Management Programme has carried out 1 Health Care Professionals Course delivered to 32 workers **MDT Teleconferences** The team is in discussions with Whittington IT to support electronic recording and dissemination of discussion notes and action lists – they will be viewable on Care Centric, that is, community (RIO) and GP (EMIS) users will be able to view the notes. The team has reached an agreement with MDT co-ordinators across NCL to facilitate MDT discussions for cross-borough patients (patients registered with	Set-up of the first Care Closer to Home Integrated Networks (CHINs) to coordinate delivery of acute, primary and social care. Locality Team is aiming to see a much large number of service users through referrals routes from a range of health and social care services other than just relying on GP referrals. Continue to support the self-management of people living with diabetes and other Long Term Conditions Continue to prioritise MDT discussions for patients who attend A&E multiple times and those who have complex discharges Working with London Ambulance Service to obtain data on frequent callers and link this to the MDT teleconference and Locality Teams.	No new data for this measure is due out until after March 2018 and we are above our BCF target for this measure.

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by March 2018	What will not be achieved and why? (State detailed issues preventing the achievement)
				a GP in a neighbouring borough.		
5	**Vulnerable adults safeguarded from abuse**					
a	**Feeling safe and secure**	**Maintain a satisfaction rate of 89% by 2017-18**	Haringey's performance has continued to improve with 89.2% saying that services have made them feel safe and secure.	Haringey is above the average for its Comparator borough averages for 2016-17, and is within London's Top Quartile. Mosaic work flow system amended to reflect and record best practice and enable effective reporting Audit tool developed and being tested	Roll out of safeguarding responsibilities across all teams. Recruitment to full safeguarding team including manager post. Embed auditing of cases to test best practice and identify areas of practice for development. We are currently running the survey and results will be ready for evaluation in April 18.	
b	**Safeguarding enquiries**	**There is still discussions around how best to report this objective. Aim at present is to maintain target of 67% of safeguarding concerns addressed through preventative work.**	There has been discussion within the NCL group to establish a way of reporting this key indicator, ADASS are developing a dash board for implementation and once in place will be used to inform reporting for this objective.	There is considerable fluctuation over time in the number of Section 42 enquiries, and this is consistent with experience in other boroughs. Improved use of preventative work at the initial concern stage has been one key driver of lower numbers of concerns proceeding to Section 42 and although the rate has fallen below our stated range, this reflects proactive safeguarding prevention and intervention.	Continue to monitor the rate of Section 42 referrals, alongside trends in the number of concerns raised and the proportions receiving preventative input. Agree target to be achieved, or maintained in light of knowledge that of all concerns raised 2/3 (67%) safeguarding concerns are addressed through preventative work, 27% go on to a S42 and 6% result in a NFA.	Achieving a rate of S42 enquiries within the narrow band 50-55 is challenging and an alternative approach may be required, e.g. using a rolling 12-month average. Also, the lower rate of Section 42 has been evidenced as reflecting increased safeguarding prevention and early intervention. Work is underway to develop a more meaningful performance measure
c	**Safeguarding outcomes**	**Increase the percentage of people who say the outcome was partly or fully met to 90% by 2017/18**	Haringey's performance has shown significant improvement over time since Q1 2015/16, increasing the percentage of those whose outcomes were partly or fully met from 43% to 93% by Q3 2017/18.	Amendments to mosaic work flow to effectively capture stated outcomes of people coming through safeguarding team Mandatory steps added to mosaic work flow to ensure process is being adhered too and data captured for effective reporting	Dedicated safeguarding team member in place within First Response Team to ensure that referrals to safeguarding at the first contact identify outcomes as part of initial triage. Effective audit to ensure best practice is being adhered too and the mandatory steps in the workflow have aided the reporting and evaluation of data and therefore the ability to report on the achievement of our objectives.	

Corporate Plan 2015-18

Status Report 2017

Priority 3

Corporate Plan Priority [1, 2, 3, 4, 5]	**3**
Priority Name	**Clean and Safe**
Priority Lead	**Matthew Duhy**
Priority Owner	**Stephen McDonnell**
Date	**12/02/2018**

Priority Summary

A clean, well maintained and safe borough where people are proud to live and work

"We will strengthen communities and partnership to improve our environment and reduce crime, ensuring that residents and traders feel safe and are proud of where they live and work."

- Community Safety Partnership

Priority Objectives



Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
1	**Safe and proud of where you live**					
a	Fear of crime	Haringey East, North and West to all be down to 29% by 2018	33%	• Delivery of Team Noel Park. • Distribution of 70,000 leaflets to assist confidence in the wards of highest concern twice in the last 6 months. • Police Community Engagement Board fully established. • Community engagement increased through social media platforms - Facebook and Twitter. • Increased presence in print media- active promotion of Bike Safe campaign in print and social media. • Kingdom Pilot – combating street litter. • Roll out of crime reduction stencils in hot spot areas to advise residents of phone snatches	• Property Licensing: Report to Cabinet Nov 2017 (to include evidence base) and Public Consultation completed.	• Property Licensing: Final report to Cabinet, This has moved from March 2018 to June 2018 due to the delay in commencement of the public consultation. • All planned initiatives will be delivered. Achievement of this target is dependent on large scale behaviour change and partnership initiatives.
2	**Street clean, well maintained and safe**					
a	Pothole repairs	95% by 2018	23%	• Successful major scheme bid (White Hart Lane) • 2016/17 £3.5m of investment to improve footway and carriageway planned maintenance. • Performance improvement plan in place with Term contractor • Confirm on Demand rolled out. • New Highways inspection regime in place.	• 2017/18 £3.5m of investment to improve footway and carriageway planned maintenance. • Confirm connect fully operational on all maintenance services • Review of options for delivery of highways maintenance services completed.	• We will not achieve the target for pot hole repairs. This is due to contractor failure. We are exploring options for an alternative contractor and working with the current provider to improve current performance levels.
b	Killed and seriously injured on roads	10% reduction by 2018 from annual 77 target	73 KSI	• The implementation of borough wide 20mph default speed limit • Improvement to two major signal junctions – new pedestrian facilities introduced • 6 new CPZs introduced • 2016/17 Sustainable Transport Works Plan (STWP) delivery of £7.2m external investment to support transport improvements, road safety, bus priority and encouraging more people to walk and cycle. (*supports cycling, walking and road safety)*	• 2017/18 STWP delivery of £4.8m external investment to support transport improvements, road safety, bus priority and encouraging more people to walk and cycle. (*supports cycling, walking and road safety*). •	• KSI continues to fall in Haringey. This is the second consecutive year of reduction with 11 fewer compared to last year. The 73 KSI casualties in Haringey for 2016 is less than the annual target of 77 and remains on track to achieve its 2017 corporate plan target of 66.

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
c	Litter on streets	Levels of litter will reduce to 3% by 2018 within all areas in Haringey to achieve London Top Quartile.	10% (after first survey in 17/18) Last full year (16/17): 5%	• Residential sweeping – moved to a performance intelligence led service. • Improved contract monitoring to increase income collection. • Cleanliness maintained at average 5% (or 95% roads passing) following the reduction of residential sweeping frequency to achieve savings' target.	• Review of contract and negotiation with Veolia to reduce cost whilst maintaining service levels. • Completion of Scrutiny review on street cleansing • Roll out of charged services for garden waste, bulky waste and replacement bins • Satisfaction survey results will be available for comparison with 15/16 and 16/17. • Closure of Park View Road Reuse & Recycling Centre for savings.	• Corporate stretch target (3%) will be very challenging following reduction to once per week sweep in 2016. • Recycling rate target in contract will not be achieved. (not a corporate plan target)
3	More people will be walking, cycling and using public transport					
a	Travel by bicycle	5% by 2018	3%	• Delivery of range of sustainable transport projects and smarter travel initiatives. • CS1 (Cycling Super Highway) delivered in conjunction with TfL • Successful delivery of the Council's first cycling conference • 5th tri borough Festival of Cycling and Walking achieved • Every year around 1500 people receive cycle training, 500 bikes are serviced and over 100 people attend cycle maintenance courses • Expansion of borough CPZ programme which discourages private car use and in turn encourages more sustainable transport modes.	• Continuing to deliver cycle training and maintenance sessions to encourage more people to take up cycle training • Working on the 6th tri borough Festival of Cycling and Walking (June 2018) • Delivering information and advice roadshows to support people with the information needed to change their behaviour • Supporting community projects to work with their service users to travel by bike • Introduction of two new controlled parking areas – Hornsey North and Alexandra Palace Extension	• All planned initiatives will be delivered. Achievement of this target is dependent on large scale behaviour change and improvements to cycling infrastructure. • Note that this EU bid was unsuccessful. Other sources of funding being sought for this type of behaviour change work
b	Bus service reliability indicator	88% by 2018	86.2%	• 2016/17 STWP delivery of £7.2m external investment to support transport improvements, road safety, bus priority and encouraging more people to walk and cycle.	• Over 99% of bus stops in the borough accessible. • Reliability improvements along the 318 route	

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
c	Travel by walking	40% by 2018	36%	• Delivered 5000 personal travel plans in Seven Sisters, Tottenham Green and Muswell Hill • Over 860 pledges made by resident to travel more sustainably. • 65 schools now have school travel plans • Support the Haringey walks campaign including continuing the success of the HARI Bear walking project which engaged 46 schools in walking 903 miles • Expansion of borough CPZ programme which discourages private car use and in turn encourages more sustainable transport modes.	• Delivering personal Travel Planning and 10-minute walk zones in 6 schools in 2017/18 and 6 schools in 2018/19 • Working with schools to ensure that at least 65 School travel plans are achieved • Delivering a HARI Bear orienteering project in 5 parks in October • Working with Highways on developing a Schools Street pilot which would see the road closed during drop off and pick up time at one school • Supporting community projects to work with their service users to walk more • Introduction of two new controlled parking areas – Hornsey North and Alexandra Palace Extension	• All planned initiatives will be delivered. Achievement of this target is dependent on large scale behaviour change.
4	**To prevent and reduce violence against women and girls (VAWG)**					
a	High risk victims of domestic abuse (MARAC referrals)	Increase to hear 410 cases per year by 2017/18	433	• Development of 10-year Strategy and first 3-year partnership action plan • Increased partnership working across boroughs • Increased community buy-in and awareness achieved • Development of a male engagement programme and recruitment of male ambassadors • Development of a multi-agency VAWG training framework and standards	• Development of a VAWG referral pathway for all professionals • The service started for women experiencing multiple disadvantage. The project aims to provide holistic support to the most vulnerable survivors of abuse in the borough. Women referred to the programme will have experienced any form of violence against women and girls. • Development of the pilot approach to the Coordinated Community Response • Implementation of the VAWG training programme and community group model for children • Achievement of the White Ribbon Accreditation • Development of the Survivors' Forum	• There has been a slight slippage with the survivor forum as we have reshaped this with funding from the transformation fund to be a small grants scheme for survivors. This will run in conjunction with a forum and the development of a conference celebrating success. This project is due to start in April 2018. • The community group approach has also slipped due to a change in approach. This project will also commence in April and is looking at developing a more targeted programme based on resilience and attachment theory.
5	**Reduce serious crime and gang activity**					

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
• a	• Violence with injury	• MOPAC target is a 20% by March 2016. We plan to reduce a further 10% by 2018. • Corporate plan target 6.09%	• 10.94%	• Partnership Tasking Forum set up to review crime/ ASB hotspots. • Autumn & Winter Nights initiative ongoing annually. • Operation Sceptre – Ongoing police activity including weapons sweeps & intelligence led stop and search to target habitual knife carriers. • Operation Equinox: A coordinated crackdown on non-DA VWI targeting licensed venues and fast food outlets in Noel Park, Northumberland Park and Tottenham Green.	• Draft knife crime action plan to be prepared. • Operation Hayle (targeted partnership activity to address gang activity) in hot spot areas • Working with the Bridge Renewal trust to engage the community and voluntary sector in activities to reduce serious crime and gang activity • Development of a Community Safety Strategy	• The Community Safety strategy will be delayed to bring it in line with the Borough Plan summer 2018. • All planned initiatives will be delivered. Achievement of this target is dependent on large scale behaviour change and partnership initiatives.
• b	• Robbery	• MOPAC target is a 20% reduction by March 2016. We plan to reduce a further 10% by 2018. • Corporate plan target 4.03%	• 6.39%	• Successful community led “gang call in” • Successful Project integrate delivery. • Operation Hale introduced, (targeted partnership activity to address gang activity) - • Operation Perseus: Dedicated anti-robbery initiative. • Formation of Robbery Unit – This is a new unit committed to tackling street crime including robbery and moped enabled crime including theft person (snatch) offences. • Operation Teal: This is an ongoing MPS wide policing operation supporting Boroughs focusing on addressing knife, gang and serious youth violence. • Gang • s summit: This is being led by Reverend John Wood from St. Ann’s in partnership with police. • Engagement tactics: Police have increased the focus of their schools’ work and engagement on weapons and gang-related activity.	• Roll out of crime reduction stencils in hot spot areas to advise residents of phone snatches. • Heightened police presence in targeted areas. • Autumn night’s partnership approach to tackle robbery and burglary Engagement tactics: Police have increased the focus of their schools’ work and engagement on weapons and gang-related activity. • Youth at risk summit led by Bridge Renewal Trust to take place March 2018	• Wider roll out of crime reduction stencils has been delayed, whist the partnership determines further hot spot areas around other crime generators. • All planned initiatives will be delivered. Achievement of this target is dependent on large scale behaviour change and partnership initiatives.
• c	• Burglary	• MOPAC target is a 20% reduction by March 2016. • We plan to reduce a further 10% by 2018.	• 8.33%	• Successful reduction in burglary through Met Trace. (Traceable liquids to mark property of value).	• Further phased roll out of Met Trace in hot spot areas	

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
		• Corporate plan target 9.82%				

Additional Comments

Cabinet decision:

- Property Licensing proposals and public consultation underway
- Feb / March Cabinet Decision - In principle agreement to Bull Lane Sports Hub Project and Heads of Terms with Football Foundation for their Grant.

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Corporate Plan 2015-18

Status Report February 2018

Priority 4

Corporate Plan Priority [1, 2, 3, 4, 5]	4
Priority Name	Drive growth and employment from which everyone can benefit
Priority Lead	Carla Segel
Priority Owner	Emma Williamson
Date	12.02.18

Priority Summary

Sustainable Housing, Growth and Employment

"Haringey is London's future: a borough embracing growth to create thriving, more prosperous and more equal communities."

- Economic Development and Growth Strategy
- Tottenham Regeneration
- Discretionary Business Rates Relief Policy

Priority Objectives



Objectives – Status Report

Objective No.	Objective Description	Target	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
1	**Enable growth by securing infrastructure**					
a	**Education investment**	**Investment of £81.4million worth of funding by 2017/18**	Investment of £115.8mil worth of funding achieved	£40m secured for the Harris Academy, ADA: the National College of Digital Skills, which opened in 2016, and DfE Capital funding for across the Corporate Plan period.	The target has been exceeded	n/a target achieved.
b	**Health investment**	**£3.1 million by 2017/18**	**Expecting to achieve target.** £250 thousand invested in health at Q1 2017/18.	NHS England gave conditional approval for up to £11m.	Further work to be undertaken on the outline and full business cases before OBC submission targeted for March 2018. Funding approval for 2017/18 would see this exceeding the Corporate Plan target. We are anticipating securing first stage approval by March.	The scheme's deadline has now been extended from 2019 to 2021 moving into the next Corporate Plan period.
c	**Transport investment**	**Investment of £374.3million worth of funding by 2017/18**	£421.4m investment in transport funding secured.	Funding secured includes HMT and TFL for preparation of Crossrail 2 business case, and £2.85m of LIP funding confirmed for 2017/2018	The target has been exceeded	n/a target achieved.
d	**Environment investment**	**£40.2 million by 2017/18**	£47.2m invested	External investment secured to undertake public realm improvement works such as in White Hart Lane, in Northumberland Park, along the High Road including heritage building improvements, and for decentralised energy in North Tottenham.	The target has been exceeded	n/a target achieved
e	**Planning services**	**Minor Apps –65% & Other Apps –80%**	Achieving target at Q32017/2018.	100% for Major Apps, 97% for Minors, 98% for Others. Planning services ranked in top quartile based on CLG London Borough comparison stats.	The target has been acheived	n/a target to be achieved
2	**Support growth in business and jobs**					
a	New businesses	Total to increase to 12,040 by 2017 (data will be available in 2018)	Target achieved. Total has increased by 13,305 (at 2017).		The target has been exceeded	n/a target achieved. However, will need to observe any data fluctuations from updates over the reporting period.
b	New jobs	Additional 1,250 jobs in total, 2014-2017 2017/18 –71,450 jobs in Haringey	On track to achieve, target. Data for 2015 indicates 69,400 new jobs created.		Trend remains positive.	
c	Superfast broadband businesses	To reach 1,000 businesses by 2017/18	295 businesses with superfast broadband in 2016/2017 from yearly target of 200.	Target in 2015/2016 was over achieved because of demand for GLA superfast broadband voucher scheme.	There are no further anticipated achievements between now and March 2018, as following the end of the GLA voucher scheme, there is no further	If successful with the bid for funding from the DCMS, delivery of the scheme would likely be in the second year of the next Corporate Plan period.

				The GLA provided funding for businesses to access superfast broadband.	public sector funding which would enable a programme to be delivered by the end of the CP period. However, the Economic Development team has made a bid for 6.5M to DCMS to implement ultra-fast broadband scheme within Haringey.	The target was predicated on expected development taking place in Tottenham Hale, and us attracting a number of tech companies into the area. Ashley Road South was the site expected to house the major tech companies. Delays to planning agreements to the site affected ability to achieve the target. The target was set without allocating any funds for schemes to help achieve it. Without securing the GLA external funding, very limited progress would have been achieved.
d	Earnings of lowest 25%	To reduce the gap between Haringey and London by 15% by 2018	2017 data shows that the lowest 25% earnings in Haringey has risen to £460 against earnings of £479 for London, a gap of 4%.	The lowest 25% earnings in Haringey has risen from £391.50 to £460 since 2014, a 17% rise. This is against earnings rising from £440.80 to £479.00 for London in the same period, a 9% rise.	The percentage gap is at 4% and the monetary gap has fallen substantially from £50.30 to £19.00 from 2016 to 2017 suggesting a positive trajectory. However, 2018 data will not be available until after the end of this Corporate Plan Period so we do not yet know whether the target will be achieved.	Performance is subject to wider economic factors outside of the Council's control. Factors affecting earning including individual characteristics of the population (examples age and gender), as well as job related characteristics (public/private, occupation group, size of businesses).
e	Technology led businesses	10 businesses by 2017/18	On track but delays mean this may be achieved outside of this Corporate Plan period. 1 business achieved in 2016/17, with target of 9 concentrated in the final year.	Ada: National College for Digital Skills was established in 2015/16, with the first cohort of students taken in late 2016.	In discussion with several tech incubator firms, and Ada: National College for Digital Skills, helping raise the profile Haringey with tech firms and develop a skills pipeline. Wayra (a digital business acceleration hub) at Tottenham Hale is due to open in early 2018. This should start generating start up tech businesses from 2018 onwards.	This programme has been delayed by the need to obtain clarification on state aid rules. It is unlikely that the projected businesses will be realised in the current Corporate Plan period, but likely to be achieved in Q2 of 2018/2019.
3	**Residents have training, skills & support to find and keep good quality employment**					
a	**Construction employment**	**A total of 100 construction jobs filled by 2017/18**	38 construction jobs achieved in Q2 2017/18.	The majority of jobs are coming from the Tottenham Hotspur Stadium project.	This target is on track to be met and will be delivered mainly from opportunities at Spurs, Apex House and Alexandra Palace. K10 are now in contract to deliver the Haringey Construction Employment Service	
b	**People supported into work**	**1,100 people by 2017/18**	50 people were supported into work in Q3 17/18.	903 people have been supported into work overall during the Corporate Plan period.	The target is still on track to be met. However, further delays to the start of the London Councils-ESF will introduce a risk that the target will not be met.	Further delays to start of the London Councils-ESF project will introduce a risk that the target will not be met
c	**Skills level and earnings**	**400 people by 2017/18**	At 17/18 Q2, 488 people were supported to increase skills / earnings, taking performance to date to 833 against the target of 400.	Overall 833 people have increased their skill level & earnings, from a target of 400. This has been delivered through a range of activities such as the Haringey 100 apprenticeship scheme, the GLA's Haringey Employment Support Project, Birkbeck Higher Education widening participation activities and Haringey	The target has been exceeded	n/a target achieved

				Adult Learning Service delivery.		
d	**Apprenticeship take-up**	**200 young people by 2017/18**	At 17/18 Q3 an additional 2 people took up apprenticeship opportunities taking the total to 69 against the 200 target.	The total number of young people taking up apprenticeships has been 69.	Anticipated to achieve a minimum of 75 apprenticeship starts	The target will not be achieved due to structural issues around the negative perception of apprenticeships amongst young people, schools and parents. In addition, many young people who are interested in apprenticeships do not have the requisite hard and soft skills to handle the demands of one. As such, these young people need long-term and comprehensive support to prepare them for undertaking an apprenticeship.
4	**Reduce carbon emissions and grow the green economy**					
a	Operational estates CO_2 emissions	Reduce CO2 by 10% year on year	2016/2017 C02 emissions across our operational estates have reduced by at least 10% from 2015/16.	The Council have moved from estimated billing to actual reads. Other interventions include implementation of RE:FIT projects at Alex House, River Park House and Wood Green Library. High-energy consuming buildings including Care Homes have been closed. Phase one of the Street Lighting Energy Efficiency project has also been completed.	Anticipated to continue reducing CO2 by 10% in 2017/18.	n/a
b	CO_2 emissions reduction	To reduce by 40%	Latest data is from 2015. Reduced by 28.7% from the original emissions.	Down to 2.7 tonnes per person, below the London figure of 3.8. In the last year there has been a reduction in Corporate Estate Carbon footprints, over £500K secured from Government to support the delivery of District Energy, enforcement of Zero Carbon Policy on new Planning Applications. There is also Capital Agreement to deliver a DEN at North Tottenham.	2016 data released in 2018 – target is 3.1 which is likely to be achieved.	n/a
c	Home energy advice/measures	To support 4,000 retrofit works by 2017/18	Year-end figures for 17/18 show a total of 2,450 homes supported.	End of the Smart Homes project has seen performance tail off.	Any achievements between now and March 2018 will be opportunistic as there is no funding for major interventions.	It is unlikely that the remaining target will be achieved without the funds to provide an intervention. It was hoped that Carbon Offsetting could be secured through planning to deliver more interventions in existing housing stock.
d	SME supported via low carbon interventions	To support 150 interventions by 2017/18	As of the start of 17/18 there have been 135 SMEs supported.	Performance has slowed down due to the end of the Smart Business project.	The target is anticipated to be met with intensive work in Wood Green and on the commercial property portfolio. Properties below an E rating on an Energy Performance Certificate, from 1st April 2018 cannot be rented out. This legal requirement will impact on property services, requiring interventional work to improve energy performance. The legislation is likely to result in the target being achieved by March 2018.	n/a

5	**Prioritise growth in Tottenham, Wood Green and focus on key community assets**					
a	Gross development value	£1.7bn Gross Development Value of projects in Tottenham and Wood Green by 2018	£635.7million GDV of housing units consented in Tottenham and Wood Green at Q3 2017/18. Data uses an average price per square foot to provide a measure of eternal investment in the development of the borough by the numbers of homes consented.	The original £1.25bn investment target (in total) has been revised to £1.6bn profiled over 3 years.	This target will not be met this year as we have not consented as much development as anticipated. Given the future pipeline of sites targets are expected to be met and exceeded in 18/19.	
b	Wood Green units consented	958 units by 2017/18	No units consented so far due to delays with sites. Although there is resolution to grant at planning committee for 700 units and planning applications submitted for the balance of the target.		If planning consent is issued for the 3 major sites in the pipeline this target will be overachieved.	
c	Tottenham HZ units consented	2,828 units by 2017/18	1,534 units consented overall at Q3 2017/18.		Approximately 800 further units are at resolution to grant stage as at Q3 17/18. A further 800-1000 units are associated with SDP sites which have been subject to delay but which will be submitted by summer 2018; the target will be exceeded at that time.	
d	Borough wide units consented	1,502 units per year	3,592 at Q3 from a target of 3,755		Consents by year end are expected to meet this target.	
e	New commercial space consented	187,515m^2 by March 2018	140,338m2 new commercial space consented so far.		The target will be narrowly missed in this financial year however forthcoming years will over-deliver to compensate.	

Additional Comments

Based on current performance and projected performance by the end of the Corporate Plan period, 74% of the targets (captured in the performance wheel) will be achieved with only six indicators out of 23 not expected to be met within this Corporate Plan period (26%). A number of the indicators are based on national datasets; of which some are updated only once per year. This means some of the data can only be reviewed retrospectively, significantly after the period has ended rather than being used for ongoing performance analysis.

The programme for completion of housing units is outside the Corporate Plan Period, and so progress is measured using planning consents instead of build completion. Planning consents however are only reported once the S106 agreement has been signed, meaning there are a number of schemes already approved by Planning Committee which do not yet figure in our reporting.

It is hoped that the new borough plan finds ways to reduce the 23 indicators into more meaningful and efficient indicators of success, focussing on indicators we have agency over.

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Corporate Plan 2015-18

Status Report February 2018

Priority 5

Corporate Plan Priority [1, 2, 3, 4, 5]	5
Priority Name	Create homes and communities where people choose to live and are able to thrive
Priority Lead	Alison Woodcraft
Priority Owner	Dan Hawthorn
Date	12 February 2018

Priority Summary

Sustainable Housing, Growth and Employment

"Housing is about people and communities, not just bricks and mortar. This means mixed and inclusive neighbourhoods where residents can lead happy and fulfilling lives."

- Housing Strategy

Priority Objectives



Objectives – Status Report

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
1	**Achieve a step change in the number of new homes built**					
a	New additional homes provided	1,502 net additional homes a year by 2018/19	2016/17: 774 net additional homes 2017/18 to Q2: 481	2014/15 640 2015/16 660 2016/17 774 2017/18 to date 481 Total to date 2555	The projection of new homes for 2017/18 is for 1,340 by March 2018	This target is set for Haringey by the Mayor via the London Plan. It will not be possible to meet the target of 1,502 homes as this was unrealistic given the potential supply pipeline within the borough, and the need to mobilise planning policy and delivery mechanisms for the pipeline the council do have during the Corporate Plan period.
b	Percentage of net affordable homes	40% of new homes are affordable, on a habitable room basis	2017/18 to date: 56% affordable on a habitable room basis (47% on a unit basis)	Over the Local Plan period to date (April 2011 – September 2017), 50% of all conventional housing delivered has been secured as affordable housing on a habitable room basis. On a unit basis, 42.5% of all new homes delivered have been affordable.	The current level of delivery of affordable homes means that it should be possible to maintain an average of 40% of new homes being affordable on a habitable room basis from 2014/15 to 2017/18. Over the Local Plan period (from 2011) 50% of homes were affordable on a habitable room basis.	n/a Despite the challenging context (with Government reducing investment in new affordable housing by around 65% since 2010) Haringey has delivered a large number of affordable homes. Over the current Local Plan period, from 2011-2017, 42% of all new housing has been affordable, rising to 50% as a percentage of all habitable rooms. This means that Haringey's average was significantly higher than the average across all London boroughs of only 28% of new homes being affordable in the 2011-2016 period (the latest date for which comparative data is available).
c	Gross affordable housing delivery	1,000 affordable homes completed by end of 2017/18	By Q3 2017/18: 963	963 homes delivered to date, including 31 delivered directly by the council under Phase 1 of the small sites programme - 18 properties at affordable rent (7 flats, 11 houses), and 13 for shared ownership (12 flats, 1 house).	Projections show that 1,010 homes on named schemes are already onsite and should complete by end of March 2018.	n/a
2	**Prevent homelessness and support residents to lead fulfilling lives**					
a	Homelessness preventions as a percentage of approaches	To be 40% by 2018/19	Q3 2017/18: 52% of approaches were prevented	The Homes for Haringey (HfH) Housing Demand team cleared a backlog of homelessness cases and was restructured in Autumn 2016 which has led to improved early intervention and prevention. The increased levels of preventions have resulted from work undertaken to reach households earlier, the delaying of homelessness using powers in the Deregulation Act, the flexible use of prevention funding and an increase in ASTs as an alternative to homelessness for households who cannot remain where they were.	It is expected that HfH will maintain preventions at 50%. The introduction of the Homelessness Reduction Act is likely to increase footfall, therefore acceptances might go up, but the ratio of preventions to acceptances should also increase. However the implementation of Universal Credit could have a negative impact on this.	n/a
b	Households in temporary	2,980 by March 2018	Q3 2017/18: 3,002 households in temporary	Gradual decrease from peak of 3,216 in August 2016, following 3 previous years	It is expected that HfH will be able to decrease this figure further to at most	The original target of 2,500 households in TA will not be met. This is due to the

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
	accommodation	(original target was 2,500)	accommodation	of increases.	2,980 households, which is a decrease of 22 from the current position. A TA reduction plan is in place which includes measures to prevent homelessness and to secure additional supply, with key projects to be presented to SLT before the end of March 2018.	lack of supply of homes to discharge them into (particularly social housing for the 1,100 households in TA prior to the Localism Act 2011), as well as the failure to deliver previously proposed supply initiatives over the plan period, and limited ability to increase the supply of ASTs.
c	% Change in rough sleeping within Haringey	Target tbc	Q3 2017/18: 55 people seen rough sleeping by outreach services	This is a new indicator, introduced in response to the increase in rough sleeping in the borough. Additional funding has been secured from DCLG and a Rough Sleeping Monitoring Officer has been appointed for 2 years.	A Rough sleeping strategy and rough sleeping programme plan are under development and will be in place by March 2018. Targets for reduction will be set in the new Borough Plan, although monitoring is being improved in the interim.	n/a
3	**Drive up the quality of housing for all residents**					
a	Overall satisfaction with Homes for Haringey (HfH)	81% by 2018/19	Q3 2017/18: 64% of residents are satisfied with HfH	Additional surveys are now being undertaken every month on a ward by ward basis to better understand the reasons for satisfaction being below target. Evidence to date has identified the following key drivers of satisfaction which need to improve: • The quality of a neighbourhood as a place to live • Repairs • Listening to residents' views As an example of action taken to date; residents suggested that HfH staff should be more identifiable when on estates, so HfH is working on ensuring this.	The council is still awaiting a full action plan to address poor customer satisfaction from HfH. An extensive consultation on residents' Business Plan priorities, engagement preferences and resident group recognition has been undertaken by HfH. Once analysed this will inform an action plan to improve satisfaction.	The target will not be met as there will not be another full survey of customer satisfaction until after the end of the plan period. An action plan is expected to be in place in April. The new HfH management agreement includes additional levers for the Council to help improve HfH's performance.
b	% of Homes for Haringey (HfH) homes that meet Decent Homes standards	81% of stock to be decent by end of 2017/18	Q3 2017/18: 80.5% of stock is decent	The budget for major works/decent homes for 2017/18 is £24.615m – the projected year-end outturn is £22.735m. Of the 10 schemes within 2017/18, there are 4 schemes on site. All other schemes will be on site before the end of March 2018, with 3 of these before the end of January 2018.	HfH are on course to achieve our local target of increasing this percentage to 81.0% of the stock by March 2018. However, this target will be revised to a more ambitious target to reflect the increased stock investment budget due to be approved in the MTFS going to Cabinet in Feb '18 and the need for Haringey's performance to improve to at least the London average	HfH have yet to achieve 100% decency. The major works budget has been fully spent each year, but HfH are well below the London average which has increased to 92% over the same period, with the top quartile of boroughs increasing to 100%. Following the comprehensive spending review the Decent Homes funding Haringey had expected to receive was reduced and spread over a longer period during which additional homes have fallen into non-decency.
c	Private rented sector households in safer licensed conditions	1,800 households in safer conditions between 1st April 2017 and 31st March 2018	Q3 2017/18: 961 households are in safer licensed conditions.	For 2017/18 data was analysed and the number of HMO properties that require a license has been assessed. So far 961	Mandatory Licensing is operational across the borough. An additional HMO Licensing Scheme operates within 5	The target to improved living conditions for 1800 households using our existing licensing schemes is not on target as we

Objective No.	Objective Description	Target (Mar 18)	Latest Performance Information	What has been achieved to date	What will be achieved by end March 2018	What will not be achieved and why?
		Previous annual targets: 1,500 households in safer conditions between 1st April 2016 and 31st March 2017 (Indicator only established for 2016/17 dashboard.)		households are living in safer conditions. 2016/17: 348 licenses were issued, leading to 1,476 households living in safer conditions	wards in Tottenham (TALA). Across the two schemes it is envisaged that 1,400 households will be in safer conditions as a result of licensing in 2017/18. This is based on the Housing Improvement work programme and allocation of resources as well as the Governments proposed introduction to extended mandatory HMO Licensing to more properties. There is an average of 30/35 licenses being issued each month which will enable the target to be met This should continue, barring any enforcement action being required which could delay the process.	approach quarter 4. This is because a Government initiative to redefine Mandatory HMO licensing has not yet been introduced, which we had included in our forecast. Although the number of licenses issued is always weighted more heavily at the end of financial year, based on currently activity the 1800 household target may not be reached.

Haringey LONDON

Status Report October 2017

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Status Report February 2018

Priority X

Corporate Plan Priority [1, 2, 3, 4, 5]	N/a
Name	Priority X
Lead	Andrew Rostom
Owner	Richard Grice
Date	13 February 2018

Summary

- Priority X is quite different to the other five Priorities in the Corporate Plan in that it is somewhat 'inward' facing, focusing on the efficiency of enabling service areas and back office functions. As such, it does not have a set of outcomes or performance wheel indicators aligned to the delivery as is the case with Priorities 1 to 5.
- Priority X brings together a collection of activities, projects and programmes aimed at improving the efficiency of enabling and back office services, so that they are better able to support and enable Priorities to deliver the outcomes in the Corporate Plan.

Activity	What have we achieved	What will be achieved by end March 2018	What will not be achieved
Customer Focus • Restructure	A restructure of Customer Services was carried out in 2016 achieving a £1.1M saving.		
• Digital services	A number of new ways for residents to interact with the Council have made it cheaper and easier to do business with the council including: • **My Account** – allowing residents to access services on-line ranging from Council Tax and Housing benefits to environmental problems and our Library catalogue. 55% of all residents now signed up. • **Assisted self-service scanning** – allowing self-serve when reporting changes in circumstances meaning waiting time are significantly reduced. • Introduction of **hand held devices** for CS staff in order that they can handle customer enquiries more efficiently • **E-forms** – new e-forms available for six key enquiry areas.	• **Parking –** Introduction of and Telephone and digital offer only for Parking Permit Renewals. • The introduction of a digital offer with regards to Customer Experience feedback • **My Account** introduction of Universal Credit postcode checker to signpost residents correctly during transition period to UC**.** • **Automated call-back** option to assist low income customers with the cost of calling. • **IT specialist recruited** (with Shared Digital) to enable further digital improvements	• **Automated switchboard** which will be re-evaluated when the function is moved to the Cloud
• The Perform Programme	• The Perform Programme has delivered significant productivity gains which are now feeding through to better customer service.		

Activity	What have we achieved	What will be achieved by March 2018	What will not be achieved
Shared Service Centre	A Shared Service Centre established with the transition of transactional/operational services including Human Resources; IT Service Desk; Operational Finance; Revenues and Benefits; Account Payable; Purchasing	**Review existing ToM for Shared Services in conjunction with Customer Services**	

	and Compliance. New systems to support delivery including: • A case management system (V-fire ire/SSC Self Service Portal) • A new telephony system • Intranet pages were updated and e enhanced		
• Business Support	New Business Support TOM implemented to support frontline services based on agreed service offer / SLA; £300k savings delivered; better managed and more resilient service in place	Further review of Business Support specifically relating to Children's Service being undertaken to assess changes in workloads / resourcing since implementation of new ToM	
• Human Resources – Recruitment	New TOM being implemented for **Permanent & Temporary Recruitment**. More professionally focussed end-to-end recruitment service to support workforce plan.	New Haringey Resourcing Hub (Hays) implemented: new ToM and eRecruitment system Payroll - Online Payslips Solution fully implemented Strategic HR (Pay & Reward, Business Partners) integrated into SSC	
• Benefits	Engaged **third-party provider** to support administration **of Housing Benefit** during peak periods of work / provide resilience to shortfalls in staffing.	Regular Housing Landlord stakeholder liaison meetings implemented Embed PERFORM Performance Management	
• Revenues	"**Arrears Collection**" projects partly funded by GLA aimed at improving collection rates in CT & NNDR have been particularly successful and will be extended.	Council Tax & Business Rates "Arrears" Collection Projects implemented Embed PERFORM Performance Management	
• Finance		Planned review of existing structure and specifically Corporate Debt, Operational Procurement and Accounts Payable Implement Debt Reduction Project	
• Central Team		**Planned review and restructure of Feedback & Information Governance, Central & Business Support team into more integrated single business unit** **Undertaken major review of Process / Procedures**	
Activity	**What have we achieved**	**What will be achieved by March 2018**	**What will not be achieved**

Strategic Procurement • A new operating model • Introduction of a Dynamic Purchasing System (DPS) • A recruitment contract with Hays	The implementation of a new Strategic Procurement function and operating model, along with a new contract management and purchasing system. The DPS is enabling us to achieve better value for money with regards social care provision. The DPS has been rolled out in the following areas: • Homecare • Semi-Independent / Supported Living • Residential & Nursing A recruitment contract which will better enable us to respond to staffing needs, attracting the right people at the right time (both permanent and temporary staff). It will help reduce the reliance on temporary workers and mean faster recruitment whilst reducing the cost of advertising and recruitment.	The SSC are currently reviewing the transactional functions related to procurement and are proposing a change to the SSC structure to align resource requirements with demand Establish proposals for a dedicated **DPS** for the provision of professional services, aligned with and to complement the existing **LCP Major Works** 2014 Framework Agreement. It is anticipated that this will generate significant income for the Council.	
Future Front Office/Back Office	The FOBO programme was initiated in response to addressing the challenge in delivering MTFS savings in both the Shared Service Centre and Customer Services. At its core it is reviewing the current front office design and alignment / integration of this with back office services (and vice versa) in order to identify future options. High level design work is currently underway looking at future improvement of cross council processes / functions which currently are organised and managed by these business units, meaning they can sometimes work in silos and miss wider opportunities for end-to-end process improvement. By looking at these services/functions more holistically, there are opportunities to look more widely at the way functions are currently organised and identify opportunities for improvement and consider the introduction and use of new skills and tools as part of this	Design work is scheduled to complete by Mar 18, and when completed will feed into the development of a final report. Following review of the final report, a draft outline business case will be developed by Spring 18. The outline business case will set out options for both the Shared Service Centre and Customer Services & Libraries for delivering agreed MTFS savings of £4.25m by 20/21	
Future Ways of Working	A Gateway Review was undertaken to provide some external independent assurance on considerations that the Council should factor into any future stages of the FWoW programme. One such consideration was that the programme should be reconfigured with the 'new office options' project at its core		
Governance • Priority X Board	The Priority X Board provides oversight across a collection of activities, projects and programmes aimed at improving the efficiency of enabling and back office services, thus better supporting and enabling Priorities to deliver outcomes in the Corporate Plan. The Board is chaired by the Director of Transformation and Resources (interim), and provides a rigorous approach to monitoring the delivery of benefits sought in a manner similar to that used across the other Priorities.		

• Organisation Impact Assessment Group	The Group provides comments and advice on proposed projects including: • Resource implications for enabling resources and confirmation as to whether the proposal can be supported or not. • Provide the business lead with professional and specialist advice relating to costs, benefits, skills needed, timeline, compliance and best practice		

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Report for: **Cabinet 6 March 2018**

Title: **Homelessness Strategy**

Report authorised by: **Helen Fisher, Interim Strategic Director of Regeneration, Planning and Development**

Lead Officer: **Alan Benson - Head of Housing Strategy & Commissioning**

Ward(s) affected: **All**

Report for Key/ Non Key Decision: **Key**

1. Describe the issue under consideration

1.1 The Council adopted a new Housing Strategy in November 2016, with a strategic objective to "Improve support and help to prevent homelessness". This set out a broad approach to homelessness, focusing on advice and prevention, alongside a new approach to temporary accommodation and the allocation of affordable housing.

1.2 The Council is required to carry out a homelessness review and publish a Homelessness Strategy at least every five years. Haringey's last Homelessness Strategy was published in 2012.

1.3 Following joint work with the Homelessness Forum, the Council developed and consulted on a draft Homelessness Strategy between 14 November 2016 and 19 January 2017. However, a decision was taken to pause the formal adoption of the draft Homelessness Strategy, pending clarity around the implications of the Homelessness Reduction Bill (which received Royal Assent in April 2017) and levels of funding to be made available when the Temporary Accommodation Management Fee was replaced with the Flexible Homelessness Support Grant, again in April 2017.

1.4 This report sets out the new Homelessness Strategy which has been developed following that consultation and subsequent further work with the Homelessness Forum. This new strategy sits alongside a new Rough Sleeping Strategy.

2. Cabinet Member Introduction

2.1 Homelessness is a blight on communities and individuals, with significant human and financial costs. It is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country and growing numbers of rough sleepers. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.

2.2 Our vision is that Haringey is a place where we all work together to prevent and resolve homelessness and rough sleeping. Our objectives are:

- to reduce the financial and human costs of homelessness - through intervening earlier to prevent homelessness, increasing the supply of accommodation available and meeting the needs of those already in Temporary Accommodation, and
- to deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities - through rapid intervention to offer a route off the street for all, improving health, wellbeing and resilience and tackling street activity associated with rough sleeping.

2.3 The draft Homelessness Strategy presented here has been developed collaboratively with partners across the borough including statutory service providers, voluntary and community organisations, and people using our services. Officers will continue working closely with these groups and individuals as we develop our strategic delivery plan.

2.4 The Homelessness Strategy sets out our broad strategic vision, objectives and the overarching principles that inform our approach to addressing homelessness in Haringey, as well as summarising the harms and costs to people and communities caused by homelessness and rough sleeping. Our commitment to preventing homelessness at an earlier stage applies equally to single vulnerable people who may be at risk of rough sleeping as it does to families. However, in recognition of growing numbers of rough sleepers in Haringey, and the particular harms to people and communities that sleeping on our streets causes, we have developed a standalone Rough Sleeping Strategy to accompany the Homelessness Strategy. In that strategy, we identify an additional three priorities that we think are essential to effectively address rough sleeping in the borough.

3. Recommendations

It is recommended that Cabinet:

3.1 Notes the Equalities Impact Assessment at Appendix 2

3.2 Approves the draft Homelessness Strategy set out in Appendix 1, and, in particular, the priorities of the strategy which are as follows:

(a) Intervening earlier to prevent homelessness (as set out in section 7.1)
(b) Increasing the supply of accommodation available (as set out in section 7.2)
(c) Meeting the needs of those already in temporary accommodation (as set out in section 7.3)

4. Reasons for decision

4.1 Homelessness in Haringey remains a persistent challenge, with the second highest level of homelessness in the country. A radically different approach that drives whole systems change is necessary. Haringey needs a new culture for dealing with homelessness; rooted in honesty about what is and is not possible and based on finding solutions and offering support.

4.2 The shared strategic vision and priorities set out in the Homelessness Strategy will guide our homelessness prevention and relief activities with partners and our communities over the coming years. This strategy is necessary to ensure our approach is appropriate, co-ordinated and that we are held to account on delivery.

4.3 The recommendation in 3.1 is to ensure the Council has met its duties under the Equality Act 2010.

4.4 The recommendation in 3.2 is to ensure that the Council meets its statutory duty to carry out a homelessness review and publish a Homelessness Strategy. The Council published its last Homelessness Strategy in 2012.

Alternative options considered

4.5 Not to produce a Homelessness Strategy. The Council would be failing in its statutory obligations if it failed to produce an up to date Homelessness Strategy. The lack of a strategy would also render the council less effective in setting out its strategic approach to tackling homelessness and would make partnership working more difficult without a clear agreed direction.

4.6 Alternative priorities within the Homelessness Strategy were considered and discounted:

- A ‘Gatekeeping’ approach to homelessness. By making it harder for people to get help from the council, numbers in temporary accommodation could be minimised. This option was discounted as it does not reflect the new statutory framework of the Homelessness Reduction Act and the wider focus on prevention set out in the Council’s Corporate Plan.
- A focus on moving significantly more households out of London. Whilst this option may need to be reviewed in future, it is currently not deemed to

be in the interests of the council to pursue housing solutions that force families to move far away from their social and community networks

- Less focus on the 'personal' factors that contribute to homelessness. Our approach could have simply sought 'housing' solutions to homelessness without also addressing the underlying root causes such as poverty, unemployment and poor health and wellbeing. This option was discounted; the housing options people access have to be sustainable for them and for this they need to be resilient and independent.
- Less reliance on the Private Rented Sector as a source of homes. The council simply does not have access to enough social rented accommodation for all those threatened with homelessness.

5. Background information

Strategic context

5.1 *Local Strategic context*
This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the Corporate Plan notes, "We will provide realistic and achievable options for people to find housing or alternative housing." Further details of the local strategic context are set out in section 7 and in the strategy.

New legislation and responsibilities

5.2 Since the previous Homelessness Strategy, there have been a number of important pieces of legislation, including the Localism Act 2012, the Housing and Planning Act 2016 and recently the Homelessness Reduction Act 2017, which will come into force in April 2018. These are all reflected in the strategy as appropriate.

Reduction in the incomes of households vulnerable to homelessness

5.3 There have also been significant changes to the ability of households to sustain private sector tenancies. This is partly because of new legislation, such as the Welfare Reform and Work Act 2016, which caps the maximum income households on benefit can receive. The Overall Benefit Cap limits maximum benefits that a London family can receive to £23,000 per year, for couples and families with children, and £15,410 for single people without children, with the benefit removed from the housing element. This has resulted in an average reduction of £14.16 a week in the incomes of Haringey's low-income working-age households.

5.4 At the same time private sector rents in Haringey have continued to rise faster than incomes, while the government has frozen increases in Local Housing Allowance (LHA) rates for 4 years from April 2016 meaning fewer properties are available within these rates.

Supply and demand for housing

5.5 Haringey continues to experience a high level of demand for help with housing. As at 1st November 2017, 3,049 Haringey households were living in council-provided temporary accommodation. A recent report by Shelter ranks Haringey as second only to Newham in having the highest rates of recorded homelessness in the country, with one in every 29 people in the borough either sleeping rough or living in temporary accommodation provided by the council.

5.6 In 2016/17, 967 households asked the council for help because they were threatened with homelessness. In 435 cases, the council was able to help them avoid becoming homeless. Homeless acceptances in Haringey have decreased from a peak of 762 in 2013/14 to 686 in 2016/17, in contrast to the London picture of increasing acceptances over this period. Numbers in temporary accommodation have now started to reduce, largely due to success in preventing and relieving homelessness, with 3,049 households in TA on 1st November 2017. Loss of a private rented sector tenancy remains the most common reason for homelessness, alongside friends and family asking the person to leave.

5.7 Haringey's annual supply of new and relet social rented accommodation has reduced by 50% since 2011, so the Council cannot hope to meet the housing needs of those presenting as homeless through the allocation of social housing alone. Estate regeneration offers opportunities for new affordable homes to be built in Haringey; however, the benefits of these projects in terms of new affordable supply may not be seen for several years. The social rented sector accounts for just under 30% of properties in the borough with the remainder in the private rented sector. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.

Funding context

Flexible Homelessness Support Grant

5.8 Temporary accommodation costs for homelessness households have previously been met by central government through the Temporary Accommodation Management Fee (TAMF) paid through the Housing Benefit system. The overheated rental market in the capital led to this being increasingly topped up by boroughs' General Funds, reducing the ability of councils to fund other services. In Haringey, we currently spend c£7m of our General Fund on Temporary Accommodation.

5.9 Our ability to meet these targets depends on our ability to:

- achieve ongoing reductions in the number of households entering Temporary Accommodation by preventing homelessness
- reduce the length of time people stay in Temporary Accommodation by moving them on to alternative housing options more quickly – i.e. by increasing the supply of affordable private rented sector accommodation and empowering people to take these options up successfully
- reducing the overall cost of Temporary Accommodation by, for example, obtaining better deals with landlords or purchasing open market stock

5.10 In April 2017, the Temporary Accommodation Management Fee (TAMF) was replaced by the Flexible Homelessness Support Grant (FHSG). The grant offsets the loss in Housing Benefit subsidy, with the remainder ring-fenced for 'work to prevent or deal with homelessness'. The new grant is intended to empower councils with the freedom to support the full range of homelessness services, based on what can be demonstrated to be effective locally. FHSG represents the primary source of additional revenue funding for the delivery of our Homelessness Strategy.

5.11 Haringey has received its FHSG allocations for 2017/18 and 2018/19, with further announcements on 2019/20 expected in spring 2018. Officers anticipate the amount available in 2019/20 will be significantly reduced and are currently working to a projected allocation of £1.6m.

5.12 This funding is ring-fenced for homelessness work, in as much the Ministerial Statement to both houses made by the Minister for Local Government on 15th March 2017 on announcing the funding identified that that "*In order to manage the transition to a new funding regime carefully, we are ring-fencing the grant for two years to ensure it is spent on homelessness services"* DCLG's covering email to the Haringey of 16th March 2017, accompanying the grant notification included the requirement that: "*The grant is ring-fenced for an initial period of two years and during that time may be used only to prevent or deal with homelessness"*

5.13 The Housing Benefit offset for 2017/18 that must be paid for from the FHSG is projected to be £2.9m. In addition £800,000 of the 2017/18 funding will be used to offset the General Fund overspend on temporary accommodation. Future funding allocations are likely to be closely linked to Council's proven ability to spend these resources effectively to prevent homelessness at scale.

Other funding available

5.14 Haringey has been allocated £1,235,883 'New Burdens funding', spread over the three years 2017/18 to 2019/20, in order to meet the requirements of the new Homelessness Reduction Act.

5.15 Using its General Fund, Haringey already commissions a range of services offering both accommodation and community-based support to vulnerable people. These services aim to prevent homelessness and promote independence, enabling people to remain in the community rather than be forced into more expensive institutional settings such as residential care or hospital. Over the three years 2017/18 to 2019/20 this amounts to £11,776,387.

5.16 In addition, in 2017, DCLG awarded Haringey £397,875 over 3 years to deliver a range of new services to address the growing levels of rough sleeping seen in the borough.

Consultation and strategy development

5.17 Following the publication of the Housing Strategy, the council consulted on a new Homelessness Strategy as part of its wider consultation on policies to meet housing need – alongside the Allocations Policy, the Tenancy Strategy and intermediate housing. This consultation took place over 9 weeks between 14 November 2016 – 19 January 2017 and received 328 responses.

5.18 Over 11,000 council tenants, temporary accommodation residents, sheltered accommodation residents and households on the housing register were emailed and invited to take part in the consultation. There were a series of public drop in events, held throughout the borough during November and December 2016, where information was provided to residents on the policy proposals and assistance given in completing the questionnaire. A total of 135 residents attended the four public drop-in events.

5.19 The consultation was advertised through both Haringey Council and Homes for Haringey websites, the Bridge Renewal Trusts Community Impact Bulletin. Paper copies of the consultation booklet were available at Station Road, Marcus Garvey and Wood Green customer service centres where customer services officers were asked to inform tenants about the consultation. In addition, all Homes for Haringey resident groups in the Borough were contacted.

5.20 The results of the consultation are outlined below. As the consultation was one which consulted on four key housing policies, only the questions related to the Homelessness Strategy have been included below. The table below outlines the results. A total of 328 residents responded to the consultation.

Question	Agree	Disagree
Question 2a: Do you think that the extent and cause of homelessness in the borough have been correctly assessed in the plan?	57%	43%
Question 4a: Do you think the plan has accurately assessed the impact of homelessness demand, for example, the amount of temporary accommodation required and the support homeless households need in moving on to a settled home?	58%	42%
Question 5a: Do you think the plan correctly analyses rough sleeping in the borough and included actions which will reduce it?	64%	37%
Question 6a: Does the plan include the right priorities?	66%	34%
Question 7a: Does the plan include the right actions to deliver out priorities?	71%	29%

5.21 There was support for the priorities and actions in the Draft Homelessness Strategy as well as the Council's assessment of housing supply and demand and its analysis of rough sleeping in the borough. Most respondents took the opportunity to comment on their personal circumstances but recurring themes included the need for the council or its partners to build more genuinely affordable housing and for some sort of rent control to be introduced in the private rented sector, to reduce or stop rents from increasing.

5.22 A presentation on the findings of this consultation was made to the Overview and Scrutiny Committee on 9th February 2017 and the accompanying report is attached at Appendix 3.

5.23 The consultation was also presented and promoted to partners at a series of forums. In particular, the Council worked in partnership with the Homelessness Forum and Core Group to develop the strategies, including setting out the strategic vision, overarching principles, and priorities. The Forum included workshops on the strategy before, during and after the formal consultation period from 14 November 2016 to 29 January 2017.

5.24 Following the public consultation, a decision was taken to pause development of the Homelessness Strategy pending more detail on the Homelessness Reduction Act becoming available. The Homelessness Reduction Act received Royal Assent in April 2017 and a revised draft Homelessness Code of Guidance was published in October 2017. The strategy has been refined and updated to reflect the implications of the Act and the new guidance, and other key changes since the draft was initially published, such as the new Supported Housing funding regime. During this time, the Council has undertaken further consultation events with key stakeholders from across the partnership and with people using homelessness services.

5.25 The Homelessness Forum was strongly of the view that the Council should produce a separate Rough Sleeping Strategy, to address this growing issue with specific challenges for the borough. The Forum also encouraged the Council to prioritise exploring hidden homelessness, in light of this too becoming an increasing problem that needs to be addressed. The draft strategy was also revised, in line with consultation responses, to ensure language used was more accessible to all stakeholders. Alongside this, the Council has committed to improving the information and training on housing needs and homelessness for providers and staff to ensure they have the knowledge and skills to support residents more effectively.

Main themes of the strategy

5.26 The Homelessness Strategy sets out four ways in which the Council intends to change the way it works to enable it to deliver its objectives on homelessness. It then goes on to then identify three key priorities for delivery.

How we will change what we do:

5.27 **Providing strategic leadership and building collaborative partnerships:** The council cannot deliver the outcomes needed on its own. Its role is to act as a platform, building capacity, sharing information and providing direction, enabling all the players to come together to deliver change. This will require us to build trust and transparency and deliver consistent messages across the partnership.

5.28 **Making prevention everyone's responsibility:** The best way to tackle homelessness is to prevent it from happening in the first place. All members of our partnership, including homeless people themselves, have a role to play and responsibilities in this. We must find new ways to integrate our homelessness

prevention work with other services who also meet people in housing need, enabling us to intervene earlier and more effectively.

5.29 **Commissioning more effectively to better meet local need:** We will use modern strategic commissioning practices to better understand local need, effectively manage resources and plan and deliver services. These practices will deliver improved value for money, a renewed focus on outcomes, quality and customer satisfaction and better integration with the local partnership.

5.30 **Delivering in and with our community:** Our approach to addressing homelessness recognises the strengths and assets that individuals and communities already have within them. Our offer of help will build on these strengths, empowering individuals and communities to build their resilience and self-sufficiency so they are less dependent on services in the future.

Homelessness Strategy priorities

5.31 **Priority 1. Intervening earlier to prevent homelessness:** The Homelessness Strategy makes a commitment to identify the specific triggers, risk factors and causes of homelessness across the life course and, building on that, to develop a range of interventions specifically targeted at addressing these. These interventions will take place at a universal, targeted and crisis prevention level and will be available to the general population, specific individuals in housing need and within the local community partnership.

5.32 **Priority 2. Increasing the supply of accommodation available:** Our approach to increasing the supply of homes will include: maximising the supply of social rented units available, securing more affordable tenancies in the private rented sector and increasing the length of tenure and quality of these homes. We will also review and modernise our supported housing provision in line with the Supported Housing Review.

5.33 **Priority 3. Meeting the needs of those already in Temporary Accommodation:** The Homelessness Strategy makes a commitment to develop a range of housing options tailored to the individual needs, aspirations and capabilities of the c3000 households currently living in temporary accommodation. Alongside this it commits to building our understanding of what households in Temporary Accommodation want and need by undertaking research and developing better data on outcomes; focus on improving the health, resilience and wellbeing of people in Temporary Accommodation and ensuring that we work with everyone in Temporary Accommodation to develop a personalised, realistic ‘move on plan’.

6. Contribution to strategic outcomes

6.1 This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the Corporate Plan notes, "*We will provide realistic and achievable options for people to find housing or alternative housing."*

6.2 The Corporate Plan Priority 5 includes the objective to "Prevent homelessness and support residents to live fulfilling lives" and aims to assess success in this objective by measuring both the number of households where homelessness has been prevented and also the number of households who have been helped into settled homes, whether in the social rent or private rented sector. The Homelessness Delivery Plan aims to drive this objective forward and improve performance in this area.

6.3 As set out in the report, this policy supports the delivery of Objective 2 of Haringey's Housing Strategy 2017-2022 Objective 2 – Improve support and help to prevent homelessness:

- Provide timely and effective housing advice to help those in crisis or threatened with crisis to sustain their existing accommodation if at all possible. This will be at the first point of contact with the council and its partners but increasingly we want to intervene before an approach is made, where risk of homelessness can be identified.
- Act at all times to prevent homelessness but where current accommodation cannot be sustained, to provide advice on realistic options and assistance to secure suitable affordable accommodation.
- Provide suitable and affordable emergency or temporary accommodation when necessary, in accordance with fair and transparent criteria, while overall reducing the number of households in temporary accommodation and the cost of it to the local taxpayer.
- Allocate council tenancies and intermediate tenures in accordance with fair and transparent criteria, both at the commencement and when reviewing the expiry of a fixed term council tenancy

7. Statutory Officers comments

Finance comments

7.1 The proposed strategy would give the Council a clear direction in tackling homelessness in the borough. Failure to respond to the homelessness crisis could result in continuing pressures on Temporary Accommodation budget.

7.2 The pressures faced in relation to increasing homelessness and temporary accommodation have been widely reported. These pressures, together with savings anticipated from measures being implemented, have been included in the Medium Term Financial Plan.

7.3 Any financial implications arising from the Homelessness Reduction Act will be reported to Members alongside the established budget monitoring and performance monitoring reports.

7.4 The actions and activities set out in the detailed strategy and framework will be funded from existing budgets and Flexible Homelessness Support Grant (FHSG).

7.5 There has been one-off funding agreed from FHSG in 2017/18 to support work on prevention as identified in the strategy and action plan. Where appropriate, and reducing spending pressures, other investment supporting the strategy may be funded on an "Invest To Save" basis". Financial implications will be developed alongside such proposals.

Procurement comments

7.6 Strategic Procurement notes the contents of this report and the associated strategy documents. Strategic Procurement will provide the required support to assist the council in the delivery of this strategy; however, it should be noted the commissioning of temporary accommodation is an activity that is undertaken by Homes for Haringey, with Strategic Procurement providing limited support in developing this category.

Legal comments

7.7 The Assistant Director for Corporate Governance has been consulted in the preparation of this report and comments as follows. Legal Implications are otherwise set out in the body of this report. He sees no legal reason why the Recommendations should not be followed.

7.8 By s1 Homelessness Act 2002 the Council was required to carry out a homelessness review for its district and formulate a Homelessness Strategy informed by that review by 31 July 2003. It must keep that strategy under review, and publish a new strategy at intervals of no more than 5 years thereafter. Haringey's last new Homelessness Strategy was published in 2012.

7.9 The homelessness review forming the evidence base for the draft new strategy is set out in Section 4 of the strategy.

7.10 The Homelessness Strategy is by s3(1), "a strategy formulated by a local housing authority for:

(a) preventing homelessness in their district;
(b) securing that sufficient accommodation is and will be available for people in their district who are or may become homeless;
(c) securing the satisfactory provision of support for people in their district
  (i) who are or may become homeless; or
  (ii) who have been homeless and need support to prevent them becoming homeless again.

7.11 The Council is required (also by s1) to take its Homelessness Strategy into account in the exercise of its functions.

7.12 In formulating its Homelessness Strategy, the Council (s3 (7A)) must have regard to its current Allocation Scheme, Tenancy Strategy and the current London Housing Strategy. Relevant provisions of each are set out in the body of the strategy.

7.13 By s3(8), “Before adopting or modifying a homelessness strategy the authority shall consult such public or local authorities, voluntary organisations or other persons as they consider appropriate.”

7.14 The Council has a practice of consulting service users and providers, housing staff and other stakeholders, as well as more general public consultation to capture ideas, views and feedback. Those groups have a legitimate expectation of consultation.

7.15 These consultations were carried out as set out in the body of the report.

7.16 The Homelessness Reduction Act 2017 (“the new Act”) imposes upon local housing authorities new “assessment” “prevention” and “relief” duties to those whom the authority is satisfied are eligible and either homeless or threatened with homelessness within 56 days. These duties require authorities to:

- provide personalised written housing assessments including agreed plans setting out the steps that the authority considers it and the applicant should reasonably take to secure accommodation for the applicant (“assessment”)
- take reasonable steps to help an applicant threatened with homelessness to secure that their accommodation does not cease to be available (“prevention”)
- take reasonable steps to secure that suitable accommodation becomes available (for at least 6 months) to a homeless applicant (“relief”)

7.17 These new duties apply to all those homeless or threatened with homelessness, irrespective of whether they have a priority need; and apply in addition to the existing duties to those who are in priority need.

7.18 The new Act also places a duty upon specified public authorities (to be specified by statutory instrument, but expected to include a range including the armed forces, hospitals, prisons and other institutions) to refer those whom they believe may be homeless or threatened with homelessness, and who agree to be referred, to the local housing authority of the applicant’s choice. The draft Code of Guidance issued by the MHCLG recommends that local housing authorities set up procedures to deal with these referrals, including establishing protocols with likely local referrers.

Equality comments

7.19 The council has a public sector equality duty under the Equality Act (2010) to have due regard to; tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation); advance equality of opportunity between people who share those protected characteristics and people who do not; and foster good relations between people who share those characteristics and people who do not.

7.20 The potential impact of the new strategy has been assessed during and after consultation. The Homelessness Strategy identifies particular groups at risk of homelessness, including those with protected characteristics. The Equality Impact Assessment (EqIA) sets out how the Homelessness Strategy address the needs of these groups. The EqIA is attached as Appendix 1.

8. Use of Appendices

Appendix 1 Proposed new Homelessness Strategy

Appendix 2 Equalities Impact Assessment

9. Local Government (Access to Information) Act 1985

Background papers:

Corporate Plan 2015-2018
http://www.haringey.gov.uk/sites/haringeygovuk/files/corporate_plan_2015-18.pdf

Housing Strategy 2017-2022
http://www.haringey.gov.uk/sites/haringeygovuk/files/housing_strategy_2017-2022.pdf

Homelessness Strategy 2012-14
http://www.haringey.gov.uk/sites/haringeygovuk/files/homelessness_strategy_2012-14.pdf

Overview and Scrutiny Panel report February 2017 *"Consultation on Four Policies to Meet Housing Need"*
http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=128&MId=8066&Ver=4

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Title	Draft Homelessness Strategy				
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Homelessness Strategy 2018

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Cabinet Member Foreword

I am pleased to introduce Haringey Council's Homelessness Strategy 2018.

London's housing crisis is keenly felt by many people, but none more so that those who find themselves with no home at all. Tackling homelessness and the harms associated with it is one of the greatest challenges we face as a society. This is particularly the case in Haringey, where levels of homelessness and rough sleeping are unacceptably high.

Meeting this challenge will require a radical change in how we work; simply carrying on as we did before will not deliver the reduction in homelessness that is necessary. We do not have enough social housing to meet demand from homeless people, and we will increasingly rely on the private rented sector to offer solutions. This will involve securing more affordable, decent homes and ensuring that the people moving in to them have the resources and support to manage them sustainably.

But we can no longer simply deal with the consequences of homelessness once a crisis has happened. Our new approach is underpinned by the same principles that drive the Homelessness Reduction Act, which represents a new statutory framework for local authorities and enshrines in law the requirement to intervene earlier and prevent homelessness wherever possible.

Homelessness is the symptom of a complex interaction between a person's specific situation and a range of structural and social factors that are often beyond their control. If we are to successfully tackle homelessness, we need to find new ways of addressing these root causes; poverty and disadvantage, unemployment, poor health and wellbeing and lack of access to affordable, decent homes.

Our focus on prevention will involve working more closely with people using services to understand their strengths, and support them holistically to achieve their goals. Over the life of this strategy, we will build on existing services and continuously improve service delivery. We will forge new relationships with our partners, encouraging them to identify people who may be at risk of homelessness at the earliest opportunity. We will bring our offer of help into the community, establishing place-based services using co-location and partnership working to increase prevention activity. And we will engage the wider statutory and voluntary sector to address the support needs that may otherwise contribute to homelessness, with a focus on systems change to deliver sustainability.

This is an exciting time, full of opportunity, and there is much to do. I would like to thank the many different organisations who have worked with us to develop this shared understanding of the issues we face, the role they can play in tackling homelessness and what our expectations and hopes are for the future.

Executive summary

Our vision and objectives

Strategic vision

Haringey is a place where we all work together to prevent and resolve homelessness and rough sleeping

Objectives

Homelessness: We will reduce the financial and human costs of homelessness through intervening earlier to prevent homelessness, increasing the supply of accommodation available and meeting the needs of those already in Temporary Accommodation.

Rough Sleeping: We will deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities through rapid intervention to offer a route off the street for all, improving health, wellbeing and resilience and tackling street activity associated with rough sleeping.

Homelessness is a blight on communities and individuals, with significant human and financial costs. It is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country[1]. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.

We have collaboratively developed our Homelessness and Rough Sleeping strategies with partners across the borough including statutory service providers, voluntary and community organisations, and people using our services. We will continue working closely with these groups and individuals as we develop our strategic delivery plan.

This main Homelessness Strategy sets out our broad strategic vision, objectives and the overarching principles that inform our approach to addressing homelessness in Haringey, as well as summarising the harms and costs to people and communities caused by homelessness and rough sleeping. Our commitment to preventing homelessness at an earlier stage applies equally to single vulnerable people who may be at risk of rough sleeping as it does to families. However, in recognition of growing numbers of rough sleepers in Haringey, and the particular harms to people and communities that sleeping on our streets causes, we have developed a standalone Rough Sleeping Strategy to accompany this Homelessness Strategy. In that strategy, we identify an additional three priorities that we think are essential if we are to effectively address rough sleeping in the borough.

[1] Shelter: Far from Alone Homelessness in Britain November 2017

How we will change what we do

In order to deliver this, we must work together to change the 'ecosystem' within which homelessness prevention and relief services exist. We have identified the following overarching principles to guide us in redesigning our systems to deliver these objectives:

Providing strategic leadership and building collaborative partnerships
The Council cannot deliver the outcomes needed on its own. Its role is to act as a platform, building capacity, sharing information and providing direction, enabling all the players to come together to deliver change. This will require us to build trust and transparency and deliver consistent messages across the partnership.

Making prevention everyone's responsibility
The best way to tackle homelessness is to prevent it from happening in the first place. All members of our partnership, including homeless people themselves, have a role to play and responsibilities in this. We must find new ways to integrate our homelessness prevention work with other services who also meet people in housing need, enabling us to intervene earlier and more effectively.

Commissioning more effectively to better meet local need
We will use modern strategic commissioning practices to better understand local need, effectively manage resources and plan and deliver services. These practices will deliver improved value for money, a renewed focus on outcomes, quality and customer satisfaction and better integration with the local partnership.

Delivering in and with our community
Our approach to addressing homelessness recognises the strengths and assets that individuals and communities already have within them. Our offer of help will build on these strengths, empowering individuals and communities to build their resilience and self-sufficiency so they are less dependent on services in the future.

What we will deliver - Homelessness

Priority 1: Intervening earlier to prevent homelessness

- We will identify the specific triggers, risk factors and causes of homelessness at different points in people's lives. Building on that, we will develop a range of interventions specifically targeted at addressing these.
- These interventions will take place at a universal, targeted and crisis prevention level and will be available to the general population, specific individuals in housing need and within the local community partnership.

Priority 2: Increasing the supply of accommodation available

- We urgently need to access more affordable, safe and suitable homes for people in housing need.
- Our approach to increasing the supply of homes will include;
    - maximising the supply of social rented units available
    - securing more affordable tenancies in the private rented sector
    - increasing the length of tenure and quality of these homes.

- We will also review and modernise our supported housing provision in line with the Supported Housing Review

Priority 3: Meeting the needs of those already in Temporary Accommodation

- We will develop a range of housing options tailored to the individual needs, aspirations and capabilities of the c3,000 households currently living in TA.
- We will build our understanding of what households in Temporary Accommodation want and need by;
    - undertaking research and developing better data on outcomes
    - focus on improving the health, resilience and wellbeing of people in Temporary Accommodation
    - ensuring that we work with everyone in Temporary Accommodation to develop a personalised, realistic 'move on plan'

What we will deliver - Rough Sleeping

Priority 1: Rapid intervention to offer a route off the street for all

- Rough sleeping is harmful to communities and individuals, and it is unacceptable for people to be sleeping on the streets. We will intervene quickly to offer everyone a route off the street
- Our approach will include; increasing our capacity to identify people earlier, improving the support we offer to help the person off the street and, as a last resort, taking co-ordinated enforcement action to prevent ongoing harm to individuals and communities
- There is no 'one size fits all' approach to which route off the street will be right; we will explore the full range of appropriate options and offer holistic support to address other, overlapping issues

Priority 2: Improving health, wellbeing and resilience

- We will work with our partners to reduce the severe health inequalities faced by rough sleepers by improving data collection, increasing access to health services and refocusing on health, wellbeing and resilience outcomes
- We will undertake a health needs audit and create a health 'passport' to improve our understanding of and track outcomes for single homeless people in our supported housing pathway
- We will ensure our services meet the 'Psychologically Informed Environment (PIE) standard

Priority 3: Tackling street activity associated with rough sleeping

- We will develop a coordinated approach to tackling street activity associated with rough sleeping, such as begging, street drinking and drug-taking, ensuring that the harms this behaviour causes are minimised
- As a last resort, alongside ongoing support, we will take enforcement action against individuals or groups who persist in such behaviour
- We will ensure that vulnerable people displaced as a result of enforcement action are protected and have a plan in place to prevent them rough sleeping

1. Introduction

1.1 Background

Haringey has a strong history of working together in partnership to tackle homelessness. Despite our successes to date, the scale and extent of homelessness has remained a persistent challenge. It is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country. A radically different approach that drives whole system change is now necessary. Haringey needs a new culture for dealing with homelessness; rooted in honesty about what is and is not possible to achieve within the resources we have, and based on finding solutions and offering support.

This new strategy focuses on preventing people from becoming homeless in the first place and helping people who are homeless to build a more positive future. Homelessness is harmful to individuals, to families and to communities and the cumulative costs associated with it, both human and financial, are immense, escalating and ultimately unsustainable.

The task ahead will be very challenging. Increasing pressure on budgets, the impact of the Homelessness Reduction Act 2017 and the planned rollout of Universal Credit in October 2018 are just some of the challenges that we face. These are occurring within a changing policy landscape, and at a time of a reducing supply of social rented accommodation in Haringey, down a startling 50% since 2011. Haringey urgently needs more affordable homes for people in housing need.

The growing number of people living on the street makes visible what may otherwise be hidden to many people. In recognition of this, we have developed a standalone Rough Sleeping Strategy to accompany this Homelessness Strategy. The strategic vision, objectives, overarching principles and priorities set out in the Homelessness Strategy apply equally to the Rough Sleeping Strategy. However, we have identified an additional three priorities that to address the specific harms to individuals and communities that sleeping on the streets causes.

Homelessness can lead individuals and families into a cycle that can have a profound effect on all aspects of life. It is not just about a lack of accommodation; homelessness affects our physical and mental health and wellbeing, educational achievement, ability to gain and sustain employment, and puts pressure on our personal and family relationships and on the wider community. These effects, especially on children, can be life long and can cause repeated homelessness of a generational nature. These are the manifold problems that this strategy seeks to address.

1.4 About This Strategy

This is a statutory strategy, in as much as the Homelessness Act 2002 requires the Council to produce a homelessness strategy. The Act places a duty on local housing authorities, with the assistance of social services authorities, and in consultation with other bodies including registered social landlords and voluntary organisations:

- to carry out reviews of homelessness within their area.
- to formulate and publish a strategy for tackling and preventing homelessness, and
- to publish a new strategy at least every five years.

Section four of this strategy updates the Homelessness Review and sets out the evidence base on which this strategy is founded.

This strategy has been developed collaboratively with our Homelessness Forum and other key partners from across the sector and wider community. In 2016, the Council published an initial draft alongside a Homelessness Review. A formal consultation with individuals and families in housing need, including residents in temporary accommodation and on the housing register, was undertaken between 14th November 2016 and 19th January 2017. A report on the outcomes was taken to Haringey's Housing & Regeneration Scrutiny Panel on 9th February 2017.

Following that, a decision was taken to pause development of the strategy pending more detail on the Homelessness Reduction Act, which only received Royal Assent in April 2017. The strategy has since been further refined and updated to reflect its implications and other key changes since the draft was initially published, including the new Supported Housing funding regime. During this time, we have undertaken further consultation events with key stakeholders from across the partnership and with people using homelessness services.

One of the four key ways in which we need to change the way we work to deliver this strategy (see section five) is our commitment to delivering in and with our community. Our 'asset-based'[2] approach means that, over the life of this strategy, we are committed to working more collaboratively with people living and working in our communities to better understand their needs and how they can be empowered to share ownership of, and contribute towards, achieving the vision set out here. This approach also creates a feedback loop to enable us to monitor the extent to which the strategy is being delivered and any need for review.

The Public Sector Equality Duty (Equality Act 2010) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities. As such, our approach will be informed by the latest available intelligence when determining key actions associated with the delivery of our strategy vision.

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[2] See https://www.thersa.org/discover/publications-and-articles/rsa-blogs/2016/12/homelessness-in-oxford and http://www.altogetherbetter.org.uk/Data/Sites/1/5-assetbasedcommunitydevelopment.pdf for examples of an Asset-based approach

1.3 Strategic Vision

Haringey's Strategic Vision

Haringey is a place where we all work together to prevent and resolve homelessness and rough sleeping

Objectives

Homelessness: We will reduce the financial and human costs of homelessness through intervening earlier to prevent homelessness, increasing the supply of accommodation available and meeting the needs of those already in Temporary Accommodation.

Rough Sleeping: We will deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities through rapid intervention to offer a route off the street for all, improving health, wellbeing and resilience and tackling street activity associated with rough sleeping.

This shared strategic vision will guide all our work with partners to tackle homelessness and rough sleeping. The full detail on the actions and initiatives that flow from this vision and its objectives is set out in chapters five to seven of this document and in the Rough Sleeping Strategy.

2. Homelessness – the policy context

Homelessness is a national and regional challenge. At nearly 58,000, annual homelessness acceptances were some 18,000 higher across England in 2015/16 than in 2009/10. With a rise of 6% over 16/17, acceptances stood 44% above their 2009/10 low point[3].

Between 1 April and 30 June 2017, local authorities accepted 14,400 households as statutorily homeless; down 1% on the previous quarter and down 5% on the same quarter last year. However, households in temporary accommodation on 30 June 2017 was 78,180, up 7% on a year earlier. Ending of an Assured Shorthold Tenancy continues to be the most common reason for loss of a settled home accounting for 30% of acceptances nationally (34% in London)[4].

Between 1 April and 30 June 2017, local authorities successfully helped to prevent and relieve homelessness for 54,270 households, down 1% on the same quarter of 2016. Resolving Housing Benefit problems, providing assistance to remain in the private rented sector, debt advice and support to resolve rent arrears accounted for c65% of all successful homelessness preventions.

2.1 Defining Homelessness

The Ministry of Housing, Communities and Local Government (MHCLG) defines statutory homelessness as: *"A household is legally homeless if, either, they do not have accommodation that they are entitled to occupy, which is accessible and physically available to them or, they have accommodation but it is not reasonable for them to continue to occupy this accommodation"*

Households in 'priority need' include families, pregnant women and single people who are particularly vulnerable.

MHCLG define street homelessness as: *"People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or "bashes" which are temporary structures often made from cardboard)"*

2.2 Legal duties

The **Housing (Homeless Persons) Act 1977** requires local authorities to prevent as well as respond to homelessness and assist people under imminent threat of homelessness (and classed as 'in priority need') by taking reasonable steps to prevent them from losing their existing accommodation.

Part VII of the **Housing Act 1996**, as amended by the **Homelessness Act 2002**, sets out the duties owed by local housing authorities to someone who is homeless or threatened with homelessness.

[3] Crisis, Homelessness Monitor England 2017
[4] MHCLG

The **Homelessness Act 2002** places a specific requirement for Local Authorities to produce and implement a Homelessness Strategy. The **Localism Act 2011** enables councils to discharge their duty permanently by making use of suitable accommodation in the private rented sector.

The **Homelessness Reduction Act 2017** places a duty on Local Authorities to provide anyone threatened with or at risk of being homeless (within a 56-day period) with advice and support to prevent them becoming homeless. It also requires specified public bodies[5] to refer (with the person's consent) anyone they consider to be homeless or threatened with homelessness.

2.3 Welfare Reform

There are increasing pressures on low-income families following welfare changes that have both affected their incomes and limited the amount of benefit payable towards housing costs. Welfare Reforms with the most significant implications for homelessness include:

- Local Housing Allowance (LHA) reductions including total LHA caps and the limiting of LHA to 30th percentile of market rents. The Government has frozen increases in LHA rates for 4 years from April 2016 meaning fewer properties are available within these rates.
- The Overall Benefit Cap, limiting the benefit that a London family can receive to a maximum of £23,000 per year, for couples and families with children, and £15,410 for single people without children, with the benefit removed from the housing element.
- Single person private renters under the age of 35 are only entitled to the shared accommodation rate. This means that they can only receive housing benefit at the same rate for a single room in a shared house, even if they are living in a self-contained flat.
- Universal Credit will be implemented in Haringey in October 2018. It replaces the range of unemployment benefits and housing benefit previously claimed separately and paid weekly, rolling these into one monthly payment, made directly to the claimant. Whilst DWP data shows Universal Credit has had a positive impact on labour market outcomes for new claimants in the 10 pathfinder sites, other evidence shows tenants who have moved to Universal Credit have built up significant rent arrears, with the 6-week delay in making the first payment a particular cause for concern.
- In the 2017 Autumn Budget, the government announced the removal of the 7-day waiting period, a Housing Benefit run-on period to help claimants with the cost of renting in the period before they receive their first Universal Credit payment and measures to recoup 80% of the money local authorities spend on TA directly from DWP rather than the claimant. At the time of writing, further work to assess the impact of these changes is ongoing.

2.4 Funding for supported housing

In October 2017, the government announced that it was dropping plans to apply Local Housing Allowance to supported housing and launched a fresh consultation

[5] At the time of writing, the public authorities with a 'duty to refer' are yet to be determined. Regulations are expected to be laid in early 2018

on funding arrangements from April 2020. The proposals outline a funding regime tailored to three different types of supported housing:

- Sheltered and extra care
- Short term supported housing (including refuges)
- Long term supported housing for those with ongoing support needs

The proposal for short-term supported housing would see the rental element (currently covered by housing benefit) funded through a ring-fenced grant to local authorities. This will require local authorities to have greater oversight of services in their area, including those not directly commissioned by them, and to undertake robust needs and provision assessments to determine how funding should be used.

2.5 The Mayor Of London's Housing Strategy

The Mayor of London set out his vision for a new approach to tackling London's housing crisis in his draft 2017 Housing Strategy, which has 5 priorities:

1. Building homes for Londoners
2. Delivering genuinely affordable homes
3. High quality homes and inclusive neighbourhoods
4. A fairer deal for private renters and leaseholders
5. Tackling homelessness and helping rough sleepers

The Mayor of London is a key commissioner of Rough Sleeping services:

- £8.5m per year to 20/21 to fund pan-London rough sleeping services: No Second Night Out, London Street Rescue, CHAIN database, Clearing House, Routes Home scheme, StreetLink
- £4.2m from government to strengthen existing rough sleeping services and develop new ones including NSNO, a rough sleeping Social Impact Bond, a scheme with TfL to provide outreach provision on night buses and tubes.
- No Nights Sleeping Rough taskforce – dissemination of good practice and improving data collection

2.6 The North London Housing Partnership

Haringey is part of the North London sub-region, along with Islington, Barnet, Westminster, Camden and Enfield. The purpose of the partnership is to work collaboratively across the sub-region to:

- lobby for the interests of the North London boroughs on housing issues,
- develop collaborative working across the sub region and between boroughs, in order to create efficiencies,
- improve provision of housing services in North London through sharing knowledge, expertise and resources, and
- develop an excellent understanding of housing demand, needs and conditions across North London, and an understanding of how this impacts on wider strategic issues affecting local authorities;

Recent projects undertaken sub-regionally include the procurement of a new IT system required for implementation of the Homelessness Reduction Act and a Homelessness Trailblazer project to pilot new approaches to homelessness prevention and early intervention. In 2017, the North London Housing Partnership

was successful in its Controlling Migration Fund bid to MHCLG. This will deliver employment and accommodation support for rough sleepers with no recourse to public funds who are primarily, but not exclusively living in encampments.

2.7 The Haringey Policy Context

Haringey's Corporate Plan *Building a Stronger Haringey Together* describes the Council's overall priorities and programme of work for 2015-18. It identifies housing as one of its five priorities, committing us over that period to 'Create homes and communities where people choose to live and are able to thrive'. A key objective is to: 'Prevent homelessness and support residents to lead fulfilling lives'. The Council's role is to provide realistic and achievable options for people to find housing and proactively help people avoid eviction and sustain their tenancies.

Haringey's Housing Strategy 2017-2022 describes our local housing context and builds on the Corporate Plan, defining four strategic objectives:

1. Achieve a step change in the number of new homes being built
2. Improve support and help to prevent homelessness
3. Drive up the quality of housing for all residents
4. Ensure that housing delivers wider community benefits

The Housing Strategy makes clear Haringey's belief that housing is fundamentally about people and communities, not just bricks and mortar and that in order to help our children have the best start in life and adults to fulfil their ambitions, it is crucial that residents have access to high quality homes at prices they can afford.

In March 2017, the Council completed a review of its supported housing which made a series of recommendations to transform Haringey's supported housing provision, with specific recommendations made regarding support for people with learning disabilities, mental health conditions, older people and vulnerable young people. The objectives of the review were to

- Maximise the reach and impact of Council resources and actively contribute to financial efficiency and cost reduction
- To provide supported housing services that enable integrated housing, health and social care outcomes for the population in need

This five-year transformation programme will progress over the life of this homelessness strategy. The vision, objectives, principles and outcomes it hopes to achieve underpin our efforts to modernise and transform the help and support we offer to the some of the most vulnerable people in our society.

3. Homelessness – the costs

3.1 The Human Costs

The impact of homelessness begins at birth; children born into homelessness are more likely to be born at a low birth weight and miss their immunisations, and are less likely to be registered with a GP. Homeless children are three times more likely to experience poor mental health; the impact of which is long lasting. As a result of their preoccupation with addressing their unstable and unsafe living conditions, a parent's capacity to effectively parent can be greatly reduced.[6]

For many people, homelessness is not just a housing issue. It is closely linked with complex and chaotic life experiences. Mental health problems, drug and alcohol dependencies, and experiences in prison or with the care system are often closely linked to more entrenched experiences of homelessness. Traumatic childhood experiences are part of most street homeless people's life histories.[7]

Homeless households experience severe health inequalities, poorer health and wellbeing, and a lower life expectancy than the general population. It is vital that we can identify and address the impact of homelessness for people at every stage of life.[8]

Individuals and families, communities, the voluntary, private and public sector agencies all co-exist with each other. Yet too often they operate as separate entities, with their own language, culture and objectives. When viewed from the standpoint of the individual experiencing more complex and overlapping problems, as many homeless people do, these systems can seem bewildering and overwhelming; often working against each other rather than to a collective vision. To create an environment in which homeless people can recover from their experiences and build their resilience so they no longer need to access expensive services, we have to work together and make it easier for people to navigate our systems.

3.2 The Financial Costs

The financial cost of dealing with homelessness is immense and escalating. London has over 50,000 households living in temporary accommodation and the pressure is stretching local authorities to breaking point. The National Audit Office estimates the current cost of homelessness in all its forms to be in excess of £1billion per year.

Temporary accommodation costs have traditionally been met by central government through the Temporary Accommodation Management Fee, paid through the housing benefit system. However, the overheated rental market in the capital has led to this being increasingly made up by boroughs' General Funds, reducing the ability of councils to fund other services. The cost of temporary accommodation across London in 2014/15 was close to £663m. The level of

[6] https://www.qni.org.uk/wp-content/uploads/2016/09/homelessness_babies_families.pdf
[7] http://lankellychase.org.uk/multiple-disadvantage/publications/hard-edges/
[8] The Impact of Homelessness on Health, Local Government Association

expenditure met by London boroughs specifically, from their own General Funds, can be estimated at just over one quarter of that cost, or £170m[9].

In Haringey, we currently spend over £7m of our general fund on temporary accommodation (TA), alongside just under £9m on Housing Related Support including hostels and supported accommodation, women's refuges and floating support services for vulnerable people. Every household in Temporary Accommodation costs Haringey £3.5K per year, with the average cost of a placement in self-contained, nightly paid accommodation standing at £4,000 per unit per year.

In April 2017, the Temporary Accommodation Management Fee was replaced by the Flexible Homelessness Support Grant. The grant offsets the loss in Housing Benefit subsidy, with the remainder ring-fenced for 'work to prevent or deal with homelessness'. Haringey has been allocated £8.6 million in 2017/18 and £8.2 million in 2018/19, with further announcements on 2019/20 expected in spring 2018. Future funding allocations are likely to be closely linked to councils' proven ability to prevent homelessness at scale.

Of course, the costs of homelessness do not only fall on to local housing authorities. Research shows the cumulative costs of addressing severe and multiple disadvantage in single vulnerable homeless people alone are over £10 billion per year[10]. In advance of its rollout, the Troubled Families programme attempted to evidence the additional cost to the public purse of families with complex and overlapping disadvantages including homelessness, finding £8 billion of a total £9 billion spent was associated with addressing these additional needs. Crisis estimates that thirty people sleeping rough for 12 months would cost over £600,000 a year in additional public expenditure, rising to £1.2 million if the situation persisted for two years. These additional costs sit within health and social care, police and community safety budgets, as well as those covering the costs of housing.

In 2017 the then Department of Communities and Local Government awarded Haringey £397,875 over 3 years to deliver a range of new services to address the growing levels of rough sleeping seen in the borough. This includes provision of outreach services, a community hosting scheme and a lead health worker to be co-located with our main drug and alcohol service providers and North Middlesex Hospital.

The Government also made £1,235,883 of 'New Burdens' funding available to Haringey for the three years 2017/18 to 2019/20. This was to offset some of the additional costs that will accrue to the Council in implementing the Homelessness Reduction Act 2017.

[9] Temporary Accommodation in London: Local Authorities under Pressure, Julie Rugg 2016
[10] Hard Edges, Lankelly Chase

4. Homelessness – the evidence base

There are approximately 278,500 people[11] living in Haringey in about 113,500 households; this figure is predicted to rise to 286,774 by 2021, a 12.2% increase since 2011. Haringey ranks as the fifth most diverse borough in London. Overall 39.4% of Haringey's population were born overseas, with around 4.3% coming from Poland and 4.0% from Turkey. Around three-quarters of our young people are from ethnic minority backgrounds.

74.3% of Haringey's population is 'economically active', that is, either in employment (69%) or unemployed (6.2%). Of the 50,500 who are 'economically inactive', 35% are students, 25% are looking after family, 19% are long term sick and 7% are retired. Of those, 10,600 (21%) say they want to work. There are 13,000 workless households in Haringey[12].

Haringey has one of the highest proportions of low paid workers in London and 36% of children in Haringey live in poverty (8th highest in England). In Tottenham, this increases to 44% of children. Recent research has shown that poverty in childhood is the single biggest factor affecting people's subsequent risk of homelessness.[13]

Nationally the Government recognises that the housing system is 'broken'. Locally, this market failure is particularly apparent as lower wages and high house prices make it impossible for some people to ever buy a house. Buying a home in Haringey is expensive; the average price of a two bed flat is £440,947 whereas the estimated median household gross income is around £35,400.

Average and lower quartile monthly rents in Haringey (2016/17)[14]

	Shared	Studio	1-bed	2-bed	3-bed	4+bed
Average	£623	£895	£1,229	£1,544	£1,948	£2,966
Lower quartile	£525	£772	£1,100	£1,352	£1,699	£2,000

Private renting in Haringey is also expensive, with the average weekly rent for a 2-bedroom property being over £350 per week. There are around 33,500 privately rented properties in the borough (constituting about 33% of all households) but only 6% of households see this as their preferred tenure. Around 37% of these households are claiming Local Housing Allowance. In accordance with research undertaken by the National Audit Office, these households are at particular risk of falling victim to rising rent levels and homelessness.

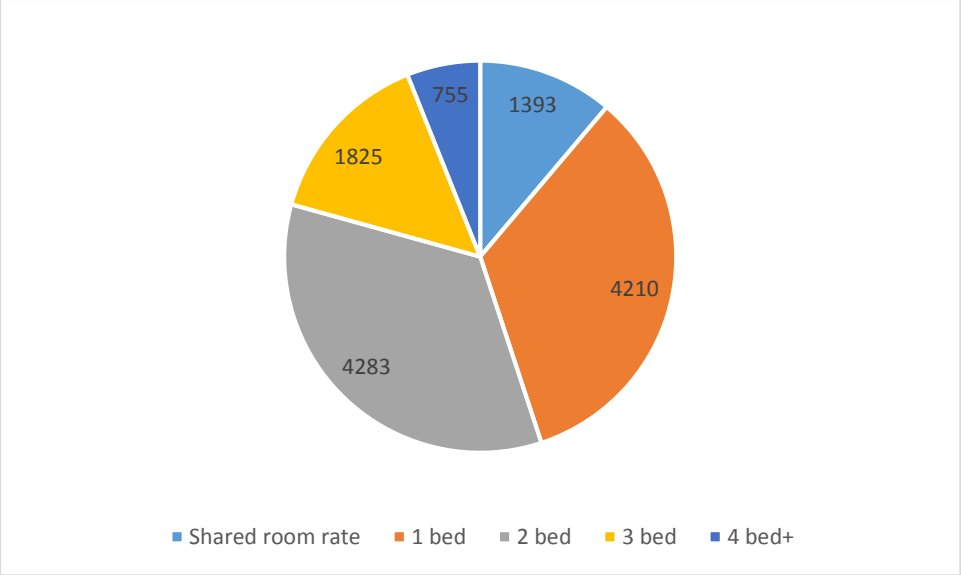
LHA claims in the PRS

[11] ONS population estimates

[12] NOMIS 2016

[13] Homelessness in the UK: Who is most at risk? Bramley and Fitzpatrick 2017

[14] Valuation Office June 2017 Private Rental Market Statistics Tables 2.1 to 2.16



Low-income working-age households in Haringey have seen their incomes fall by an average of £14.16 per week as a result of welfare reforms implemented in the previous parliament, such as the under-occupation charge, benefit cap, LHA cap and cuts to Council tax support.

48% of households in temporary accommodation are affected by welfare reform, with just under half (£816,425) of the 2016/17 Discretionary Housing Payment budget (£1,726,627) being allocated to households in Temporary Accommodation. Households living in the private rented sector received £350,418 of Discretionary Housing Payments in 2016/17. Discretionary Housing Payments remain a key homelessness prevention and relief tool, but the budget is under pressure and should not be seen as a long-term solution to homelessness.

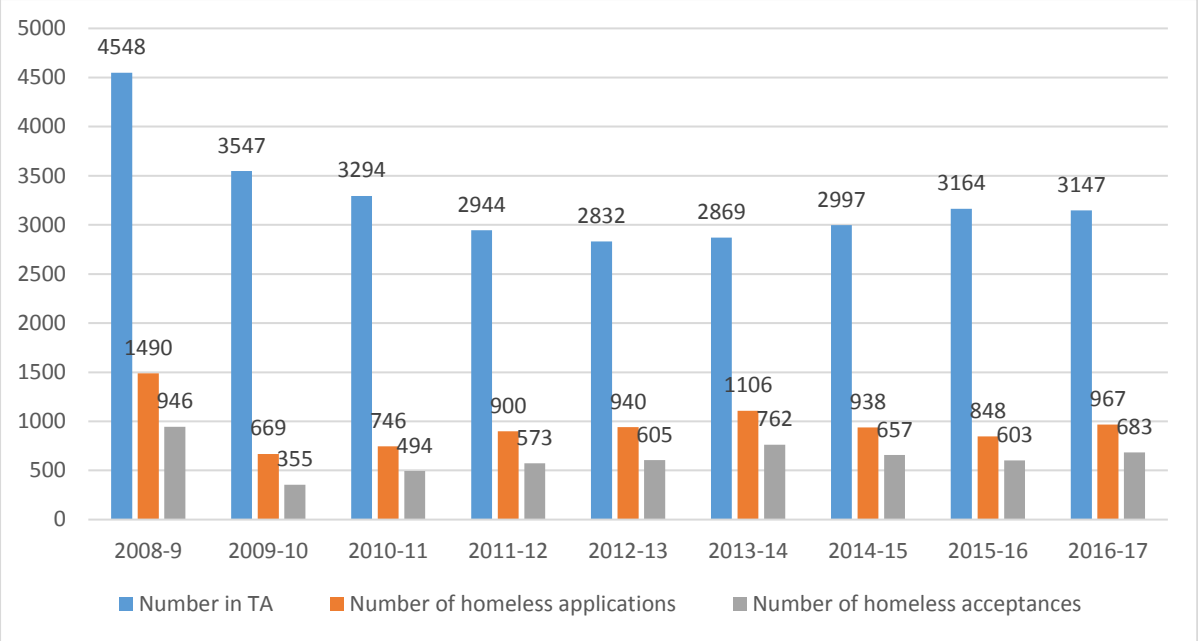
Haringey continues to experience a high level of demand for help with housing. A recent report by Shelter[15] ranks Haringey as second only to Newham in having the highest rates of recorded homelessness in the country, with 1 in every 29 people in the borough either sleeping rough or living in temporary accommodation provided by the council.

In 2016/17, 967 households asked the Council for help because they were threatened with homelessness. In 435 cases, the Council was able to help them avoid becoming homeless. Homeless acceptances in Haringey have decreased from a peak of 762 in 2013/14 to 686 in 16/17, in contrast to the London picture of increasing acceptances.

Despite this encouraging trend, at the end of the 2016/17 financial year, 3147 Haringey households were living in council-provided temporary accommodation. A steady reduction in numbers from 2008/09 reversed in 2013/14 when the number of

[15] Shelter: Far from Alone Homelessness in Britain November 2017

homeless applications and acceptances was peaking, largely driven by welfare reform.

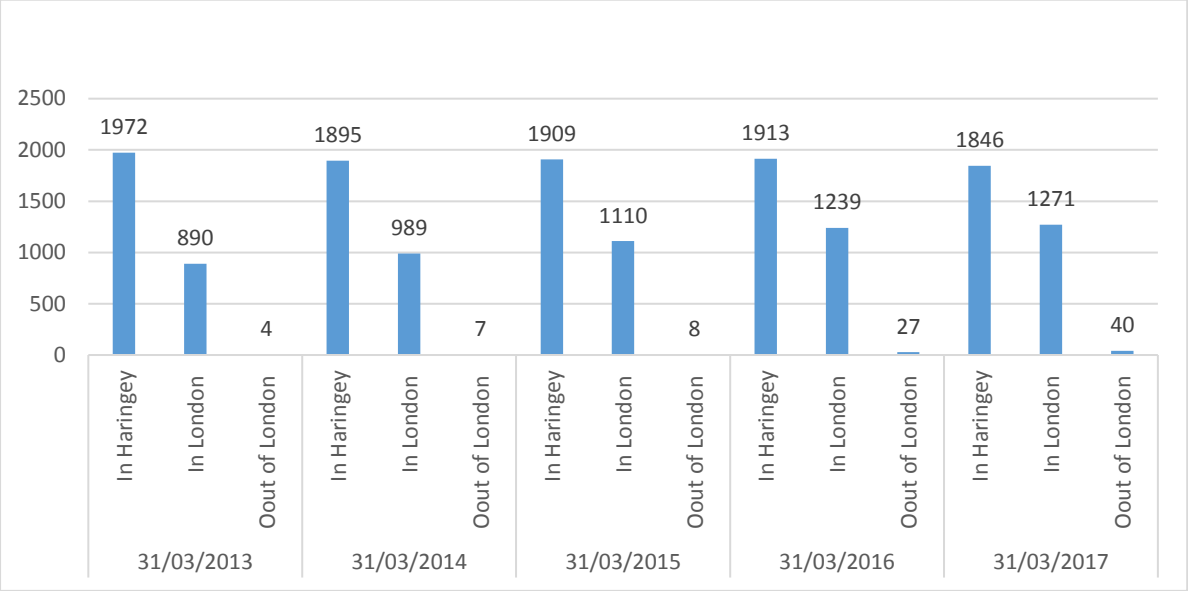


Numbers in temporary accommodation have again started to reduce, largely due to renewed levels of success in preventing and relieving homelessness, with 3049 households in TA on 01/11/17. Loss of Private Rented Sector tenancy remains the most common reason for homelessness, alongside friends and family asking the person to leave.

Over recent years, the buoyancy of the private rented market has made procuring such properties challenging, as landlords have been able to obtain higher rents by letting to the professional market, or selling their property to realise their asset. Not only has this contributed to the rise in homelessness, it has also created challenges in accessing that market for either offers of accommodation to homeless households, or securing new Temporary Accommodation.

Where we owe them a duty, we will always try to offer people temporary accommodation in or as near to Haringey as possible. However, the procurement challenges referred to above means we have had to look further afield for temporary accommodation that is affordable. While the number of households in Temporary Accommodation outside the borough has increased significantly, the numbers housed further away outside London remains low, at less than 2% of the total Temporary Accommodation population.

Location of Temporary Accommodation



At the point of writing, there are early signs that the London market may be flattening, which presents opportunities for procurement of both longer term, more affordable Temporary Accommodation and of properties in the private rented sector that can be used to sustainably relieve homelessness.

Homelessness is an adverse childhood experience that can have a long-term negative impact on children's development. It affects social bonding, school performance and is linked to disadvantage in future generations. Our current temporary accommodation population includes around 10,000 individuals, of whom around 5000 are children. A lone parent heads 59% of households in Temporary Accommodation; 71% of those accepted as homeless in 2015/16 were lone parent families headed by a woman. It is important that our efforts to support homeless households into work acknowledge the additional barriers around child care that these households face and that we recognise the needs of these households to maintain ties with family and support networks, including fathers living outside the family home.

Evidence suggests that young people who identify as Lesbian, Gay, Bisexual or Transgender (LGBT) may be disproportionately affected by 'hidden homelessness', with 24% of homeless young people identifying as LGBT. 77% of these young people believe coming out to their parents was the main factor causing their homelessness[16]. Among the most prevalent outcomes of LGBT people becoming homeless were sexual exploitation and mental health issues, alongside homophobic bullying and alcohol abuse.

[16] Albert Kennedy Trust

Adults who are vulnerable due to mental health conditions are more likely to become homeless, come into contact with the criminal justice system and have unplanned hospital admissions where discharge is delayed. In 2016/17, we identified that 31% of people accessing our Single Homeless pathway had a primary mental health need and 25% had an offending background.

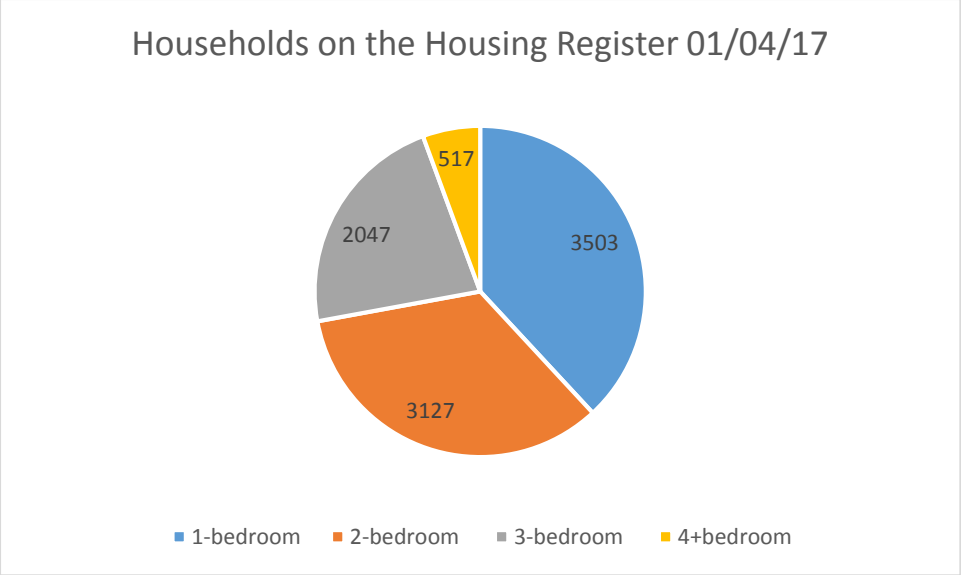
Primary need	Number	%
Mental health	191	25
Offending	191	25
Physical health	116	15
Unrecorded	51	7
Mental health DTOC*	48	6
Vulnerable homeless	43	6
Young person	41	5
Alcohol	27	4
Complex / multiple	27	4
Substance use	26	3
Learning disability	2	0.02
Total	763	100%

*Delayed Transfer of Care

We know that for many single vulnerable people, their primary or presenting need may be just one of a complex and overlapping set of circumstances that together, combine to increase their vulnerability. The data we hold on these overlapping needs and on outcomes for people accessing our single homeless pathway are currently not robust enough, so improving our data collection procedures and systems for measuring outcomes will be a priority activity over the life of this strategy. This was a key recommendation of the Supported Housing Review.

Haringey is at crisis point with rough sleepers at the most visible tip of the homelessness iceberg. Based on our annual street count, completed in November 2017, the number of street homeless people in Haringey has increased by 33% in the last year. The complexity of multiple disadvantage and increasing inter-relationship of triggers and reasons leading people to sleep rough makes it increasing more difficult for a single provider or partner to address. We need to find new ways to engage with this group and support them to turn their lives around.

In addition to those already affected by homelessness, Haringey has a significant population who are living in insecure or unsuitable housing. As at 1st April 2017, there were 9194 households on Haringey's Housing Register.



The Housing Register includes just under 300 households who need to move on medical and welfare grounds and over 7000 households living in insanitary, overcrowded or otherwise unsuitable conditions. 57% of these households are in Band C and are very unlikely to secure social housing due to a lack of supply.

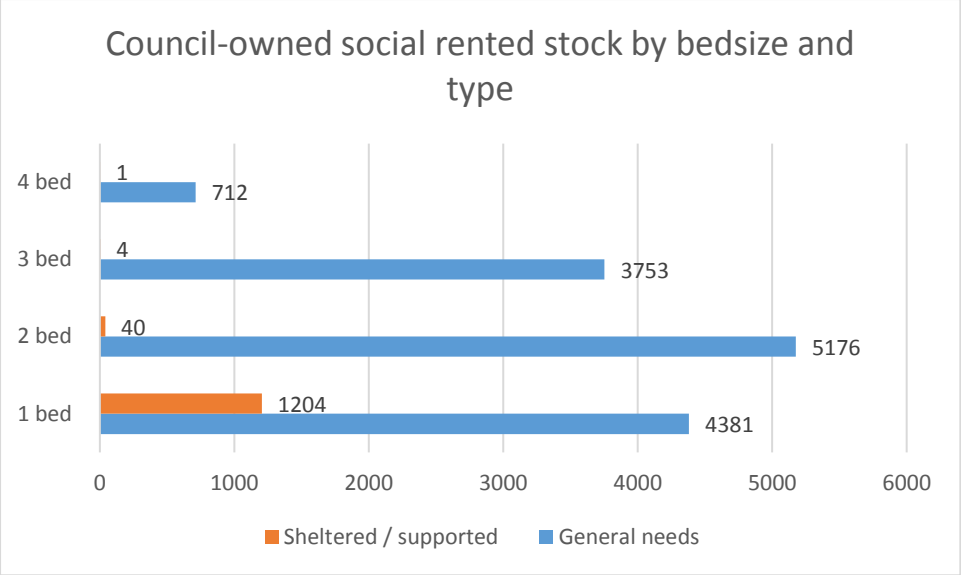
In September 2017, the London Assembly Housing Committee published a report 'Hidden Homelessness in London' that sought to estimate the numbers of hidden homeless people in London. That is, people excluded from the official statistics but in precarious situations such as sofa surfing, squatting, and sleeping on public transport. These situations can be particularly dangerous, leaving the person vulnerable to abuse, exploitation and assault. The report estimates that 13 times more people are homeless but hidden than are visibly sleeping rough, as many as 12,500 each night. The Crisis Homelessness Monitor 2017 estimates that on any one night there may be 60,000 households 'sofa surfing'.

Stock profile and lettings

The borough of Haringey contains around 102,000 dwellings, of which around 40% are owner-occupied. The social rented sector accounts for just under 30% of properties with the remainder in the private rented sector. 28% of the total stock has one-bedroom, 33% two-bedrooms, 24% three-bedrooms and just 15% four or more bedrooms. Of the 27,242 social rented units, over 70% have one or two-bedrooms, with only 5% of the stock four-bedroom or larger[17].

At the time of writing Homes for Haringey, the Council's Arms-Length Management Organisation, manages 20,225 homes, of which 69% are general needs tenancies, 6% are sheltered / supported tenancies for older people and 24% are lessees.

[17] Census 2011



Demand for social housing continues to outstrip supply, with the number of social rented lettings decreasing year on year. Supply shortages are particularly acute for larger homes, with 29 four-bedroom homes being let in total in 2016/17 and only 19 expected to be let in 2017/18.

FINANCIAL YEAR	NO OF LETS	% REDUCTION ON PREVIOUS YEAR
2011/12	1,103	
2012/13	945	14.4
2013/14	848	10.3
2014/15	697	17.9
2015/16	625	10.5
2016/17	522	16.4
2017/18 (projection)	490	6.2

These dramatic reductions in supply reflect the fact that since 2011, fewer large Registered Provider developments have come on-stream and flow through our own stock appears to be reducing, with fewer people moving out. Coupled with this, new tenure types such as the introduction of Affordable Rent, which allows landlords to charge up to 80% of market rent, and the GLA's Pan-London top-slice have further limited the supply of social rented homes available to people on the waiting lists.

Waiting times for social housing 2016 - 17

	Band A	Band B
1 bed	11 months	2 years 10 months
2 bed	1 year 11 months	7 years 7 months
3 bed	3 years 4 months	11 years 4 months
4 bed +	1 year 4 months	12 years 7 months

The table above shows how long people re-housed in 2016 / 17 had waited, prior to being re-housed. Those with very specific needs, for example those who need a

wheelchair-adapted home, may find they wait longer due to the shortage of homes available that meet their specific needs. Additionally, as the number of social lets decreases, those entering the system now are very likely to face even longer waits for social rented homes.

Based on the above, it is clear that we cannot meet Haringey's housing needs through the provision of social rented accommodation alone and we must continue to work with families to find alternative housing options including properties in the private rented sector. If private renting is to be suitable for a household, it has to be affordable and the household will need the skills and resources to manage their tenancy and live within their means. In many cases, this will mean they will need support to enter employment and develop their financial resilience.

The Regeneration and Growth agenda
The Council's vision for regeneration includes new and improved housing alongside other measures including better local town centres, enterprise, employment and training, transport, health education, community safety and environmental improvements.

- **Tottenham** is the largest Housing Zone in London with over £100m of investment to help tackle barriers to development and growth and bring forward estate renewal projects as well as substantial numbers of new homes by 2025.
- **Wood Green** has the capacity for around 5,000 new homes in the next fifteen years, making a significant contribution to Haringey's overall target but also playing a major role in achieving much needed growth, boosted by proposals for a new Crossrail 2 station in the heart of the high street

Regeneration provides potential opportunities to make significant contributions to tackling homelessness and housing need - by delivering new affordable homes and increasing, in particular, the supply of family sized social rented homes. Additionally, more job opportunities, improved health and leisure facilities, parks and open spaces will contribute to the overall resilience of our communities.

But there are challenges as well that need to be managed carefully. These include short term increased pressure on the supply of social rented homes when an estate is being decanted, the potential impact on households in the private rented sector as homes are demolished and, over the longer term, potentially higher rents.

5. How we will change what we do

In order to deliver our strategic vision, we must work together to change the 'ecosystem' within which homelessness prevention and relief services exist. We have identified the following four overarching principles to guide us in redesigning our systems to deliver these objectives:

5.1 Providing strategic leadership and building collaborative partnerships

Throughout this document, we refer to our partnership as being key to the delivery of our objectives and outcomes. Our partnership is diverse and multi-agency, and includes (but is not limited to): staff in our commissioned homelessness services including Homes for Haringey, charitable and third sector organisations such as St Mungo's, Thames Reach, One Housing Group and Solace Women's Aid, local voluntary and community groups such as Neighbourhood Watch and Bringing Unity Back into the Community (Bubic), colleagues from other statutory services such as police, Children's and Adults Social Care, Mental Health, Public Health, Job Centre Plus, Community Safety teams and the Department for Work and Pensions and perhaps most importantly, people with lived experiences of homelessness.

The financial challenge facing Haringey sets the context for this strategy and our role in delivery. In addition to our role as funders of homelessness prevention and relief services, we will also provide strategic leadership to the partnership, utilising and further developing existing relationships, influence and leverage.

We have collaboratively developed the actions and approaches we believe are necessary to realise our ambitions, and recognise that not all these actions will be directly within the gift or responsibility of the Council to deliver. We are committed to working alongside and supporting those who are better placed to deliver, and encourage all partners to identify how their organisation can contribute to the ambitions and principles set out here.

As strategic leaders, we will provide direction, bring the partnership together around this shared set of objectives and hold it to account on delivery. As capacity builders and enablers, we will co-ordinate and support our partnership to deliver well integrated homeless prevention and support, providing information, building skills and knowledge and creating efficient pathways.

With a renewed focus on delivering excellent customer service and psychologically informed support that recognises the overlapping stresses and trauma that many people affected by homelessness experience, we will redesign services around the needs of our customers. Underpinning this, we will work with community and partners to build a new culture of trust and transparency. Everyone in the partnership must work together to ensure the messages we deliver about homelessness in Haringey are honest, consistent, accurate and understandable. This will enable people in housing need to make informed choices about their housing options.

5.2 Making Prevention Everyone's Responsibility

All members of our partnership have responsibilities and a role to play in preventing homelessness and the escalation of circumstances that can drive someone towards crisis point. We must all work together to recognise and address the underlying issues at the root cause of homelessness, such as poverty and unemployment, rent arrears, debt and benefit problems, poor physical and mental health, family breakdown and experiences of trauma and abuse.

We will work with the community and local partnership to ensure that everyone is able to identify and understand these early homelessness triggers and help the person in need to improve their situation before things escalate to the point they have lost their home or suffered another kind of crisis.

People heading towards a homelessness crisis require holistic support that is tailored to their specific needs, with all agencies playing their part in finding the solution. This will involve partners referring the person on for specialist housing support at an earlier stage, co-ordinating assessments and creating joint support plans with our housing teams. It will also involve working closely with housing colleagues to ensure the options and help offered are appropriate and realistic, and that messages about what is and is not available are consistent.

Housing staff will need to be better trained in responding to domestic violence, abuse and safeguarding issues, delivering Mental Health First Aid and other initiatives to improve health and wellbeing, such as Making Every Contact Count.

Households themselves also have responsibilities when it comes to homelessness prevention; this means engaging with the help and support they are offered. Due to the shortages of supply, it also means recognising that an offer of social housing is unlikely, for most people, to be the solution to their housing problem.

5.3 Commissioning More Effectively To Better Meet Local Need

At a time of unprecedented change, with funding pressures set to continue over the life of this strategy, we must stretch the resources we have much further than they have in the past. This means being more innovative in how we deliver against our priorities, modernising and streamlining services to meet the challenges of the future and empower people to rebuild their lives so they are less reliant on services.

We will use modern strategic commissioning practices to better understand and evidence local need, effectively manage resources and plan and deliver a range of services that place self-sufficiency at the core, achieve improved value for money, a renewed focus on outcomes, quality and customer satisfaction and better integration with the local partnership.

5.4 Delivering In And With Our Community

Haringey has a rich and vibrant community that cares deeply about homelessness and rough sleeping and wants to be involved in finding solutions to these issues. This is demonstrated by the range of peer and volunteer-led initiatives that are already delivering excellent work in this area. Without this community-led support,

many more people would suffer the harm caused by homelessness and rough sleeping.

Recognising that a ‘one size fits all’ approach to homelessness prevention and relief is inadequate, we will be person-centred from concept to delivery. We will build on assets of people and place, actively involving, empowering and giving voice to people using services and providing a platform for local community groups and voluntary organisations to contribute towards the delivery of our outcomes.

We will focus on what people and communities can do as well as what they need help with and will offer holistic support appropriate to their specific needs and capabilities. The root cause of homelessness lies in poverty and disadvantage, so the solutions lie in empowering people to build their resilience and develop self-sufficiency. This could include helping people to find employment, manage their finances or access affordable childcare in order to get back to work, as well as more obviously ‘housing-focussed’ help.

We recognise and celebrate the strengths and capacity of our communities and individual community members to be co-producers of solutions to prevent or relieve homelessness. By working with ‘experts by experience’ who have used our services previously, we will strive to better understand individual customer journeys and experiences of homelessness, using this learning to reshape our services. This will include developing opportunities for people with lived experience of homelessness to become involved in supporting their peers to build resilience and find solutions to their homelessness.

6. Delivering our key objectives

Priority 1: Intervening earlier to prevent homelessness

The best way to tackle homelessness and rough sleeping is to prevent it from happening in the first place. By the time a household comes to the attention of statutory homelessness services, it is often too late to meaningfully intervene, resulting in a response can be reactive, unplanned and limited in the range of options available. This can lead to a poor customer experience, poor outcomes and significantly increased costs – both human and financial.

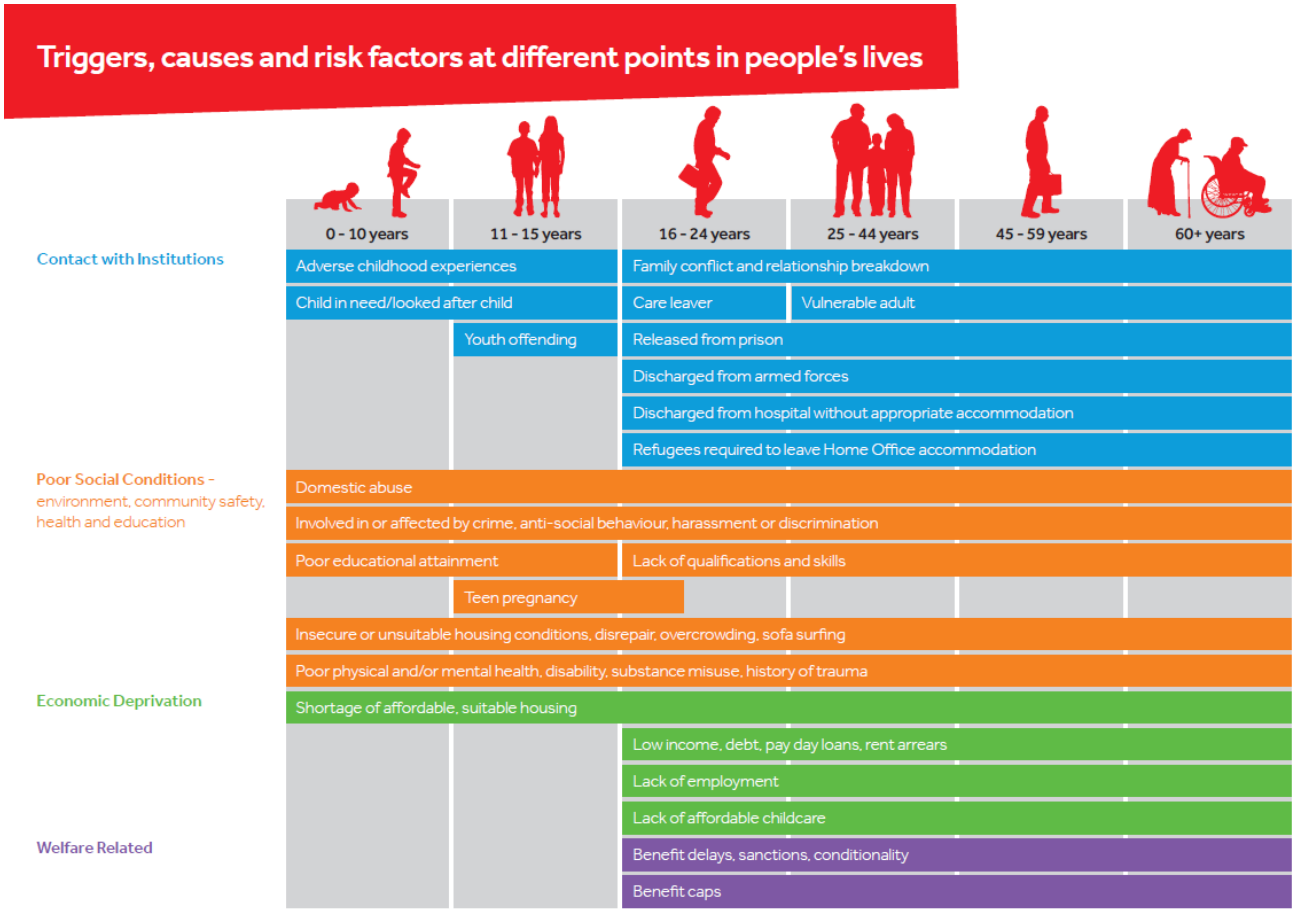
For our prevention activity to be effective, it is essential that we identify people at risk of crisis at an earlier stage in their journey towards homelessness and work with them to create a plan that enables the crisis to be averted.

We need to:

- create a range of channels through which people can seek help, tailored to the specific needs and characteristics of our population and ‘at risk’ groups
- improve the availability of good quality, easy to understand information on the range of realistic housing options available, enabling people to make informed choices and help themselves
- proactively reach out to those at risk and offer them support at a much earlier stage, rather than waiting for people to approach us when already at a point of crisis
- make our ‘front of house’ services easier to access, with less bureaucracy and a more welcoming, supportive feel
- move away from a ‘transactional’ relationship with those in housing need, towards a more ‘relational’ approach, with the person very much an active participant in finding a solution. The role of our housing staff must change from 'assessor / gatekeeper' to 'facilitator / enabler'
- recognise that a homelessness crisis often goes hand in hand with other problems, and work with partners and our community to ensure the support we offer is holistic and joined-up and that our staff are well trained and able to respond to these other issues

We know that at different points in people’s lives there are specific triggers and risk factors for homelessness, and that other professionals will also be working alongside families at risk at these points. This offers us the opportunity to co-ordinate and plan our work to achieve the best outcomes.

Triggers, causes and risk factors at different points in people's lives



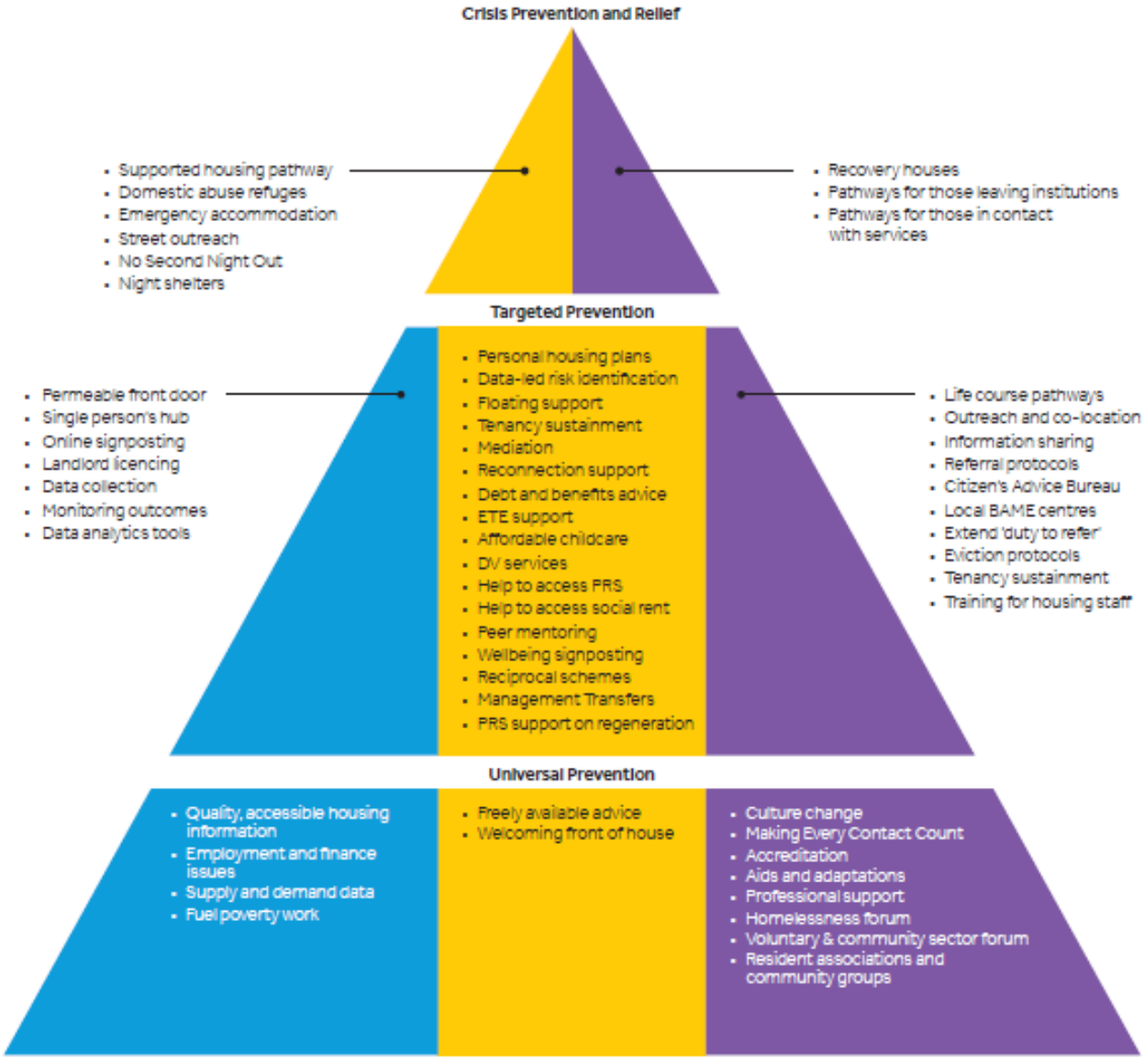
We will establish Task and Finish groups to map out the 'as is' and 'to be' homelessness prevention offer for each at-risk group above and develop action plans to drive forward service redesign in each of these areas.

To inform this, we will undertake customer journey mapping to better understand the lived experiences of people at risk of homelessness, and will use this learning to inform our service redesign. We will identify a range of interventions to prevent homelessness at a universal, targeted and crisis level. These interventions will be available to the general population, specific individuals in housing need and within the local community partnership.

Alongside this, we will develop new systems for collecting data and monitoring homelessness prevention outcomes, to ensure that our new approaches are effective and people are getting the help that they need.

The 'Homelessness Prevention Pyramid' below is an indicative model of how the overall offer could look.

Homelessness Prevention Pyramid



Key:

- Population
- Individual
- Community and Partnership

Crisis Prevention and Relief

At the individual level: Services will include: Domestic Abuse Refuges, Supported Housing pathway for vulnerable single people and young parents, street outreach services and No Second Night Out for rough sleepers, and safe, secure emergency accommodation for eligible households while alternative housing solutions are arranged.

At the community and partnership level: Planned pathways for all vulnerable people leaving institutions with no suitable accommodation to go to, and for those already in contact with other statutory services.

Targeted Prevention

At the population level:

- We will provide clear signposting information online showing people how to get additional help.
- We will roll out our Landlord Licencing scheme to address poor housing conditions in the private rented sector.
- We will make better use of data, enabling us to identify 'at risk' households in the community and proactively offer support.

At the individual level:

- We will reshape our homelessness 'front door', making it easier for people to get help. This will include developing a new 'hub' offering holistic, person-centred support to single people, including rough sleepers. This hub will function as a 'one stop shop' for single people, allowing them to access the help they need in a welcoming, 'psychologically informed' setting, reducing the bureaucracy associated with this.
- We will draw up Personal Housing Plans for everyone threatened with homelessness within 56 days, as required under the Homelessness Reduction Act. These will include offering a range of interventions designed to prevent or relieve their homelessness. For example:
    - Floating support and intensive tenancy sustainment services
    - Debt and welfare benefits advice, Discretionary Housing Payments
    - Employment, Education & Training support, including access to affordable childcare
    - Family and landlord mediation, reconnection support
    - Peer mentoring and befriending services
    - Domestic Violence services including the Sanctuary scheme, reciprocal schemes and Management Transfers
    - Help to access private rented accommodation or social housing in areas where there is no shortage
    - Proactive support for people living in private rented tenancies in regeneration areas
    - Signposting to mental health, substance use and other health and wellbeing support services.

At the community and partnership level:

- We will increase our community outreach, proactively reaching out to people in need rather than waiting for them to approach us at a point of crisis. This will include co-locating staff where we know 'at risk' groups are likely to be, such as Job Centre Plus, Children's Centres, health settings, probation offices.
- We will develop information sharing and referral protocols and pathways with and between relevant agencies working with 'at risk' groups and seek to extend the 'duty to refer' practices to other partners not covered by Regulations – for example Registered Providers.
- We will work more closely with the Citizen's Advice Bureau and local BAME community centres
- We will develop eviction protocols with local private landlords, housing associations and supported housing providers.
- We will develop joint working 'pledges' between housing associations and mental health services and will support training for housing staff on Mental Health First Aid, Making Every Contact Count and other issues that may push a vulnerable person towards a crisis.

Universal Prevention

At the population level: We will publish data annually on housing supply and demand, ensuring that good quality, accessible information about housing is available online, enabling people to make informed decisions about their housing options. This will include information showing how financial and employment status affects housing choices, with clear signposting for people who want to get a job or reduce debts.

At the individual level: We will ensure that free advice is available over the telephone, via email and in person from customer service centres. And we will ensure we provide a welcoming, friendly front of house that people feel comfortable accessing.

At the community and partnership level:

Making prevention everyone's responsibility will require a culture change at all levels of the Council and the wider partnership and we are committed to driving this forward.

- Homes for Haringey will seek Domestic Abuse Housing Alliance and National Practitioner Support Service accreditation and will undertake other training as required to tailor their service to the specific needs of service users, such as Equalities / LGBT training.
- We will work closely with the aids, adaptations and community alarms services, enabling people to maintain their independence and stay in their homes
- We will ensure the availability of training and resources for professionals and community leaders on housing needs issues and homelessness prevention.

- We will promote a vibrant Homelessness Forum led by providers, empower resident associations and community groups to deliver key messages on homelessness and ensure that there are regular contributions from Housing at our Voluntary & Community Sector Forum.

PRIORITY 2: INCREASING THE SUPPLY OF ACCOMMODATION AVAILABLE

Our first priority is always to prevent people from losing the homes they already have wherever we can. However, in some cases this will not be possible and our role will be to help people find new homes elsewhere. Those homes must be suitable and affordable, and the people moving into them must be equipped to sustain their accommodation so the cycle of homelessness can be broken.

Our supply of social rented accommodation has reduced by 50% since 2011. The major new build and regeneration schemes under way across the borough offer exciting opportunities for new affordable homes to be built in Haringey. However, the benefits of these projects may not be seen for several years and we cannot wait for these to solve our supply problem. Therefore, we must do more to make better use of the homes we do have, and to open up new sources of supply to people who desperately need a home.

We will develop an integrated, co-ordinated approach to increasing housing supply across a range of tenure types and locations, for people at various stages in their life course. This activity will fall into the following three areas:

We will:

Maximise the supply of social rented homes	• Review levels of under-occupation in our own stock (inc. TA) and develop new incentive schemes for downsizers or those who wish to move away from Haringey entirely • Focus on rooting out tenancy fraud and subletting • Work with Registered Provider partners to develop their own under-occupation and fraud programmes • Review nominations agreements with Registered Providers to ensure we are maximising opportunities • Promote Homefinder UK and other national mobility schemes • Develop specific approaches to marketing 'Affordable Rent' tenancies – possibly linked to employment support programmes - to ensure take up • Promote Reciprocal schemes for people forced to flee their social tenancies due to violence or risk issues • Work with developers and Registered Providers to bring forward new developments, maximising the supply of affordable homes within these • Estate Regeneration programmes in some of our most deprived areas • Explore opportunities for innovative building methods such as modular build • Develop new processes for identifying and letting properties with adaptations or that are suitable for those with mobility needs • Review allocation scheme and associated policies (e.g. TA placement policy) to ensure fit for purpose
Increase access, availability and suitability of private rented homes	• Create portfolio of sub-market housing via a Co-operative Community Benefit Society • Invest in a Purchase and Repair programme to municipalise poorer quality, badly managed private rented homes within and outside Haringey • Range of schemes to increase access to PRS including; Guaranteed Rent, Rent Deposit schemes • Work with landlords to convert expensive nightly paid TA into longer term tenancies • Handholding support for people wishing to move to PRS • Renewed focus on Tenancy Sustainment support with dedicated help for landlords who let to our nominees

	• Develop Landlord Forum to build stronger relationships with PRS landlords • Development of borough-wide HMO licencing scheme to improve quality of PRS • Increase number of council-owned lodges for emergency accommodation, reducing our reliance on expensive nightly paid accommodation • Explore options for increasing the supply of accommodation for people aged under 35 who are only entitled to the shared room rate • Keep supply of and demand for out of London properties under review – promoting this to those who wish to move to other parts of the country • Use of 'better off in work' calculators and other budgeting tools to help people establish what accommodation they can afford • Support around employment and financial / digital inclusion to help people build financial resilience and increase housing options
Modernise and improve our supported accommodation	• Implement recommendations set out in Supported Housing Review • Commit to placing no single vulnerable people in general needs TA without appropriate support • Undertake strategic review of single homeless pathway and floating support provision, to ensure sufficient provision to meet above commitment • Create new supported housing for key groups such as young parents and care leavers • Develop 5-year commissioning plan for 'single homeless' supported housing • Extend Housing First options for more complex individuals who will not manage in more traditional supported housing settings, such as women with complex needs • Review move on from supported housing and develop new approaches to increasing flow through provision • Rent deposit schemes for people moving from supported housing to PRS • Increase supported housing options for people with more complex and overlapping needs • Housing Strategy commitment to build new specialist supported housing to be rigorously explored as part of all new development plans • Work with providers to prepare for funding changes in 2020 • Targeted support for families who might otherwise be deemed 'intentionally homeless' thus enabling them to move on into PRS • Ensuring Clearing House options are available to former CHAIN-verified rough sleepers

PRIORITY 3: MEETING THE NEEDS OF THOSE ALREADY IN TEMPORARY ACCOMMODATION

We know that the needs, aspirations and goals of people living in our temporary accommodation are diverse in nature and that a 'one size fits all' approach to helping them move on to settled housing will not suffice. Currently around 1300 households in Temporary Accommodation are working, 314 of them full time, and many have aspirations for career progression and eventually, home ownership. These families want to be able to settle close to where they work with disruption minimised.

Others have told us they feel their lives are 'on hold' while they wait for their move out of temporary accommodation. This can be particularly acute for people in temporary accommodation outside the borough, and can affect the choices they make around seeking work, schooling their children or otherwise laying down ties in the community where they are living.

Within our temporary accommodation population there is a significant group of economically disadvantaged households, who are not working and are heavily reliant on welfare benefits to get by. Many of these are larger households headed by female lone parents who tell us they feel powerless to change their circumstances due to the complex and overlapping disadvantages they face. Many feel that nothing but an offer of social housing would meet their particular needs, despite the fact that this is becoming less and less of a realistic option due to shortages of supply.

These perceptions appear to be particularly noticeable within the c1000 households who were accepted as homeless prior to the 2011 Localism Act. The Council cannot discharge its housing duty towards these household by offering them a private sector tenancy, unless they agree to this voluntarily. These households face exceptionally long waits in Temporary Accommodation before they are likely to receive an offer of social housing.

Lacking the funds to make ends meet through welfare benefits alone due to the benefit cap, many of these households require significant 'top ups' from Discretionary Housing Payments. These households may be at particular risk of running into arrears or other debt problems when rolled on to Universal Credit in 2018.

We know that within our current temporary accommodation population, there are families with specific health and wellbeing needs, such as those who use a wheelchair or have other mobility needs that limit the type of housing they can live in, those who are receiving packages of support from social services or who are undergoing extensive treatment for chronic health conditions. There are also multi-generational families living within one household, where we simply do not have accommodation available of an appropriate size. The data we hold on the needs of these households needs to be improved so we can better target support and offer options that are appropriate to the specific needs of these households.

The theme of ‘culture change’ that is running through this strategy applies in equal part to people using our services; there is simply not enough social housing for everyone and so where possible, people will need to be flexible and realistic about the options they are willing to consider.

We will:

Develop our evidence base	• Set up TA ‘Experts by Experience’ panel to co-produce development of options for current TA cohorts • Develop data systems to capture and record specific needs and aspirations of people in TA e.g. mobility needs, cross cutting support from other services etc • Undertake specific research to understand what influences the choices made by households in TA, exploring use of Behavioural Insights and Nudge etc, to help shape service design • Develop monitoring systems to track outcomes for households in TA (e.g. numbers on waiting lists and waiting times, move on destinations etc) and make this information available to others to help inform choices
Focus on health, wellbeing and resilience	• Targeted help for households in TA to build resilience – e.g. employment coaching, financial and debt management advice, benefits maximisation • Specific help and advice to manage the transition to Universal Credit • Revise policy for assessing mobility needs and suitability of accessible / adapted properties to ensure those in greatest need of these homes are prioritised • All households receiving Discretionary Housing Payments to get help to reduce this dependence and build self-sufficiency • Peer support and peer mentoring schemes for households in TA to help build personal empowerment
Provide information and realistic options	• Each household in TA will have their own personalised ‘move on plan’ which sets out the specific options available to them and actions they can take to increase their options • For the majority of households accepted ‘Post-Localism Act 2011’, this is likely to focus on PRS options • Those who wish to move out of borough / London or explore remaining in the area of their existing TA to be offered handholding support to lay down roots and establish themselves in the community • ‘Pre-Localism’ households will be supported to explore their choices based on accurate information about affordability, waiting times and availability of e.g. social housing in cheaper parts of the UK • Development of specific schemes for very large households, where there is no supply available e.g. exploring options for splitting the household

7. Action planning and outcomes

This strategy and the objectives within it will form the basis for our ongoing engagement with our partners and the community going forward to 2022. The key elements of an action plan to deliver the strategy's objectives are set out below, along with some headline outcomes. Following engagement with our partners and the community, we will formulate a detailed Strategy Implementation Plan that sets out responsibilities, timeframes, lead organisations and the resources available to meet the objective identified.

The multiagency Homelessness Forum will oversee delivery of the Strategy Implementation Plan. This will report in to the Council's Housing Priority Board. More formally, as a statutory strategy for which the Council is responsible, it will be the responsibility of the Council's democratic scrutiny arrangements to hold the Council to account for delivery of its aims.

7.1 How we will change what we do

Providing strategic leadership and building collaborative partnerships

We will:

- Refresh the Homelessness Forum to lead the partnership
- Produce a detailed outcomes framework for the whole partnership
- Develop new training, information and other resources to support delivery

And this will deliver:

- An increase in trust and transparency
- An improvement in the quality of advice delivered across the partnership
- Clarity of vision and understanding of what we are trying to achieve together

Making prevention everyone's responsibility

We will:

- Embed homelessness prevention into the work-plans of partners
- Ensure housing staff are able to recognise and sensitively address other factors that may contribute to a person's vulnerability, signposting them on to appropriate support as required
- Provide training for frontline services on the prevention agenda and holistic support offer
- Develop personal housing plans for people at risk of homelessness, including actions for housing and other partners and for the person at risk
- Promote co-location, joint working and integration with key partners including single assessments

And this will deliver:

- A reduction in the costs associated with failing to get things right first time
- An increase in levels of personal responsibility taken by those who are potentially homeless and a commitment to prevention among partner organisations
- Joined up services that behave 'like a system' and manage expectations
- A better understanding of available options increases take up

- Earlier interventions to increase the chances of successful prevention
- A more coherent offer of assistance to those who need help from multiple agencies, to increase effectiveness and efficiency
- Cross-cutting outcomes to reduce poverty and exclusion, such as improved safeguarding, health and wellbeing, employment

Commissioning more effectively to better meet local need

We will:

- Undertake a strategic review of all commissioned homelessness prevention services, building on the Supported Housing Review and making recommendations for service development and redesign
- Plan for the delivery of supported housing post the funding changes in 2020
- Develop 5-year commissioning plan based on outcome of review

And this will deliver:

- Evidence-led commissioning of 'what works', services better able to meet local need
- Increased quality, value for money and effectiveness of services
- 'Leaner' systems with reduced bureaucracy improves access and effectiveness
- Well planned services, 'future proofed' to meet changing population and funding landscape

Delivering in and with our community

We will:

- Ensure support is person-centred, holistic, flexible and builds on strengths
- Embed Supported Housing Tenant Charter at heart of all commissioning and service design
- 'Expert by Experience' research to better understand customer journey, triggers and inform service design
- Develop peer mentoring and befriending as part of support offer
- Find new ways to include and recognise the contribution of non-funded community projects in our response to homelessness prevention

And this will deliver

- Services designed in a 'psychologically-informed' way are more likely to be effective
- Individuals and families are empowered to build their self- sufficiency and reduce their reliance on services
- Communities build their resilience and ability to find their own solutions to problems
- Services are better designed, easier to access and more effective
- The root causes of homelessness; poverty, disadvantage and multiple exclusion, are addressed alongside the symptom – the need for accommodation
- Intergenerational disadvantage is addressed
- Reductions in 'revolving door' homelessness

7.2 Delivering Our Key Objectives

The table below sets out an initial set of aims headlines that will be developed, with our key partners, into a detailed action plan to deliver this strategy. The action plan will be accompanied by a set of measurable targets, but an initial headline indicator is identified for each priority.

This table should be read alongside the similar table in the rough sleeping strategy with its own actions, outcomes and three headline indicators to provide the full homelessness and rough sleeping action plan.

Priority 1: Intervening earlier to prevent homelessness	
Headline indicator: The number of successful homelessness preventions	
Action	Outcome
• Task and finish groups are set up to map 'as is' prevention offer and make recommendations for improvement at each stage of the life-course, using the 'Triggers' diagram • The 'Front door' is redesigned to make access easier, quicker and offer of help more person-centred and empowering • Increased levels of community outreach are promoted alongside the development of 'Duty to Refer' protocols with partners • The use of data and information sharing is improved to proactively identify and help people at risk of homelessness • The interventions sitting within 'Prevention Pyramid' are developed on a collaborative basis; offering universal, targeted and crisis prevention to the general population, specific individuals in need and within the community and partnership	• People get help quicker, before their problems escalate and become more intractable • A reduction in the costs associated with not getting it right first time (ie 'failure demand' • Services are personalised and tailored to the specific needs, strengths and aspirations of different groups, making them more effective at **preventing** homelessness • Access to holistic help for chronically excluded single people is improved • An increase in resilience and self-sufficiency as a result of Housing support, sitting alongside other support • An increase in the number of people prevented from becoming homeless • A reduction in the number of people moving into temporary accommodation and thus reduced costs

Priority 2: Increasing the supply of accommodation available	
Headline indicator: The number of households in Temporary Accommodation	
Action	Outcome
• An increase in the supply of social rented homes • An increase in the availability and suitability of private rented homes • Our supported housing is modernised and improved	• A reduction in numbers of people in temporary accommodation • A reduction in cost of temporary accommodation • A reduction in levels of housing fraud • Improved utilisation of the housing assets we do have • An increase in the effectiveness of housing related support to reduce revolving door homelessness and increase the resilience of vulnerable people
Priority 3: Meeting the needs of those already in TA	
Headline indicator: The number of households engaged with a personalised move on plan	
Action	Outcome
• Undertake research to understand choices and motivations of people in TA, to inform service design • With partners, develop package of holistic support to help people in TA build resilience, wellbeing and improve health • Develop personal 'move on plans' for everyone in TA and encourage uptake of realistic options	• Reduction in reliance on Discretionary Housing Payments for people in temporary accommodation • Increase in numbers of people moving out of temporary accommodation to sustainable alternatives • Scarce social housing resources are targeted at those who need them the most • Root causes of homelessness are addressed, reducing intergenerational risk of homelessness

Title	Draft Homelessness Strategy EQIA				
Version	22	Date	16.02.2018	Author	LW

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty'** on all public bodies to have '**due regard'** to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Homelessness Strategy Approval
Service area	Housing & Growth
Officer completing assessment	Helena Stephenson/Laura Wilson
Equalities/ HR Advisor	Ashley Hibben
Cabinet meeting date (if applicable)	16th January 2018
Director/Assistant Director	Lyn Garner / Dan Hawthorn

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

Proposal

In accordance with the Homelessness Act 2002, all local authorities have a duty to have and implement a homelessness strategy. The period covered by Haringey's most recently adopted homelessness strategy ended in 2014. A draft strategy covering 2017-22 was consulted on but never formally adopted having been subject to review in light of the Homelessness Reduction Act, significant welfare reform (including the overall benefit cap) and the rollout of Universal Credit.

We propose to have an updated version of the published draft of the homelessness strategy in order to comply with our statutory duties. It will continue to cover the period 2017-22, complementing the council's overarching Housing Strategy. In addition to this, after consultation with key partners, the decision has been taken to have a complimentary, but standalone, Rough Sleeping Strategy to focus specifically on those more vulnerable to sleeping rough.

The main objectives for the proposed Homelessness Strategy are as follows:

1) Providing strategic leadership and building collaborative partnerships
2) Making prevention everyone's responsibility
3) Commissioning more effectively to better meet local need
4) Delivering in and with our community
5) Homelessness: through early intervention, proactive prevention and strong partnership working we will reduce the financial, economic and human cost of homelessness
6) Rough Sleeping: we will deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities

The three key priorities proposed are as follows:

1) Intervening earlier to prevent homelessness
2) Increasing the supply of accommodation available
3) Meeting the needs of those already in Temporary Accommodation

Context

Haringey ranks second only to Newham in having the highest rates of recorded homelessness in the country, with 1 in 29 either sleeping rough or residing in temporary accommodation. 3,049 households are currently in temporary accommodation (TA) and of the approximate10,000 residents in TA, half are children. There is substantial evidence to show that unstable housing reduces the quality of life for those subject to such conditions. Rough sleepers, for instance, have a significantly reduced life expectancy of 43 years for a woman and 47 years for a man. Homelessness also poses a substantial financial challenge to Haringey, with nightly paid accommodation, the most expensive accommodation used, costing £4,000 per unit per year.

In accordance with Priority 5 of the current Corporate Plan, the Homelessness and

Rough Sleeping Strategies aim to address these issues, detailing Haringey's priorities, key actions to be taken and expected outcomes.

Key Stakeholders/Demographics
The demographics of those impacted will reflect the type of households who seek assistance for housing, are currently homeless and are vulnerable to becoming homeless who are as follows:

- Black households who, statistically, make up the vast majority of households in temporary accommodation
- Lone parent households, most commonly headed by women
- Women, who statistically make up the vast majority of individuals who approach the homelessness service for support
- Young people who identify as LGBTQ
- Those with mental health needs

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics St Mungo's http://rebuildingshatteredlives.org/theme/housing-and-homelessness-services-for-women-with-complex-needs/ London Assembly https://www.london.gov.uk/sites/default/files/london_assembly_-_hidden_homelessness_report.pdf Internal data from homelessness and temporary accommodation	The new strategies will have no impact on Haringey Council employees (unless they are residents of the borough and also homeless or likely to become homeless and thus included below).
Gender Reassignment	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-	

	jsna	
Age	P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics Internal data from homelessness and temporary accommodation	
Disability	As above	
Race & Ethnicity	As above Census data: https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?opt=3&theme=&subgrp= GLA latest population projections (ethnicity at the bottom): https://data.london.gov.uk/dataset/projections Combined Homeless Information Network https://data.london.gov.uk/dataset/chain-reports	
Sexual Orientation	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna EqIA Profile on Harinet Albert Kennedy Trust: "LGBT Youth Homelessness" http://www.akt.org.uk/webtop/modules/_repository/documents/AlbertKennedy_researchreport_FINALinteractive.pdf	
Religion or Belief (or No Belief)	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna EqIA Profile on Harinet	
Pregnancy & Maternity	Internal data from homelessness and temporary accommodation EqIA Profile on Harinet P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics	
Marriage and Civil Partnership	Internal data from homelessness and temporary accommodation	
Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the		

impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Users who will benefit from the proposed changes

The proposed strategy will benefit those who are vulnerable to homelessness and/or those who are currently homeless. This will be achieved by providing clear, strategic direction and specific actions to the council and partners to prevent and resolve homelessness. Through this, residents will be enabled and empowered to hold Haringey and partners to account and given the support they need to prevent themselves from becoming homeless or improve their experience and options if already homeless.

Although not having the strategy in place would not be enough to hinder the commitments made coming to fruition, it would stop the council meeting its statutory duty. In addition, without both being in place we would fail to have a clear strategic vision for the council and our partners to meet the challenges that cause homelessness and improve the lives of those that currently are. The absence of this strategy would also hinder residents and others being able to hold us to account. Having it in place will provide legitimacy for commissioning, service management and expenditure decisions to be undertaken during their lifetime.

There are particular groups who we can infer are more vulnerable to/likely to be homeless that the data below outlines.

Sex, pregnancy & maternity

Data shows that women are disproportionately likely to approach homelessness services for support. The table below outlines that a female applicant headed 73% of homeless acceptances, with a large proportion being lone single parents. In addition, a small proportion of those who approached housing services did so as result of domestic violence issues. However, the numbers are not as comprehensive as they could be with only the primary reason for approach currently recorded.

With the Homelessness Strategy targeting prevention at those vulnerable to becoming homeless and supporting those that currently are we can infer women will disproportionately, but positively, benefit from the commitments made in the strategy due to making up such a large proportion of homeless applicants. There are a few key commitments which demonstrate how women, specifically, will be positively impacted:

- Employment, education and training support – including access to affordable childcare
- Training for staff so they are able to better support residents who are victims of domestic violence alongside a range of flexible domestic violence services
- Targeted support for families who might otherwise be deemed 'intentionally homeless' thus enabling them to move into the PRS
- DAHA (Domestic Abuse Household Alliance) and NPSS (National Practitioner Support Service) accreditation for HfH
- Promotion of reciprocal schemes for people forced to flee their social tenancies

due to violence or risk issues

- Extend Housing First options for more complex individuals who will not manage in more traditional supported housing settings, such as women with complex needs

Gender	Current households in TA (31 July 2018)	Accepted households in Q2 of 2017/18
Female	2301 (75%)	77 (73%)
Male	769 (25%)	28 (27%)

Reason for approach	13/14	14/15	15/16	16/17
Loss of PRS tenancy	349	270	362	370
DV / other viol	13	13	12	9
Asked to leave by fam / friend	212	156	165	184
Other	188	218	64	120

Homeless acceptances - reason for PN*	13/14	14/15	15/16	16/17
Age 16-17	12	2	0	0
1 dep child	287	297	275	312
2 dep child	184	159	147	149
3 dep child	139	106	117	129
4+ dep child	0	0	0	0
Pregnant	4	0	0	9
Vulnerable MH	30	25	4	15
Vulnerable PH	30	20	16	44
Other	76	48	44	25

*Priority Need

In regards to rough sleeping, there is evidence that suggests the triggers and experiences of female rough sleepers tend to be distinct from those of men. Although fewer in number, comprising around 11% of rough sleepers in London, they face particular barriers to accessing support and have a significantly reduced life expectancy of 43 years, 4 years shorter than that of a rough sleeping man. We know that many women avoid rough sleeping by sofa surfing, staying in abusive relationships or living in squats, crack houses and brothels. A higher proportion of women than men will have also had specific traumatic experiences that led to their homelessness such as domestic abuse and perhaps having their children taken into care. Consequently, women who are sleeping rough often have higher and more complex needs than men, including mental and physical health issues, substance use issues, offending histories and involvement in prostitution.

The Homelessness Strategy makes a commitment to undertaking a review of our Single Homelessness Pathway to ensure that the provision is fit for purpose and appropriate for

the needs of vulnerable people, including rough sleepers. This will include reviewing availability of Haringey's current Assessment Centre, 24-hour supported provision, women-only services and other options such as Housing First to ensure the needs of people with severe and multiple disadvantages are met.

With this in mind, it is clear the Homelessness Strategy will disproportionately, but positively, benefit women as they are more vulnerable when rough sleeping and represent the majority of Haringey's homeless households.

Sexual Orientation

LGBTQ+ people comprise up to 24% of the young homeless population nationally though Haringey does not collect this data. Sexual orientation data specific to Haringey is not available but nationally, 69% of LGBT homeless young people have experienced familial rejection, abuse and violence. With the Homelessness Strategy set to improve the lives of those who are in temporary accommodation those vulnerable to homelessness and rough sleeping, it will inevitably have a positive impact on the young LGBTQ+ community.

The Homelessness Strategy make clear commitments which will benefit those in the LGBTQ+ community who are more vulnerable to homelessness and rough sleeping, they are as follows:

- The creation of a single person's hub
- To undertake a strategic review of single homeless pathway and floating support provision, to ensure sufficient provision
- To develop a Supported Housing pathway for vulnerable single people and young parents

The Homelessness Strategy also makes an additional commitment to provide a family mediation service, which will prove beneficial to young people who identify as LGBTQ+ who, as evidence suggests, are likely to face familiar rejection, abuse or violence.

Age

The table below outlines a disproportionate number of 25-59 year olds in temporary accommodation. In addition, as mentioned previously, of the 10,000 people in temporary accommodation, 5,000 are children. With the Homelessness Strategy making a number of clear commitments to improve life for those in temporary accommodation, those below the age of 18 and aged between 25 and 59 will disproportionately, but positively, benefit from the implementation of the Homelessness Strategy. Examples of such commitments are as follows:

- Set up TA 'Experts by Experience' panel to co-produce development of options for current TA cohorts
- Targeted help for households in TA to build resilience – e.g. employment coaching, financial and debt management advice, benefits maximisation
- Review allocation scheme and associated policies (e.g. TA placement policy) to ensure fit for purpose
- Each household in TA will have their own personalised 'move on plan' which sets out the specific options available to them and actions they can take to increase

their options

- Those who wish to move out of borough / London or explore remaining in the area of their existing TA to be offered handholding support to lay down roots and establish themselves in the community
- Explore options for increasing the supply of accommodation for people aged under 35 who are only entitled to the shared room rate
- Enable Employment, Education & Training support, including access to affordable childcare

Age	**Current households** in TA (31 July 2018)	**Accepted households** in Q2 of 2017/18
16-24	198 (6%)	16 (15%)
25-44	2047 (67%)	64 (61%)
45-59	750 (24%)	23 (22%)
60-64	40 (1%)	2 (2%)
65 or over	35 (1%)	*none*

Young people who identify as LGBTQ+ are likely to disproportionately, but positively, benefit from the implementation of this strategy as outlined previously.

Disability/Mental Health

There is only data on disability in homelessness applications if it is the applicant's priority need. In 2015/16, 3% of accepted households had a physical impairment as their priority need and 2 cases had a mental health issue or learning disability as their priority need. These rates are relatively low compared to the general population as there are Disability and Mental Health Pathways which help these households into suitable housing so that they do not need to make homelessness applications.

Primary need	Number	%
Mental health	191	25
Offending	191	25
Physical health	116	15
Unrecorded	51	7
Mental health DTOC*	48	6
Vulnerable homeless	43	6
Young person	41	5
Alcohol	27	4
Complex / multiple	27	4
Substance use	26	3
Learning disability	2	0.02
Total	763	100%

Looking at supported housing more specifically, the table above demonstrates there is a substantial amount of those with mental health needs accessing the homelessness

pathway. Adults who are vulnerable due to mental health conditions are more likely to become homeless, come into contact with the criminal justice system and have unplanned hospital admissions where discharge is delayed. In 2016/17, 31% of people accessing our Single Homeless pathway were identified as having a primary mental health need and 25% have an offending background.

We know that for many single vulnerable people, their primary or presenting need may be just one of a complex and overlapping set of circumstances that together, combine to increase their vulnerability. The data we hold on these overlapping needs and on outcomes for people accessing our single homeless pathway are currently not robust enough, so improving our data collection procedures and systems for measuring outcomes will be a priority activity over the life of this strategy if implemented.

In regards to rough sleepers in the borough more specifically, their support needs have been consistently high over the past few years. In 2016/17, 79% of the 87 rough sleepers assessed identified having support needs around one or more of alcohol, drugs and mental health.

Alcohol:	Drugs:	Mental health:	Other:
49%	43%	48%	21%

With the above in mind, the Homelessness Strategy makes a number of commitments to those who may be vulnerable as a result of mental health needs, some of which are as follows:

- Supported Housing pathway for vulnerable single people and young parents
- Street outreach service for rough sleepers
- Single person's hub
- Signposting to mental health, substance use and other health and wellbeing support
- Training for housing staff on Mental Health First Aid, Making Every Contact Count and other issues that may push a vulnerable person towards a crisis
- Develop 5-year commissioning plan for 'single homeless' supported housing

Race & ethnicity

Homelessness Strategy

There is evidence to suggest in the east of the borough, where the average income is generally lower; there is a high concentration of Haringey's black residents. Therefore, with it being known that those on a lower income are more likely to be vulnerable to homelessness, it is reasonable to infer that those who identify as black are more vulnerable to being homeless and therefore will be disproportionately but positively impacted by the implementation of the Homelessness Strategy.

Ward	Population (GLA Projection 2017)	Medium income	% of the ward population who are black
Northumberland Park	16,611	£25,090	40.3%
White Hart Lane	13,903	£27,010	28.3%
Tottenham Hale	18,511	£27,340	32.7%
Tottenham Green	16,769	£28,920	28.8%

Bruce Grove	15,490	£30,340	31.9%
Noel Park	15,443	£30,620	19.8%
West Green	14,540	£31,110	23.8%
Woodside	16,025	£32,010	16.9%
St Ann's	17,751	£32,460	20.2%
Seven Sisters	15,945	£33,500	21.2%
Bounds Green	15,118	£34,550	17.2%
Harringay	14,681	£37,150	11.8%
Hornsey	13,442	£40,260	13.2%
Stroud Green	12,761	£44,780	11.3%
Fortis Green	13,915	£49,950	4.8%
Alexandra	12,758	£51,450	5.5%
Crouch End	13,632	£52,070	4.3%
Highgate	12,864	£53,710	4.5%
Muswell Hill	12,218	£53,910	4.6%

In addition, as with 44% of households in temporary accommodation identifying as black, as evidenced in the table below, it is clear a strategy which improves the lives of those living in temporary accommodation and vulnerable to homelessness will be of benefit to this group. These commitments have been outlined previously. The strategy also makes a specific commitment to work closely with local BAME community centres to help prevent homelessness. Therefore, the Homelessness Strategy's commitments to prevent homelessness and improve the lives of those where this has not been possible will disproportionately, but positively, benefit black residents.

Ethnicity	**Current households** in TA (31 July 2018)	**Accepted households** in Q2 of 2017/18
Asian	235 (8%)	4 (4%)
Black	1336 (44%)	46 (44%)
Chinese or other	260 (8%)	11 (10%)
Mixed	128 (4%)	3 (3%)
White	1017 (33%)	31 (30%)
Refused or unknown	94 (3%)	10 (10%)

Religion

The council does not hold data on the religion of its tenants or resident leaseholders, but the borough profile by religion is as follows;

Religion in Haringey	**Percentage**
Christian	45.0%
Buddhist	1.1%
Hindu	1.8%
Jewish	3.0%
Muslim	14.2%
Sikh	0.3%
Other religion	0.5%
No religion	25.2%
Not stated	8.9%

There is no sufficient evidence to suggest that one particular religion will be disproportionately affected by the adoption of the Homelessness Strategy. All homelessness services are allocated based on the need and therefore it is reasonable to infer that no religion will be disproportionately impacted by the implementation of the strategies.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Residents

All residents were given the opportunity to participate in a formal consultation on the Homelessness Strategy prior to its review, alongside three other key policies to meet housing need from 14 November 2016 – 29 January 2017. All residents were consulted as, we are aware that homelessness, in its most extreme form, has a clear impact on the occupation and use of public space, which affects all residents.

Residents were given the opportunity to feedback on the following questions in relation to the Homelessness Strategy:

- **Question 2a**: Do you think that the extent and cause of homelessness in the borough have been correctly assessed in the plan?
- **Question 4a**: Do you think the plan has accurately assessed the impact of homelessness demand, for example, the amount of temporary accommodation required and the support homeless households need in moving on to a settled home?
- **Question 5a**: Do you think the plan correctly analyses rough sleeping in the borough and included actions which will reduce it?
- **Question 6a**: Does the plan include the right priorities?
- **Question 7a**: Does the plan include the right actions to deliver out priorities?

Partners & Providers – Homelessness Forum

The Homelessness Strategy was created in partnership with the Homelessness Forum, including setting out the strategic vision, overarching principles, and priorities in November 2015. Since this initial meeting, the Homelessness Forum and the Core Group have been actively involved in developing the strategy. The Forum also featured workshops on the strategy before, during and after the formal consultation period from 14 November 2016 – 29 January 2017.

The decision was taken to consult with the forum as, as a council, we will expect our partner to deliver much of what the strategy outlines. Therefore, it is imperative they are aligned with the strategy's overarching principles, objectives and strategic vision. It was also important to consult with our partners to ensure that the strategy meets the needs of residents currently homeless and vulnerable to being so and had tangible and achievable

aims and objectives.

The most recent forum event on 16th October 2017 was attended by 16 council officers, 4 representatives from Homes for Haringey, 15 representatives from a multitude of housing providers and 18 individuals from a range of third sector organisations operating in the borough.

In addition to this, the council held a consultation event at our Voluntary & Community Sector Forum on 9th October 2017. 31 representatives from the local Voluntary & Community Sector attended the event. Attendees participated in a workshop that examined the key themes presented in the draft strategy and sought their views on what opportunities for the Voluntary & Community Sector arose from this, how housing services and the VCS could work better together to prevent or relieve homelessness and specifically, what role individual organisations could play in the delivery of the objectives outlined.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Question	Agree	Disagree
Question 2a: Do you think that the extent and cause of homelessness in the borough have been correctly assessed in the plan?	57%	43%
Question 4a: Do you think the plan has accurately assessed the impact of homelessness demand, for example, the amount of	58%	42%

Residents

All residents were given the opportunity to participate in a formal consultation on the Homelessness Strategy prior to its review, alongside three other key policies to meet housing need from 14 November 2016 – 29 January 2017. The response was broadly positive, and residents voted in favour of the strategy and it priorities. The table below outlines the results. A total of 328 residents responded to the consultation.

temporary accommodation required and the support homeless households need in moving on to a settled home?		
Question 5a: Do you think the plan correctly analyses rough sleeping in the borough and included actions which will reduce it?	64%	37%
Question 6a: Does the plan include the right priorities?	66%	34%
Question 7a: Does the plan include the right actions to deliver out priorities?	71%	29%

As the majority felt the Homelessness Strategy had accurately assessed the causes and impacts of homelessness with the correct priorities in place, no major changes were made because of this public consultation.

Partners

As outlined previously, the Homelessness Strategy was created in partnership with the Homelessness Forum, including setting out the strategic vision, overarching principles, and priorities in November 2015. Since this initial meeting, the Homelessness Forum and the Core Group have been actively involved in developing the strategy. The Forum also featured workshops on the strategy before, during and after the formal consultation period 14 November 2016 – 29 January 2017.

In these meetings, the Forum was in support of the proposals, and actively contributed to, and amended, the Homelessness Action Plan which was included in the consultation. Key changes that were made as a result of this consultation are as follows:

1. **Separate rough sleeper strategy** – the group felt it important we highlighted the differing challenges facing those who are currently, and vulnerable to, rough sleeping vs. those that typically present to homelessness services. We have responded to these concerns and gone forward with their suggestion to have a separate rough sleeper strategy
2. **Exploration of hidden homelessness** – some commented on the rising significance of those who are deemed to be 'hidden homeless' and that there was little mention of this in the strategy. As a result, we have committed to understanding our service users' journeys more in order to identify those who could become the hidden homeless at the earliest stage possible
3. **Focused on using more accessible language** – some felt the language used need to be simplified in order for it to be accessible. Parts of the strategy were rewritten in order to accommodate this
4. **Focus on providing better information about housing supply and demand, and housing training for providers and residents** – many felt they were unable to give the best quality housing advice due to being unclear on housing legislation and procedures within Haringey Council. We have responded to this in the strategy by making a commitment to provide better quality information on housing needs issues and offer training to Haringey Council staff, partners and providers

All of these recommendations appear in the Homelessness Strategy.

Following the formal consultation, on 9 February 2017, the Oversight and Scrutiny Committee reviewed the Homelessness Strategy against its Social Inclusion Report, and was satisfied with the strategy.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

Summary of section 3

1. Sex *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

Homelessness Strategy
It is reasonable to infer that women are more vulnerable to becoming homeless, with 75% of those in temporary accommodation being female and a small proportion approaching services due to domestic violence. With the Homelessness Strategy outlining commitments to work with different groups to prevent homelessness and help improve life for those in temporary accommodation, we can infer women will disproportionately, but positively, benefit from the commitments made in the strategy due to making up such a large proportion of homeless applicants.

Female rough sleepers face particular barriers to accessing support and have a significantly reduced life expectancy of 43 years, 4 years shorter than that of a rough sleeping man. We know that many women avoid rough sleeping by sofa surfing, staying in abusive relationships or living in squats, crack houses and brothels. A higher proportion of women than men will have also had specific traumatic experiences that led to their homelessness such as domestic abuse and perhaps having their children taken into care. Consequently, women who are sleeping rough often have more complex needs than men, including mental and physical health issues, substance use issues, offending histories and involvement in prostitution.

The Homelessness Strategy makes a commitment to undertaking a review of our Single Homelessness to ensure that the provision is fit for purpose and appropriate for the needs of vulnerable people, including rough sleepers. This will include reviewing availability of Haringey's current Assessment Centre, 24-hour supported provision, women-only services and other options such as Housing First to ensure the needs of people with severe and multiple disadvantages are met.

2. Gender reassignment *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact		Unknown Impact	x

We do not hold data on gender reassignment so cannot assess this. However, it is likely that the homelessness strategy will have a neutral impact.

3. Age *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

Homelessness Strategy
Since 65% of those currently residing in temporary accommodation are aged 25-44 this should have a positive impact on this group as we can infer they are more likely to be vulnerable to homelessness. With approximately 50% of the 10,000 individuals living in temporary accommodation being children, and there being clear commitments to support families and improve the lives and prospects of those living in temporary accommodation, the Homelessness Strategy will have a positive impact on those 18 years and younger.

Evidence shows that rough sleepers suffer poor health outcomes at a disproportionately early age. A woman sleeping on the streets has a life expectancy of 43 years and a man 47 years; lower than even the most poverty-stricken and war-torn countries in the world. Between 2010 and 2016 in London alone, an average of one person a fortnight died while rough sleeping, or within a year of rough sleeping. The Homelessness Strategy addresses these inequalities therefore will have a positive impact on the life expectancy of rough sleepers.

4. Disability *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

In 2016/17, 31% of people accessing our Single Homeless pathway were identified as having a primary mental health need and 25% have an offending background. In addition, 48% of rough sleepers had a mental health need and was the primary reason for sleeping rough. With the commitments outlined previously, it clear the Homelessness Strategy will have a disproportionate but positive impact on those with a mental health need who may be vulnerable to or currently homeless.

5. Race and ethnicity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

There are a higher percentage of black tenants in council housing, social housing and on the housing register than across borough as a whole. With 44% of households in temporary accommodation identifying as black it is clear strategies which improves the lives of those living in temporary accommodation and vulnerable to homelessness will disproportionately but positively benefit this group.

6. Sexual orientation *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

LGBTQ+ people comprise up to 24% of the young homeless population nationally. Sexual orientation data specific to Haringey is not available but nationally, 69% of LGBT homeless young people have experienced familial rejection, abuse and violence.

The Homelessness Strategy make clear commitments that will benefit those in the LGBTQ+ community who are more vulnerable to homelessness and rough sleeping. Therefore, it is reasonable to infer that the strategy will have a disproportionate but positive impact on young people who identify as LGBTQ+.

The Homelessness Strategy also makes an additional commitment to provide a family mediation service, which will prove beneficial to young people who identify as LGBTQ+ who, as evidence suggests, are likely to face familiar rejection, abuse or violence. Alongside this, the strategy commits to upskilling staff and ensuring our services are LGBTQ+ friendly.

7. Religion or belief (or no belief) *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact		Unknown Impact	x

There is no sufficient evidence to suggest that one particular religion will be disproportionately affected by the adoption of the Homelessness Strategy. All homelessness services are allocated based on the need and therefore it is reasonable to infer that no religion will be disproportionately impacted by the implementation of the strategy.

8. Pregnancy and maternity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

Homelessness Strategy

With 75% of those in temporary accommodation being female and a high proportion being the head of a single parent household it is clear women are more vulnerable to becoming homeless. With the Homelessness Strategy outlining commitment to work with different groups to prevent homelessness and help improve life for those in temporary accommodation, the strategies are highly likely to have a positive impact on women. With approximately 50% of the 10,000 individuals living in temporary accommodation, and there being clear commitments to support families and improve the lives and prospects of those living in temporary accommodation, this strategy will have a positive impact on those 18 years and younger.

9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

Positive		Negative		Neutral impact	X	Unknown Impact	

There is no evidence to suggest the Homelessness Strategy will have an impact on those who are/are not in a marriage or civil partnership.

10. Groups that cross two or more equality strands e.g. young black women

- Black single mothers – as outlined previously
- Young people who identify as LGBTQ+ - as outlined previously

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?**
  This includes:
  a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
  b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**
  c) **Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low**
- **Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?**

The Homelessness Strategy will not result in any direct or indirect discrimination for any group. The strategy will provide residents with more support, which will either prevent them becoming homeless, improve their outcomes if not preventable and help those who are currently homeless.

The implementation of this strategy will improve services and support for vulnerable residents, many of whom are covered by multiple protected characteristics. The commitments made will prevent and/or better experiences of homelessness across the borough.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	*N*
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

The Homelessness and Strategy will be owned by the Priority 5 Board, with Alan Benson as the responsible officer for its delivery. The Homelessness Strategy and Commissioning Team will develop a delivery plan, outlining how and when the commitments made in the strategies will be delivered, alongside clear and measureable KPIs.

Progress will be monitored by the Homelessness Forum and Priority 5 Board. By reporting progress and collecting data regularly we will be able to monitor the impact for particular groups and thus can adapt support and service provision according to ensure outcomes are delivered.

7. Authorisation

EqIA approved by ..... (Assistant Director/ Director)	Date .....

8. Publication

Please ensure the completed EqIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqIA process.

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Report for: **Cabinet 6 March 2018**

Title: **Rough Sleeping Strategy**

Report authorised by: **Helen Fisher, Interim Strategic Director of Regeneration, Planning and Development**

Lead Officer: **Alan Benson - Head of Housing Strategy & Commissioning**

Ward(s) affected: **All**

Report for Key/ Non Key Decision: **Key**

1. Describe the issue under consideration

1.1 The Council adopted a new Housing Strategy in November 2016, with a strategic objective to "Improve support and help to prevent homelessness". This set out a broad approach to homelessness, focusing on advice and prevention, alongside a new approach to temporary accommodation and the allocation of affordable housing.

1.2 Following joint work with the Homelessness Forum, the Council developed and consulted on a draft Homelessness Strategy between 14 November 2016 and 19 January 2017. However, a decision was taken to pause the formal adoption of the draft Homelessness Strategy, pending clarity around the implications of the Homelessness Reduction Bill (which received Royal Assent in April 2017) and levels of funding to be made available when the Temporary Accommodation Management Fee was replaced with the Flexible Homelessness Support Grant, again in April 2017.

1.3 This report sets out the new Rough Sleeping Strategy, which has been developed that consultation and subsequent further work with the Homelessness Forum, service users and other strategic partners. This new strategy sits alongside the new Homelessness Strategy.

2. Cabinet Member Introduction

2.1 Homelessness is a blight on communities and individuals, with significant human and financial costs. It is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country and growing numbers of rough sleepers. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.

2.2 Our vision is that Haringey is a place where we all work together to prevent and resolve homelessness and rough sleeping. Our objectives are:

- to reduce the financial and human costs of homelessness - through intervening earlier to prevent homelessness, increasing the supply of accommodation available and meeting the needs of those already in Temporary Accommodation, and
- to deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities - through rapid intervention to offer a route off the street for all, improving health, wellbeing and resilience and tackling street activity associated with rough sleeping.

2.3 The draft Rough Sleeping Strategy presented here has been developed collaboratively with partners across the borough including statutory service providers, voluntary and community organisations, and people using our services. Officers will continue working closely with these groups and individuals as we develop our strategic delivery plan.

2.4 The Homelessness Strategy sets out our broad strategic vision, objectives and the overarching principles that inform our approach to addressing homelessness in Haringey, as well as summarising the harms and costs to people and communities caused by homelessness and rough sleeping. Our commitment to preventing homelessness at an earlier stage applies equally to single vulnerable people who may be at risk of rough sleeping as it does to families. However, in recognition of growing numbers of rough sleepers in Haringey, and the particular harms to people and communities that sleeping on our streets causes, we have developed a standalone Rough Sleeping Strategy to accompany the Homelessness Strategy. In this strategy, we identify an additional three priorities to those in the Homelessness Strategy, which we think are essential to effectively address rough sleeping in the borough.

3. Recommendations

It is recommended that Cabinet:

3.1 Notes the Equalities Impact Assessment at Appendix 2

3.2 Approves the draft Rough Sleeping Strategy set out in Appendix 1, and, in particular, the priorities of the strategy which are as follows:
(a) Rapid intervention to offer a route off the street for all (as set out in section 7.4)
(b) Improving health, wellbeing and resilience (as set out in section 7.5)
(c) Tackling street activity (as set out in section 7.6)

4. Reasons for decision

4.1 Homelessness in Haringey remains a persistent challenge, with the second highest level of homelessness in the country. A radically different approach that drives whole systems change is necessary. Haringey needs a new culture for dealing with homelessness; rooted in honesty about what is and is not possible and based on finding solutions and offering support.

4.2 The strategic vision and priorities set out in the Rough Sleeping Strategy will guide our homelessness prevention and relief activities with partners and our communities over the coming years. The strategy is necessary to ensure our approach is appropriate, co-ordinated and that we are held to account on delivery.

4.3 The recommendation in 3.1 is to ensure the Council has met its duties under the Equality Act 2010.

4.4 The recommendation in 3.2 is to ensure that the Council specifically addresses the significant increase in rough sleeping in the borough and asks for a clear, distinctive and specific commitment from partners and residents.

Alternative options considered

4.5 Not to produce a Rough Sleeping Strategy
It is not mandatory to have a standalone Rough Sleeping Strategy. However, there has been a significant increase in rough sleeping in the borough. There has also been an ask of the council for a clear, distinctive and specific commitment to address this issue from partners and residents. Therefore, not having a standalone Rough Sleeping Strategy would fail to signal the Council's intent on this issue and its commitment to act on feedback from stakeholders.

5. Background information

Strategic context

5.1 *Local Strategic context*
This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the Corporate Plan notes, "We will provide realistic and achievable options for people to find housing or alternative housing." Further details of the local strategic context are set out in section 7 and in the strategy.

New legislation and responsibilities

5.2 Since the previous Homelessness Strategy, there have been a number of important pieces of legislation, including the Localism Act 2012, the Housing and Planning Act 2016 and recently the Homelessness Reduction Act 2017, which will come into force in April 2018. These are all reflected in the Rough Sleeping Strategy as appropriate.

Reduction in the incomes of households vulnerable to homelessness

5.3 There have also been significant changes to the ability of households to sustain private sector tenancies. This is partly because of new legislation, such as the Welfare Reform and Work Act 2016, which caps the maximum income households on benefit can receive. The Overall Benefit Cap limits maximum benefits that a London family can receive to £23,000 per year, for couples and families with children, and £15,410 for single people without children, with the benefit removed from the housing element. This has resulted in an average reduction of £14.16 a week in the incomes of Haringey's low-income working-age households.

5.4 At the same time private sector rents in Haringey have continued to rise faster than incomes, while the government has frozen increases in Local Housing Allowance (LHA) rates for 4 years from April 2016 meaning fewer properties are available within these rates.

Supply and demand for housing

5.5 Haringey continues to experience a high level of demand for help with housing. As at 1st November 2017, 3,049 Haringey households were living in council-provided temporary accommodation. A recent report by Shelter ranks Haringey as second only to Newham in having the highest rates of recorded homelessness in the country, with one in every 29 people in the borough either sleeping rough or living in temporary accommodation provided by the council.

5.6 In 2016/17, 967 households asked the council for help because they were threatened with homelessness. In 435 cases, the council was able to help them avoid becoming homeless. Homeless acceptances in Haringey have decreased from a peak of 762 in 2013/14 to 686 in 16/17, in contrast to the London picture of increasing acceptances over this period. Numbers in temporary accommodation have now started to reduce, largely due to success in preventing and relieving homelessness, with 3,049 households in TA on 1st November 2017. Loss of a private rented sector tenancy remains the most common reason for homelessness, alongside friends and family asking the person to leave.

5.7 Haringey's annual supply of new and relet social rented accommodation has reduced by 50% since 2011, so the Council cannot hope to meet the housing needs of those presenting as homeless through the allocation of social housing alone. Estate regeneration offers opportunities for new affordable homes to be built in Haringey; however, the benefits of these projects in terms of new affordable supply may not be seen for several years. The social rented sector accounts for just under 30% of properties in the borough with the remainder in the private rented sector. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.

Funding context

Flexible Homelessness Support Grant

5.8 Temporary accommodation costs for homelessness households have previously been met by central government through the Temporary Accommodation Management Fee (TAMF) paid through the Housing Benefit system. The overheated rental market in the capital led to this being increasingly topped up by boroughs' General Funds, reducing the ability of councils to fund other services. In Haringey, we currently spend c£7m of our General Fund on Temporary Accommodation.

5.9 Our ability to meet these targets depends on our ability to:

- achieve ongoing reductions in the number of households entering Temporary Accommodation by preventing homelessness
- reduce the length of time people stay in Temporary Accommodation by moving them on to alternative housing options more quickly – i.e. by increasing the supply of affordable private rented sector accommodation and empowering people to take these options up successfully
- reducing the overall cost of Temporary Accommodation by, for example, obtaining better deals with landlords or purchasing open market stock

5.10 In April 2017, the Temporary Accommodation Management Fee (TAMF) was replaced by the Flexible Homelessness Support Grant (FHSG). The grant offsets the loss in Housing Benefit subsidy, with the remainder ring-fenced for 'work to prevent or deal with homelessness'. The new grant is intended to empower councils with the freedom to support the full range of homelessness services, based on what can be demonstrated to be effective locally. FHSG represents the primary source of additional revenue funding for the delivery of our Rough Sleeping Strategy.

5.11 Haringey has received its FHSG allocations for 2017/18 and 2018/19, with further announcements on 2019/20 expected in spring 2018. Officers anticipate the amount available in 2019/20 will be significantly reduced and are currently working to a projected allocation of £1.6m.

5.12 This funding is ringfenced for homelessness work, in as much the Ministerial Statement to both houses made by the Minister for Local Government on 15th March 2017 on announcing the funding identified that that "*In order to manage the transition to a new funding regime carefully, we are ring-fencing the grant for two years to ensure it is spent on homelessness services"* DCLG's covering email to

the Haringey of 16th March 2017, accompanying the grant notification included the requirement that: "*The grant is ringfenced for an initial period of two years and during that time may be used only to prevent or deal with homelessness"*

5.13 The Housing Benefit offset for 2017/18 that must be paid for from the FHSG is projected to be £2.9m. In addition £800,000 of the 2017/18 funding will be used to offset the General Fund overspend on temporary accommodation. Future funding allocations are likely to be closely linked to Council's proven ability to spend these resources effectively to prevent homelessness at scale.

Other funding available

5.14 Haringey has been allocated £1,235,883 'New Burdens funding', spread over the three years 2017/18 to 2019/20, in order to meet the requirements of the new Homelessness Reduction Act.

5.15 Using its General Fund, Haringey already commissions a range of services offering both accommodation and community-based support to vulnerable people. These services aim to prevent homelessness and promote independence, enabling people to remain in the community rather than be forced into more expensive institutional settings such as residential care or hospital. Over the three years 2017/18 to 2019/20 this amounts to £11,776,387.

5.16 In addition, in 2017, DCLG awarded Haringey £397,875 over 3 years to deliver a range of new services to address the growing levels of rough sleeping seen in the borough.

Consultation and strategy development

5.17 Following the publication of the Housing Strategy, the council consulted on a new Homelessness Strategy as part of its wider consultation on policies to meet housing need – alongside the Allocations Policy, the Tenancy Strategy and intermediate housing. This consultation took place over 9 weeks between 14 November 2016 – 19 January 2017 and received 328 responses.

5.18 Over 11,000 council tenants, temporary accommodation residents, sheltered accommodation residents and households on the housing register were emailed and invited to take part in the consultation. There were a series of public drop in events, held throughout the borough during November and December 2016, where information was provided to residents on the policy proposals and assistance given in completing the questionnaire. A total of 135 residents attended the four public drop-in events.

5.19 The consultation was advertised through both Haringey Council and Homes for Haringey websites, the Bridge Renewal Trusts Community Impact Bulletin. Paper copies of the consultation booklet were available at Station Road, Marcus Garvey and Wood Green customer service centres where customer services officers were asked to inform tenants about the consultation. In addition, all Homes for Haringey resident groups in the Borough were contacted.

5.20 The results of the consultation are outlined below. As the consultation was one that consulted on four key housing policies, only the questions related to the

Homelessness Strategy have been included below. The table below outlines the results. A total of 328 residents responded to the consultation.

Question	Agree	Disagree
Question 2a: Do you think that the extent and cause of homelessness in the borough have been correctly assessed in the plan?	57%	43%
Question 4a: Do you think the plan has accurately assessed the impact of homelessness demand, for example, the amount of temporary accommodation required and the support homeless households need in moving on to a settled home?	58%	42%
Question 5a: Do you think the plan correctly analyses rough sleeping in the borough and included actions which will reduce it?	64%	37%
Question 6a: Does the plan include the right priorities?	66%	34%
Question 7a: Does the plan include the right actions to deliver out priorities?	71%	29%

5.21 There was support for the priorities and actions in the Draft Homelessness Strategy as well as the Council's assessment of housing supply and demand and its analysis of rough sleeping in the borough. Most respondents took the opportunity to comment on their personal circumstances but recurring themes included the need for the council or its partners to build more genuinely affordable housing and for some sort of rent control to be introduced in the private rented sector, to reduce or stop rents from increasing.

5.22 A presentation on the findings of this consultation was made to the Overview and Scrutiny Committee on 9th February 2017 and the accompanying report is attached at Appendix 3.

5.23 The consultation was also presented and promoted to partners at a series of forums. In particular, the Council worked in partnership with the Homelessness Forum and Core Group to develop the strategies, including setting out the strategic vision, overarching principles, and priorities. The Forum included workshops on the strategy before, during and after the formal consultation period from 14 November 2016 to 29 January 2017.

5.24 Following the public consultation, a decision was taken to pause development of the Homelessness Strategy pending more detail on the Homelessness Reduction Act becoming available. The Homelessness Reduction Act received Royal Assent in April 2017 and a revised draft Homelessness Code of Guidance was published in October 2017. The strategy has been refined and updated to reflect the implications of the Act and the new guidance, and other key changes since the draft was initially published, such as the new Supported Housing funding regime. During this time, the Council has undertaken further consultation events with key stakeholders from across the partnership and with people using homelessness services.

5.25 The Homelessness Forum was strongly of the view that the Council should produce a separate Rough Sleeping Strategy, to address this growing issue with

specific challenges for the borough. The Forum also encouraged the Council to prioritise exploring hidden homelessness, in light of this too becoming an increasing problem that needs to be addressed.

5.26 A Rough Sleeping Strategy consultation process was then undertaken with professional stakeholders including Community Safety & Enforcement, the Metropolitan Police, Public Health, Homes for Haringey, Bringing Unity Back into the Community (Bubic), The Grove, Haringey Advisory Group on Alcohol (HAGA), accommodation providers, Thames Reach and St. Mungo's. The consultation involved three workshops, namely: identifying the key priority areas for the strategy, recognising the assets and strengths we have within Haringey and deciding what our strategic goals should be. Part of this exercise was to look at the need more information and data to inform policymaking and delivery.

5.27 The key themes that arose through the consultation were the need for a single homeless hub, for greater capacity within our outreach team, for an accommodation pathway that better meets the needs of its users, and for the process to access help to be less bureaucratic and more flexible for rough sleepers and single people with multiple and overlapping disadvantages. These recommendations are reflected in the Rough Sleeping Strategy.

5.28 A further Rough Sleeping Strategy consultation process was also held with a number of former rough sleepers in a mixture of one-to-one sessions and in a focus group. These consultations involved discussions on: what could have been done to prevent the individuals ending up on the streets, what worked for them whilst on the streets and their priorities.

5.29 One key theme that arose in this part of the process was that there were times for all individuals where, if the appropriate support had been given, the rough sleeping could probably have been prevented. As a result, the need for more prevention support appears heavily in the Rough Sleeping Strategy. Further themes were around the need for greater support with physical and mental health. Again, commitments are made in order to address these in the Rough Sleeping Strategy.

Main themes of the strategy

5.30 The Rough Sleeping Strategy sets out four ways in which the Council intends to change the way it works to enable it to deliver its objectives on homelessness and rough sleeping. It then goes on to then identify three key priorities for delivery.

How we will change what we do:

5.31 **Providing strategic leadership and building collaborative partnerships:** The council cannot deliver the outcomes needed on its own. Its role is to act as a platform, building capacity, sharing information and providing direction, enabling all the players to come together to deliver change. This will require us to build trust and transparency and deliver consistent messages across the partnership.

5.32 **Making prevention everyone's responsibility:** The best way to tackle homelessness is to prevent it from happening in the first place. All members of our partnership, including homeless people themselves, have a role to play and responsibilities in this. We must find new ways to integrate our homelessness

prevention work with other services who also meet people in housing need, enabling us to intervene earlier and more effectively.

5.33 **Commissioning more effectively to better meet local need:** We will use modern strategic commissioning practices to better understand local need, effectively manage resources and plan and deliver services. These practices will deliver improved value for money, a renewed focus on outcomes, quality and customer satisfaction and better integration with the local partnership.

5.34 **Delivering in and with our community:** Our approach to addressing homelessness recognises the strengths and assets that individuals and communities already have within them. Our offer of help will build on these strengths, empowering individuals and communities to build their resilience and self-sufficiency so they are less dependent on services in the future.

Rough Sleeping Strategy priorities

5.35 **Priority 1. Rapid intervention to offer a route off the street for all:** The Rough Sleeping Strategy acknowledges that it is unacceptable for people to be sleeping on the streets and pledges to intervene quickly and offer everyone a route off the street. The approach proposed to achieve this includes: increasing our capacity to identify people earlier, improving the support we offer to help the person off the street and, as a last resort, taking co-ordinated enforcement action to prevent ongoing harm to individuals and communities. In acknowledgement that there is no 'one size fits all' approach to which route off the street will be right, the strategy commits to explore the full range of appropriate options and offer holistic support to address other, overlapping issues.

5.36 **Priority 2. Improving health, wellbeing and resilience:** The Rough Sleeping Strategy commits to working with partners to reduce the severe health inequalities faced by rough sleepers. We intend to achieve this by improving data collection, increasing access to health services and refocusing on health, wellbeing and resilience outcomes. In addition, there is a commitment to undertake a health needs audit and create a health 'passport' to improve our understanding of and track outcomes for single homeless people in our supported housing pathway. Alongside this, there will be efforts made to ensure Haringey services meet the 'Psychologically Informed Environment' (PIE) standard.

5.37 **Priority 3. Tackling street activity associated with rough sleeping:** The Rough Sleeping Strategy commits to developing a coordinated approach to tackling street activity associated with rough sleeping such as begging, street drinking and drug taking, ensuring that the harms this behaviour causes are minimised. It also outlines a commitment, as a last resort and in coordination with ongoing offers of support, to take enforcement action against individuals or groups who persist in such behaviour. There is also an assurance in place that vulnerable people displaced as a result of enforcement action are protected and have a plan in place to prevent them rough sleeping.

Contribution to strategic outcomes

5.38 This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the

Corporate Plan notes, "*We will provide realistic and achievable options for people to find housing or alternative housing."*

5.39 The Corporate Plan Priority 5 includes the objective to "Prevent homelessness and support residents to live fulfilling lives" and aims to assess success in this objective by measuring both the number of households where homelessness has been prevented and the number of households who have been helped into settled homes, whether in the social rent or private rented sector. The Homelessness Delivery Plan aims to drive this objective forward and improve performance in this area.

5.40 As set out in the report, this policy supports the delivery of Objective 2 of Haringey's Housing Strategy 2017-2022 Objective 2 – Improve support and help to prevent homelessness:

- Provide timely and effective housing advice to help those in crisis or threatened with crisis to sustain their existing accommodation if possible. This will be at the first point of contact with the council and its partners but increasingly we want to intervene before an approach is made, where risk of homelessness can be identified.
- Act at all times to prevent homelessness but where current accommodation cannot be sustained, to provide advice on realistic options and assistance to secure suitable affordable accommodation.
- Provide suitable and affordable emergency or temporary accommodation when necessary, in accordance with fair and transparent criteria, while overall reducing the number of households in temporary accommodation and the cost of it to the local taxpayer.
- Allocate council tenancies and intermediate tenures in accordance with fair and transparent criteria, both at the commencement and when reviewing the expiry of a fixed term council tenancy

6. Statutory Officers comments

Finance comments

6.1 This proposed strategy would give the Council a clear direction in tackling rough sleeping in the borough. Failure to respond to the homelessness crisis could result in continuing pressures on Temporary Accommodation budget.

6.2 The pressures faced in relation to increasing homelessness and temporary accommodation has been widely reported. These pressures, together with savings anticipated from measures being implemented have been included in the Medium Term Financial Plan.

6.3 Any financial implications arising from the Homelessness Reduction Act will be reported to Members alongside the established budget monitoring and performance monitoring reports.

6.4 The actions and activities set out in the detailed strategy and framework will be funded from existing budgets and Flexible Homelessness Support Grant (FHSG).

6.5 There has been one-off funding agreed from FHSG in 2017/18 to support work on prevention as identified in the strategy and action plan. Where appropriate, and reducing spending pressures, other investment supporting the strategy may be funded on an “Invest To Save” basis”. Financial implications will be developed alongside such proposals.

Procurement comments

6.6 Strategic Procurement notes the contents of this report and the associated strategy documents. Strategic Procurement will provide the required support to assist the council in the delivery of this strategy; however, it should be noted the commissioning of temporary accommodation is an activity that is undertaken by Homes for Haringey, with Strategic Procurement providing limited support in developing this category.

Legal comments

6.7 The Assistant Director for Corporate Governance has been consulted in the preparation of this report and comments as follows. Legal Implications are otherwise set out in the body of this report. He sees no legal reason why the Recommendations should not be followed.

6.8 There is no legal requirement for the Council to maintain a Rough Sleeping Strategy as such. That Strategy sits as a discrete part of the main Homelessness Strategy.

6.9 The Homelessness Reduction Act 2017 (“the new Act”) imposes upon local housing authorities new “assessment” “prevention” and “relief” duties to those whom the authority is satisfied are eligible and either homeless or threatened with homelessness within 56 days. These duties require authorities to:

- provide personalised written housing assessments including agreed plans setting out the steps that the authority considers it and the applicant should reasonably take to secure accommodation for the applicant ("assessment")
- take reasonable steps to help an applicant threatened with homelessness to secure that their accommodation does not cease to be available ("prevention")
- take reasonable steps to secure that suitable accommodation becomes available (for at least 6 months) to a homeless applicant ("relief")

6.10 These new duties apply to all those who are homeless or threatened with homelessness, irrespective of whether they have a priority need; and apply in addition to the existing duties to those who are in priority need.

6.11 The new Act also places a duty upon specified public authorities (to be specified by statutory instrument, but expected to include a range including the armed forces, hospitals, prisons and other institutions) to refer those whom they believe may be homeless or threatened with homelessness, and who agree to be referred, to the local housing authority of the applicant's choice. The draft Code of Guidance issued by the MHCLG recommends that local housing authorities set up procedures to deal with these referrals, including establishing protocols with likely local referrers.

Equality comments

6.12 The council has a public sector equality duty under the Equality Act (2010) to have due regard to; tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation); advance equality of opportunity between people who share those protected characteristics and people who do not; and foster good relations between people who share those characteristics and people who do not.

6.13 The potential impact of the new strategy has been assessed during and after consultation. The Rough Sleeping Strategy identifies particular groups at risk of rough sleeping, including those with protected characteristics. The Equality Impact Assessment (EqIA) sets out how the Rough Sleeping Strategy address the needs of these groups. The EqIA is attached as Appendix 1.

7. Use of Appendices

Appendix 1 Proposed new Rough Sleeping Strategy

Appendix 2 Equalities Impact Assessment

8. Local Government (Access to Information) Act 1985

Background papers:

Corporate Plan 2015-2018
http://www.haringey.gov.uk/sites/haringeygovuk/files/corporate_plan_2015-18.pdf

Housing Strategy 2017-2022
http://www.haringey.gov.uk/sites/haringeygovuk/files/housing_strategy_2017-2022.pdf

Homelessness Strategy 2012-14
http://www.haringey.gov.uk/sites/haringeygovuk/files/homelessness_strategy_2012-14.pdf

Overview and Scrutiny Panel report February 2017 *"Consultation on Four Policies to Meet Housing Need"*
http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=128&MId=8066&Ver=4

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Title	**Draft Rough Sleeping Strategy**				
Version	21	Date	01.02.2018	Author	AB

Rough Sleeping Strategy 2018

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Cabinet Member foreword (INSERT)

I am pleased to introduce Haringey Council's Rough Sleeping Strategy 2018.

London's housing crisis is keenly felt by many people, but none more so that those who find themselves with no home at all. Tackling homelessness and the harms associated with it is one of the greatest challenges we face as a society. This is particularly the case in Haringey, where levels of homelessness and rough sleeping are unacceptably high.

Meeting this challenge will require a radical change in how we work; simply carrying on as we did before will not deliver the reduction in homelessness that is necessary. We do not have enough social housing to meet demand from homeless people, and we will increasingly rely on the private rented sector to offer solutions. This will involve securing more affordable, decent homes and ensuring that the people moving in to them have the resources and support to manage them sustainably.

But we can no longer simply deal with the consequences of homelessness once a crisis has happened. Our new approach is underpinned by the same principles that drive the Homelessness Reduction Act, which represents a new statutory framework for local authorities and enshrines in law the requirement to intervene earlier and prevent homelessness wherever possible.

Homelessness is the symptom of a complex interaction between a person's specific situation and a range of structural and social factors that are often beyond their control. If we are to successfully tackle homelessness, we need to find new ways of addressing these root causes; poverty and disadvantage, unemployment, poor health and wellbeing and lack of access to affordable, decent homes.

Our focus on prevention will involve working more closely with people using services to understand their strengths, and support them holistically to achieve their goals. Over the life of this strategy, we will build on existing services and continuously improve service delivery. We will forge new relationships with our partners, encouraging them to identify people who may be at risk of homelessness at the earliest opportunity. We will bring our offer of help into the community, establishing place-based services using co-location and partnership working to increase prevention activity. And we will engage the wider statutory and voluntary sector to address the support needs that may otherwise contribute to homelessness, with a focus on systems change to deliver sustainability.

This is an exciting time, full of opportunity, and there is much to do. I would like to thank the many different organisations who have worked with us to develop this shared understanding of the issues we face, the role they can play in tackling homelessness and what our expectations and hopes are for the future.

Executive summary

OUR VISION AND OBJECTIVES

Haringey's Strategic Vision

Haringey is a place where we all work together to prevent and resolve homelessness and rough sleeping

Objectives

Homelessness: We will reduce the financial and human costs of homelessness through intervening earlier to prevent homelessness, increasing the supply of accommodation available and meeting the needs of those already in Temporary Accommodation.

Rough Sleeping: We will deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities through rapid intervention to offer a route off the street for all, improving health, wellbeing and resilience and tackling street activity associated with rough sleeping.

Homelessness is a blight on communities and individuals, with significant human and financial costs. It is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country[1]. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.

We have collaboratively developed our Homelessness and Rough Sleeping strategies with partners across the borough including statutory service providers, voluntary and community organisations, and people using our services. We will continue working closely with these groups and individuals as we develop our strategic delivery plan.

The main Homelessness Strategy sets out our broad strategic vision, objectives and the overarching principles that inform our approach to addressing homelessness in Haringey, as well as summarising the harms and costs to people and communities caused by homelessness and rough sleeping. Our commitment to preventing homelessness at an earlier stage applies equally to single vulnerable people who may be at risk of rough sleeping as it does to families. However, in recognition of growing numbers of rough sleepers in Haringey, and the particular harms to people and communities that sleeping on our streets causes, we have developed this standalone Rough Sleeping Strategy to accompany the Homelessness Strategy. In this strategy, we identify an additional three priorities that we think are essential if we are to effectively address rough sleeping in the borough.

HOW WE WILL CHANGE WHAT WE DO

In order to deliver this, we must work together to change the 'ecosystem' within which homelessness prevention and relief services exist. We have identified the

[1] Shelter: Far from Alone Homelessness in Britain November 2017

following overarching principles to guide us in redesigning our systems to deliver these objectives:

Providing strategic leadership and building collaborative partnerships
The Council cannot deliver the outcomes needed on its own. Its role is to act as a platform, building capacity, sharing information and providing direction, enabling all the players to come together to deliver change. This will require us to build trust and transparency and deliver consistent messages across the partnership.

Making prevention everyone's responsibility
The best way to tackle homelessness is to prevent it from happening in the first place. All members of our partnership, including homeless people themselves, have a role to play and responsibilities in this. We must find new ways to integrate our homelessness prevention work with other services who also meet people in housing need, enabling us to intervene earlier and more effectively.

Commissioning more effectively to better meet local need
We will use modern strategic commissioning practices to better understand local need, effectively manage resources and plan and deliver services. These practices will deliver improved value for money, a renewed focus on outcomes, quality and customer satisfaction and better integration with the local partnership.

Delivering in and with our community
Our approach to addressing homelessness recognises the strengths and assets that individuals and communities already have within them. Our offer of help will build on these strengths, empowering individuals and communities to build their resilience and self-sufficiency so they are less dependent on services in the future.

WHAT WE WILL DELIVER - HOMELESSNESS

Priority 1: Intervening earlier to prevent homelessness

- We will identify the specific triggers, risk factors and causes of homelessness at different points in people's lives. Building on that, we will develop a range of interventions specifically targeted at addressing these.
- These interventions will take place at a universal, targeted and crisis prevention level and will be available to the general population, specific individuals in housing need and within the local community partnership.

Priority 2: Increasing the supply of accommodation available

- We urgently need to access more affordable, safe and suitable homes for people in housing need.
- Our approach to increasing the supply of homes will include;
    - maximising the supply of social rented units available
    - securing more affordable tenancies in the private rented sector
    - increasing the length of tenure and quality of these homes.
- We will also review and modernise our supported housing provision in line with the Supported Housing Review

Priority 3: Meeting the needs of those already in Temporary Accommodation

- We will develop a range of housing options tailored to the individual needs, aspirations and capabilities of the c3,000 households currently living in TA.
- We will build our understanding of what households in Temporary Accommodation want and need by;
    - undertaking research and developing better data on outcomes
    - focus on improving the health, resilience and wellbeing of people in Temporary Accommodation
    - ensuring that we work with everyone in Temporary Accommodation to develop a personalised, realistic 'move on plan'

WHAT WE WILL DELIVER - ROUGH SLEEPING

Priority 1: Rapid intervention to offer a route off the street for all

- Rough sleeping is harmful to communities and individuals, and it is unacceptable for people to be sleeping on the streets. We will intervene quickly to offer everyone a route off the street
- Our approach will include; increasing our capacity to identify people earlier, improving the support we offer to help the person off the street and, as a last resort, taking co-ordinated enforcement action to prevent ongoing harm to individuals and communities
- There is no 'one size fits all' approach to which route off the street will be right; we will explore the full range of appropriate options and offer holistic support to address other, overlapping issues

Priority 2: Improving health, wellbeing and resilience

- We will work with our partners to reduce the severe health inequalities faced by rough sleepers by improving data collection, increasing access to health services and refocusing on health, wellbeing and resilience outcomes
- We will undertake a health needs audit and create a health 'passport' to improve our understanding of and track outcomes for single homeless people in our supported housing pathway
- We will ensure our services meet the 'Psychologically Informed Environment (PIE) standard

Priority 3: Tackling street activity associated with rough sleeping

- We will develop a coordinated approach to tackling street activity associated with rough sleeping, such as begging, street drinking and drug-taking, ensuring that the harms this behaviour causes are minimised
- As a last resort, alongside ongoing support, we will take enforcement action against individuals or groups who persist in such behaviour

1. Introduction

1.1 BACKGROUND

Rough sleeping is the most visible form of homelessness and the most damaging. It causes significant harm to individual physical and mental health, and general wellbeing and reduced life expectancy. A woman sleeping on the streets has a life expectancy of 43 years and a man 47 years, lower than even the most poverty-stricken and war-torn countries in the world. Between 2010 and 2016 in London alone, an average of one person a fortnight died while rough sleeping, or within a year of rough sleeping[2]. Rough sleeping and the street-based behaviour often associated with it, such as begging, street drinking and other forms of antisocial behaviour are also highly damaging to communities.

We believe that nobody should be sleeping on the streets, and with appropriate support, everybody can move away from the streets and live a healthier and happier life.

Haringey has, over the past few years, seen a significant increase in the numbers of rough sleepers, including a growing number from Central and Eastern European (CEE) and European Economic Area (EEA) countries. The rising number of people sleeping rough in Haringey mirrors a trend seen across all London boroughs, and is due in part to welfare reform, most notably the benefit cap, the local housing allowance cap, the reduction in the amount of benefits that CEE and EEA nationals are eligible for, and increased sanctions for those on benefits. We know that poverty and deprivation are significant drivers of all types of homelessness, including rough sleeping.

Haringey has also seen an increase in the number of rough sleepers with a range of overlapping and multiple disadvantages, such as addiction, poor physical and mental health, contact with institutions as children or adults, offending histories and experiences of trauma. As a result, we are committed to improving the outcomes for rough sleepers in these areas. Over the life of this strategy, we will continue to adapt and be flexible in order to meet these complex needs; ensuring that our single homeless housing-related support services are sufficient to meet demand.

Rough sleeping is an area of priority for the Council, in terms of preventing people from sleeping rough, ensuring there are swift and effective routes off the streets for everyone and providing appropriate support to improve health and wellbeing. In 2017, the Council successfully bid for £397,875 funding from the Department of Communities and Local Government to deliver improvements to our provision for rough sleepers over the period 2017-2019.

Haringey's Rough Sleeping Programme, supported by this funding, includes the following strands:

[2] St Mungo's Nowhere Safe to Stay

- A Rough Sleeping Strategy & Monitoring Coordinator to lead the programme,
- A Health Lead working in partnership with hospitals and substance misuse agencies to identify and support those at risk of homelessness or actually rough sleeping ,
- A Community Host scheme – to provide short term accommodation in the community, and
- Partnership work with organisations in the voluntary and community sector and faith-based communities.

In 2017, Haringey Council also commissioned a street outreach service to work alongside the GLA-commissioned London Street Rescue.

This Rough Sleeping Strategy was developed collaboratively by the Council, its partners and rough sleepers themselves. This commitment to partnership runs throughout the strategy. We recognise the assets within the borough: the voluntary and community sector, night and winter shelters, housing-related support providers, substance use agencies, Metropolitan Police and Community Safety and Enforcement Team, all of whom will continue to work together to improve the lives of those either currently or formerly living on the streets. We cannot do things alone.

This strategy sets out the key priorities for rough sleeping: ensuring every rough sleeper has an appropriate offer to move away from the streets, ensuring that the health and wellbeing needs of people sleeping rough are met and for a strategic approach to be taken to tackle anti-social behaviour and street-based activity associated with rough sleeping.

1.2 ABOUT THIS STRATEGY

Unlike the Homelessness Strategy, this is not a statutory strategy. That is, the Council is under no duty to produce a Rough Sleeping Strategy.

Nevertheless, the Council has decided that it should produce this document, alongside the statutory Homelessness Strategy, and treat the requirements of that statutory strategy as if they applied – for example the requirement to develop the strategy with the assistance of social services authorities, and in consultation with other bodies including registered social landlords and voluntary organisations.

Section four of the Homelessness Strategy updates the Homelessness Review, which, taken together with section two of this strategy, sets out the evidence base on which this strategy is founded.

This strategy has been developed collaboratively with our Homelessness Forum and other key partners from across the sector and wider community. In 2016, the council published an initial draft alongside a Homelessness Review. A formal consultation with individuals and families in housing need, including residents in temporary accommodation and on the housing register, was undertaken between 14th November 2016 and 19th January 2017. A report on the outcomes was taken to Haringey's Housing & Regeneration Scrutiny Panel on 9th February 2017.

Following that, a decision was taken to pause development of any Homelessness and Rough Sleeping strategies, pending more detail on the Homelessness Reduction Act becoming available. The Homelessness Reduction Act received Royal Assent in April 2017. The Rough Sleeping has now been drafted to reflect its implications and other key changes since the draft Homelessness Strategy was initially published, including the new Supported Housing funding regime. During this time, we have undertaken further consultation events with key stakeholders from across the partnership and with people using homelessness services.

One of the four key ways in which we need to change the way we work to deliver this strategy (see section five) is our commitment to delivering in and with our community. Our 'asset-based'[3] approach means that, over the life of this strategy, we are committed to working more collaboratively with people living and working in our communities to better understand their needs and how they can be empowered to share ownership of, and contribute towards, achieving the vision set out here. This approach also creates a feedback loop to enable us to monitor the extent to which the strategy is being delivered and whether it needs to be reviewed in light of this.

The Public Sector Equality Duty (Equality Act 2010) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities. As such, our approach has and will continue to be informed by the latest available intelligence when determining key actions associated with the delivery of our strategy vision

1.3 STRATEGIC VISION

This shared strategic vision will guide all our work with partners to tackle homelessness and rough sleeping. The full detail on the actions and initiatives that flow from this vision and its objectives is set out in chapters five and six of this document and in the Homelessness Strategy.

It is particularly important to read these two documents together to understand the full approach to Rough Sleeping. That is, work on homelessness prevention, which has to be central to any approach to tackling Rough Sleeping, is contained within the Homelessness Strategy. For brevity, it is not replicated in this document, but it is, of course, a key part of our shared approach.

Haringey's Strategic Vision

Haringey is a place where we all work together to prevent and resolve homelessness and rough sleeping

Objectives

Homelessness: We will reduce the financial and human costs of homelessness through intervening earlier to prevent homelessness, increasing the supply of accommodation

[3] See https://www.thersa.org/discover/publications-and-articles/rsa-blogs/2016/12/homelessness-in-oxford and http://www.altogetherbetter.org.uk/Data/Sites/1/5-assetbasedcommunitydevelopment.pdf for examples of an Asset-based approach

available and meeting the needs of those already in Temporary Accommodation.

Rough Sleeping: We will deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities through rapid intervention to offer a route off the street for all, improving health, wellbeing and resilience and tackling street activity associated with rough sleeping.

2. Rough Sleeping – The Policy Context and Evidence Base

2.1 DEFINING ROUGH SLEEPING AND STREET ACTIVITY

MHCLG defines rough sleeping as: *"People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or "bashes" which are makeshift shelters, often comprised of cardboard boxes)"*

Throughout this strategy, we refer to those who are currently rough sleeping, and to former rough sleepers currently in our single homeless housing-related supported services or otherwise being supported to stay off the streets and rebuild their lives.

A priority for this strategy is to address the street-based activity that is often associated with rough sleeping and former rough sleeping. 'Street based activity', as referred to in this strategy, includes begging, anti-social behaviour, street crime, street fouling, street drinking and street drug-use. This is not to say that everyone who engages in street behaviour is a rough sleeper; a large number of people seen begging on Haringey's streets are not, and never have been, rough sleepers. However, this behaviour blights communities and individuals alike and we know makes it harder for people entrenched in a street lifestyle to break away and change their circumstances. Therefore, it is important that we work together to address this.

2.2 LEGAL DUTIES

The **Housing (Homeless Persons) Act 1977** requires local authorities to prevent as well as respond to homelessness and assist people under imminent threat of homelessness (and classed as 'in priority need') by taking reasonable steps to prevent them from losing their existing accommodation.

Part VII of the **Housing Act 1996**, as amended by the **Homelessness Act 2002,** sets out the duties owed by local housing authorities to someone who is homeless or threatened with homelessness.

The **Homelessness Act 2002** places a specific requirement for Local Authorities to produce and implement a Homelessness Strategy. The **Localism Act 2011** enables councils to discharge their duty permanently by making use of suitable accommodation in the private rented sector.

The **Homelessness Reduction Act 2017** places a duty on Local Authorities to provide anyone threatened with or at risk of being homeless (within a 56-day period) with advice and support to prevent them becoming homeless. It also requires specified public bodies[4] to refer (with the person's consent) anyone they consider to be homeless or threatened with homelessness.

[4] At the time of writing, the public authorities with a 'duty to refer' are yet to be determined. Regulations are expected to be laid in early 2018

2.3 WELFARE REFORM

There are increasing pressures on low-income single people following welfare changes that have both affected their incomes and limited the amount of benefit payable towards housing costs. Welfare Reforms with the most significant implications for homelessness include:

- Local Housing Allowance (LHA) reductions including total LHA caps and the limiting of LHA to 30th percentile of market rents. The Government has frozen increases in LHA rates for 4 years from April 2016 meaning fewer properties are available within these rates.
- The Overall Benefit Cap, limiting the benefit that someone living in London family can receive to a maximum of £15,410 for single people without children, with the benefit removed from the housing element.
- Single person private renters under the age of 35 are only entitled to the shared accommodation rate. This means that they can only receive housing benefit at the same rate for a single room in a shared house, even if they are living in a self-contained flat.
- Universal Credit will be implemented in Haringey in October 2018. It replaces the range of unemployment benefits and housing benefit previously claimed separately and paid weekly, rolling these into one monthly payment, made directly to the claimant. Whilst DWP data shows Universal Credit has had a positive impact on labour market outcomes for new claimants in the 10 pathfinder sites, other evidence shows tenants who have moved to Universal Credit have built up significant rent arrears, with the 6-week delay in making the first payment a particular cause for concern.
- In the 2017 Autumn Budget, the government announced the removal of the 7-day waiting period, a Housing Benefit run-on period to help claimants with the cost of renting in the period before they receive their first Universal Credit payment and measures to recoup 80% of the money local authorities spend on TA directly from DWP rather than the claimant. At the time of writing, further work to assess the impact of these changes is ongoing.

2.4 FUNDING FOR SUPPORTED HOUSING

In October 2017, the government announced that it was dropping plans to apply Local Housing Allowance to supported housing and launched a fresh consultation on funding arrangements from April 2020. The proposals outline a funding regime tailored to three different types of supported housing:

- Sheltered and extra care
- Short term supported housing (including refuges)
- Long term supported housing for those with ongoing support needs

The proposal for short-term supported housing would see the rental element (currently covered by housing benefit) funded through a ring-fenced grant to local authorities. This will require local authorities to have greater oversight of services in their area, including those not directly commissioned by them, and to undertake robust needs and provision assessments to determine how funding should be used.

2.5 THE MAYOR OF LONDON'S HOUSING STRATEGY

The Mayor of London set out his vision for a new approach to tackling London's housing crisis in his draft 2017 Housing Strategy, which has 5 priorities:

1. Building homes for Londoners
2. Delivering genuinely affordable homes
3. High quality homes and inclusive neighbourhoods
4. A fairer deal for private renters and leaseholders
5. Tackling homelessness and helping rough sleepers

The Mayor of London is a key commissioner of Rough Sleeping services:

- £8.5m per year to 20/21 to fund pan-London rough sleeping services: No Second Night Out, London Street Rescue, CHAIN database, Clearing House, Routes Home scheme, StreetLink
- £4.2m from government to strengthen existing rough sleeping services and develop new ones including NSNO, a rough sleeping Social Impact Bond, a scheme with TfL to provide outreach provision on night buses and tubes.
- No Nights Sleeping Rough taskforce – dissemination of good practice and improving data collection

2.6 THE NORTH LONDON HOUSING PARTNERSHIP

Haringey is part of the North London sub-region, along with Islington, Barnet, Westminster, Camden and Enfield. The purpose of the partnership is to work collaboratively across the sub-region to:

- lobby for the interests of the North London boroughs on housing issues,
- develop collaborative working across the sub region and between boroughs,
- improve provision of housing services in North London through sharing knowledge, expertise and resources, and
- develop an excellent understanding of housing demand, needs and conditions across North London, and an understanding of how this impacts on wider strategic issues affecting local authorities;

The six boroughs making up the sub region have a strong track record in successfully applying for funding to deliver frontline services where service gaps have been identified. Since 2011, the partnership has successfully applied for funding for ten projects to assist and prevent single homelessness. As a result of these projects, over 1000 single homeless people have been rehoused since 2012.

These include a proactive, community outreach-based service to identify and assist single people at risk of homelessness, a scheme to improve access to private rented accommodation for single 'non-priority' homeless people, a service offering street outreach and reconnection for Central and Eastern European rough sleepers, and additional support for transient female rough sleepers with complex mental health problems. Most recently, the partnership was successful in its Controlling Migration Fund bid to MHCLG. This will deliver employment and accommodation support for rough sleepers with no recourse to public funds who are primarily, but not exclusively living in encampments.

2.7 THE HARINGEY POLICY CONTEXT

Haringey's Corporate Plan *Building a Stronger Haringey Together* describes the council's overall priorities and programme of work for 2015-18. It identifies housing as one of its five priorities, committing us over that period to 'Create homes and communities where people choose to live and are able to thrive'. A key objective is to: 'Prevent homelessness and support residents to lead fulfilling lives'. The council's role is to provide realistic and achievable options for people to find housing and proactively help people avoid eviction and sustain their tenancies.

Haringey's Housing Strategy 2017-2022 describes our local housing context and builds on the Corporate Plan, defining four strategic objectives:

1. Achieve a step change in the number of new homes being built
2. Improve support and help to prevent homelessness
3. Drive up the quality of housing for all residents
4. Ensure that housing delivers wider community benefits

In March 2017, the council completed a review of its supported housing which made a series of recommendations to transform Haringey's supported housing provision, with specific recommendations made regarding support for people with learning disabilities, mental health conditions, older people and vulnerable young people. The objectives of the review were to

- Maximise the reach and impact of council resources and actively contribute to financial efficiency and cost reduction
- To provide supported housing services that enable integrated housing, health and social care outcomes for the population in need

This five-year transformation programme will progress over the life of this strategy. The vision, objectives, principles and outcomes it hopes to achieve underpin our efforts to modernise and transform the help and support we offer to the some of the most vulnerable people in our society.

2.8 ROUGH SLEEPING IN HARINGEY

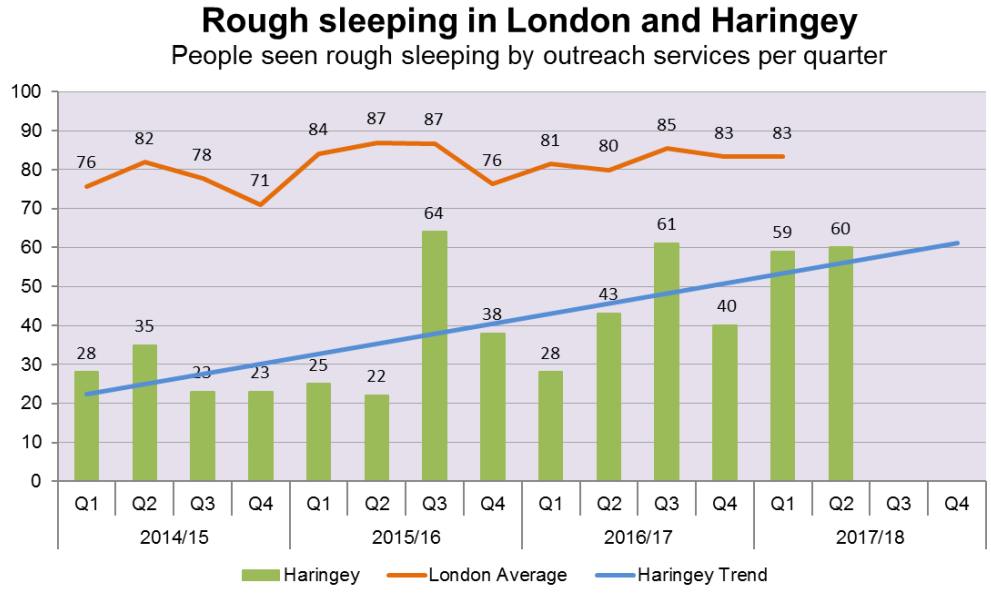
As with the policy context, the Evidence Base presented in this section, which is specific to the issue of rough sleeping, should be read alongside the wider evidence base on homelessness set out in the Homelessness Strategy.

Although rough sleepers in Haringey represent a relatively small percentage of the overall homeless population, they are by far the most visible, often the most complex, and can present with the greatest risks to both themselves and to the community.

The council uses the Combined Homelessness and Information Network (CHAIN) to monitor numbers of rough sleepers in the borough. CHAIN is a multi-agency database recording information about rough sleepers in London. We also undertake an annual street count or estimate. This entails completing a snapshot survey of the number of people known to be sleeping out on a 'typical night' between 1st October to 30th November each year.

According to CHAIN, 8108 people were seen rough sleeping in London in 2016/17, of which 146 were seen in Haringey. This is in comparison to 43 people seen rough sleeping in Haringey in 2011/12.

Numbers of rough sleepers have continued to increase, and in the first two quarters of 2017/18 were among the highest Haringey has ever seen; with 59 and 60 respectively. On the night of 23 November Haringey completed its official rough sleeper count and a total of 43 people were identified as sleeping rough on that night. This is an increase of 33% from 2016. The Haringey count figure for 2014 was a rather unlikely 1 solitary rough sleeper.



The majority, 108, of Haringey's verified rough sleepers in 2016/17 were new to the street, and of these, 78% were seen only once.

Haringey has seen an increase in numbers of rough sleepers who are from either Central and Eastern Europe (CEE) or the European Economic Area (EEA) with 38% in 2011/12 and 52% in 2016/17. As a result of changes to welfare benefits for this group from 2014, they will now have no recourse to public funds meaning it is extremely challenging for them to access accommodation and employment.

The support needs of rough sleepers in Haringey have been consistently high over the past few years. In 2016/17, 79% of the 87 rough sleepers assessed identified having support needs around one or more of alcohol, drugs and mental health.

Alcohol:	Drugs:	Mental health:	Other:
49%	43%	48%	21%

Rough sleepers currently cost public services a disproportionate amount, due to the complexity of issues they face and their use of public services in an unplanned way. An entrenched rough sleeper has been estimated to cost the public an average of

£16,000 per year[5] through demands placed on public services (compared to £4,600 for the average adult). The current pressures on finances across all partners mean it is vital that we work together to reduce these costs.

The rising numbers of rough sleepers across London and in Haringey is likely to be due to a variety of reasons. These include ongoing welfare reforms, the buoyancy of the private rented market, increasing numbers of 'hidden homeless' people living in insecure, overcrowded and inappropriate housing and wider pressures on the public sector, in health and social care and the criminal justice system in particular. However, we currently lack sufficient data on patterns of rough sleeping in Haringey to really understand the complex set of circumstances that has led to the rises we are seeing locally. Developing this intelligence and data on rough sleepers' needs, aspirations and customer journeys will be a priority for us as we develop our approach to homelessness prevention, as set out in our Homelessness Strategy.

What we do know is that for some people, the complex and overlapping traumas and life experiences that have led them to sleep rough in the first place make it much harder for them to find and keep accommodation, even when this is available to them. Individuals entrenched in substance use, with severe and often poorly-treated mental health conditions or with other complex health problems, often struggle to navigate the pathways into accommodation. If accommodation is secured, it is often hard for them to maintain it, pay bills and break away from entrenched patterns of behaviour that have been developed over their lifetime.

Evidence[6] suggests that the triggers and experiences of female rough sleepers tend to be distinct from those of men. Although fewer in number, comprising around 11% of rough sleepers in London, they face particular barriers to accessing support. We know that many women avoid rough sleeping by sofa surfing, staying in abusive relationships or living in squats, 'crack houses' and brothels[7]. A higher proportion of women than men will have had specific traumatic experiences that led to their homelessness such as domestic abuse and perhaps having their children taken into care. Consequently, women who are homeless often have higher and more complex needs than men, including mental and physical health issues, substance use issues, offending histories and involvement in prostitution.

Entrenched rough sleepers experience very high levels of abuse and violence, which often tracks back to traumatic and violent childhoods, stays in institutional care, prison or other institutional settings as adults. Perhaps unsurprisingly, many have exceptionally low self-esteem or belief that their lives can change for the better and some may appear to give up on this altogether. Our challenge is to offer these most

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[5] DCLG https://www.gov.uk/government/publications/addressing-complex-needs-improving-services-for-vulnerable-homeless-people

[6] St Mungo's http://rebuildingshatteredlives.org/theme/housing-and-homelessness-services-for-women-with-complex-needs/

[7] London Assembly https://www.london.gov.uk/sites/default/files/london_assembly_-_hidden_homelessness_report.pdf

damaged members of our society assertive, person-centred, trauma-informed responses that allow for the possibility of hope and recovery.

Similarly, we know that among the population of Eastern European rough sleepers there are individuals who have No Recourse to Public Funds so cannot claim Housing Benefit. While such individuals may work in informal or low paid jobs, the money earned may well be sent to relatives in other countries rather than be used to pay for accommodation in the UK. This poses a long-term risk that such individuals get drawn into more dangerous behaviours while sleeping on the streets, such as problematic drinking or taking drugs, which can lead to long-term entrenchment.

This situation raises challenging issues. We are clear that the streets are not an appropriate accommodation option for people who come here without a realistic plan for where they are going to sleep. Choosing to sleep on the streets, in order to maximise earnings to be sent back to other countries, is not a legitimate choice. This is because of the dangers rough sleeping poses to the individuals themselves and the risk that they will be drawn into exploitative situations such as prostitution or modern slavery, anti-social behaviour and crime.

3. How we will change what we do

In order to deliver our strategic vision, we must work together to change the 'ecosystem' within which services to tackle rough sleeping exist. We have identified the following four overarching principles to guide us in redesigning our systems to deliver these objectives:

3.1 PROVIDING STRATEGIC LEADERSHIP AND BUILDING COLLABORATIVE PARTNERSHIPS

Throughout this document, we refer to our partnership as being key to the delivery of our objectives and outcomes. Our partnership is diverse and multi-agency, and includes (but is not limited to) staff in our commissioned homelessness services including Homes for Haringey, charitable and third sector organisations such as St Mungo's, Thames Reach, One Housing Group and Solace Women's Aid, local voluntary and community groups such as Neighbourhood Watch and Bringing Unity Back into the Community (Bubic), colleagues from other statutory services such as police, Children's and Adults Social Care, Mental Health, Public Health, Job Centre Plus, Community Safety teams and the Department for Work and Pensions and perhaps most importantly, people with lived experiences of homelessness.

The financial challenge facing Haringey sets the context for this strategy and our role in delivery. In addition to our role as funders of homelessness prevention and relief services, we will also provide strategic leadership to the partnership, utilising and further developing existing relationships, influence and leverage.

We have collaboratively developed the actions and approaches we believe are necessary to realise our ambitions, and recognise that not all these actions will be directly within the gift or responsibility of the council to deliver. We are committed to working alongside and supporting those who are better placed to deliver, and encourage all partners to identify how their organisation can contribute to the ambitions and principles set out here.

As strategic leaders, we will provide direction, bring the partnership together around this shared set of objectives and hold it to account on delivery. As capacity builders and enablers, we will co-ordinate and support our partnership to deliver well integrated homeless prevention and support, providing information, building skills and knowledge and creating efficient pathways.

With a renewed focus on delivering excellent customer service and psychologically informed support that recognises the overlapping stresses and trauma that many people affected by the experience of rough sleeping, we will redesign services around the needs of rough sleepers. Underpinning this, we will work with community and partners to build a new culture of trust and transparency. Everyone in the partnership must work together to ensure the messages we deliver about rough sleeping in Haringey are honest, consistent, accurate and understandable. This will enable people in housing need to make informed choices about their housing options.

3.2 Making Prevention Everyone's Responsibility

All members of our partnership have responsibilities and a role to play in preventing rough sleeping and the escalation of circumstances that can drive someone towards crisis point. We must all work together to recognise and address the underlying issues at the root cause of rough sleeping, such as poverty and unemployment, rent arrears, debt and benefit problems, poor physical and mental health, family breakdown, experiences of trauma and abuse and alcohol and substance misuse.

We will work with the community and local partnership to ensure that everyone is able to identify and understand these early homelessness triggers and help the person in need to improve their situation before things escalate to the point they have lost their home or suffered another kind of crisis.

People heading towards a homelessness crisis require holistic support that is tailored to their specific needs, with all agencies playing their part in finding the solution. This will involve partners referring the person on for specialist housing support at an earlier stage, co-ordinating assessments and creating joint support plans with our housing teams. It will also involve working closely with housing colleagues to ensure the options and help offered are appropriate and realistic, and that messages about what is and is not available are consistent.

Housing staff will need to be better trained in responding to domestic violence, abuse and safeguarding issues, delivering Mental Health First Aid and other initiatives to improve health and wellbeing, such as Making Every Contact Count.

Households themselves also have responsibilities when it comes to homelessness prevention; this means engaging with the help and support they are offered. Due to the shortages of supply, it also means recognising that an offer of social housing is unlikely, for most people, to be the solution to their housing problem.

3.3 Commissioning More Effectively To Better Meet Local Need

At a time of unprecedented change, with funding pressures set to continue over the life of this strategy, we must stretch the resources we have much further than they have in the past. This means being more innovative in how we deliver against our priorities, modernising and streamlining services to meet the challenges of the future and empower people to rebuild their lives so they are less reliant on services.

We will use modern strategic commissioning practices to better understand and evidence local need, effectively manage resources and plan and deliver a range of services that place self-sufficiency at the core, achieve improved value for money, a renewed focus on outcomes, quality and customer satisfaction and better integration with the local partnership.

3.4 Delivering In And With Our Community

Haringey has a rich and vibrant community that cares deeply about homelessness and rough sleeping and wants to be involved in finding solutions to these issues. This is demonstrated by the range of peer and volunteer-led initiatives that are already delivering excellent work in this area. Without this community-led support,

many more people would suffer the harm caused by homelessness and rough sleeping.

Recognising that a ‘one size fits all’ approach to tackling rough sleeping is inadequate, we will be person-centred from concept to delivery. We will build on assets of people and place, actively involving, empowering and giving voice to people using services and providing a platform for local community groups and voluntary organisations to contribute towards the delivery of our outcomes.

We will focus on what people and communities can do as well as what they need help with and will offer holistic support appropriate to their specific needs and capabilities. The root cause of rough sleeping lies in poverty and disadvantage, so the solutions lie in empowering people to build their resilience and develop self-sufficiency. This could include helping people to find employment, manage their finances or access affordable childcare in order to get back to work, as well as more obviously ‘housing-focussed’ help.

We recognise and celebrate the strengths and capacity of our communities and individual community members to be co-producers of solutions to prevent or relieve homelessness. By working with ‘experts by experience’ who have used our services previously, we will strive to better understand individual customer journeys and experiences of homelessness, using this learning to reshape our services. This will include developing opportunities for people with lived experience of rough sleeping to become involved in supporting their peers to build resilience and find solutions to their homelessness.

4. Delivering our key objectives

PREVENTING ROUGH SLEEPING

Our first priority is always to prevent homelessness, including rough sleeping, from occurring in the first place. Indeed Priority 1 in the Homelessness Strategy is "Intervening earlier to prevent homelessness", which makes clear that "*The best way to tackle homelessness and rough sleeping is to prevent it from happening in the first place."*

The Homelessness Strategy sets out in detail how we intend to deliver this priority for the various groups we know are at risk, including single vulnerable people who may be at risk of rough sleeping. From a prevention of rough sleeping perspective, it will be particularly important to ensure appropriate protocols are in place around prison and hospital discharge and people leaving other institutions, such as the armed forces, and that we ensure an ongoing dialogue with people who have experienced rough sleeping to ensure our approaches are co-produced.

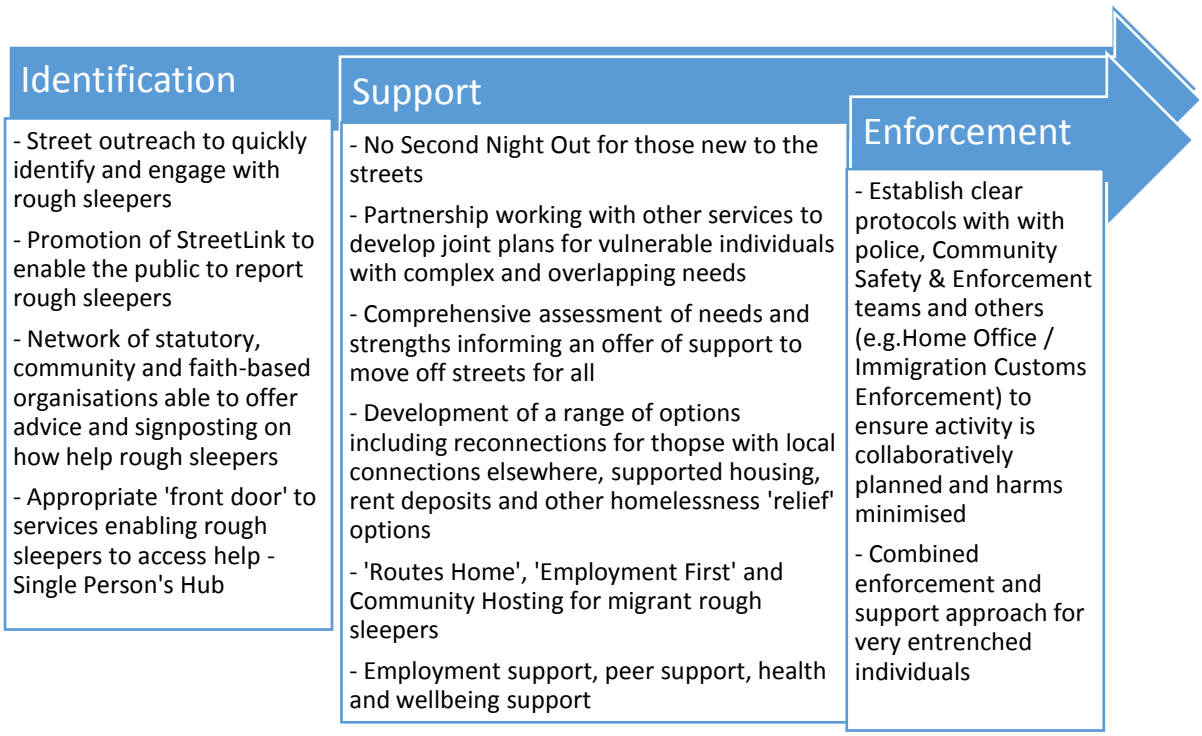
PRIORITY 1: RAPID INTERVENTION TO OFFER A ROUTE OFF THE STREET FOR ALL

Rough sleeping is harmful and dangerous for the person sleeping on the streets, and the longer someone stays on the streets, the more harmful and dangerous it becomes for both the individual and the wider community. We are very clear that sleeping on the streets is always unacceptable and cannot be ignored or allowed to continue.

If we cannot prevent someone from rough sleeping, it is imperative that we address this as quickly as possible to prevent the harms and costs of this escalating. This will involve identifying appropriate support and options to enable the person to move off the street as quickly as possible. We know that a one-size-fits-all approach will not work here. Where appropriate and safe, we will, for example, support the person to return to accommodation and support networks that are available to them elsewhere, either in the UK or abroad, help them access private rented accommodation, or for those with additional support needs, our single homeless pathway.

We recognise that for entrenched rough sleepers, coming in to accommodation is likely to be the first step in a long journey of recovery and we will continue to work assertively with those individuals to help them maintain their accommodation. However, where problems with rough sleeping persist and, despite ongoing offers of help and support an individual refuses to engage with help to move away from rough sleeping, our offers of support may be combined with enforcement activity.

Evidence from our sub-regional borough colleagues suggests that a combined enforcement and support approach can be helpful to the individuals concerned in these circumstances. Our approach to this is as follows:



In January 2017, Haringey Council showed its commitment to tackling rough sleeping by commissioning an outreach service, Haringey Street Outreach Team (SORT). Haringey SORT works alongside the GLA-commissioned London Street Rescue to provide personalised assessment, advice and referral to specialist services on issues that include housing, welfare benefits, substance misuse, physical health and mental health. The current commissioned service consists of one worker for 23 hours per week. By looking at the increase in numbers, and taking into account feedback during the consultations with rough sleepers, we are clear that current services do not have sufficient capacity to meet the needs of all rough sleepers in the borough.

Feedback from our stakeholders, from rough sleepers themselves and evidence from innovative projects elsewhere in London (e.g. the Greenhouse in Hackney) indicates that individuals with severe and multiple disadvantages are often excluded from ‘traditional’ housing advice and support services and require a more flexible, person-centred approach that recognises their particular challenges and experiences of trauma and multiple exclusion. That is why we are committed to developing a community-based single person’s housing and support hub. Our hub will reduce bureaucracy and offer a welcoming ‘front door’ to single people with housing and other complex health and social care needs, enabling them to access a range of related services in one location. This will include access to our Housing-Related Support provisions for single homeless people.

As set out in the Homelessness Strategy, under Priority 2, we are committed to undertaking a review of our Single Homeless pathway to ensure that the provision is fit for purpose and appropriate for the needs of vulnerable people, including rough sleepers. This will include:

- Reviewing the availability of our Assessment Centre, our 24-hour supported provision, women-only services and other options such as Housing First, to ensure the needs of people with severe and multiple disadvantages are met,
- Establishing procedures for minimising evictions and unplanned exits, and
- Ensuring that there is appropriate throughput within our services, including the availability of appropriate move on options.

This review will inform the development of a five-year commissioning plan for our single homeless support services.

The challenges presented by rough sleepers with No Recourse to Public Funds (NRPF) are significant and highly contentious. From May 2016, the Home Office designated EEA nationals who were rough sleeping as abusing their rights to free movement under EU Law. The Home Office then sought to deport them, regardless of whether they were working. In December 2017, the High Court ruled that this approach was unlawful. Those previously deported and subject to a 12-month re-entry ban under this policy may be entitled to have the ban lifted and be re-admitted to the UK.

We do not yet know what effect the result of the referendum on the UK's membership of the EU may have on this situation. In particular, we do not know what the future rules will be regarding the movement of EU nationals. Whatever the final outcome, there are limits to what a local authority can realistically do to help many non-UK nationals who sleep rough here.

Our position statement on working with rough sleepers with NRPF is set out below. This will be kept under review, in light of the issues described above.

Position Statement on rough sleepers with no recourse to public funds (NRPF)

Individuals with NRPF cannot be accommodated in our single homeless pathway or offered financial support to prevent or relieve their homelessness (e.g. rent deposits etc). Where capacity allows, we will offer rough sleepers with NRPF a place on our Community Host scheme; providing short-term, safe and stable accommodation alongside support to enable the person to make longer term plans for their future housing and employment options.

Again, where capacity allows, we will offer rough sleepers with NRPF 'Employment First' support; signposting individuals to third-sector partners including St Mungo's, Thames Reach and Crisis who will help them to prepare for and find employment.

We will work with the GLA-commissioned Routes Home Service to offer migrant rough sleepers a safe reconnection/connection option off the streets.

Haringey has a rich and vibrant community that cares deeply about homelessness and rough sleeping and wants to be involved in finding solutions to these issues. This is demonstrated by the range of peer and volunteer-led initiatives that are already delivering excellent work in this area.

These groups include two night shelters (All People All Places winter shelter and Highway of Holiness all-year shelter), soup kitchens, community centres and other

Voluntary & Community Sector (VCS) groups as well as members of the public and Neighbourhood Watch. During our consultation with these groups, many told us they are unsure of the best way to help rough sleepers and would appreciate support and direction. Others are operating with no real input from the council or our wider partnership, and would benefit from being included in, and recognised as part of, the solution to rough sleeping.

There is no doubt that one of the main causes of homelessness in all its forms is poverty, and that the use of food banks and soup runs has increased over recent years as a result. These services are often delivered by community organisations. We are very clear that without community-led support, many more people would suffer the harm caused by poverty, homelessness and rough sleeping.

As set out in Priority 3, street activity such as begging is harmful and goes hand in hand with drug taking and other problematic behaviour[8]. There is also an emerging school of thought [9] that, while obviously well intentioned, activities such as street-based soup runs and handing out of tents and blankets at best offer temporary amelioration of the effects of homelessness. At worst, particularly where the person lacks legal entitlement to the assistance they receive, these interventions can subvert a person's capacity to take control of their lives, leading to a feeling of life 'being on hold' during homelessness. This may result in them staying on the street for longer or not engaging with more empowering forms of support. Additionally, such services may act as a magnet for those not currently rough sleeping, drawing them into a pattern of street behaviour. They may also draw in rough sleepers from other areas, thus compounding the issue in Haringey and creating 'hot spots'[10].

We need to find ways of channelling the huge generosity of our community and desire to be part of the solution in ways that are safe, ethical and which enable rough sleepers to rebuild their lives. We will take an asset-based approach to this. This means mapping out and building on the strengths and potential already within the community, and helping local groups, organisations and individuals to mobilise their efforts in a co-ordinated way.

[8] Thames Reach https://thamesreach.org.uk/what-we-do/campaigns/killing-with-kindness/giving-money-people-begging-frequently-asked-questions/
[9] FEANTSA http://www.feantsa.org/download/think-piece-17548219635943096840.pdf
[10] https://www.cege.ucl.ac.uk/teaching/MSc_Posters/201617%20GIS/GIS_FosterL.pdf

WE WILL:

- Increase our street outreach capacity, enabling us to meet more rough sleepers at an earlier stage and to develop individualised plans to support people off the street quickly and sustainably.
- Maintain our commitment to the Mayor of London's No Second Night Out initiative, which we will utilise where permitted to prevent new rough sleepers from spending a second night on the streets.
- Continue holding monthly multi-agency Task and Targeting Meetings to discuss complex rough sleepers and implement robust action plans.
- Undertake an asset-mapping exercise to better understand the community resources we already have, then use this to strengthen our relationships and build new partnerships that empower rough sleepers on their recovery journeys.
- Establish 'Communities of Practice' for local organisations and groups, enabling them to develop their offer to rough sleepers and ensure ongoing dialogue via our Voluntary and Community Sector Forum.
- Offer bi-annual training sessions to agencies that come into contact with rough sleepers e.g. Metropolitan Police, London Fire Brigade and London Ambulance Service, so that we can raise awareness of the rough sleeping pathway.
- Develop a wallet-sized information leaflet for the community and agencies including blue light services, giving advice on what to do if they come into contact with rough sleepers.

PRIORITY 2: IMPROVING HEALTH, WELLBEING AND RESILIENCE

People who live on the streets have a much shorter life expectancy than those in the general population; 43 years for women and 47 years for men. Rough sleepers also often have complex physical health needs as a result of prolonged substance misuse, alcohol dependency and exposure to severe weather.

In order to ensure we fully support rough sleepers and those in our single homeless supported housing pathway with their health, we need to better understand their health needs. To address this, we will launch a health needs audit in partnership with Haringey's Public Health Team. This will cover health issues such as drugs and alcohol use, dentistry, opticians, foot care and mental health.

Where a rough sleeper has a suspected need around their mental health or a lack of mental capacity, there is currently no local mechanism for the necessary assessments to be completed by practitioners on the streets or in a non-clinical setting such as a 'crisis café'. This can lead to people spending longer on the streets than might otherwise be the case. This is a gap that is beyond the Council's direct control to resolve, so we will work with our partners in health and social care and alongside our outreach teams to find a solution. Our aspiration is that our new community hub may offer an appropriate space for such assessments to take place.

As part of our Rough Sleeping Programme partnership with St Mungo's and Thames Reach, a Health Coordinator is working with St Ann's Hospital and North Middlesex Hospital. The Co-ordinator is working alongside Haringey's range of substance use services (including The Grove, Haringey Advisory Group on Alcohol (HAGA) and the Haringey Recovery Service), to identify and support those who are either rough sleeping, or at risk of becoming homeless, in order to secure accommodation options. We are committed to ensuring this partnership work is effective and continues, so that people with complex health needs including substance and alcohol use are prevented from becoming homeless and sleeping rough, and are not prevented from accessing accommodation. Early results show that successes are being made with this client group.

Feedback from our consultations has indicated that rough sleepers have not always been able to access the medical support they require while on the streets. This often results in crisis and costly ambulance call-outs, frequent attendance at Accident and Emergency departments and admissions to hospital. MHCLG research[11] shows that rough sleepers are four times more likely to use Accident and Emergency departments than the general population. The research also shows that cost estimates range from £16,000 a year for the average entrenched rough sleeper to £21,180 a year for the average client facing substance misuse, offending and homelessness problems.

[11] [11] MHCLG https://www.gov.uk/government/publications/addressing-complex-needs-improving-services-for-vulnerable-homeless-people

There is now extensive evidence[12,13] to show that peer support offers an effective alternative to more 'traditional' methods of helping people experiencing homelessness and health inequalities arising from their complex needs. Haringey already has Bringing Unity Back into the Community (Bubic) an inspirational peer-led outreach service working with people who have substance use needs. In addition, several of our supported housing providers include peer-support programmes within their service offer. Working with our partners across the sector, we will develop more opportunities for people with lived experiences of homelessness and the poor health we associate with rough sleeping to engage with peer-led services, both as recipients of support and as providers, and build this into our commissioning plans.

At the heart of promoting resilience for rough sleepers is enabling them to access volunteering opportunities and education, training and employment (ETE). Rough sleepers often face barriers to employment which include low self-confidence, few or no qualifications, poor literacy and numeracy, lack of suitable clothing, up to date CVs, access to online job search sites and discrimination. Our single homeless pathway providers help people to access ETE through the support planning process and have developed links with local colleges and third-sector ETE organisations, offering support and advice in this area.

WE WILL

- Complete a health needs audit with everyone in our single homeless pathway to inform service design, future commissioning and opportunities for closer joint working and to improve outcomes for rough sleepers with complex health needs.
- Develop a joint working protocol with partners in mental health services, social care and our outreach team to ensure we are meeting the mental health needs of rough sleepers.
- Ensure that all rough sleepers are supported to register with a GP and dentist and have early access to primary healthcare; enabling them to access medical help in a way that is person-centred, taking into account their unique circumstances.
- Gather data from the NHS on the numbers of rough sleeper frequent attenders, and the numbers of ambulance callouts and missed appointments by rough sleepers, to build a thorough picture of the health needs of rough sleepers.
- Ensure that all single homeless services respond to the psychological and emotional needs of rough sleepers by ensuring every Commissioned service meets the Psychologically Informed Environment (PIE) standard and that this is monitored consistently.
- Develop services in a peer-led way; ensuring those with lived experience are given opportunities to develop themselves, and to support others in a similar position. This will include developing an 'Expert by Experience' group to co-produce our work on service development and commissioning.

[12] FEANTSA http://www.feantsa.org/download/peer_support_policy_paper2951723577548485776.pdf
[13] Community Mental Health Journal https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5438434/

- Maintain our commitment to working in partnership with Public Health to support and develop services in relation to the needs of rough sleepers – e.g. around smoking cessation, diet and exercise, screening and vaccinations
- Ensure that rough sleepers, whether on the streets or in accommodation through the HRS single homeless pathway, are able to access appropriate, person-centred support to address their substance use and alcohol needs.
- Ensure rough sleepers have support to acquire the correct identification, make benefit claims and open a bank account.
- Support the development of relationships between colleges, local businesses and third-sector ETE organisations and our rough sleeper support services, linking in with Haringey's wider employment support offer.
- Ensure all commissioned support services promote ETE and empower people using services to seek and maintain employment or other meaningful activity.

PRIORITY 3: TACKLING STREET ACTIVITY ASSOCIATED WITH ROUGH SLEEPING

Street-based activity that is commonly associated with rough sleeping in Haringey includes begging, street drinking and substance use, anti-social behaviour and prostitution. This is, in part, committed by rough sleepers or former rough sleepers. However, there are many occasions where those involved are not actually homeless. A key objective under this priority is to better evidence and understand the extent to which problematic street activity is actually being caused by Haringey rough sleepers and how much is associated with other groups. This will enable us to better target our interventions to address this.

There is no doubt of the harm and misery that such behaviour can cause to individuals and communities. It is unacceptable for people to have to walk past used syringes and condoms, through human urine or faeces or feel intimidated by beggars as they leave their buildings or walk through their parks, especially when they are with their children. It is unacceptable for people to live in street encampments in 21st Century Britain and we must do all we can to stop such behaviour when it arises.

Individuals engaging in behaviour such as begging or prostitution are often being exploited and are extremely vulnerable. We must ensure that our partnership is trained to identify where people have been victims of crimes such as trafficking or exploitation and that those coming into contact with them know how to respond appropriately. It is important that authorities are able to go after the individuals behind such crimes, and we will do everything possible to support the Police, National Crime Agency and others involved in tackling these issues.

Over recent years, Haringey and other London boroughs have been blighted by ‘cuckooing’ where a vulnerable person’s home is taken over by a drug dealer or other criminal who then uses it for illicit purposes. These vulnerable people are at risk of losing their homes as a result, either driven away by fear of the perpetrator or evicted due to Antisocial Behaviour that they are deemed to be responsible for. It is essential that we work with local landlords and our enforcement partners to ensure the welfare of vulnerable people displaced as a result of this behaviour is protected and they do not end up rough sleeping as a result.

It is very important that when we do take enforcement action against people who are rough sleeping or engaging in other street based activity, we do so in a way that avoids simply moving the problem around. This will involve working collaboratively with partners, including those in neighbouring boroughs, to coordinate our activity and ensure that an offer of support to address the problematic behaviour is made alongside the enforcement action.

Haringey’s Community Safety and Enforcement Team, alongside the Metropolitan Police, British Transport Police and the Home Office, leads on addressing these behaviours and taking action where appropriate. The team works in partnership with Haringey Street Outreach Team, accommodation providers and estate teams, drug and alcohol services and other community groups. To date in Haringey, enforcement action has been sought against individuals, but only as a last resort, where

absolutely necessary. Haringey also works in partnership with our neighbouring boroughs, Hackney and Islington, through quarterly tri-borough meetings, to take targeted action on shared hot spots.

Alongside offers of support, we see enforcement action as a tool to encourage rough sleepers and others who may be caught up in damaging lifestyles, to take positive steps to change their lives. Although ideally we would not have to take such action, we are prepared to do so as a last resort and will always attempt to place positive behavioural conditions on individuals, such as engaging with support, as part of any process.

WE WILL:

- Recruit Community Champions through our existing networks in the community and encourage people to report street-based antisocial behaviour, to provide early intelligence and support interventions to tackle this behaviour.
- Develop protocols with housing partners, the Police and Community Safety and Enforcement teams around specific enforcement actions such as ‘crack house’ or brothel closures, immigration enforcement activity or the six antisocial behaviour powers set out in the Antisocial Behaviour, Crime and Policing Act 2014. This will aim to ensure that these interventions are well coordinated and minimise the risk that a vulnerable person may be made homeless or disengage from existing support as a result.
- Hold regular case review meetings across the borough to discuss and plan actions relating to complex rough sleeping and problematic street activity.
- Develop a targeted educational programme on what the public and key partners can do when they see people sleeping rough or engaging in other harmful behaviours on the street.
- Develop a campaign around the dangers and risks associated with giving money to people begging, offering alternative ways to give
- Maintain our focus on ‘hotspot’ areas within the borough and ensure enforcement action is implemented where required.
- Ensure that data is collated on street population anti-social behaviour, brothel and ‘crack house’ premises closures and Home Office operations.
- Establish links with local businesses to help them manage anyone found rough sleeping or begging outside their premises.

5. Action planning and outcomes

This strategy and the objectives within it will form the basis for our ongoing engagement with our partners and the community to 2022. The key elements of an action plan to deliver the strategy's objectives are set out below, along with some headline outcomes. Following engagement with our partners and the community, we will formulate a detailed Strategy Implementation Plan that sets out responsibilities, timeframes, lead organisations and the resources available to meet the objective identified.

The multiagency Homelessness Forum will oversee delivery of the Strategy Implementation Plan. This will report in to the council's Housing Priority Board. More formally, as a strategy for which the council is responsible, it will be the responsibility of the Council's democratic scrutiny arrangements to hold the council to account for delivery of its aims.

5.1 HOW WE WILL CHANGE WHAT WE DO

Providing strategic leadership and building collaborative partnerships

We will:

- Refresh the Homelessness Forum to lead the partnership
- Produce a detailed outcomes framework for the whole partnership
- Develop new training, information and other resources to support delivery

And this will deliver:

- An increase in trust and transparency
- An improvement in the quality of advice delivered across the partnership
- Clarity of vision and understanding of what we are trying to achieve together

Making prevention everyone's responsibility

We will:

- Embed homelessness prevention into the work-plans of partners
- Ensure housing staff are able to recognise and sensitively address other factors that may contribute to a person's vulnerability, signposting them on to appropriate support as required
- Provide training for frontline services on the prevention agenda and holistic support offer
- Develop personal housing plans for people at risk of homelessness, including actions for housing and other partners and for the person at risk
- Promote co-location, joint working and integration with key partners including single assessments

And this will deliver:

- A reduction in the costs associated with failing to get things right first time
- An increase in levels of personal responsibility taken by those who are potentially homeless and a commitment to prevention among partner organisations
- Joined up services that behave 'like a system' and manage expectations
- A better understanding of available options and increases in take up

- Earlier interventions to increase the chances of successful prevention
- A more coherent offer of assistance to those who need help from multiple agencies, to increase effectiveness and efficiency
- Cross-cutting outcomes to reduce poverty and exclusion, such as improved safeguarding, health and wellbeing, employment

Commissioning more effectively to better meet local need

We will:

- Undertake a strategic review of all commissioned homelessness prevention services, building on the Supported Housing Review and making recommendations for service development and redesign
- Plan for the delivery of supported housing post the funding changes in 2020
- Develop 5-year commissioning plan based on outcome of review

And this will deliver:

- Evidence-led commissioning of ‘what works’, services better able to meet local need
- Increased quality, value for money and effectiveness of services
- ‘Leaner’ systems with reduced bureaucracy improving access and effectiveness
- Well planned services, ‘future proofed’ to meet changing population and funding landscape

Delivering in and with our community

We will:

- Ensure support is person-centred, holistic, flexible and builds on strengths
- Embed the Supported Housing Tenant Charter at heart of all commissioning and service design
- ‘Expert by Experience’ research to better understand customer journey, triggers and inform service design
- Develop peer mentoring and befriending as part of support offer
- Find new ways to include and recognise the contribution of non-funded community projects in our response to homelessness prevention

And this will deliver

- Services designed in a ‘psychologically-informed’ way that are more likely to be effective
- Individuals and families empowered to build their self- sufficiency and reduce their reliance on services
- Communities helped to build their resilience and ability to find their own solutions to problems
- Services that are better designed, easier to access and more effective
- The root causes of homelessness; poverty, disadvantage and multiple exclusion, are addressed alongside the need for accommodation
- Addressing intergenerational disadvantage and reducing
- Reductions in ‘revolving door’ homelessness

5.2 Delivering Our Key Objectives

The table below sets out an initial set of aims headlines that will be developed, with our key partners, into a detailed action plan to deliver this strategy. The action plan will be accompanied by a set of measurable targets, but an initial headline indicator is identified for each priority.

This table should be read alongside the similar table in the Homelessness strategy with its own actions, outcomes and three headline indicators to provide the full homelessness and rough sleeping action plan.

Priority 1: Rapid intervention to offer a route off the street for all	
Headline indicator: Number of people seen sleeping rough within the quarter	
Action	Outcome
• Increase street outreach capacity. • Maintain commitment to No Second Night Out. • Monthly multi-agency Task and Targeting Meetings. • Asset mapping to better understand community resources and build relationships. • Establish 'Communities of Practice' enabling local organisations to develop their offer to rough sleepers. • Bi-annual training for agencies on rough sleeping issues • Wallet-sized information leaflet for community and agencies including blue light services, giving advice on what to do if they meet rough sleepers.	• People get help quicker, before their problems escalate • A reduction in the costs associated with not getting it right first time (ie 'failure demand' • Access to holistic help for chronically excluded single people is improved • Personalised support is more effective at resolving rough sleeping • Services are better designed, easier to access and more effective • Joined up services that behave 'like a system' and manage expectations • Better quality of advice delivered across the partnership • Clarity of vision and understanding of what we are trying to achieve together

Priority 2: Improving health, well-being and resilience	
Headline indicator: The number of service users who report an improvement in their health and wellbeing	
Action	Outcome
• Health needs audit with everyone in single homeless pathway • Joint working protocols • Support all rough sleepers to access primary healthcare • Gather data from the NHS on numbers of rough sleeper frequent attenders, ambulance callouts and missed appointments • Psychologically Informed Environment (PIE) standard in commissioned services. • Develop 'peer-support' offer • Public Health initiatives– e.g. around smoking cessation, diet, exercise, screening vaccinations • Appropriate, person-centred support to address substance use and alcohol needs. • Support rough sleepers to acquire identification, claim benefits & open a bank account. • Develop ETE offer	• Better access to health care reduces risks to health of rough sleepers • Improved health and wellbeing of rough sleepers leads to increased resilience and ability to recover from rough sleeping • Evidence-led commissioning of 'what works', services better able to meet local need • Services designed in a 'psychologically-informed' way are more likely to be effective • Cross-cutting outcomes to reduce poverty and exclusion, such as improved safeguarding, health and wellbeing, employment • Clarity of vision and understanding of what we are trying to achieve together • People are empowered to build their self-sufficiency and reduce their reliance on services • Savings to partner agencies achieved though reducing 'failure demand' and

Priority 3: Tackling street activity associated with rough sleeping	
Headline indicator: The number of recorded incidents of problematic street activity	
Action	Outcome
• Recruit Community Champions to report street-based ASB, provide intelligence & support interventions • Data collection & protocols on enforcement action • Case review meetings to discuss & plan actions relating to complex rough sleeping and problematic street activity. • Targeted educational programme on what people can do when they witness rough sleepers and other harmful behaviours on the street. • 'Alternatives to begging' campaign • Focus on 'hotspot' areas & ensure enforcement action is taken • Establish links with local businesses to help them manage anyone found rough sleeping or begging outside their premises.	• Well-coordinated interventions minimise the risk that a vulnerable person may be made homeless or disengage from existing support as a result of enforcement action • A more coherent offer of assistance to those who need help from multiple agencies, to increase effectiveness and efficiency • Earlier interventions to resolve the issue more quickly • Interventions that address the root causes of the behaviour more likely to resolve it, rather than simply move the problem around • Communities build their resilience and ability to find their own solutions to problems

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Title	Draft Rough Sleeping Strategy EQIA				
Version	22	Date	16.02.2018	Author	LW

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty'** on all public bodies to have '**due regard'** to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition, the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Rough Sleeping Strategy Approval
Service area	Housing & Growth
Officer completing assessment	Helena Stephenson/Laura Wilson
Equalities/ HR Advisor	Ashley Hibben
Cabinet meeting date (if applicable)	16th January 2018
Director/Assistant Director	Lyn Garner / Dan Hawthorn

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

Proposal
In accordance with the Homelessness Act 2002, all local authorities have a duty to have and implement a homelessness strategy. The period covered by Haringey's most recently adopted homelessness strategy ended in 2014. A draft strategy covering 2017-22 was consulted on but never formally adopted having been subject to review in light of the Homelessness Reduction Act, significant welfare reform (including the overall benefit cap) and the rollout of Universal Credit.

We propose to have an updated version of the published draft of the homelessness strategy in order to comply with our statutory duties. It will continue to cover the period 2017-22, complementing the council's overarching Housing Strategy. In addition to this, after consultation with key partners, the decision has been taken to have a complimentary, but standalone, Rough Sleeping Strategy to focus specifically on those more vulnerable to sleeping rough.

The main objectives of the proposed Rough Sleeping Strategy mirror those of the broader Homelessness Strategy. The three key priorities of the Rough Sleeping Strategy are as follows:

1) Rapid intervention to offer a route off the street for all
2) Improving health, wellbeing and resilience
3) Tackling street activity associated with rough sleeping

Context
Haringey ranks second only to Newham in having the highest rates of recorded homelessness in the country, with 1 in 29 either sleeping rough or residing in temporary accommodation. 3,049 households are currently in temporary accommodation (TA) and of the approximate10,000 residents in TA, half are children. There is substantial evidence to show that unstable housing reduces the quality of life for those subject to such conditions. Rough sleepers, for instance, have a significantly reduced life expectancy of 43 years for a woman and 47 years for a man. Homelessness also poses a substantial financial challenge to Haringey, with nightly paid accommodation, the most expensive accommodation used, costing £4,000 per unit per year.

In accordance with Priority 5 of the current Corporate Plan, the Rough Sleeping Strategy aim to address these issues, detailing Haringey's priorities, key actions to be taken and expected outcomes.

Key Stakeholders/Demographics
The demographics of those impacted will reflect the type of households who vulnerable to rough sleeping who are as follows:

- Those who identify as Eastern European, as they make up a significant proportion of the rough sleeping population in the borough
- Women, who statistically make up the vast majority of individuals who approach

the homelessness service for support
- Young people who identify as LGBTQ
- Those with mental health needs

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics St Mungo's http://rebuildingshatteredlives.org/theme/housing-and-homelessness-services-for-women-with-complex-needs/ London Assembly https://www.london.gov.uk/sites/default/files/london_assembly_-_hidden_homelessness_report.pdf Internal data from homelessness and temporary accommodation	The new strategies will have no impact on Haringey Council employees (unless they are residents of the borough and also homeless or likely to become homeless and thus included below).
Gender Reassignment	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna	
Age	P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics Internal data from homelessness and temporary accommodation	
Disability	As above	
Race &	As above	

Ethnicity	Census data: https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?opt=3&theme=&subgrp= GLA latest population projections (ethnicity at the bottom): https://data.london.gov.uk/dataset/projections Combined Homeless Information Network https://data.london.gov.uk/dataset/chain-reports	
Sexual Orientation	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna EqIA Profile on Harinet Albert Kennedy Trust: "LGBT Youth Homelessness" http://www.akt.org.uk/webtop/modules/_repository/documents/AlbertKennedy_researchreport_FINALinteractive.pdf	
Religion or Belief (or No Belief)	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna EqIA Profile on Harinet	
Pregnancy & Maternity	Internal data from homelessness and temporary accommodation EqIA Profile on Harinet P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics	
Marriage and Civil Partnership	Internal data from homelessness and temporary accommodation	

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Users who will benefit from the proposed changes

The Rough Sleeping Strategy will benefit those who are vulnerable to rough sleeping and/or those who are currently rough sleeping. This will be achieved by providing clear,

strategic direction and specific actions to the council and partners to prevent and resolve rough sleeping. Through this, residents will be enabled and empowered to hold Haringey and partners to account and given the support they need to prevent themselves from rough sleeping or find a route off the streets.

Having the Rough Sleeping Strategy in place would not be enough to hinder the commitments made coming to fruition. However, we would fail to have a clear strategic vision for the council and our partners to meet the challenges that cause rough sleeping. The absence of the strategy would also hinder residents and others being able to hold us to account. Having the strategy in place will provide legitimacy for commissioning, service management and expenditure decisions to be undertaken during its lifetime.

There are particular groups who we can infer are more vulnerable to/likely to be homeless that the data below outlines.

Sex, pregnancy & maternity

Rough Sleeping Strategy

There is evidence that suggests the triggers and experiences of female rough sleepers tend to be distinct from those of men. Although fewer in number, comprising around 11% of rough sleepers in London, they face particular barriers to accessing support and have a significantly reduced life expectancy of 43 years, 4 years shorter than that of a rough sleeping man. We know that many women avoid rough sleeping by sofa surfing, staying in abusive relationships or living in squats, crack houses and brothels. A higher proportion of women than men will have also had specific traumatic experiences that led to their homelessness such as domestic abuse and perhaps having their children taken into care. Consequently, women who are sleeping rough often have higher and more complex needs than men, including mental and physical health issues, substance use issues, offending histories and involvement in prostitution.

The Rough Sleeping Strategy commits to undertaking a review of our Single Homelessness Pathway to ensure that the provision is fit for purpose and appropriate for the needs of vulnerable people, including rough sleepers. This will include reviewing availability of Haringey's current Assessment Centre, 24-hour supported provision, women-only services and other options such as Housing First to ensure the needs of people with severe and multiple disadvantages are met.

With this in mind, it is clear the Rough Sleeping Strategy will disproportionately, but positively, benefit women, as they are more vulnerable when rough sleeping.

Sexual Orientation

LGBTQ+ people comprise up to 24% of the young homeless population nationally though Haringey does not collect this data. Sexual orientation data specific to Haringey is not available but nationally, 69% of LGBT homeless young people have experienced familial rejection, abuse and violence. With the Rough Sleeping Strategy set to support those vulnerable to and/or currently rough sleeping, they will inevitably have a positive impact on the young LGBTQ+ community.

The Rough Sleeping Strategy makes a number of commitments which will benefit those in the LGBTQ+ community who are more vulnerable to and currently rough sleeping, they are as follows:

- The creation of a single person's hub
- To undertake a strategic review of our Single Homeless Pathway and floating support provision, to ensure sufficient provision
- To develop a Supported Housing Pathway for vulnerable single people and young parents

Age

Young people who identify as LGBTQ+ are likely to disproportionately, but positively, benefit from the implementation of this strategy as outlined previously.

Evidence shows that rough sleepers suffer poor health outcomes at a disproportionately early age. A woman sleeping on the streets has a life expectancy of 43 years and a man 47 years; lower than even the most poverty-stricken and war-torn countries in the world. Between 2010 and 2016 in London alone, an average of one person a fortnight died while rough sleeping, or within a year of rough sleeping. The Rough Sleeping strategy addresses these inequalities by making specific recommendations to improve the health and wellbeing of rough sleepers, as set out in Priority 2 of the strategy.

Disability/Mental Health

There is only data on disability in homelessness applications if it is the applicant's priority need. In 2015/16, 3% of accepted households had a physical impairment as their priority need and 2 cases had a mental health issue or learning disability as their priority need. These rates are relatively low compared to the general population, as there are Disability and Mental Health Pathways, which help these households into suitable housing so that they do not need to make homelessness applications.

Primary need	Number	%
Mental health	191	25
Offending	191	25
Physical health	116	15
Unrecorded	51	7
Mental health DTOC*	48	6
Vulnerable homeless	43	6
Young person	41	5
Alcohol	27	4
Complex / multiple	27	4
Substance use	26	3
Learning disability	2	0.02
Total	763	100%

Looking at supported housing more specifically, the table above demonstrates there is a substantial amount of those with mental health needs accessing the homelessness pathway. Adults who are vulnerable due to mental health conditions are more likely to become homeless, come into contact with the criminal justice system and have unplanned hospital admissions where discharge is delayed. In 2016/17, 31% of people accessing our Single Homeless Pathway were identified as having a primary mental health need and 25% have an offending background.

We know that for many single vulnerable people, their primary or presenting need may be just one of a complex and overlapping set of circumstances that together, combine to increase their vulnerability. The data we hold on these overlapping needs and on outcomes for people accessing our single homeless pathway are currently not robust enough, so improving our data collection procedures and systems for measuring outcomes will be a priority activity over the life of these strategies if implemented

In regards to rough sleepers in the borough more specifically, their support needs have been consistently high over the past few years. In 2016/17, 79% of the 87 rough sleepers assessed identified having support needs around one or more of alcohol, drugs and mental health.

Alcohol:	Drugs:	Mental health:	Other:
49%	43%	48%	21%

Rough Sleeping Strategy
The Rough Sleeping Strategy also make a number of commitments to support those who may be vulnerable a result of mental health needs, some of which are as follows:

- Supported Housing pathway for vulnerable single people and young parents
- Street outreach service for rough sleepers
- Single person's hub
- Signposting to mental health, substance use and other health and wellbeing support
- Develop 5-year commissioning plan for 'single homeless' supported housing
- Training for housing staff on Mental Health First Aid, Making Every Contact Complete a health needs audit with everyone in the single homeless pathway to inform service design, future commissioning and opportunities for closer joint working and improve outcomes for rough sleepers with complex health needs.
- Develop a joint working protocol with partners in mental health services, social care and our Outreach Team to ensure we are meeting the mental health needs of rough sleepers.
- Ensure that all rough sleepers are supported to register with a GP and dentist and have early access to primary healthcare; enabling them to access medical help in a way that is person-centred, taking into account their unique circumstances.
- Gather data from the NHS on numbers of rough sleeper frequent attenders, numbers of Ambulance callouts and missed appointments. This will be vital in order for us to build a thorough picture of the health needs of rough sleepers.
- Through commissioning, ensure that all single homeless services respond to the psychological and emotional needs of rough sleepers by ensuring every service meets the Psychologically Informed Environment (PIE) standard and that this is monitored consistently
- Develop services in a peer-led way; ensuring those with lived experience are given opportunities to develop themselves, and to support others in a similar position. This will include developing an 'Expert by Experience' group to co-produce our service development work and commissioning around rough sleeping.
- Ensure that rough sleepers, whether on the streets or in accommodation through the HRS single homeless pathway are able to access appropriate, person-centred support to address their substance use and alcohol needs.

Race & ethnicity
The Eastern European community will be disproportionately, but positively, affected by the implementation of the Rough Sleeping Strategy, as they make up a significant proportion of the rough sleeping population in the borough. Haringey has seen an

increase in numbers of rough sleepers who are from either Central and Eastern Europe (CEE) or the European Economic Area (EEA) with 38% in 2011/12 and 52% in 2016/17. Because of changes to welfare benefits for this group from 2014, they will now have No Recourse to Public Funds meaning it is extremely challenging for them to access accommodation and employment.

The challenges presented by rough sleepers with No Recourse to Public Funds are significant and highly contentious. From May 2016, the Home Office designated EEA nationals who were rough sleeping as abusing their rights to free movement under EU Law. The Home Office then sought to deport them, regardless of whether they were working. In December 2017, the High Court ruled that this approach was unlawful. Those previously deported and subject to a 12-month re-entry ban under this policy may be entitled to have the ban lifted and be re-admitted to the UK.

With the above in mind, the Rough Sleeping Strategy makes a number of commitments which will specifically support those from the Eastern European community:

- 'Routes Home', 'Employment First' and Community Hosting for migrant rough sleepers
- Community hosting scheme for those with NRPF
- Revision of the NRPF position statement in accordance with the Judicial Review aforementioned

Religion

The council does not hold data on the religion of its tenants or resident leaseholders, but the borough profile by religion is as follows;

Religion in Haringey	Percentage
Christian	45.0%
Buddhist	1.1%
Hindu	1.8%
Jewish	3.0%
Muslim	14.2%
Sikh	0.3%
Other religion	0.5%
No religion	25.2%
Not stated	8.9%

There is no sufficient evidence to suggest that one particular religion will be disproportionately affected by the adoption of the Sleeping Strategy. All homelessness and rough sleeping services are allocated based on the need and therefore it is reasonable to infer that no religion will be disproportionately impacted by the implementation of the strategy.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Residents

All residents were given the opportunity to participate in a formal consultation on the Homelessness Strategy prior to its review, alongside three other key policies to meet housing need from 14 November 2016 – 29 January 2017. All residents were consulted as, we are aware that homelessness, in its most extreme form, has a clear impact on the occupation and use of public space, which affects all residents. At the time of consultation, the Rough Sleeping Strategy was incorporated into the Homelessness Strategy. Residents were given the opportunity to feedback on the following questions in relation to the Homelessness Strategy:

- **Question 2a**: Do you think that the extent and cause of homelessness in the borough have been correctly assessed in the plan?
- **Question 4a**: Do you think the plan has accurately assessed the impact of homelessness demand, for example, the amount of temporary accommodation required and the support homeless households need in moving on to a settled home?
- **Question 5a**: Do you think the plan correctly analyses rough sleeping in the borough and included actions which will reduce it?
- **Question 6a**: Does the plan include the right priorities?
- **Question 7a**: Does the plan include the right actions to deliver out priorities?

A Rough Sleeping Strategy consultation was held with professional stakeholders including Community Safety & Enforcement, Met Police, Public Health, Homes for Haringey, Bringing Unity Back into the Community (BUBIC), The Grove, Haringey Advisory Group on Alcohol (HAGA), accommodation providers, Thames Reach and St. Mungo's on Thursday 12 October 2017. The consultation involved three workshops:

1. Identifying the key priority areas for the strategy,
2. Recognising the assets and strengths we have within Haringey,
3. Deciding what our strategic goals should be. Part of this was to look at whether we need more information or data prior to making this decision.

A Rough Sleeping Strategy consultation was also held with a number of former rough sleepers in a mixture of one-to-one sessions and a focus group. These consultations involved discussions on the following:

1. What could have been done to prevent the individuals ending up on the streets
2. What worked well for them whilst on the streets
3. What didn't work well and was the individual's priority

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Question	Agree	Disagree
Question 2a: Do you think that the extent and cause of homelessness in the borough have been correctly assessed in the plan?	57%	43%
Question 4a: Do you think the plan has accurately assessed the impact of homelessness demand, for example, the amount of temporary accommodation required and the support homeless households need in moving on to a settled home?	58%	42%
Question 5a: Do you think the plan correctly analyses rough sleeping in the borough and included actions which will reduce it?	64%	37%
Question 6a: Does the plan include the right priorities?	66%	34%
Question 7a: Does the plan include the right actions to deliver out priorities?	71%	29%

Residents
All residents were given the opportunity to participate in a formal consultation on the Homelessness Strategy prior to its review, alongside three other key policies to meet housing need from 14 November 2016 – 29 January 2017. The response was broadly positive, and residents voted in favour of the strategy and it priorities. The table below outlines the results. A total of 328 residents responded to the consultation.

As the majority felt the Homelessness Strategy had accurately assessed the causes and impacts of homelessness with the correct priorities in place, no major changes were made because of this public consultation.

Partners
A Rough Sleeping Strategy consultation was held with professional stakeholders including Community Safety & Enforcement, Met Police, Public Health, Homes for Haringey, Bringing Unity Back into the Community (BUBIC), The Grove, Haringey Advisory Group on Alcohol (HAGA), accommodation providers, Thames Reach and St. Mungo's. The consultation involved three workshops:

1. Identifying the key priority areas for the strategy,
2. Recognising the assets and strengths we have within Haringey,
3. Deciding what our strategic goals should be. Part of this was to look at whether we need more information or data prior to making this decision.

The key themes that arose were the need for:

- A single homeless hub
- Greater capacity within our outreach team
- An accommodation pathway that meets the needs of its users
- The process into accommodation to be less bureaucratic and flexible for rough sleepers.
- Separate rough sleeper strategy – the group felt it important we highlighted the differing challenges facing those who are currently, and vulnerable to, rough sleeping vs. those that typically present to homelessness services. We have responded to these concerns and gone forward with their suggestion to have a separate rough sleeper strategy

All of these recommendations appear in the Rough Sleeping Strategy.

A further Rough Sleeping Strategy consultation was also held with a number of former rough sleepers in a mixture of one-to-one sessions and a focus group. These consultations involved discussions on the following:

1. What could have been done to prevent the individuals ending up on the streets,
2. What worked well for them whilst on the streets,
3. What didn't work well and was the individual's priority.

One key theme that arose was that there were times for all individuals where, if the correct support was given, the rough sleeping could have been prevented. The need for more prevention support appears heavily in the Rough Sleeping Strategy. Further themes were around the need for greater support with physical and mental health. Again, commitments are made in order to address these in the Rough Sleeping Strategy:

- Complete a health needs audit with everyone in our single homeless pathway to inform service design, future commissioning and opportunities for closer joint working and improve outcomes for rough sleepers with complex health needs.
- Develop a joint working protocol with partners in mental health services, social care and our Outreach Team to ensure we are meeting the mental health needs of rough sleepers.
- Ensure that all rough sleepers are supported to register with a GP and dentist and have early access to primary healthcare; enabling them to access medical help in a way that is person-centred, taking into account their unique circumstances
- Gather data from the NHS on numbers of rough sleeper frequent attenders, numbers of Ambulance callouts and missed appointments. This will be vital in order for us to build a thorough picture of the health needs of rough sleepers
- Maintain our commitment to working in partnership with Public Health to support and develop these services in relation to the needs of rough sleepers – including for example around smoking cessation, diet and exercise, screening and vaccinations
- Ensure that rough sleepers, whether on the streets or in accommodation through the HRS single homeless pathway are able to access appropriate, person-centred support to address their substance use and alcohol needs.

Following the formal consultation, on 9 February 2017, the Oversight and Scrutiny Committee reviewed the Homelessness Strategy, when it still included the Rough Sleeping Strategy, against its Social Inclusion Report, and was satisfied with the strategy.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

Summary of section 3

1. Sex *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

Female rough sleepers face particular barriers to accessing support and have a significantly reduced life expectancy of 43 years, 4 years shorter than that of a rough sleeping man. We know that many women avoid rough sleeping by sofa surfing, staying in abusive relationships or living in squats, crack houses and brothels. A higher proportion of women than men will have also had specific traumatic experiences that led to their homelessness such as domestic abuse and perhaps having their children taken into care. Consequently, women who are sleeping rough often have more complex needs than men, including mental and physical health issues, substance use issues, offending histories and involvement in prostitution.

The Rough Sleeping Strategy commits to undertaking a review of our Single Homelessness Pathway to ensure that the provision is fit for purpose and appropriate for the needs of vulnerable people, including rough sleepers. This will include reviewing availability of Haringey's current Assessment Centre, 24-hour supported provision, women-only services and other options such as Housing First to ensure the needs of people with severe and multiple disadvantages are met.

2. Gender reassignment *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact		Unknown Impact	x

We do not hold data on gender reassignment so cannot assess this. However, it is likely that the Rough Sleeping Strategy will have a neutral impact.

3. Age *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

Evidence shows that rough sleepers suffer poor health outcomes at a disproportionately early age. A woman sleeping on the streets has a life expectancy of 43 years and a man 47 years; lower than even the most poverty-stricken and war-torn countries in the world. Between 2010 and 2016 in London alone, an average of one person a fortnight died while rough sleeping, or within a year of rough sleeping. The Rough Sleeping Strategy addresses these inequalities therefore will have a positive impact on the life expectancy of

rough sleepers.

4. Disability *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

In 2016/17, 31% of people accessing our Single Homeless Pathway were identified as having a primary mental health need and 25% have an offending background. In addition, 48% of rough sleepers had a mental health need and was the primary reason for sleeping rough. With the commitments outlined previously, it clear the Rough Sleeping Strategy will have a disproportionate but positive impact on those with a mental health need who may be vulnerable to or currently homeless.

5. Race and ethnicity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

The Eastern European community will be disproportionately but positively impacted by the implementation of the Rough Sleeping Strategy, as they make up a significant proportion of Haringey's rough sleeping population. As outlined previously, there are a significant number of commitments made which will help this particular group.

6. Sexual orientation *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

LGBTQ+ people comprise up to 24% of the young homeless population nationally. Sexual orientation data specific to Haringey is not available but nationally, 69% of LGBT homeless young people have experienced familial rejection, abuse and violence.

The Rough Sleeping Strategy make clear commitments that will benefit those in the LGBTQ+ community who are more vulnerable to homelessness and rough sleeping. Therefore, it is reasonable to infer the strategy will have a disproportionate but positive impact on young people who identify as LGBTQ+.

7. Religion or belief (or no belief) *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral		Unknown	x

				impact		Impact	

There is no sufficient evidence to suggest that one particular religion will be disproportionately affected by the adoption of the Rough Sleeping Strategy. All rough sleeping services are allocated based on the need and therefore it is reasonable to infer that no religion will be disproportionately impacted by the implementation of the strategy.

8. Pregnancy and maternity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	

There is no evidence to suggest that the implementation of the Rough Sleeping Strategy will have a disproportionate impact on those that are pregnant or have children.

9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

Positive		Negative		Neutral impact	X	Unknown Impact	

There is no evidence to suggest either strategy will have an impact on those who are/are not in a marriage or civil partnership.

10. Groups that cross two or more equality strands e.g. young black women

- Young people who identify as LGBTQ+ - as outlined previously

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?**
  This includes:
  a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
  b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**
  c) **Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low**
- **Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?**

The Rough Sleeping Strategy will not result in any direct or indirect discrimination for any group. The strategy will provide residents with more support, which will either prevent them from rough sleeping or give them a route off the street. The implementation of this strategy will improve services and support for vulnerable residents, many of whom are covered by multiple protected characteristics. The commitments made will prevent and reduce rough sleeping across the borough.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	*N*
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

The Rough Sleeping Strategy will be owned by the Priority 5 Board, with Alan Benson as the responsible officer for its delivery. The Homelessness Strategy and Commissioning Team will develop a delivery plan, outlining how and when the commitments made in the strategies will be delivered, alongside clear and measureable KPIs.

Progress will be monitored by the Homelessness Forum and Priority 5 Board. By reporting progress and collecting data regularly we will be able to monitor the impact for particular groups and thus can adapt support and service provision according to ensure outcomes are delivered.

7. Authorisation	
EqIA approved by ..... (Assistant Director/ Director)	Date .....

8. Publication
Please ensure the completed EqIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqIA process.

Report for: **Cabinet 6 March 2018**

Title: **Housing Allocations Policy Update**

Report authorised by: **Helen Fisher, Interim Strategic Director of Regeneration, Planning and Development**

Lead Officer: **Alan Benson - Head of Housing Strategy & Commissioning**

Ward(s) affected: **All**

Report for Key/ Non Key Decision: **Key**

1. Describe the issue under consideration

1.1 This report outlines the updates required for the Housing Allocations Policy to be compliant with the new Homelessness Reduction Act, which comes into effect in April 2018.

2. Cabinet Member Introduction

2.1 Homelessness is a blight on communities and individuals, with significant human and financial costs. It is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country and growing numbers of rough sleepers. The new Homelessness Strategy sets out our broad strategic vision, objectives and the overarching principles that inform our approach to addressing homelessness in Haringey, as well as summarising the harms and costs to people and communities caused by homelessness and rough sleeping.

2.2 These minor amendements to the Allocations Policy are required to ensure that the Council's policies are fully compliant with the new Homelessness Reduction Act and support the delivery of aims set out in the new Homelssness Strategy.

3. Recommendations

It is recommended that Cabinet:

3.1 Approves the minor amendments to the Housing Allocations Policy 2015 set out in Appendix 1, to ensure that Reasonable Preference is extended to those who are at the Prevention and Relief stages of an application, as required by the the Homelessness Reduction Act.

4. Reasons for decision

4.1 The recommendation in 3.1 is because minor changes to the Housing Allocations Policy are required to ensure that it is compliant with the Homelessness Reduction Act.

5. Alternative options considered

5.1 Not to make any amendments to the Housing Allocations Policy. It could be argued that the extension of the Reasonable Preference category under the Homelessness Reduction Act is implicit in the existing wording. However, the amendments proposed make it clear that the Council is fully compliant with the new Homelessness Reduction Act.

6. Background information

6.1 The current Housing Allocations Policy was created in 2015 and was last updated by the Cabinet in April 2017. While the Homelessness Reduction Act 2017 does not make any direct changes to the categories of reasonable preference set out in the Housing Act 1996, it does extend the duty owed to those threatened with homelessness, who are in turn entitled to reasonable preference. To clarify the position, the following amendments to the Housing Allocations Policy are proposed (additions are underlined, deletions are struck through)

6.2 In Section 14, under the Band C criteria:

6.2.1. Amend Category 3 to read:

"Applicants who are homeless ~~or threatened with homelessness~~ but <u>either have not yet had a priority need assessment or</u> have been assessed by the council within the previous 12 months as having no right to rehousing under the homelessness legislation because they are not in priority need.

6.2.2. Amend category 4 to read:

"Applicants who are homeless ~~or threatened with homelessness~~ but have been assessed within the previous 12 months by the council as having no right to rehousing under the homelessness legislation because they are considered to have become homeless intentionally, and have not been resident in settled accommodation.

6.2.3. Renumber existing categories 5-9 to 6-10

6.2.4. Add new category 5 reading:

"<u>Applicants who are threatened with homelessness, have been assessed by the council as being owed the duty arising under s195(2) of the Housing Act 1996 ('the prevention duty'), and the council have not brought that duty to an end</u>"

6.3 The proposed changes are marked in the Housing Allocations Policy 2015 (as updated by Cabinet in 2017) and provided at Appendix 1.

7. Contribution to strategic outcomes

7.1 This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the Corporate Plan notes, "*We will provide realistic and achievable options for people to find housing or alternative housing."*

7.2 The Allocations Policy supports the delivery of Objective 2 of Haringey's Housing Strategy 2017-2022 Objective 2 – Improve support and help to prevent homelessness. In particular the amendment delivers on the following stated aim:

- Allocate council tenancies and intermediate tenures in accordance with fair and transparent criteria, both at the commencement and when reviewing the expiry of a fixed term council tenancy

8. Statutory Officers comments

Finance comments

8.1 Any financial implications arising from the Homelessness Reduction Act will be reported to Members alongside the established budget monitoring and performance monitoring reports.

Procurement comments

8.2 Strategic Procurement notes the contents of this report and the associated documents. Strategic Procurement will provide the required support to assist the council in the delivery of this policy.

Legal comments

8.3 The Homelessness Reduction Act 2017 ("the new Act") imposes upon local housing authorities new "assessment" "prevention" and "relief" duties to those whom the authority is satisfied are eligible and either homeless or threatened with homelessness within 56 days. These duties require authorities to:

- provide personalised written housing assessments including agreed plans setting out the steps that the authority considers it and the applicant should reasonably take to secure accommodation for the applicant ("assessment")
- take reasonable steps to help an applicant threatened with homelessness to secure that their accommodation does not cease to be available ("prevention")
- take reasonable steps to secure that suitable accommodation becomes available (for at least 6 months) to a homeless applicant ("relief")

8.4 These new duties apply to all those homeless or threatened with homelessness, irrespective of whether they have a priority need; and apply in addition to the existing duties to those who are in priority need.

8.5 The new Act also places a duty upon specified public authorities (to be specified by statutory instrument, but expected to include a range including the armed forces, hospitals, prisons and other institutions) to refer those whom they believe

may be homeless or threatened with homelessness, and who agree to be referred, to the local housing authority of the applicant's choice. The draft Code of Guidance issued by the MHCLG recommends that local housing authorities set up procedures to deal with these referrals, including establishing protocols with likely local referrers.

8.6 The Council is required by Housing Act 1996 s166A to have a scheme for determining priorities and as to the procedure to be followed in allocating housing accommodation, and to allocate accommodation according to that scheme. The scheme applies (s159) to (i) selection to be a secure or introductory tenancies in its own stock (ii) nomination to be a secure or introductory tenant of another provider's stock and (iii) nomination to an assured tenancy of stock held by a private registered provider or a registered social landlord.

8.7 In framing its Scheme, the Council must have regard to its own Homelessness and Tenancy Strategies and to the London Housing Strategy (s166A(12)). The Council must also (s166A) give reasonable preference to certain categories of persons on the Register – in particular those found to be homeless within Part VII of the Housing Act 1996 – and additional preference to others.

8.8 Before making a major alteration to its Scheme, the Council is required (s166A(13)) to send a copy of the proposed alteration to every private registered provider and registered social landlord with whom they have nomination arrangements and give them a reasonable opportunity to comment on the proposals. The proposed amendments are not considered to require this procedure.

8.9 While there is no statutory requirement to do so, the Council adheres to best practice in consulting its residents on significant changes to its Allocations Scheme, and residents have a legitimate expectation that the Council will continue to do so. The changes proposed are not considered a major alteration so as to require consultation.

8.10 The legislative changes driving the proposed changes are outlined in the body of the report.

8.11 Cabinet should conscientiously have regard to the outcome of the various consultations carried out, and to the Equalities Impact Assessment annexed.

Equality comments

8.12 The council has a public sector equality duty under the Equality Act (2010) to have due regard to; tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation); advance equality of opportunity between people who share those protected characteristics and people who do not; and foster good relations between people who share those characteristics and people who do not.

8.13 The potential impact of this minor amendment to the policy has been assessed as part of the overall EQIA of the Homnelessness Strategy.

9. Use of Appendices

Appendix 1 Draft amended Housing Allocations Policy 2015 as amended in 2017 *(with HRA compliant revisions marked in underlined italics)*

10. Local Government (Access to Information) Act 1985

Background papers:

Corporate Plan 2015-2018
http://www.haringey.gov.uk/sites/haringeygovuk/files/corporate_plan_2015-18.pdf

Housing Allocations Policy 2015 (as amended 1 May 2017)
http://www.haringey.gov.uk/sites/haringeygovuk/files/haringeys_housing_allocations_policy_2015_amended_1_may_2017_v2.pdf

Housing Strategy 2017-2022
http://www.haringey.gov.uk/sites/haringeygovuk/files/housing_strategy_2017-2022.pdf

Homelessness Strategy 2012-14
http://www.haringey.gov.uk/sites/haringeygovuk/files/homelessness_strategy_2012-14.pdf

Overview and Scrutiny Panel report February 2017 *"Consultation on Four Policies to Meet Housing Need"*
http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=128&MId=8066&Ver=4

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Title	**Draft Rough Sleeping Strategy**				
Version	24	Date	26.02.2018	Author	AB

Housing Allocations Policy 2015

as amended 1 May 2017

(Including information about the Housing Register
and Choice Based Lettings Scheme)

Haringey's Housing Allocations Policy 2015 was effective from 29th September 2015. The Policy was updated in early 2017 following consultation on further changes. This version includes the changes which came into effect from 1 May 2017.

Existing Policy with changes proposed in the Homelessness Strategy Cabinet report

Proposed changes to align the policy with Homeless Reduction Act highlighted in red

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1 INTRODUCTION

1.1 Statement of Choice

1.1.1 We are committed to providing excellent services that ensure the widest possible access to housing and prevent discrimination on the grounds of race, religion, gender or marital status, sexual orientation or disability.

1.1.2 Our aim is to achieve this by:

- Offering choice of accommodation, within the constraints of available supply.
- Giving applicants the opportunity to express preferences about their accommodation whenever possible, whilst at the same time allowing us to meet the needs of the borough in relation to housing, health and social care, sustainable communities and value for money.
- Meeting our legal and strategic obligations and requirements in a way that also takes into account the needs of local communities
- Setting out clear standards for the services we provide, so that everyone knows what to expect
- Writing our publications in plain English and offering translations, large print or a reading service where needed to help customers make informed choices about their housing
- Ensuring that decisions reflect policy and are consistent and transparent, and that all decisions made in relation to applications for housing are closely monitored and confirmed in writing
- Responding to the needs of our customers and partners and ensuring that the views of our customers are heard
- Providing comprehensive and accurate advice and information (using a range of media) about social housing and other housing options, including how to access them
- Directing customers to the appropriate team, service or organisation where specialist advice is required

1.1.3 If you are applying for housing, it is your responsibility to:

- Provide full and accurate details on all forms or correspondence in relation to your application for housing
- Tell us immediately if your circumstances change in any way, for example, your address, family details, medical condition
- Respond to all of our requests for information and attend verification appointments
- Make a decision on viewed properties within the specified timescale agreed with the landlord.

Throughout this document, we refer to people seeking access to social housing for rent or low cost home ownership options as "applicants".

1.2 Haringey's Housing Register

1.2.1 Haringey's Housing Register is a local register of housing need. All applicants seeking social housing in Haringey must apply through its Housing Register.

1.2.2 Applicants are advised that, due to the high demand for social housing in the borough, only those who have a realistic chance of securing social housing will be able to join the Housing Register. The demand for housing exceeds supply and the Housing Register exists to enable the Housing Allocations Policy to prioritise those households that are in greatest need and have the closest connection with Haringey. Where an applicant is unable to join the Housing Register, other housing options will be encouraged.

1.2.3 The Register also provides information on local needs which the Council and its partners use to develop new affordable housing.

1.2.4 The Housing Allocations Policy sets out:

- The objectives of the Housing Allocations Scheme
- How the Housing Register operates
- Who is allowed to be placed on the Housing Register
- How applicants' housing needs are assessed
- How social rented homes are let
- How the choice based lettings allocations scheme operates.

1.2.5 The Housing Allocations Scheme will operate through a choice based lettings (CBL) system and a Housing Allocations Policy. However, there may be local variations in order to make best use of social housing, in which case eligibility for properties will be clearly labelled in the advertisement.

1.2.6 The system is designed to be easy to use, and allows applicants to have an understanding of their housing situation, enabling them to make the best choice from the housing options available to them.

1.3 Partner organisations

1.3.1 Homes for Haringey (which manages homes on behalf of the Council) manages the largest stock of social housing in the borough.

1.3.2 All of the homes that Homes for Haringey manages are let in accordance with this Housing Allocations Policy.

1.3.3 Registered Providers (often referred to as 'housing associations') may advertise their available homes through the choice based lettings scheme, where nomination arrangements exist. This is when the Council has the right to nominate prospective

tenants to a property; in these cases the landlord will be normally be required to advertise the vacancy through the scheme. The Council will, except where set out below, nominate applicants in accordance with the Housing Allocations Policy.

1.3.4 In the Housing Allocations Policy, unless stated otherwise, references to Registered Providers or housing associations relate to partner organisations that have entered into nomination arrangements with the Council. They may also be referred to as 'partner organisations.'

1.3.5 The names and contact details of the organisations participating in Haringey's Housing Allocations Scheme are constantly changing. Appendix 1 An up-to-date list of the organisations that have agreed to participate can be obtained from the Council's Housing Service.

1.4 Objectives of the Housing Allocations Scheme

To set out the basis upon which the Council will allocate social housing pursuant to Part 6 of the Housing Act 1996 (as amended by the Homelessness Act 2002 and the Localism Act 2011) ("Part 6")

The Council will ensure that its Housing Allocations Policy complies with all legislative requirements, related legislation, case law, local policies and strategies.

To provide a system of choice in housing

The Council and its partners will develop the Housing Allocations Policy in accordance with the principles agreed locally. All assessments of need and allocations will be made in accordance with the agreed Policy.

The Housing Allocations Scheme aims to provide applicants with sufficient information to explain where homes are more likely to become available. This will allow them to make informed choices about their housing options.

To produce a system that applicants can understand and which is both open and fair

In order to ensure that it is consistent, fair and transparent, under the Housing Allocations Scheme the Council will:

- Seek adoption of a common housing needs banding structure
- Require clear labelling of the properties advertised
- Set out detailed procedures for needs assessment and allocations
- Publish comprehensive feedback on the homes that have been let
- Maintain a consistent review process

To increase the sustainability of local communities

Homes may be advertised with criteria aimed at improving the long-term stability of a community. In such cases, properties will be clearly advertised to show that

special criteria apply. This may include awarding additional priority to applicants in employment.

To assist in minimising homelessness and assist applicants in the highest assessed need

All applicants will have their housing needs assessed and be placed in a housing needs band according to their circumstances. This will take into account the reasonable preference criteria outlined in the Housing Act 1996 *and in accordance with the Homelessness Reduction Act 2017.*

Homes will generally be let to the applicant in the highest housing needs band who has been waiting the longest, having expressed an interest in the home and meeting the criteria advertised.

To minimise the use of temporary accommodation

A system of auto-bidding, together with the provision of comprehensive advice on housing options, will markedly reduce the length of time that applicants have to stay in temporary accommodation. In addition, the Council will make use of the private rented sector to discharge its duty to homeless households where appropriate.

To ensure that vulnerable applicants are supported

Vulnerable people will be appropriately supported to access the Housing Allocations Scheme. A number of measures will be taken to ensure that vulnerable applicants are not disadvantaged such as:

- Providing appropriate advice and assistance
- Translating documents on request
- Providing information in other formats on request
- Partnership working with support agencies via a Pathway model
- Undertaking monitoring and regular reviews of the allocations policy

To ensure that vulnerable groups are not disadvantaged by the Housing Allocations Scheme, the Council and its partners will put in place appropriate support systems and a full monitoring system to ensure that vulnerable people are successfully using the scheme.

To ensure that the scheme allows the Council and its partner organisations to make best use of homes and in particular adapted properties

Properties that have been adapted or developed for people with a disability will be advertised as such and, due to the shortage of adapted properties, preference will be given to households needing that adaptation. Property advertisements will show which groups may express an interest in them.

1.5 How the Housing Allocations Scheme will operate

1.5.1 Haringey is part of the Home Connections choice based lettings scheme. This is the choice based lettings scheme operating in North London.

1.5.2 Applicants accepted to join Haringey's Housing Register are placed in one of three Housing Needs Bands to reflect their housing need. Where applicants are unable to join the Housing Register they will be advised of alternative options.

1.5.3 Most vacant homes which are let through choice based lettings are advertised for a set period of time on a regular basis. This is called an advertising cycle.

1.5.4 Applicants can only express an interest in the homes for which they meet the criteria, for example, the number of bedrooms. They must, for example, meet the criteria for the number of bedrooms in the home.

1.5.5 They may express an interest by telephone, Smartphone app, text message, through the website or by calling in person at one of the Council's designated offices.

1.5.6 Once the deadline of the advertising cycle is reached, a shortlist of the applicants who have expressed an interest is provided by the Home Connections system.

1.5.7 The Housing Allocations Policy is then used to determine who is prioritised for housing from the shortlist.

1.5.8 Feedback on lettings is gathered when a property has been let.

1.5.9 The feedback will include information about the priority and effective date of the selected applicant, but not any personal information relating to them.

1.5.10 The choice based lettings scheme will not operate when:

- In accordance with section 6.9 below, applicants are made a direct offer of housing.
- In accordance with section 6.12 below, applicants are subject to 'auto-bidding'.

1.6 Reviewing and monitoring the Housing Allocations Policy

1.6.1 The Housing Allocations Policy will be reviewed regularly to ensure that it meets its stated objectives, complies with existing and proposed legislation and guidance, and does not operate in a manner that disadvantages, or discriminates against, any particular group.

1.7 The Annual Lettings Plan

1.7.1 The management of the Council's lets and nominations is set out in the Annual Lettings Plan. This plan forecasts the lets for the coming year and allocates them between competing housing demand groups.

1.7.2 The Annual Lettings Plans developed after 1 May 2017 will be approved by the Director of Regeneration, Planning and Development in consultation with the Cabinet Member for Housing.

1.7.3 The Annual Lettings Plan will be published each year, and is reviewed internally each quarter, and annually in preparation for the following year's Plan. The Annual Lettings Plan will be published each year.

2 THE LEGAL FRAMEWORK

2.1 Housing Act 1996

2.1.1 This policy complies with the requirements of Part 6 of the Housing Act 1996.

2.1.2 Part 6 covers:

- Allocations of local authority housing to new tenants;
- Transfers requested by local authority tenants;
- Allocations of local authority housing to current tenants of Registered Providers; and
- Nominations that the Council makes to Registered Providers

2.1.3 It sets out the circumstances of applicants to whom reasonable preference must be given when deciding who will be offered a property.

2.1.4 The policy has regard to the Allocation of Accommodation Guidance for Local Housing Authorities in England 2012 and Providing Social Housing for Local People 2013 and to the Council's Homelessness and Tenancy Strategies.

2.2 Homelessness Reduction Act 2017

2.2.1 This policy also complies with the Homelessness Reduction Act 2017 and in particular, the extension of duty owed to those threatened with homelessness, who are in turn entitled to Reasonable Preference.

2.3 Allocations that are covered by the Housing Allocations Policy but where the rules under Part 6 do not apply

2.3.1 In the following situations (where the rules under Part 6), homes will be allocated in accordance with the Housing Allocations Policy:

- Where Homes for Haringey (on behalf of the Council) needs to provide alternative accommodation for its tenant in order to carry out repairs or improvements to their property or where the tenant needs to be moved as part of a regeneration scheme.
- Where the Council has a duty to re-house persons following a compulsory purchase, or provide suitable alternative accommodation under the Land Compensation Act 1973, s 39, or under Part IV of the Rent (Agriculture) Act 1976. If it is not possible to provide an introductory or secure tenancy immediately to such an applicant, s/he will be registered within Band A of the Housing Allocations Scheme.

- Where the Council grants an introductory or secure tenancy to a former owner-occupier or statutory tenant of a defective home under the Housing Act 1985, s554 or s555.
- Where the Council provides temporary accommodation for council employees under Para 5, Schedule 1 of the 1985 Housing Act (Temporary Accommodation for Persons Taking Up Employment).

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2.4 Lettings that are not covered by the Housing Allocations Policy (and are also not covered by the rules in Part 6)

2.4.1 The following are not allocations of accommodation covered by the Housing Allocations Policy:

- Temporary accommodation provided for homeless people under Part 7 of the Housing Act 1996. However, applicants in this situation will be included on the Housing Register and take part in the choice based lettings scheme.
- Mutual exchanges between Council tenants or between Council tenants and the tenants of Registered Providers under the Housing Act 1985, s92.
- Where a secure tenant dies, the tenancy is a periodic one, and there is a person qualified to succeed the tenant under the Housing Act 1985, s89, then that person will succeed to the secure tenancy. If the home is bigger than they reasonably need they may be offered a suitable alternative home better meeting their needs.
- Where a secure tenant with a fixed term tenancy dies and the tenancy remains secure by virtue of the Housing Act 1985, s90.

2.4.2 Where a secure tenancy is assigned to someone who would have qualified to succeed to the tenancy if the secure tenant died immediately before the assignment, that person becomes the secure tenant.

2.4.3 Where a Court makes an Order about who is to be the secure tenant under:

a) the Matrimonial Causes Act 1973, s24 (property adjustment orders in connection with matrimonial proceedings);

b) the Matrimonial and Family Proceedings Act 1984, s17 (1) (property adjustment orders after overseas divorce); or

c) the Children Act 1989, Schedule 1, paragraph 1 (orders for financial relief against parents).

2.5 Reasonable preference

2.5.1 All applicants will be placed in the appropriate Housing Needs Band based on an assessment of their needs. This will ensure that the Council and the Partner Organisations (Homes for Haringey and Registered Providers) let homes to those in the highest assessed need and ensure that they meet their legal obligations.

2.5.2 The law sets out five categories of applicants to whom the Housing Allocations Policy must give reasonable preference:

- Applicants who are homeless (within the meaning of Part 7 of the Housing Act 1996) *or threatened with homelessness and have been assessed by the council as being owed the duty arising under s195(2) of the Housing Act 1996 ('the prevention duty'), and the council has not brought that duty to an end.*
- Applicants who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by such authority under section 192(3).
- Applicants occupying unsanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions.
- Applicants who need to move on medical or welfare grounds (including grounds relating to a disability).
- Applicants who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or to others).

2.5.3 The Housing Allocations Policy has been designed to ensure applicants who fall within these categories will be awarded the due reasonable preference.

2.5.4 Every application received by the Council will be considered according to its facts. Because every applicant's situation is different, applications will be considered on an individual basis and individual circumstances will be taken into account.

2.6 Equal opportunities and diversity

2.6.1 The Council will ensure that its Housing Allocations Policy is applied in a manner that actively promotes equality and complies with its statutory obligations relating to equal opportunities and diversity.

3 HARINGEY'S HOUSING REGISTER

3.1 Who can join the Housing Register?

3.1.1 To join the Housing Register, applicants must both be eligible for housing and qualify for inclusion in the Register. Both these threshold conditions are discussed further below.

3.1.2 Only applicants aged 16 or over who have been assessed as meeting the threshold conditions for inclusion on the Housing Register will be permitted to complete a full application. Some landlords may only offer tenancies to applicants under the age of 18 if they have a guarantor.

3.2 Joint applications

3.2.1 Where more than one eligible applicant wishes to have a shared application they will be joint applicants.

3.2.2 For a joint application, all applicants have to qualify and meet the conditions on eligibility. A joint tenancy will not be granted to two or more people if any one of them is a person from abroad who is ineligible.

3.3 People who can be included in the application

3.3.1 An applicant can only include, in their application, people who normally live with them (or might reasonably expected to reside with them) as a member of their household. Usually this will mean members of the applicant's family as follows:

- Husband, wife or civil partner
- Son and/or daughter
- Brother and/or sister
- Grandparents and/or grand children

3.3.2 The Council can decide whether a person is normally resident as a member of the household. A fourth tier Manager (or above) has the discretion to allow additional people to be included on the application when s/he considers it is appropriate, taking into account all of the circumstances. When exercising this discretion, the Council will also take into account the prevailing housing conditions in the borough.

3.4 Eligibility for housing

3.4.1 Section 160A of the Housing Act 1996 sets out who is ineligible to receive an allocation of housing. These are as follows:

- Certain persons who are subject to immigration control, unless they are re-included by order of the Secretary of State or are exempt because they are already a secure tenant

- Other persons from abroad whom the Secretary of State deems to be ineligible for an allocation of housing accommodation by a local housing authority or are exempt because **they are already a secure tenant**

3.4.2 The Council cannot allocate housing to anyone who is not eligible to join the Housing Register, even jointly with someone else who is eligible to join the Housing Register.

3.5 Qualification for the Register - the Council has also decided the following people do not qualify to join the Housing Register:

- Persons whose unacceptable behaviour would in the Council's view prevent them from being considered as a suitable tenant at the time of application (see further below)
- People who have not lived in the Borough for a continuous period of 3 years before their application (see further below).
- People who do not meet the threshold of housing need as defined by Bands A to C
- Applicants placed in temporary accommodation pursuant to the Housing Act 1996 by another Local Authority.
- Owner-occupiers (unless exemptions apply as set out in section 5.9)
- Applicants residing in tied accommodation will not qualify for inclusion on the Housing Register unless they are 6 months away from retirement or have received a legally binding notice asking them to leave their home (see section 5.10).
- Applicants who have a total gross household income in excess of thresholds set out below unless they meet one of the exceptions listed below.

Size	Income Threshold
1 bedroom	£33,000
2 bedroom	£42,250
3 bedroom	£52,000
4 + bedrooms	£64,200

Households who have gross household incomes above these thresholds, and are prevented from joining the Housing Register, will be directed to alternative housing options and invited to join the council's Intermediate Housing Register.

Exceptions to this threshold can be requested through the Housing Decision Panel, such as where a member of the household has a physical or mental health problem which would prevent the household finding suitable accommodation in the private sector.

- A savings threshold of £100,000 will apply to where one or both of the applicants are of pensionable age, and £50,000 for all other applicants. Households who have total household savings of more than these thresholds will not be eligible to join the Housing Register. However, discretion can be requested through the Housing Decision Panel in exceptional circumstances such as fleeing violence,

downsizing or where a member of the household has a physical or mental health problem which would prevent the household finding suitable accommodation in the private sector.

3.5.1 Behaviour that may be regarded by Haringey Council as unacceptable includes the following:

- Behaviour of the applicant(s) which would (if they were a secure tenant of the Council) entitle the Council to a possession order of their property under section 84 of the Housing Act 1985 on any ground mentioned in Part 1 of Schedule 2 to that Act (other than ground 8); or
- Behaviour of a member of the applicant's household which would (if they were a person living with a secure tenant of the Council) entitle the Council to such a possession order of their property under section 84 of the Housing Act 1985 on any ground mentioned in Part 1 of Schedule 2 to that Act (other than ground 8).

3.5.2 An applicant whom the Council has decided does not qualify to join the Register may make a fresh application if s/he considers that s/he does qualify.

3.5.3 The Council may allocate housing to an applicant who does not qualify for inclusion on the Register jointly with an applicant who does so qualify.

3.5.4 Local connection to Haringey

To establish a local connection with Haringey, applicants must be able to demonstrate that they can meet at least one of the following conditions:

- Their principal home is situated in Haringey and they have been living in the borough continuously for at least 3 years;
- They are a secure tenant of Haringey Council and living in an out-of borough property;
- They have been placed in specialised housing by Haringey Council or the Health Authority and are continuing to receive services from the Council and/or the Health Authority;
- They are resident in a women's refuge outside the Borough and had been living in Haringey continuously for at least 3 years immediately prior to moving into the refuge;
- They are temporarily residing outside Haringey in prison, hospital or residential care but have the intention of returning to Haringey and had been living in Haringey continuously for at least 3 years immediately prior to moving into prison, hospital or residential care.
- They are (whether or not they currently live in the borough):
  - a serving member of the regular forces or have been such a member within the 5 years preceding their application to be placed on the register
  - the spouse or civil partner of a deceased member of the regular forces (whose death is attributable wholly or partly to that service) and have recently ceased or will cease to be entitled to reside in Ministry of Defence accommodation

- serving or have served in the reserve forces and are suffering from a serious injury, illness or disability which is attributable (wholly or partly) to that service

- Where Haringey Council has accepted a full housing duty under the homelessness legislation and the Applicant has not resided in the borough for 3 years prior to their homelessness application, the application will remain deferred until the residency criterion is met.
- Local connection to Haringey will be accrued if you are placed outside Haringey in to temporary accommodation following a homelessness application to Haringey Council.

3.5.5 Applicants will no longer be able to remain on the Housing Register if their circumstances change in any of the following ways:

- Since applying to join the Housing Register, they have moved out of the borough and no longer meet any other local connection conditions;
- They had a local connection because Haringey Council had a rehousing duty to them under the homelessness legislation but that duty has since been discharged.

3.6 Right of review

3.6.1 On making a decision whether to accept or refuse an application, the Council will notify the applicant in writing, and if refusing, giving full details of the reason for refusal.

3.6.2 Where an application is refused because the Council has decided either that applicant is ineligible or that s/he does not qualify to join the Register, the applicant has the right to request a review of that decision under section 166A(9) of the Housing Act 1996.

4 HOW THE HOUSING REGISTER WORKS

4.1 How to apply to join the Register

4.1.1 To be considered for inclusion on the Housing Register, applicants are required to complete the Council's on-line Housing Options Assessment (through Haringey Council's website: **www.haringey.gov.uk**) or by visiting one of the Council's designated offices. This assessment will determine the housing options suitable for the applicant and only where the minimum threshold for Band C has been identified will the applicant be prompted to complete a Housing Register application.

4.1.2 Multiple applications are not allowed. An applicant may have only one active application on the Housing Register.

4.2 Civil partnerships and cohabitees

4.2.1 Cohabiting couples will be treated in the same way as married applicants and those in a civil partnership, except that some evidence of an abiding relationship will be required before a joint tenancy is awarded

4.3 Applicants' consent and declaration

4.3.1 When applicants apply to join the Housing Register, they must sign a declaration to confirm that:

- The information they have provided is complete, true and accurate.
- They will inform the Council immediately of any change in circumstances.
- They understand that information will be shared with partner organisations (Homes for Haringey and the Registered Providers) together with other relevant organisations in order to complete or verify information or to prevent fraud or protect public funds in other ways.
- They consent to the Council making enquiries of any relevant persons (including credit checking / referencing companies) to confirm that the information on the application form is correct or to add to the information given where this is necessary to complete an assessment of need or to consider suitability for housing.

4.4 Notification of changes in circumstances

4.4.1 Applicants must notify the Council if their circumstances change.

4.4.2 Examples of a change in circumstances requiring notification include someone joining or leaving the household, the birth of a child, a change of address, the purchase or acquisition of an interest in a home, or a change in the health or welfare of the applicant and/or a member of their household. If an applicant is in any doubt as to whether a change should be notified to the Council, s/he should consult the Housing Assessment Team.

4.5 Renewal of housing applications

4.5.1 Applicants are required to re-register their housing application once a year, in order to confirm that they still want to be considered for housing. In addition, to keep the Housing Register up to date, applicants may be contacted to see if they still want help with housing.

4.5.2 On the anniversary of the date their housing application was registered, applicants will be required to renew their application. Applicants will be notified of the arrangements for completing this renewal and must do so within the specified time period.

4.5.3 When completing their renewal, applicants must confirm that they still want to be considered for housing and provide details of all changes in their circumstances.

4.5.4 Failure to complete renewal within the time period specified (or to respond to a written request for information needed to assess their housing application) will result in the applicant being removed from the Housing Register.

4.6 Cancellation of housing applications

4.6.1 A housing application will be cancelled (and removed from the Housing Register) in the following circumstances:

- When the applicant requests it
- When the applicant either becomes ineligible for housing or ceases to qualify for inclusion on the Register
- When the applicant has been housed through the Allocations Scheme or the homelessness duty has been discharged into the private sector
- When the applicant accepts an Assured Shorthold Tenancy via a Council scheme
- When an applicant fails to maintain their housing application (through the renewal process) or they move home and fail to provide the Council with a contact address.
- When an applicant fails to respond to a request for further information within the specified time.

4.6.2 Should an applicant whose application has been cancelled subsequently succeed in an application to re-join the Housing Register they will receive a new effective date.

4.6.3 In exceptional circumstances the Council may agree to reinstate a cancelled application without revising the effective date if the applicant re-applies within 3 months of the application being removed from the Register.

4.7 Verification of housing applications

4.7.1 Before offering an applicant the tenancy of social housing, the Council will need to verify what the applicant has said in their housing application.

4.7.2 The verification interview may take place before or after an applicant is shortlisted for a particular property. The purpose of the interview is to check on the accuracy of the Council's initial assessment.

4.7.3 During the interview, a record will be made of the applicant's current circumstances, a check will be made to ensure that the applicant has been put into the correct Housing Needs Band and remain eligible. A photograph will be taken of all applicants in the household aged 18 years and over.

4.7.4 All applicants who are eligible for housing will be expected to produce original documents to verify their housing need at the verification appointment. If they are unable to produce the relevant documents, they may not be able to go ahead with any current bid.

4.7.5 For everyone included in the housing application, the Council will require proof of identity, together with proof of residence for all addresses used during the past five years. It will also require proof of income, proof of pregnancy, medical conditions and any disabilities, and a range of other documents, including for example birth certificates, marriage certificates, divorce papers, tenancy agreements, and bank statements, as appropriate.

4.8 Data protection

4.8.1 The Council and the Partner Organisations (Homes for Haringey and Registered Providers) will make every effort to keep information provided by applicants safe and confidential. They will comply with policies on Data Protection, which can be viewed on their websites.

4.8.2 Computer records are covered by the Data Protection Act 1998 which controls the way in which personal data is collected, processed, distributed and stored.

4.8.3 The Data Protection Act 1998 gives rights to individuals about whom the information is recorded. These rights include the rights of access to the information and the right to challenge the accuracy of that information.

4.8.4 Requests for access to data must be made in writing to the Council's Feedback and Information Team. Although a fee will not normally be charged for data access, a £10 charge will be made for a copy of the applicant's file.

4.9 Misrepresentation and fraud

4.9.1 Haringey Council and its Partners are committed to prosecuting any applicant who deliberately misrepresents their circumstances or attempts to deceive or defraud the Council in order to secure the tenancy of a council or housing association home to which they are not entitled.

4.9.2 The law imposes severe penalties (including substantial fines or imprisonment) where an offence is proved. If the applicant has gained a tenancy through misrepresentation or fraud, legal action will be taken to recover possession of the property and evict them.

4.10 Councillors' involvement in decision making

4.10.1 Elected Councillors cannot be involved in assessing housing applications or the allocation of housing.

4.10.2 This does not prevent them, however, from seeking or providing information on behalf of their constituents, or from being involved in developing and approving future policy.

4.11 Members of the Council, staff and their relatives

4.11.1 In order to ensure that the Council is treating all applicants fairly, any application for housing or re-housing from Councillors or employees of the Council or associated persons must be disclosed.

4.11.2 These applications will be assessed in the normal way but any allocation of housing must be approved by a third tier (or above) Officer.

4.12 Equal opportunities and monitoring

4.12.1 The Council is committed to the principle of equal opportunities in the delivery of all of its services. The Council will seek to ensure that its Housing Allocations Policy is applied in a manner that is fair to all sections of the community regardless of nationality, ethnic origin, marital status, age, gender or disability.

4.12.2 The Council and its partners will be responsive, accessible and sensitive to the needs of all applicants. They will not tolerate prejudice and discrimination and will actively promote equality

4.12.3 Applicants will be invited to indicate if they wish to make use of the Council's translation and interpretation services, and if they require other special services as a result of visual impairment, hearing difficulties or other disability.

4.12.4 Confidential interview facilities are provided at all Customer Service Centres and the Broadwater Farm Neighbourhood Office, all of which are wheelchair accessible. Home visits will be carried out as required, especially where the applicant has a disability or mobility problems.

4.12.5 All applicants for housing or re-housing will be asked to provide details of ethnic origin, age, gender, faith, sexuality and disability. This will not, however, be a requirement for acceptance of an application. Diversity records will be kept and monitored on a regular and systematic basis to ensure properties are being offered and allocated fairly, and will be reported to the Overview and Scrutiny Committee.

4.12.6 The Housing Allocations Policy (including amendments) will be reviewed regularly in order to ensure that it does not operate in a manner that disadvantages, or discriminates against, any particular group.

4.13 Confidentiality

4.13.1 Information about a housing application must only be disclosed to a third party on a "need to know" basis and in the following circumstances:

- For the purpose of effective joint working with health, education, social services and other agencies, in appropriate cases, to ensure the safeguarding of children and vulnerable adults and positive outcomes for households
- For the purpose of detecting and preventing fraud
- For the promotion of community safety and the detection and prevention of crime
- For efficient administration of offers of re-housing, lettings, housing association nominations and rent and benefit accountancy
- Where disclosure of information is a legal requirement.

4.14 Access to personal files

4.14.1 Housing applicants have the right to see what information is held about them on non-computerised records by virtue of the Access to Personal Files (Housing) Regulations 1989 in respect of records made after 1 April 1989.

4.14.2 Applicants also have a right of access to information held about them and their households. This right of access extends only to their own "personal" information.

4.14.3 In certain circumstances, the Council may refuse access where, for example, the information has been provided in confidence by a third party or disclosure may identify a third party who has not consented to disclosure.

4.14.4 Requests for access to data must be made in writing to the Council's Feedback and Information Team. A fee of £10 may be charged for supplying an applicant (or their representative) with a copy of their file.

5 ASSESSMENT OF HOUSING NEED

5.1 Housing Needs Bands

5.1.1 To be considered for inclusion on the Housing Register, all applicants must complete the on-line housing options assessment.

5.1.2 Following assessment, an application to the Housing Register will only be considered where the minimum threshold for Band C has been met. The application will be placed on the Housing Register (if the applicant is eligible for housing and qualifies for inclusion) in one of 3 Housing Needs Bands, based on the information provided:

Band A

Band B

Band C

5.1.3 Band A will contain those applicants in highest housing need and Band C those applicants in lowest need (see Section 14 for more information on banding).

5.1.4 Some allocations will be dealt with outside the choice based lettings scheme; these are explained in Section 6.8 and 6.9.

5.2 Assessment of housing applications

5.2.1 When the Council has assessed their housing application, the applicant will receive a letter setting out the outcome.

5.2.2 In that letter, the Council will:

- Confirm what Housing Needs Band the applicant has been placed in on initial assessment. Some assessments (such as those relating to medical conditions) may take longer and may result in a change in banding
- Confirm the size (and, if applicable, the type) of property the applicant is eligible for
- Confirm the applicant's effective date
- Include a reminder about informing the Council of any change in the household's circumstances
- Provide details of the appeal and review procedures
- Provide a registration number and unique pin number
- Explain the reasons for any temporary restriction from bidding or reduced preference
- Explain the requirement for annual re-registration**.**

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5.3 Deciding the effective date

5.3.1 Priority within Bands is determined by an applicant's effective date. The effective date is usually the date the application is received, except:

- Where an applicant is moved from one Band to another Band their new effective date will be the date when the change of circumstances causing the banding change is processed and accepted. In the event that an applicant moves up a Band and subsequently has a further change of circumstances that causes a band demotion, the original effective date in the lower band will be retained where this demotion is within six months of the band change upwards.
- Where an applicant receives priority on medical or welfare grounds, their effective date will be the date they applied for this award.
- Where an applicant has been accepted as being 'homeless' or threatened with homelessness, the effective date will be the date of the determination of their homelessness application, unless they already qualify for Band B with an earlier date.
- Where the applicant needs to move because their home is being demolished as part of an Estate Regeneration Scheme, their effective date of their application will be the date that their tenancy in their current property began. Those tenants who succeeded to a tenancy will be given the date the original tenancy in their current home began.

5.4 Applicants from outside of Haringey

5.4.1 Haringey is a high demand borough where demand for social housing is in excess of supply. For this reason, applicants who have no local connection to Haringey will not qualify for inclusion on the Housing Register.

5.5 Applicants given reduced priority

5.5.1 Applicants in Band A may have their priority reduced (to Band B) if they have not made a bid under the Home Connections choice based lettings scheme within 6 months of being placed in Band A.

5.6 Applicants given reduced preference

5.6.1 Section 166A (5) of the Housing Act 1996 allows allocation schemes to give reduced preference to the following groups of applicants:

- An applicant with significant financial resources and where s/he is financially able to secure alternative accommodation at market rent for himself
- An applicant whose behaviour (or that of a member of his household) affects their suitability to be a tenant.

5.6.2 The decision to give reduced preference to an applicant because of their behaviour (or the behaviour of a member of their household) is a sanction. It should not be confused with the Council's power to decide that an applicant does not qualify to join the Housing Register.

5.6.3 Where an applicant with reasonable preference has sufficient resources to buy (or lease) a suitable home, but their housing need enables them to be included on the Housing Register, their priority may be reduced due to their financial resources.

5.6.4 In reaching a decision, the Council will take into account the applicant's income, capital and any equitable interest they hold in their existing home and any other property, together with their ability to get a mortgage and the size and type of property they require.

5.6.5 Applicants who cannot afford to buy a property on the open market but who could afford to buy through low-cost home ownership will be placed in Housing Needs Band C under reduced preference if they have an assessed need.

5.6.6 Where an applicant with reasonable preference has an assessed need, they may be given reduced preference if any of the following situations applies:

- They are a tenant of the Council or a Registered Provider and have property-related debts (such as rent arrears, council tax arrears or a Housing Benefit overpayment) in relation to an existing or former home, due to property damage and/or non-payment.
- They are a tenant of a private landlord and have property-related debts (such as rent arrears, council tax arrears or a Housing Benefit overpayment) in relation to an existing or former home, due to property damage and/or non-payment, and a Possession Order has been made against them.
- They are a tenant who has breached the terms of a postponed possession order within the last five years.
- They (or someone they have included as part of their household) have committed acts of anti social behaviour that have caused, or are likely to cause, a serious nuisance or annoyance to their neighbours or others in the locality of where they live or have previously lived.
- They have been convicted of assaulting or harassing an employee or agent of Haringey Council, Homes for Haringey or a Registered Provider (including those with whom the Council does not have nomination arrangements).
- They (or someone they have included as part of their household) have deliberately damaged a property that they are renting, or were previously renting, from Homes for Haringey, a Registered Provider, a local authority or a private landlord**.**

5.6.7 In the above situations, an applicant who has an assessed need will generally be placed in Band C to reflect reduced preference.

5.6.8 The Council will notify applicants given reduced preference and inform them in writing of the reason for the reduced preference and if there is any action they can take to improve their assessment.

5.6.9 If the applicant owes money to the Council or their existing or former landlord and they are able to demonstrate that they have entered into and maintained effective arrangements for repaying this debt, it may not necessarily result in them being given reduced preference.

5.6.10 This is not a blanket policy and each case will be considered on its merits. In exceptional circumstances, applicants retain additional preference despite meeting the criteria outlined above. This may occur, for example, where an owner-occupier has a severe medical need and needs sheltered housing, or someone who is fleeing domestic violence has rent arrears.

5.7 Applicants who have deliberately made their housing situation worse

5.7.1 The Council will consider whether an applicant has deliberately made their housing situation worse to increase their housing need, and consequently improve their chances of rehousing through the Housing Register.

5.7.2 If the Council decides that whether before or after inclusion on the Register the applicant has deliberately made their housing situation worse, the applicant will be placed or remain in the Band that reflects their housing need before the action (or inaction) that made their situation worse.

5.7.3 The assessment will be reviewed on request but not normally within the first twelve months of the application being made. If the restriction is removed, the application will be placed in the Band that reflects the applicant's current circumstances and their 'effective date' will be the date that the application was moved to the new Band. If the applicant's circumstances do not meet the fail to meet the threshold for at least a Band C placement, they will be removed from the housing register.

5.8 Owner-occupiers

5.8.1 Owner-occupiers and applicants who own other residential property (freehold or leasehold) will not normally qualify for inclusion on the Housing Register. Applicants who have previously owned a property and have sold it will be asked to provide proof of the sale, together with evidence of the proceeds received from the sale and what has become of them.

5.8.2 Unless they are unable to meet their housing needs from their own resources and require an adapted property or supported housing owner occupiers will not qualify for inclusion on the Housing Register.

5.8.3 Owner-occupiers may qualify for inclusion on the Housing Register if they fall within one of the following groups:

- They are over 50 and have been assessed as being unable to meet their housing needs from their own resources; or
- They have a disability, require an adapted property and have been assessed as being unable to meet their housing needs from their own resources.
- They are required to leave their current accommodation because their home is being demolished as part of an Estate Regeneration Scheme, and their current assets and income do not allow them to find alternative accommodation which will meet their housing needs as set out in this section.

5.8.4 The Council will decide whether or not an applicant is able to meet their housing needs from their own resources. To make this assessment, it will require details of the applicant's income and savings.

5.8.5 After considering all of the information, the Council may decide that:

- The applicant has sufficient resources to buy or lease a suitable home outright, without the need for shared ownership or a mortgage.
- The applicant has sufficient resources and the mortgage potential to buy or lease a suitable home with a mortgage.
- The applicant cannot afford to buy or lease a suitable home**.**

5.8.6 If the applicant meets the criteria in paragraph 5.8.5 above and the Council decides that they are unable to buy or lease suitable accommodation, their application will be moved to a higher Band if they are awarded priority on medical or welfare grounds.

5.9 Applicants in Haringey 'tied' accommodation which is suitable for their needs

5.9.1 Applicants are considered to be residing in Haringey tied accommodation if the occupation of their home is essential for the performance of their duties as an employee of the Council and there is a contractual obligation for re-housing.

5.9.2 Applicants residing in tied accommodation will not qualify for inclusion on the Housing Register unless they are 6 months away from retirement or have received a legally binding notice asking them to leave their home. At this point they will be placed in Band A.

6 FINDING A HOME

6.1 Choice based lettings

6.1.1 Applicants who are accepted onto the Housing Register can bid for properties that are appropriate to their housing need unless their choice based lettings has been restricted as described in 6.2 below.

6.1.2 Although applicants cannot bid for homes that are larger than they need, applicants who need 3 bedrooms or more may bid for homes that have one bedroom less than they need.

6.1.3 In exceptional circumstances (involving very large families that have little or no prospect of obtaining a home that is large enough for their needs), applicants may be permitted to bid for properties that are up to three bedrooms smaller than they need. Before this can happen, however, the applicant must obtain the permission of the Council.

6.1.4 Where an applicant chooses to accept an offer of accommodation that has fewer bedrooms than they need they may be unable to reapply to join the Housing Register in the future.

6.1.5 Registered Providers have their own standards for occupancy and may not offer properties that are smaller than the applicant needs.

6.2 Circumstances when applicants on the Register will not be able to participate in choice based lettings

6.2.1 Some applicants will not be allowed to participate in the choice based lettings scheme if the Council considers that, due to their age or their need for specialist support, they are not yet ready to sustain a tenancy. The circumstances in which this may occur are described in section 6.6 below.

6.2.2 Applicants will also not be allowed to participate in the choice based lettings scheme if they have accepted an offer of housing but the property is not yet ready for occupation, or if it has been agreed that they will only receive a ‘direct offer’ of accommodation.

6.2.3 Applicants can be suspended from bidding for homes through the choice based lettings scheme if they refuse two written offers after making successful bids. Any suspension will be effective for up to twelve months.

6.2.4 Decisions on whether or not applicants should be temporarily prevented from participating in the choice based lettings scheme will be made by the Council. Where it decides that an applicant should not be allowed to participate, the Council will inform the applicant of the reasons why they are not able to take part, any conditions that will need to be met before they will again be entitled to take part, and the date that they may request a review of the decision to prevent them from taking part.

6.3 Advertising available homes

6.3.1 Homes that are offered through Haringey's choice based lettings scheme will be advertised as widely as possible.

6.3.2 Some Registered Provider may decide not to advertise all of their homes through the choice based lettings scheme. This will depend on the level of tenancy nomination rights that the Council has agreed with them.

6.3.3 In many cases, a home may be excluded from the advertising scheme because the property will be used to provide temporary accommodation for homeless households, or is needed, for example, to deal with an emergency or for use as alternative accommodation for a tenant who has to move out of their home because it has become unsafe or requires extensive repairs. Other examples include homes that are needed for applicants who have specific housing needs or have been specially adapted and meet the particular needs of an applicant. (See Sections 6.8 and 6.9 for further details).

6.3.4 To ensure that applicants who are eligible for choice based lettings are aware of the homes that are available, the properties will be advertised on the choice based lettings website (www.homeconnections.org.uk)

6.3.5 Advertisements will include a description of the home and any other relevant information, for example the rent, size and any special facilities or adaptations.

6.3.6 In the advertisement, the home will be labelled to show whether it is restricted to any particular group of applicants.

6.4 Labelling of properties

6.4.1 The Council will label the advertised homes in a way that provides as much information as possible about the property and which applicants are eligible to express an interest.

6.4.2 Where an applicant does not meet the criteria outlined, they will not be considered for the home.

6.4.3 Labelling criteria will include:

- Transferring tenant: The Council and Registered Providers may sometimes decide that a home will only be available for their own existing tenants.
- Property size: Applicants must be eligible for the size and type of the property they are bidding for – they will be advised of what they can bid for when they join the scheme.
- Housing needs bands: Some homes may only be offered to applicants who are in particular Bands.
- Adapted homes: Homes that are particularly suitable for people with disabilities will have special symbols to help applicants with those needs to identify them. Adverts for adapted or accessible homes (for example those with wheelchair access) will specify that they are only available for people assessed as needing them.

- Age restrictions: Some homes may have a minimum age requirement.
- Local lettings policies: In order to promote sustainable and settled communities, the Council, Homes for Haringey and Registered Provider may introduce specific lettings policies in some areas which will vary from this Housing Allocations Policy. They may do this, for example, where there are too many vulnerable residents in an area or there is a need to reduce child density, tackle serious anti social behaviour or increase the proportion of tenants who are in employment, education or training.
- Pets: The advertisement will identify whether pets are allowed.
- Home type and facilities: The advertisement will show the type of home, the floor level, the type of heating, the service charges and any other relevant details.

6.5 Expressing an interest in available homes

6.5.1 To be considered for an available home, applicants must apply for the home by the publicised deadline and meet the labelling criteria.

6.5.2 Applicants will generally be able to make expressions of interest each advertising cycle. The bidding cycle will be weekly.

6.5.3 In each weekly cycle, applicants will be able to express an interest in up to three properties for which they are eligible.

6.5.4 The number of homes in which an applicant may express an interest each bidding cycle, the length of the bidding cycle and the frequency with which details of newly available properties are added to the choice based lettings website may be changed after monitoring of the scheme.

6.5.5 Support will be offered to applicants who require assistance in using the scheme.

6.5.6 Applicants will be able to express an interest in a property by several methods:

- By telephone
- By Smartphone app
- Using the website
- In person at their local designated Council office
- By text (using a mobile phone)
- By using an advocate for any of the above methods

6.5.7 In certain circumstances applicants may bid for properties by proxy. Council staff, support agencies and other providers may be used as proxies for this purpose, subject to the Council's agreement to any such request.

6.6 Applicants who may be suspended from bidding through the choice based lettings scheme

6.6.1 An applicant may be suspended from bidding through the choice based letting scheme (or any bid that they make may be disregarded during shortlisting) in any of the following circumstances:

- Where the applicant has been assessed as being incapable of independent living or sustaining a tenancy;
- Where the applicant is only capable of sustaining a tenancy if they are provided with support, but that support is not being provided;
- Where the applicant's eligibility or level of priority is being reviewed because of, for example, a change of circumstances or concerns about possible fraud or the accuracy of the information that has been supplied in relation to their application for housing;
- Where the applicant has already accepted an offer of another property or has been formally offered another property and has not yet confirmed whether or not they will accept that offer;
- Where the applicant repeatedly fails to attend viewings of properties for which they have bid and been shortlisted;
- Where the applicant refuses, without good reason, formal written offers of properties for which they have made a successful bid under the choice based lettings scheme**.**

6.6.2 In deciding whether or not an applicant is ready for independent living and capable of sustaining a tenancy, the Council will be guided by its specialist housing teams, by support providers and the relevant health and social care professionals.

6.6.3 Where it is decided that the applicant is not yet ready for independent living (or is not receiving the support they need to live independently), their situation will be closely monitored by the Council's specialist housing teams and action will be taken to ensure that appropriate housing and support are provided as soon as practicable.

6.6.4 An applicant will normally be deemed to have 'repeatedly' failed to attend viewings or refused formal offers when, without good reason, they have failed to attend 2 viewings or accept 2 formal written offers.

6.6.5 Where it decides that an applicant should be suspended from bidding through the choice based lettings scheme, the Council will inform the applicant of the reasons why they are not able to take part, any conditions that will need to be met before they will again be entitled to take part, and the date that they may request reconsideration of the decision to suspend them from bidding for properties.

6.7 Shortlisting of interested applicants

6.7.1 Once the advert deadline has passed, a shortlist of applicants expressing an interest in the home will be produced from those who are eligible and meet the labelling criteria.

6.7.2 Following production of the shortlist, arrangements will be made by the relevant landlord (Homes for Haringey or a Registered Providers) for the shortlisted applicants to see the property as soon as possible.

6.7.3 The landlord will decide whether the applicants view the property individually (with separate appointments) or all at the same time.

6.7.4 During the viewing and/or on the telephone, applicants will be given further information about the property, the repairs to be carried out, the date when the property is expected to be available, and any special conditions of tenancy.

6.7.5 After the viewing, the property will be offered to the eligible applicant who is highest in the bidding shortlist.

6.7.6 The selected applicant will have up to 24 hours to make up their mind as to whether or not to accept the offer. In exceptional circumstances, this period of time may be increased.

6.7.7 When an applicant says that they are no longer interested in a property after the viewing, the applicant who is next on the shortlist will normally be considered for the tenancy.

6.8 Properties not offered through choice based lettings

6.8.1 The following types of property will not be advertised and so not let through the Home Connections choice based lettings scheme:

- Council homes used as temporary accommodation which are then let to the existing resident as an introductory or secure tenancy
- Service tenancies
- Supported housing, including housing for older people
- Properties selected for ‘direct lets’
- Properties which will be used to provide temporary accommodation for homeless households
- Shared ownership, rent-to-purchase and keyworker homes (although these will be publicised through the choice based lettings advertisements).

6.9 Properties selected for ‘direct lets’

6.9.1 Although most vacancies (except those in supported housing, sheltered housing and extra care supported housing and those used for temporary accommodation) will be advertised through the choice based lettings scheme, the Council will make a direct offer of accommodation to applicants in following circumstances.

6.9.2 A ‘direct let’ may be made in supported housing, sheltered housing and extra care supported housing), and may be considered for any applicant whose assessment results in them being placed in Band A of the Housing Register and where, in the judgement of the Council, a ‘direct let’ offers a better prospect of securing a move than may be achieved by bidding for a suitable home. This reflects the urgency of the move, and Examples include the following:

- Where an existing council tenant or partner housing association tenant in Haringey has been approved for an emergency management transfer because of harassment, domestic violence or hate crime
- Where an applicant needs to move urgently because of a critical medical or welfare need, including emergencies and situations where there are serious safeguarding implications
- Where it is in the overriding interests of the Council to prioritise an allocation of housing to a particular household and/or it is necessary to comply with a Court Order and/or fulfil an urgent statutory or legal duty
- Where a council tenant or housing association tenant in Haringey is occupying a specially-adapted home or under-occupying a large family home and is willing to transfer to a home that is more appropriate to their needs.
- Where an applicant has been accepted onto the Housing Register as part of a move-on quota and has failed to move within six months.

6.9.3 A 'direct let' may also be considered in other situations, such as:

- Where an applicant has been assessed by a Multi Agency Public Protection Panel (MAPPA) and it is decided by that Panel that the applicant should be offered social housing
- Where the type and/or location of the accommodation offered to a particular applicant is likely to have significant implications in relation to child protection and/or public protection
- Where an applicant is being moved under a national witness mobility / protection scheme
- Where a specially adapted property has been built, acquired or adapted in order to meet the needs of a specific applicant
- Where a council tenant or housing association tenant in Haringey requires extensive disabled facilities that can be provided more appropriately in alternative accommodation of a particular type
- Where a property is currently occupied by a homeless household (as temporary accommodation and on the basis of a non-secure tenancy) and that property is then offered to them as an introductory / starter tenancy or secure / assured tenancy
- Where an applicant is a former council tenant who has previously surrendered their tenancy (without the need for possession proceedings) on the understanding that, when they leave prison, hospital, rehabilitation or residential care, or have successfully completed a supported housing tenancy, they will be offered the tenancy of a bedsit or one-bedroom home
- Where any delay in providing the applicant with suitable accommodation is likely to prove costly to the Council.

6.9.4 Properties will be selected for direct offers on the basis of the assessed requirements of the applicants.

6.9.5 Where a ‘direct let’ is made, the property will not be advertised through the choice based lettings scheme. However, to ensure transparency, the Council will report that the property has been used as a ‘direct let’.

6.10 Circumstances when homeless households living in temporary accommodation may be made a ‘direct offer’

6.10.1 Where an applicant meets the criteria for ‘auto-bidding’ and the Council decides that they are unsuitable for ‘auto-bidding’ (because of the specific nature of their housing requirements, for example), the applicant will be encouraged to continue bidding but may be considered for a ‘direct offer’ of accommodation

6.10.2 When considering the need for a ‘direct offer’, the Council will take into account all of the circumstances, including any reasons why they must or must not reside in a particular part of the borough or type of property.

6.10.3 A ‘direct offer’ may be made, for example, where an applicant needs to move urgently because of a critical medical or welfare need, including situations where there are child protection and/or public protection implications and/or the applicant or a member of their household is a victim of harassment, domestic violence or hate crime.

6.10.4 Such offers may also be made, in exceptional circumstances, where it is in the overriding interests of the Council to prioritise an allocation of housing to a particular household and/or it is necessary to comply with a Court Order and/or fulfil an urgent statutory or legal duty.

6.11 Making an offer of accommodation

6.11.1 Before offering an applicant the tenancy of social housing, the Council will need to verify what the applicant has said in their housing application and ensure that the applicant is in the appropriate Band, has the correct effective date and is eligible for the size and type of the property available (see Section 4.7 for details of verification process).

6.11.2 If an applicant fails the verification process, they will not be offered the tenancy of the accommodation even if they are the highest in the shortlist of applicants who have confirmed an interest in being offered the tenancy. In such cases, the applicant will be told why they were not being offered the tenancy of the accommodation.

6.11.3 The successful applicant for each home will normally be the one who is eligible, meets any labelling criteria, and has been verified as being in the highest Band and having the earliest effective date.

6.11.4 The Offer letter describes the action the applicant must take to accept the offer of accommodation. The tenancy will commence on an agreed date after the property is ready for occupation and with reasonable notice given to the tenant.

6.12 Circumstances when homeless households living in temporary accommodation may be subject to 'auto-bidding'

6.12.1 Applicants living in temporary accommodation are actively encouraged to bid for properties through the choice based lettings scheme.

6.12.2 In order to minimise the cost of temporary accommodation (and the amount of time that homeless households spend in temporary accommodation), the Council may bid for properties on behalf of homeless households or, exceptionally, make them a 'direct offer' of suitable accommodation.

6.12.3 Under the Council's 'auto-bidding' arrangements, applicants who have been living in temporary accommodation and are in a position to make a successful bid for accommodation through choice based lettings will be interviewed by one of the Council's Officers. The purpose of that interview is to confirm the applicant's circumstances and housing requirements, review their bidding history and discuss the full range of housing options available to them.

6.12.4 Although an applicant who is subject to 'auto-bidding' may continue to bid for properties under the choice based lettings scheme, the auto-bidding system will normally bid (on their behalf) for all properties that have the number of bedrooms that the applicant requires.

6.12.5 Where an applicant is subject to 'auto-bidding' and requires at least 3 bedrooms but is willing to accept a home with fewer bedrooms, it is essential that they bid for any smaller homes they like, as the 'auto-bidding' system will only place bids on properties that have the number of bedrooms that the applicant has been assessed as needing.

6.12.6 If an applicant is living in temporary accommodation and makes a successful bid for accommodation (or if an 'auto-bid', made on their behalf, is successful), they will be offered the tenancy of that accommodation. This is irrespective of whether or not they have chosen to attend the viewing.

6.12.7 Such an applicant will only be entitled to withdraw their interest in a property without penalty if they are not already subject to 'auto-bidding' and they withdraw their interest before they receive a written offer.

6.13 Refusing an offer of accommodation

6.13.1 When a shortlisted applicant (who is not subject to 'auto-bidding') views a home, and says they are no longer interested in being offered the tenancy, the next applicant on the shortlist will be considered.

6.13.2 The consequences of refusing an offer of accommodation depend on the circumstances in which the offer is made. It is important for an applicant who is owed a rehousing duty under Part 7 of the Housing Act 1996 to understand that the refusal of a suitable offer of accommodation is highly likely to result in cessation of the Council's duty to accommodate them under Part 7, the loss of any temporary accommodation, and the loss of priority under this Housing Allocation Policy.

<u>Applicants who bid for properties, but are not subject to 'auto-bidding'</u>

6.13.3 If an applicant (who is not subject to 'auto-bidding') bids for a property through the choice based lettings scheme, they can withdraw their interest in that property without penalty.

6.13.4 However, if they refuse two written offers after making successful bids, the Council may suspend the applicant from bidding for homes through the choice based lettings scheme for a period of up to 12 months. This provision does not apply to supported housing, which is dealt with in section 9 below.

Applicants in temporary accommodation and subject to 'auto-bidding'

6.13.5 If an applicant is living in temporary accommodation and subject to 'auto-bidding', they are expected to accept any suitable offer of accommodation that is made to them. If the offer is refused, the applicant will be invited to reconsider the offer within the specified time period but applicants are encouraged to accept offers. They have the right, however, to request a review of the suitability of that offer of accommodation.

6.13.6 Where such an applicant refuses an offer of suitable accommodation, the Council's duty to accommodate them under Part 7 of the Housing Act 1996 will cease.

6.13.7 This means that, subject to the outcome of any review, the Council will stop providing the applicant with temporary accommodation. As well as losing their priority for housing (based on them being homeless), the applicant will have to make their own arrangements for housing.

Applicants who are offered a 'direct let'

6.13.8 If an applicant refuses a 'direct let' (based on an individual assessment of their requirements; see Section 6.9), the Council will consider the applicant's reasons for refusing the offer and decide whether or not the offer was suitable.

- Where the Council decides that it was reasonable for the applicant to refuse the accommodation offered, the Council will make one further offer of a 'direct let' of suitable accommodation

- Where the Council decides that it was unreasonable for the applicant to refuse the accommodation offered, the Council will make no further offers of a 'direct let' and, if the applicant is living in temporary accommodation, the Council's duty to accommodate them under Part 7 of the Housing Act will cease.

6.13.9 Applicants have the right to request a review of the suitability of that offer of accommodation (except in management transfer cases). Where the Council decides that the accommodation offered was not, the Council will make one further offer of a 'direct let' of suitable accommodation.

Where the Council decides that the accommodation offered was suitable the Council's duty to accommodate them under Part 7 of the Housing Act 1996 will cease. This means that the Council will stop providing the applicant with temporary accommodation and the applicant will have to make their own arrangements for housing.

6.14 Failing to respond to an offer of accommodation

6.14.1 If an applicant fails to respond to a written offer of accommodation within the timescales specified, without good reason, they will be considered to have refused that offer of accommodation. In these circumstances, the Council will no further offers of accommodation will be made.

6.15 Accepting an offer of accommodation

6.15.1 The Offer letter describes the action the applicant must take to accept the offer of accommodation, including signing the tenancy agreement and collecting the keys.

6.15.2 If an applicant signs a tenancy agreement and then rejects the property, this does not count as a refusal of an offer of accommodation because, at this stage, they are the tenant of that property.

6.15.3 If they have already given notice on their previous home, it will not be possible for them to withdraw the notice (although their former landlord may decide nevertheless to permit them to remain). Also, as they have accepted a tenancy, it is likely that the new landlord will insist on receiving 4 weeks' notice (and will be entitled to rent during that time) if the tenant decides that they do not want to continue with their new tenancy.

6.15.4 Where the applicant is living in temporary accommodation and refuses to move out of that accommodation after signing a tenancy agreement following an offer under this Scheme, they will be evicted from their temporary accommodation and the Council's duty to accommodate them under Part 7 of the Housing Act 1996 will cease. This means that the applicant will have to make their own arrangements for housing.

6.16 Withdrawing an offer of accommodation

6.16.1 A written offer of accommodation can only be withdrawn from an applicant (before the tenancy agreement is signed) where one or more of the following situations applies:

- The applicant has made a false declaration or failed to provide the Council with up-to-date information and that, after reviewing their housing application, the Council has determined that the applicant is not eligible for the property;
- The property details available at the time that the written offer was made were incorrect and it was subsequently discovered that the size and type of the property did not, in fact, match the applicant's needs;
- The applicant's eligibility has changed, since the written offer of accommodation, following a review of the application;
- A fourth tier (or above) Officer decides that, taking all factors into account, the property should not have been offered to the applicant.

6.17 Feedback on the letting of social housing

6.17.1 The Council will publish feedback on the outcomes of the bids it has received in respect of the social housing advertised through the choice based lettings scheme on a quarterly basis.

6.17.2 For each letting, the Council will provide the following information:

- The size, type and location of the home
- The number of applicants who bid for the property
- The Band and effective date of the successful bidder

6.17.3 In order to ensure transparency, the feedback will also include any homes that were let as 'direct lets' and were not advertised through the choice based lettings scheme.

6.17.4 Feedback is important because it helps applicants to assess their housing prospects and make informed choices about their future housing.

6.18 Homes in lower demand

6.18.1 Where there are no expressions of interest from eligible applicants, a home will be re-advertised or the criteria for selection will be reviewed.

7 OFFERING HOUSING TO TENANTS WHO OWE RENT

7.1.1 Tenants on the Housing Register will not normally be offered a new tenancy if they are in arrears with their rent.

7.1.2 The management of rent arrears and implication on future rehousing are included in a separate procedure, available on request.

7.1.3 If they are a housing association or council tenant, such applicants may still be offered a new tenancy if:

- They need to move urgently because of a critical medical or welfare need, including emergencies and situations where there are critical safeguarding implications;
- They have been approved for an emergency transfer because of harassment, domestic violence or hate crime;
- They need to move out of their home (temporarily or permanently) in order to allow repairs or redevelopment to take place;
- They are under-occupying a family home that has three or more bedrooms and they are willing to transfer to a home that has at least two fewer bedrooms;
- They are occupying a specially-adapted home and are willing to transfer to a home that is more appropriate to their needs.

7.1.4 Where the applicant is under-occupying their home and is entitled to receive a financial incentive for transferring to a smaller home, the transfer incentive payment will be used to reduce or clear any arrears.

7.1.5 If such an applicant is living in temporary accommodation provided by the Council under Part 7 of the Housing Act 1996, they may still be offered housing if they have been paying their rent regularly, reducing their arrears to the satisfaction of their landlord and entered into an agreement to pay all outstanding rent, by affordable instalments, over an agreed period.

7.1.6 In exceptional circumstances, where there is an urgent need for a housing association or council tenant to move on social or housing management grounds, a new tenancy may still be approved, despite the arrears. Approval will be subject to the agreement of a fourth tier (or above) Officer.

8 TYPE OF PROPERTY OFFERED

8.1 Property size and household size

8.1.1 The Council, Homes for Haringey and Registered Providers will always aim to make best use of their housing stock.

8.1.2 When determining the number and ages of the people who may occupy a property, the Council will have regard to the bedroom entitlement set out in 8.7 below.

8.1.3 Sometimes the applicant with the highest priority may not be allocated a home if this would result in either overcrowding or under-occupation, or if it would not make best use of ground floor or specially adapted accommodation.

8.1.4 Properties that have level access will be prioritised for those applicants who have a very serious medical need (so are in Band 'A') and require such accommodation.

8.1.5 If the landlord agrees an applicant will be allowed to move into a home that is smaller than their needs, where this improves their situation. For example, if an applicant has 4 children and is entitled to a 4-bedroom home but is living in one with 2 bedrooms, their application for a 3-bedroom home may be considered.

8.1.6 Registered Providers may apply different standards. The Home Connections advert will confirm how many people can be accommodated.

8.2 Parents with 'staying access' to dependent children or shared residence orders

8.2.1 Applicants with a shared residence order or staying access for children are not automatically entitled to bedrooms for their children.

8.2.2 The general principle is that a child needs one home of an adequate size, and that the Council and Registered Providers will not accept responsibility for providing a second home for children.

8.2.3 In determining the size of accommodation required for a household, children from current or former relationships will only be counted as part of the household if they live with the applicant for more than 50% of the time. Suitable evidence must be provided, in the form of a Residency Order and a child benefit statement.

8.3 Parents with a dependent child who is in foster care or being looked after by the local authority

8.3.1 When assessing bedroom entitlement, the Council will only take into account children who are currently in foster care or being looked after by the local authority if the Children & Young People's Service (CYPS) confirms that the children will be returned to the applicant when the applicant is rehoused in accommodation of a suitable size.

8.4 Support for fostering and adoption

8.4.1 When assessing bedroom entitlement, the Council will take into account the Children & Young People's Service's assessment of the requirements of prospective foster carers and adopters. This will not, however, result in any priority being given for overcrowding.

8.5 Applicants with a medical or social need for a larger property

8.5.1 Applicants can apply for an extra bedroom due to their medical or social needs. Their circumstances will be considered and evidence supporting the need for an extra room will be required.

8.6 Extra rooms for carers

8.6.1 If an applicant states that they need an extra room for a carer, the Council will carry out an assessment of the applicant's needs and decide whether or not an extra room is required. Due to the high demand for housing, such requests are only likely to be agreed in exceptional circumstances.

8.6.2 The Council's Adult Social Care service should be able to provide evidence of the need for a 'live in' carer and confirmation (where appropriate) that, if the support was not provided, the applicant would qualify for funding for a 'live in' carer.

8.6.3 Where the Council is satisfied that there is a need for a live-in carer who is not cohabiting with another member of the household, the household will be entitled to an additional bedroom.

8.6.4 To qualify for an additional bedroom for a carer, the applicant must demonstrate that this care is provided by someone who would not otherwise live with the applicant and that, if they are a relative or friend, they are in receipt of a Carer's Allowance.

8.6.5 In exceptional circumstances, an extra bedroom may be awarded where a substantial amount of specialist medical equipment has been installed in the home.

8.7 Guidance on bedroom entitlement

8.7.1 Although the assessment of applicants' bedroom entitlement is complex and based on a range of factors, the table on the next page provides guidance on how many bedrooms an applicant should have.

8.7.2 It should be noted that, if a member of the applicant's household is pregnant, this does not entitle them to an extra bedroom. Instead, their application will be amended on receipt of the birth certificate.

8.7.3 For the purposes of assessing the applicant's bedroom entitlement, adults under the age of 25 will be assessed as young people in accordance with the table below.

Household size	Lowest number of bedrooms needed
1 adult	Bedsit
2 adults living together as a couple	1 bedroom
Adults living together but not as a couple	1 bedroom each
1 adult (or 2 adults living together as a couple) with 1 child	2 bedrooms
1 adult (or 2 adults living together as a couple) with: ▪ 2 children of the opposite sex (both under 10); **or** ▪ 2 children/young people of the same sex	2 bedrooms
1 adult (or 2 adults living together as a couple) with: ▪ 2 children of the opposite sex (at least one aged 10 or over); **or** ▪ 3 or 4 children / young people of the same sex; **or** ▪ 4 children / young people (two male & 2 female); **or** ▪ 4 children / young people (3 of one sex & 1 of the other) – where at least one male and one female are aged under 10	3 bedrooms
1 adult (or 2 adults living together as a couple) with: ▪ 4 children / young people (3 of one sex & 1 of the other, where all of the former and/or the latter are aged 10 or over); **or** ▪ 5 or 6 children / young people of the same sex; **or** ▪ 5 or 6 children / young people (3 or 4 of one sex & 1 or 2 of the other);	4 bedrooms
1 adult (or 2 adults living together as a couple) with: ▪ 6 children / young people (three male & 3 female) – where all males and/or all females are aged 10 or over; **or** ▪ 7 or more children / young people.	5 or more bedrooms

8.8 Additional properties for large families

8.8.1 Due to the shortage of family homes, very large families that are in urgent need of rehousing may prefer to be offered two separate properties, rather than bid for a property that is smaller than they need.

8.8.2 For this to happen, there must be an adult member of the household who is eligible for housing and is willing to hold the second tenancy. They must join the Housing Register and be rehoused after the original applicant, who will be offered alternative accommodation that is of a size that reflects the reduced size of their household.

9 ALLOCATION OF PROPERTIES DESIGNED FOR OLDER PEOPLE AND PEOPLE WITH PHYSICAL DISABILITIES

9.1 Supported housing for older people

9.1.1 The purpose of supported housing is to provide residents with the housing support they require to enable them to continue living independently, in their own home, for as long as possible.

9.1.2 In Haringey, there are 3 types of supported housing for older people, the main difference between them being the facilities and the level of support provided:

- Community good neighbour schemes – for people who require only low level support. Although the schemes lack the communal facilities offered by sheltered housing, residents are invited to attend activities at nearby sheltered housing schemes.
- Sheltered housing schemes – for people who require a medium or high level of support due to frailty, ill-health or restricted mobility. Communal facilities include a lounge and laundry, and a dedicated scheme manager provides residents with advice and support.
- Extra care supported housing schemes – for people who require a substantial amount of personal care and housing support, and who might otherwise have to move into residential care.

9.1.3 Although most of the people moving into supported housing will be aged 50 or over, younger people may also benefit from supported housing if, for example, they have mental health support needs or a physical or learning disability and have been assessed as requiring both housing and support.

9.1.4 The provisions relating to Owner occupiers set out in section 5.9 are applicable to the allocation of supported housing.

9.2 Criteria for supported housing

9.2.1 All applicants for supported housing must meet the criteria for joining Haringey's Supported Housing Register.

9.2.2 Those criteria are that for supported housing, applicants must have an unmet housing need and have been assessed, by the Council, as requiring 'housing-related support' and ongoing monitoring of their condition and/or situation.

<u>An unmet housing need</u>

9.2.3 To satisfy the requirement that they have an unmet housing need, applicants must demonstrate that they meet at least one of the following criteria:

- They are homeless or about to become homeless and are entitled to rehousing under Part 7 of the Housing Act 1996 ;

- Their existing accommodation is wholly unsuitable (due to their health, mobility, social care and access requirements) and/or contains hazards that present a serious risk to their health and safety, to the extent that it is unreasonable to expect them to continue occupying their home.

- They are currently in hospital or residential care and are unable to return to their home but have been assessed as being able to live independently in supported housing with appropriate support.

- They need to move urgently, to avoid an inappropriate admission to hospital or long-term residential care.

- They are in need of 'move-on' after being temporarily accommodated in supported housing as part of Haringey's 'step down' service.

- They are in need of 'move-on' after being accommodated in Haringey's Housing Related Support funded supported accommodation.

- They are under-occupying a family home in Haringey that they are renting from Haringey Council or a Registered Provider.

Examples of 'housing-related support'

9.2.4 To determine whether or not an applicant is in need of 'housing-related support', they will be assessed by a member of the Council's specialist housing teams who will consider, amongst other things, the following:

- The extent to which the applicant needs help with daily living including support needs such as budgeting, safety and security, health and wellbeing.

- The nature and extent of any mobility problems, respiratory problems or sensory impairment

- Evidence of frailty, self-neglect or nutritional deficiency

- Whether or not the applicant is feeling socially isolated and/or vulnerable to crime or abuse by others

- Evidence of mental health or cognition problems, including depression, schizophrenia and dementia

- The extent to which substance misuse is affecting the applicant's ability to cope

- Evidence of a chaotic lifestyle and the applicant's need for support to enable them to cope.

Many supported housing tenants may also have (or develop over time as they age) care needs. Care may be provided by health or social service providers as an addition to the support service in supported housing.

9.3 Applicants who may not be offered supported housing

9.3.1 Irrespective of their age, applicants who are not in housing need (or are in housing need but are not in need of 'housing-related support') may not be offered supported housing. Where they are in housing need only, such applicants are advised to apply for general needs housing.

9.3.2 Even where an applicant is in housing need and requires 'housing-related support', they may not be offered supported housing if:

- They are unwilling to accept or engage with the support services offered;
- They require a level of care and support that is more appropriate to a nursing or residential care home and is beyond even that provided in extra care supported housing;
- They are likely to put themselves or other residents at risk of serious harm or injury (or to cause a serious nuisance to their neighbours) because of, for example, unresolved problems relating to substance misuse, anger management or violence;
- They insist that someone lives with them who is neither their spouse/partner nor their registered carer and who does not, in their own right, meet the eligibility criteria for supported housing.

9.3.3 If an applicant meets the above criteria but only needs low level support, they will be offered accommodation in a Community Good Neighbour Scheme. Applicants who meet the above criteria but who need medium or higher level support will be offered Sheltered Housing or Extra Care supported housing.

9.3.4 Applicants who have been assessed as needing accommodation in a Community Good Neighbour Scheme will not normally be offered sheltered housing (and those assessed as needing sheltered housing will not normally be offered a Community Good Neighbour Scheme) except where an extended waiting period may place them at risk or prevent their prompt discharge from hospital or residential care.

9.3.5 Where an applicant is displaying challenging behaviour (such as overt sexualised behaviour or a tendency toward violence and aggression) as a result of a medical condition, they may not be offered accommodation in sheltered housing or a Community Good Neighbour Scheme. However, they may be considered for Extra Care Supported Housing if it has the capacity to cope with such behaviour.

9.3.6 Extra Care Supported Housing is aimed at mentally or physically frail older people (and younger people with disabilities) who would otherwise be considered for residential care. Extra Care schemes have a dedicated on site care and support team available, 24 hours a day, to help with personal care and support, who meet the statutory requirements for care and support providers. This type of accommodation is funded by Social Services, and clients need to be assessed by them to establish if they are eligible. If it is established that an applicant's needs are better suited to this type of accommodation the assessment officer can make a referral to social services.

9.4 Applying for supported housing

9.4.1 To join Haringey's Supported Housing Register, applicants must be assessed by a Supported Housing Assessment Officer and complete a supported housing application form.

9.4.2 Applicants will only be considered for the type of supported housing they have been assessed as needing, however they have the opportunity to express an interest in particular housing schemes or areas and are actively encouraged to visit the schemes before they make their final choice. The Council's specialist housing staff can help with this.

9.4.3 Following the housing needs assessment and based on the applicant's circumstances, the Supported Housing Assessment Officer will determine the type of supported housing each applicant is eligible for and place them (in date order) in the appropriate Priority Band:

The Supported Housing Assessment Officer will look at both a person's unmet housing need as below

Unmet Housing Need	Score
• They are awaiting discharge from hospital or residential care (or move-on from 'Step Down' accommodation) and are unable to return to their home because it is no longer suitable; • They are no longer able to live independently and, unless they are provided with supported housing, they will have to be admitted to long-term residential care; • They are unintentionally homeless, in priority need and owed a housing duty by Haringey Council in accordance with Part 7 of the Housing Act 1996; • They are threatened with homelessness, in priority need and owed a housing duty by Haringey Council in accordance with Part 7 of the Housing Act 1996; • The condition or layout of their existing home is such that there is a significant risk of death or serious injury (confirmed by an assessment carried out under the Housing Health and Safety Rating System) and, in the opinion of the Council, the nature and extent of the hazards are such that the offer of supported housing is more appropriate and/or cost effective than eliminating the hazards to enable the applicant to continue living in their home; • They are experiencing adult abuse, domestic violence and/or are vulnerable to exploitation; • Their home is the subject of a Compulsory Purchase Order or they are living in supported housing or social housing and need to move out of their home to enable major repairs, regeneration or redevelopment of the property or site. • The applicants current Council or housing association home to too big for them in accordance with under occupation standards • They are ready to move on from Haringey Housing Related Support funded supported housing	**5**
• They have severe medical and social problems that are being aggravated by their existing home (for example, they are in a wheelchair and are living on the 2nd floor without a lift, and are experiencing harassment from their landlord); • They have received a Notice to Quit (NTQ) or Notice of Seeking Possession (NoSP) and their landlord has applied to the Court for a Possession Hearing, so they are at risk of homelessness;	**4**
• They have a severe medical problem that is being aggravated by their existing home (for example, they are in a wheelchair and are living on the 2nd floor without a lift) • They have a severe social problem that is being aggravated by their existing home (for example they are experiencing harassment from their landlord).	**3**

• They have severe medical and/or social problems, but these problems are not aggravated by their existing home (for example, they are housebound by a stroke, but their home is in good repair and they have no access problems). • They have applied for a transfer	**2**
• They would benefit from supported housing, but have a lower level of medical, housing or social need than those in higher bands.	**1**

Unmet Support Needs

Support Need – Financial The applicant requires support with • Income maximisation (including help applying for and obtaining the correct benefits) • Budgeting and debt reduction • Help with obtaining work or carrying on working	Yes = 1 No = 0
Support Need – Safety and Security The applicant requires support with • Safety within the home • Knowing how to reduce risk	Yes = 1 No = 0
Support Need – Health The applicant requires support with • Their physical health issues • Their mental health issues • Their substance use issues • Maintaining independence with help with aids and adaptations	Yes = 1 No = 0
Support Needs – Wellbeing The applicant requires support with • Improving their quality of life • Dealing with isolation • Engaging with leisure/cultural/faith and learning activities • Establishing contact with friends/family and external support services • Achieving personal goals	Yes = 1 No = 0

Priority Award Calculation

The priority award will be comprised of the housing need score multiplied by the number of support areas an applicant has.

Housing Need Score x Support need Score = Priority Band Points

Priority Band 1	Above 15
Priority Band 2	Between 12 - 14
Priority Band 3	Between 9 – 11
Priority Band 4	Between 6 - 8
Priority Band 5	Below 5

The Priority Band scoring matrix is kept under review. The most up to date version of this matrix can be obtained from the Housing Service.

9.5 Allocation of supported housing

9.5.1 Supported housing (including Community Good Neighbour Schemes, Sheltered Housing & Extra Care Supported Housing) is not let through the choice based lettings scheme.

9.5.2 Applicants on the Supported Housing Register will be allocated properties on the basis of need, suitability and choice, and in accordance with the Priority Bands system.

9.5.3 Two bedroom properties will usually only be offered to siblings who apply together, couples who need separate bedrooms for verified medical reasons, household members that are specified in the application and applicants who have a live-in carer who qualifies for Carer's Allowance and where it is beneficial to the applicant to have them living with them and it is necessary for their carer to live with them rather than somewhere else.

9.5.4 Priority for ground floor accommodation will be given to applicants who have been assessed as needing ground floor for medical reasons.

9.5.5 When a unit of supported housing becomes available, the Council's specialist housing teams will draw up a shortlist of suitable applicants who have expressed an interest in that scheme or area and been assessed as needing that type of supported housing.

9.5.6 Generally, properties will be offered to suitable applicants within Priority Band 1 before they are offered to suitable applicants in Priority Band 2, and so on.

9.5.7 Within each Priority Band, applicants will be prioritised in accordance with their date of application.

9.6 Refusing an offer of supported housing

9.6.1 When an applicant is invited to view a property but says (before or after the viewing) that they are not interested in being offered the tenancy, the next applicant on the shortlist will be considered.

9.6.2 The consequences of refusing an offer of supported housing depend on the circumstances in which the offer is made. The offer letter describes the action an applicant must take to decline an offer of accommodation.

<u>Applicants who are placed in temporary accommodation by the Council</u>

9.6.3 If an applicant is living in temporary accommodation and has been accepted for rehousing under Part 7 of the Housing Act 1996, they are expected to accept any suitable offer of accommodation that is made to them. If the offer is refused, the applicant will be invited to reconsider the offer within the specified time period but applicants are encouraged to accept offers. If they still refuse the offer, the Council's duty to accommodate them under Part 7 of the Housing Act 1996 will cease.

9.6.4 Applicants have the right to request a review of the suitability of that offer of accommodation.

Where the Council decides that the accommodation offered was not suitable (so it was reasonable for the applicant to refuse the offer), the Council will make one further offer of suitable accommodation. Where the Council decides that the accommodation offered was suitable the Council's duty to accommodate them under Part 7 of the Housing Act 1996 will cease. This means that the Council will stop providing the applicant with temporary accommodation and the applicant will have to make their own arrangements for housing.

Applicants who meet supported housing criteria who are not living in temporary accommodation

9.6.5 If an applicant is not living in temporary accommodation, they will usually receive more than one opportunity to view supported housing and, to a limited extent, they may refuse a property without penalty up to a maximum of three viewings.

9.6.6 Where the applicant repeatedly fails, without good reason, to attend viewings of suitable properties (or refuses three consecutive offers of accommodation in schemes for which they have expressed a preference), the Council may decide to make the applicant no further offers of supported housing for a period of up to 12 months.

9.7 Failing to respond to an offer of supported housing

9.7.1 If an applicant fails to respond to a written offer of supported housing within the timescales given, without good reason, they will be considered to have refused that offer of accommodation.

9.8 Accepting an offer of supported housing

9.8.1 The Offer letter describes the action the applicant must take to accept the offer of accommodation, including signing the tenancy agreement and collecting the keys.

9.8.2 If an applicant signs a tenancy agreement and then rejects the property, this does not count as a refusal of an offer of accommodation because, at this stage, they are the tenant of that property.

9.8.3 If applicants have already given notice on their previous home, it may not be possible for them to withdraw the notice. Also, as they have accepted a tenancy, it is likely that their landlord will insist on receiving 4 weeks' notice (and will be entitled to rent during that time) if the tenant decides that they do not want to continue with their new tenancy.

9.8.4 Where the applicant is living in temporary accommodation and refuses to move out of that accommodation after signing a tenancy agreement in respect of supported housing, they will be evicted from their temporary accommodation and the Council's duty to accommodate them under Part 7 of the Housing Act 1996 will cease. This means that they will have to make their own arrangements for housing.

9.9 Withdrawing an offer of supported housing

9.9.1 A written offer of accommodation can only be withdrawn from an applicant (before the tenancy agreement is signed) where one or more of the following situations applies:

- The applicant has made a false declaration or failed to provide the Council with up-to-date information and that, after reviewing their housing application, the Council has determined that the applicant is not eligible for the property;
- The property details available at the time that the written offer was made were incorrect and it was subsequently discovered that the size and type of the property is not, in fact, suitable to the applicant's needs;
- The applicant's circumstances have changed, since the written offer of accommodation, following a review of the application;
- A fourth tier (or above) Manager decides that, taking all factors into account, the property should not have been offered to the applicant

9.10 Properties designed or adapted for people with physical disabilities

9.10.1 The Council and a number of Registered Providers own and manage purpose-built and specially adapted housing in the borough.

9.10.2 Designed or adapted for people with mobility problems or physical disabilities, these homes will be let to households who have an assessed need for such accommodation.

9.10.3 Although some Registered Providers may decide not to advertise all of their homes, the Council is committed to ensuring that as many of these homes as possible are advertised through the choice based lettings scheme. To enable applicants to identify them easily, these properties will be clearly labelled.

9.10.4 Some specially designed or adapted properties, however, may not be included in the choice based lettings scheme, so will be directly allocated.

Examples include the following:

- Where a specially adapted property has been built, acquired or adapted in order to meet the needs of a specific applicant;
- Where the property is required in an emergency or for use as alternative accommodation (with disabled facilities) for a tenant who is required to move out of their home because it has become unsafe or requires extensive repairs;

10 TYPES OF TENANCIES OFFERED

10.1 Introductory and starter tenancies

10.1.1 Applicants who are offered permanent housing where the landlord is the Council will be offered an introductory tenancy or a secure tenancy. Where the landlord is a Registered Provider, a starter tenancy or assured tenancy will be offered. Some Registered Providers offer fixed term tenancies.

10.1.2 Introductory tenancies and starter tenancies are 'probationary tenancies' and provide reduced security of tenure during their first year. If the tenancy is conducted to the landlord's satisfaction, it will automatically convert to a secure tenancy or assured tenancy after 12 months have elapsed.

10.1.3 Tenants with an introductory or starter tenancy cannot mutually exchange their home or assign their tenancy but are eligible to transfer.

10.2 Letting permanent housing on a temporary licence or non-secure tenancy

10.2.1 A proportion of permanent housing may be let temporarily to homeless households under a licence agreement or non-secure tenancy. This accommodation will not be let through choice based lettings.

10.3 Joint tenancies

10.3.1 The Council will normally only offer joint tenancies to applicants (including existing tenants) who have satisfied the Council of their intention to live together on a long term basis.

10.3.2 The Council cannot offer a joint tenancy including an ineligible person as one of the joint tenants.

10.3.3 There is no right to a joint tenancy and a request for one will not be agreed in the following cases:

- Where there is a current Notice of Seeking Possession or Notice to Quit against the proposed joint tenant;
- Where Homes for Haringey is contemplating serving or re-serving a Notice of Seeking Possession or Notice to Quit upon the proposed joint tenant;
- Where there are management problems such as nuisance or anti-social behaviour on the part of the tenant or someone living with or visiting him;
- Where the proposed joint tenant is not maintaining an acceptable agreement in respect of rent arrears;
- Where one of the proposed joint tenants does not qualify for an allocation of housing due to their behaviour.

10.3.4 Haringey Council tenants who hold a joint tenancy but who have experienced a relationship breakdown can apply to the housing register. Should one or other party be successful in securing an offer of accommodation, s/he will be required to

serve notice to terminate the existing joint tenancy. The Council will then make a decision on the future of the remaining joint tenant in accordance with section 15.25 below. In cases of proven domestic violence, the Council will always seek possession of the property.

11 LOCAL LETTINGS POLICIES & SENSITIVE LETTINGS

11.1 Introduction

11.1.1 It is important that, in most circumstances, priority for accommodation goes to those households in greatest need. Consideration needs to be given, however, to:

- Achieving a balance between meeting the housing needs of existing tenants and new applicants; and
- Promoting more sustainable and balanced communities by ensuring a mix of households and widening the opportunities for those who are not in greatest housing need.

11.1.2 In exceptional circumstances, the Council and its partners may decide to allocate properties on a slightly different basis from normal, in the interests of building strong and sustainable communities or to deal with particular local issues. This is done through a Local Lettings Policy.

11.2 Legislation and guidance

11.2.1 Section 166A(6) of the Housing Act 1996 enables housing authorities to allocate accommodation to people of a particular description, whether or not they fall within the reasonable preference categories (see paragraph 2.4.2 of this Policy).

11.2.2 The decision to apply a Local Lettings Policy will be made jointly by the Council and the landlord of the property. Such policies should not directly or indirectly discriminate against any particular person.

11.2.3 Agreed for a specific period of time, a Local Lettings Policy will only be approved if it forms part of a strategy to tackle identified problems or contribute to sustainable communities.

11.2.4 Local lettings may be dealt with by restrictive labelling of vacancies advertised through the choice based lettings scheme.

11.2.5 All Local Lettings Policies will be subject to consultation with affected parties and will be supported by an Equalities Impact Assessment.

11.2.6 The Lead Cabinet Member for Housing has delegated authority to approve Local Lettings Policies.

11.3 Purpose of Local Lettings Policies

11.3.1 The purpose of Local Lettings Policies is to ensure a balance between housing priority (in accordance with legal duties and responsibilities) and the longer term sustainability of local communities.

11.3.2 Local Lettings Policies may be used to achieve a wide variety of housing management and other policy objectives, including:

- Reducing the incidence of anti-social behaviour
- Dealing with concentrations of deprivation

- Improving difficult-to-let estates
- Protecting existing stable communities
- Preventing future problems occurring on newly developed estates or in relation to recently modernised properties
- Helping to create balanced communities and achieve wider community objectives, such as a broader social mix and supporting and encouraging people into employment
- Making best use of the Council's housing stock.

11.4 Local Lettings Policies – properties

11.4.1 Local Lettings Policies may be used, for example, in an area or a block of flats with serious management problems, which put other tenants at significant risk and where other action has failed.

11.4.2 If a Local Lettings Policy is applied to an area due to a history of anti social behaviour, applicants applying for such properties may be asked to supply a tenancy reference and confirm that they, or a member of their household have no history of criminal convictions (this does not cover those convictions that are legally spent under the Rehabilitation of Offenders Act 1974).

11.4.3 **For existing social housing**, action against the perpetrators must be identified and agreed if possible with the other involved agencies before a decision is made as to whether or not a local lettings policy should apply.

11.4.4 Where it is proposed to introduce such a policy, there will need to be clear evidence that it is desirable and a time limit for review of not more than 2 years will apply. The implications for equal opportunities and the 'reasonable preference' criteria of the law will be considered.

11.4.5 **For new social housing**, the landlord in agreement with the Council may decide to let properties under a Local Lettings Policy. The reasons for doing so need to be clearly stated and should fall into one or more of the following categories:

- Targeting some properties to lower need bands on first lettings. Equal opportunities and legal issues would need to be taken into account;
- Targeting some, or all properties to applicants that are in employment (the definition of 'employment'
- On first lettings the landlord in consultation with the Council may consider under-occupying properties to achieve lower child densities;
- On first lettings, the landlord in consultation with the Council may consider restricting the number of vulnerable applicants with high support needs from being offered a property.

11.4.6 Sometimes Registered Providers may have agreed that they will allow a certain amount of their stock to go to their own tenants. If this happens, homes may be advertised accordingly, subject to the Council's agreement.

11.5 Local Lettings Policies – wards

11.5.1 The Council may decide that in order to create balanced communities that it would be beneficial to introduce a local lettings policy in certain wards of the borough. This would usually be by awarding additional priority to applicants that are in employment. The specific criteria for each scheme would include a definition on the hours that need to be worked, the minimum hourly wage required and the length of time the applicant will need to have been employed.

11.6 Sensitive Lettings

11.6.1 A sensitive letting may be used if the Council knows that an applicant has committed serious offences that restrict where they can live. This may include Registered Sex Offenders or those identified as posing a serious risk to a specific community. In such cases, the Council will consult fully with the Police, the Probation Service and other agencies.

11.6.2 There may also be occasions when it is necessary and appropriate to make a sensitive letting to a property that has become vacant following a period of serious nuisance or anti-social behaviour that has been caused by the drug, alcohol or mental health issues of the former tenant and/or their associates. In such instances, applicants who have such issues (and are likely to cause similar problems to arise) will be prevented from being considered for the property.

11.7 Monitoring and review

11.7.1 To ensure that housing allocations continue to comply with the duty to give reasonable preference to applicants in the reasonable preference category, and also with the Council's equalities duties, the Council will record and monitor lettings that result from the use of Local Lettings Policies.

12 MAKING THE BEST USE OF OUR HOUSING STOCK

12.1 Tenants of Registered Providers where no nomination rights exist

12.1.1 There are some Registered Providers in Haringey that are not subject to nomination agreements and can therefore choose to let all of their homes according to their own rules.

12.1.2 Applications received from tenants of these landlords will be treated in the same way as an application from a tenant in the private sector and this may mean that these tenants do not qualify for inclusion on the Housing Register.

12.1.3 This recognises that, when the tenant moves out of their current home, the accommodation will not become available to help meet Haringey's unmet housing need.

13 REVIEWS, APPEALS AND COMPLAINTS

13.1 Right of review

13.1.1 Applicants have the right to ask for a review of certain decisions that the Council has made about their application for housing or an offer of accommodation. This includes a review of:

- Decisions about refusing an application to join the Housing Register (whether because ineligible or non-qualifying)
- Decisions to remove an application from the Housing Register
- Offers of housing
- Decisions as to the facts of an applicant's case which are likely to be or have been taken into account in considering whether or not to allocate accommodation to them

13.1.2 An applicant may request a review, for example, if the Council decides to exclude them from the Register, or remove them from the Register, or where they dispute a fact that is taken into account when deciding whether or not to make an allocation of accommodation.

13.1.3 Homeless applicants may also have a statutory right of review on certain homelessness decisions, including decisions on the suitability of accommodation offered and any discharge of duty.

13.2 How to request a review

13.2.1 Applicants who disagree with a decision that the Council has made must request a review, in writing, within 21 days of the date of the letter that informed them of that decision.

13.2.2 If an applicant is unable to put the request in writing, they may be offered an interview to explain why they disagree with the decision.

13.2.3 Where an applicant has requested a review, the Council is required to respond to it, in writing, within 56 days. This period starts from the date that the Council receives the applicant's request for a review.

13.2.4 Where the Review Officer finds in favour of an applicant who has been prevented from joining the Housing Register or has been give 'reduced preference', the original decision will be cancelled and the housing application will be awarded the correct 'effective date' and priority.

13.3 Requesting a review of the suitability of an offer of housing

13.3.1 Under the choice based lettings scheme, there are generally no penalties for most applicants who refuse an offer of permanent accommodation. However, if applicants receive a direct offer and refuse that offer, their priority may be reduced and, if they are homeless and subject to 'auto-bidding', the Council's homelessness duty may cease if they refuse an offer of suitable accommodation.

13.3.2 Where an applicant refuses an offer of accommodation, the Council may ask them to complete a form to record the reasons why the property has not been accepted. This information will be used to monitor the lettings process and the standard of accommodation, and to inform future decisions on the way in which services are delivered.

13.3.3 If an applicant wishes to request a review of the suitability of an offer of housing or, if applicable, that the Council's duty has ceased, they must submit their request to the Council in writing within 21 days of the offer being refused. The Council will normally confirm, in writing, the outcome of the review within 56 days and, in its reply, it will describe any further rights of appeal that the applicant has if they are still not satisfied with the decision.

13.3.4 Where the Review Officer decides that the offer of accommodation was not suitable, any penalty that has been imposed (including the discharge of the Council's homelessness duty) will be cancelled:

- Applicants who have not accepted the offer will be entitled to another offer of accommodation (through choice based lettings, a direct offer or 'auto-bidding', as appropriate)
- Applicants who have accepted the offer and taken on the tenancy of that accommodation will be placed in Band A of the Housing Register and will be given an effective date that matches the date that they accepted the tenancy**.**

13.4 The Council's complaints procedure

13.4.1 If an applicant is dissatisfied with any aspect of the way in which their application for housing is dealt with (other than one for which a review can be requested), they should contact the Council and, if the matter is not resolved to their satisfaction, complete a complaints form.

13.4.2 Complaints may include:

- Not being considered for supported housing for older people.
- The quality of the service they have received

13.4.3 Complaints will be dealt with in accordance with the Council's Corporate Complaints Policy.

13.4.4 The complaints procedure will inform applicants of the steps they can take if they exhaust the internal process and remain dissatisfied.

14 THE BANDING SCHEME

14.1 Introduction

14.1.1 Each application for housing will be assessed and placed in the appropriate Housing Needs Band (A, B or C), based on the individual circumstances of each case.

14.1.2 Reasonable preference, where appropriate, is awarded in accordance with legislation and guidance.

14.2 The Housing Needs Bands

The following is a description of the main provisions of the Housing Needs Bands and is intended to provide a summary of these provisions. Applicants should refer to the relevant sections of this Policy for further information on the provisions of each Band.

HOUSING NEEDS BAND 'A'

1. Applicants who need to move urgently because of a critical medical or welfare need, including emergencies.
2. Applicants who, at the discretion of the Council, need to move urgently because there are critical safeguarding circumstances.
3. Tenants of the Council or Registered Partners who have been approved for an emergency management transfer because of harassment, domestic violence or hate crime, including cases agreed through reciprocal arrangements with other local authorities.
4. Haringey Council tenants and Registered Partner tenants living in Haringey who are under-occupying a family home and are willing to transfer to a home that has fewer bedrooms.
5. Haringey Council tenants and Registered Partner tenants living in Haringey who are occupying a specially-adapted home and are willing to transfer to a home that is more appropriate to their needs.
6. Applicants who have a right of succession to a Council tenancy or in favour of whom the Council has exercised its discretion to offer a tenancy to those not entitled to succeed but who are under-occupying their accommodation (or occupying a specially-adapted home) and whom the Council requires to move to somewhere smaller and/or more appropriate to their needs.
7. Haringey Council tenants and Registered Partner tenants living in Haringey who require extensive disabled facilities that can be provided more appropriately in alternative accommodation.
8. Applicants who are in severe need and have been accepted for rehousing, by Haringey Council, under the homelessness legislation.
9. Haringey Council tenants and Registered Provider tenants living in Haringey who need to be permanently decanted in order to enable essential repairs or redevelopment to be carried out, or as part of a regeneration scheme in Haringey.
10. Applicants who are required to leave their homes as a result of an prohibition order served by the Council or the Fire Service in relation to the premises.
11. Applicants (including young care leavers, those leaving the Armed Forces and people leaving hospital, residential care and supported housing) who are nominated for move-on accommodation by named agencies in accordance with an agreed nominations agreement that includes specific quotas.
12. Retiring service tenants who are living in Council accommodation and for whom Haringey Council has a contractual obligation to provide accommodation.
13. Situations where it is in the overriding interests of the Council to prioritise an allocation of housing to a particular household and/or it is necessary to fulfil an urgent statutory or legal duty.
14. Applicants (except homeless households for whom the Council has accepted a rehousing duty) who have two or more needs in Band B.

HOUSING NEEDS BAND 'B'

1. Applicants who need to move because they have been assessed as having a serious medical or welfare need.

2. Haringey Council tenants and Registered Partner tenants living in Haringey who are severely overcrowded and have at least two rooms less than the number of rooms to which they would be entitled to under Haringey's Housing Allocations Policy. This includes reception rooms that could reasonably be used as bedrooms.

3. Adult (aged over 25) members of the households of Council and Registered Partner tenants living in Haringey who require single person accommodation, and where the household is severely overcrowded and has at least two rooms less than the number of rooms to which they would be entitled under Haringey's Allocations Policy. This includes reception rooms that could reasonably be used as bedrooms.

4. Applicants for whom Haringey Council has accepted a full rehousing duty under the homelessness legislation.

5. Applicants who need to move to a particular locality in the Borough, where failure to meet that need would cause hardship to themselves or to others.

6. Applicants living in accommodation for which an improvement notice has been served, or is about to be served, by Haringey Council in relation to the applicant's dwelling and the Council has determined that the dwelling must be vacated because the remedies that are needed to reduce the hazard will require the property to be vacated for a significant period of time or will make the property unsuitable for occupation by the applicant.

7. Applicants with 4 or more needs in Housing Needs Band C.

8. Applicants who, at the discretion of the Council, need to move urgently because there are serious safeguarding circumstances.

HOUSING NEEDS BAND 'C'

1. Applicants who need to move because they have been assessed as having a moderate medical or welfare need.

2. Haringey Council tenants and partner housing association tenants living in Haringey who are overcrowded because they have one bedroom less than the number of bedrooms to which they would normally be entitled under Haringey's Housing Allocations Policy.

3. *Applicants who are homeless but either have not yet an assessment of priority need or have been assessed by the council within the previous 12 months as having no right to rehousing under the homelessness legislation because they are not in priority need*

4. *Applicants who are homeless but have been assessed within the previous 12 months by the council as having no right to rehousing under the homelessness legislation because they are considered to have become homeless intentionally, and have not been resident in settled accommodation.*

5. *Applicants who are threatened with homelessness, have been assessed by the council as being owed the duty arising under s195(2) of the Housing Act 1996 ('the prevention duty'), and the council has not brought that duty to an end*

6. *Applicants who are homeless and do not fall within any other category*

7. Applicants who have no fixed abode.

8. Applicants who the Council has placed in specialist or supported accommodation, or applicants (including young care leavers and people leaving hospital, residential care and supported housing), and require move-on from that accommodation.

9. Protected tenants and tenants of tied accommodation who have been served with a valid notice to quit and the Council is satisfied that they have little or no prospect of successfully defending the possession proceedings.

10. Applicants who are severely overcrowded and living in private rented (including non-partner housing association) accommodation in Haringey.

11. Applicants living in accommodation for which a hazard awareness notice has been served, by Haringey Council in relation to a Category 1 or 2 hazard in the applicant's dwelling and the remedies needed to reduce the hazard will require the property to be vacated for a significant period of time or will make the property unsuitable for occupation by the applicant.

12. Applicants living in accommodation lacking permanent facilities or sharing facilities with others not included on their application.

15 HOUSING PRIORITY

15.1 Deciding who has priority on the Housing Register

15.1.1 Applicants will be placed in the relevant Housing Needs Band, defined by their specific circumstances. Reasonable preference, where relevant, will be awarded in accordance with legal responsibilities.

15.2 Overcrowding

15.2.1 When assessing overcrowding, the Council will only take into account those people who are part of an applicant's household. Applicants will be deemed to be severely overcrowded when they are lacking two or more rooms than they would be entitled to under Haringey's Allocations Policy. Applicants will be deemed to be overcrowded when they have one room less than they would be entitled to under Haringey's Allocations Policy. Over-crowding in the private sector will not lead to inclusion on the Housing Register and those affected will be given advice on how to alleviate this.

15.2.2 Additional priority will not be given for overcrowding if the overcrowding is the result of someone moving into the applicants' household. If applicants need an extra room for medical or welfare/hardship reasons, they will instead be assessed for medical or welfare priority. If applicants need an extra room for any other circumstances, this will be assessed and the Council will exercise discretion in these cases. Due to the high demand for housing, it is likely that this discretion will only be exercised in exceptional cases.

15.2.3 Where an applicant is pregnant and will be entitled to a larger property, priority may only be given for overcrowding when that baby is born.

15.2.4 Where the applicant is not the main person who cares for the children named in their housing application, the children may not be taken into account in the assessment of overcrowding.

15.2.5 A second reception room will be counted as a bedroom in the assessment of overcrowding where it could reasonably be used as such.

15.2.6 Although the Council has a responsibility to provide suitable temporary accommodation, homeless households may be offered temporary accommodation smaller than that they would be eligible for as permanent housing.

15.2.7 The Housing Needs Band in which an applicant is placed depends on their tenure, the extent of their overcrowding:

- Applicants who are tenants of Haringey Council or a Registered Provider whose housing is subject to a tenancy nominations agreement with Haringey Council will normally be placed in Housing Needs Band B and have at least two bedrooms less than the number to which they would be entitled under Haringey's Housing Allocations Policy
- Applicants who are tenants of either Haringey Council or a Registered Provider that has entered into a nominations agreement with Haringey Council will

normally be placed in Housing Needs Band C and have one bedroom less than the number to which they would be entitled under Haringey's Housing Allocations Policy

- Applicants who are tenants of private rented accommodation (or are living with relatives or friends) will normally be placed in Housing Needs Band C if they are severely overcrowded
- Applicants who are tenants of a Registered Provider whose housing is not subject to a tenancy nominations agreement with Haringey Council will normally be placed in Housing Needs Band C if they are severely overcrowded

15.3 Children sharing bedrooms

15.3.1 Children and young people of the same gender up to the age of 25 are expected to share a bedroom unless there is a medical, behavioural or social reason why the children cannot share a bedroom.

15.3.2 Where children of different genders are sharing a bedroom, they will be assessed as requiring their own bedroom (if they are unable to share a bedroom with someone else) when the oldest child is aged 10 or over.

15.3.3 Applications will only be considered for overcrowding priority if the applicant is the main person who cares for the child(ren) named on the housing application. Welfare or medical grounds may be considered in other circumstances.

15.4 Disrepair, poor design and lack of facilities

15.4.1 Any complaint about disrepair in homes managed by the Council or a Registered Provider must be reported to the Repairs Service of the applicant's landlord.

15.4.2 People living in private sector accommodation in poor condition will be referred to the Council's Housing Improvement Team (Private Sector) who will assess the situation and seek to provide a resolution to enable the tenant to remain in the property.

15.4.3 If an applicant's home lacks permanent facilities (such as cooking facilities, washing facilities, toilet facilities or heating) and there is no other housing need, they will not qualify for inclusion on the Housing Register. Instead they will be advised of alternative housing options to alleviate the issue.

15.5 Sharing with another household

15.5.1 People sharing facilities with others will not qualify for inclusion on the Housing Register. Instead they will be advised of alternative housing options to alleviate the issue.

15.6 People living in mobile homes, houseboats or caravans

15.6.1 People living in a caravan, mobile home or houseboat will not qualify for inclusion on the Housing Register if there is no other housing need, reflecting parity with other private sector applicants.

15.7 Applicants for whom Haringey Council has accepted a rehousing duty under the homelessness legislation

15.7.1 All homeless households for whom the Council has accepted a rehousing duty (which has not yet been discharged) under Part 7 of the Housing Act 1996 will be placed in Housing Needs Band B.

15.7.2 Homeless households will be actively encouraged to bid for properties through the choice based lettings scheme.

15.7.3 In order to minimise the cost of temporary accommodation (and the amount of time that homeless households spend in temporary accommodation), the Council may bid for properties on behalf of homeless households or make them a 'direct offer' of suitable accommodation.

15.8 Accepted homeless households in severe need

15.8.1 In exceptional circumstances, homeless households (for whom Haringey Council has accepted a full rehousing duty under the homelessness legislation) will be placed in Housing Needs Band A if they are assessed, by the Council, as being in 'severe need'.

15.8.2 An 'accepted' homeless household will be regarded as being in 'severe need' (so may be placed in Housing Needs Band A) if any of the following situations applies to the applicant or a member of their household:

15.8.3 They have a terminal or life-threatening illness

- They are permanent wheelchair users
- They are frail and elderly
- They have severe mental health problems and/or have been 'sectioned' under the Mental Health Act and have been unable (or are likely to be unable) to cope with living in temporary accommodation
- They have a critical medical or welfare need, including situations where there are critical safeguarding implications
- They are especially vulnerable and the Council is unable to provide them with suitable temporary accommodation**.**

15.8.4 The Council will decide which of these applicants will be placed in Housing Needs Band A.

15.9 Other homeless households not owed a duty

15.9.1 Other applicants who are homeless (including those who have no fixed address) or threatened with homelessness within 28 days but are not owed a rehousing duty under Part 7 of the Housing Act 1996 are still entitled to 'reasonable preference'.

15.9.2 This covers people who are intentionally homeless and those who are not in priority need, but not those ineligible for assistance.

15.9.3 These applicants will be placed in Housing Needs Band C.

15.10 Tenants of tied accommodation under notice

15.10.1 Tenants in tied accommodation who have been served with a valid Notice to leave their accommodation and the Council is satisfied that they have little or no prospect of successfully defending the possession proceedings, will be placed in Housing Needs Band C.

15.11 Protected tenants under notice

15.11.1 This applies to a tenant with a 'protected' tenancy (that is a tenancy with protection from eviction, but not an assured shorthold tenancy).

15.11.2 If the applicant has been served with a valid Notice to leave their accommodation and the Council is satisfied that they have little or no prospect of successfully defending the possession proceedings, they will be placed in Housing Needs Band C. If the possession order has been granted because of a breach of tenancy, an applicant will be ineligible for inclusion on the Housing Register.

15.12 Qualifying Agricultural workers (protection under the Rent (Agricultural) Act 1976)

15.12.1 Certain categories of agricultural workers who are provided with accommodation as a condition of their employment, may be protected against eviction even if their employment comes to an end.

15.12.2 The worker can only be asked to leave their accommodation if an Agricultural Dwelling House Advisory Committee (ADHAC) decides that the accommodation will be required by a successor or that the property is no longer in the interest of efficient agriculture.

15.12.3 If ADHAC decides that a worker must leave their accommodation, the local housing authority must use their best endeavours to offer housing to the worker.

15.12.4 An authority would not be properly carrying out its duty if it were to refuse to offer suitable accommodation to the worker because they did not have enough priority on the register.

15.12.5 In such cases this applicant will be placed in Housing Needs Band A.

15.13 Emergency Management Transfers

15.13.1 In exceptional circumstances, tenants of Haringey Council and tenants of certain partner Registered Providers (where Haringey Council has nomination rights) may be provided with an emergency management transfer. This will occur when a Management Transfer Panel has determined that a transfer to alternative social housing offers the most appropriate way of ensuring the personal safety of the tenant, members of their household and/or the local community.

15.13.2 Although most of the transfer requests that are approved relate to extremely serious incidents involving domestic violence, intimidation and harassment, hate crime or threats to kill, the Management Transfer Panel will only approve a transfer where it is satisfied that all other ways of resolving the problem have been exhausted and that it would not be reasonable to expect the tenant to continue living in their home.

15.13.3 Where the Management Transfer Panel approves the transfer, the tenant will be placed in Housing Needs Band A and will be made a 'direct offer' of alternative accommodation on a like-for-like basis in terms of number of bedrooms.

15.13.4 Where the applicant has already been awarded medical priority, the home that they are offered will reflect their assessed needs.

15.13.5 Given the urgency of the situation, it is essential that the transfer takes place quickly. For this reason, the Council and the relevant tenancy management officer will work closely with the tenant to ensure effective communication and that all available options are fully explained and properly considered.

15.13.6 On completion of the emergency management transfer, the tenant's transfer application will be either cancelled or reassessed in accordance with the wishes of the applicant. If the transfer application is reassessed, the original date of application will apply.

15.14 Decant Moves (for essential repairs)

15.14.1 A decant (for essential repairs) is where the landlord needs to do major repairs to their property and the property needs to be vacant for this work to be carried out.

15.14.2 Decants will only apply to tenants of local authorities or tenants of Registered Providers who allocate all their properties through the Haringey Council Allocations Scheme. Moves will usually be temporary but in some circumstances consideration will be given to permanent moves arising from a decant.

15.14.3 All such cases will be dealt with outside the Choice Based Lettings Scheme to enable the landlord to move applicants as quickly as possible. To ensure full transparency, these moves will be included in the feedback given in relation to lettings outcomes.

15.14.4 Decants occur when a Decants Panel has decided that a transfer to alternative accommodation offers the best way of ensuring that essential repairs and redevelopment take place without causing huge disruption or hardship to the tenants.

15.14.5 If a tenant does not want to be permanently decanted to alternative accommodation, they have the right to return to their existing home.

15.14.6 When reaching a decision on whether or not a tenant should be offered another property, the Decants Panel will consider the likely impact of the planned repairs and improvements and whether they will be so disruptive that it would be unreasonable to expect the applicant to remain in the property while the works are carried out.

15.14.7 The Decants Panel will also consider whether or not, for technical or safety reasons, it is feasible for the applicant to remain in their home while the works are carried out around them.

15.14.8 For the tenant to be awarded decant priority, the Decants Panel will need to be satisfied that the work is so disruptive that it cannot be completed with the tenants remaining in occupation and either:

- The work is likely to take more than 3 months to complete; or
- The health of the tenant or a member of their household will be severely affected if they have to leave their home and then move back again at a later date.

15.14.9 If the work is estimated to take less than three months but cannot be completed with the tenants in occupation, the tenant will be expected to move into temporary accommodation and to return to their permanent home after the work has been completed.

15.14.10 In the event of the tenant refusing a reasonable offer of temporary accommodation, their decant priority will be removed and possession proceedings will be commenced.

15.14.11 If the work is likely to take more than 3 months to complete and/or it would not be reasonable for the tenant to have to leave their home and then move back again at a later date, the tenant may be awarded priority for a transfer to suitable alternative accommodation.

15.14.12 If the work is estimated to take less than three months but then runs on for longer, the tenant will be awarded decant priority.

15.15 Decant Moves (for redevelopment/regeneration)

15.15.1 Tenants that need to be decanted from their homes on a permanent basis as a result of redevelopment or regeneration will be moved in a planned way. Each redevelopment/ regeneration scheme will be subject to consultation, equalities impact assessment and approval by Cabinet.

15.15.2 Once decant status is authorised tenants will be placed into Band A on a phased basis to bid for an alternative home. If the tenant has not bid for and been offered accommodation twelve months prior to the Council requiring vacant possession, the Council will reserve the right to make a direct offer of accommodation to the tenant. If this offer is refused a further offer of accommodation will only be considered in exceptional circumstances and if none exist the Council may decide to take possession proceedings.

15.16 Move-on from specialist or supported accommodation

15.16.1 The Pathway Model provides vulnerable single people with appropriate support, to develop the skills to live independently. As part of the pathway approach an assessment will be carried out to determine whether private sector or social housing is suitable, when the client is ready to move on. If it is deemed that the client needs to continue to be in a more supported environment, then social

housing will be prioritised. Applicants living in a supported housing scheme will initially be placed in Housing Band C.

15.16.2 Where the applicant has been assessed as being capable of sustaining a tenancy and is ready for independent living, they may apply for medical/welfare priority (see sections 15.20 and 15.21). If they are awarded extra priority, they will be placed in the appropriate Housing Needs Band.

15.16.3 Applicants who are nominated for move-on accommodation by named agencies (in accordance with the Move-On Strategy and an approved nominations agreement that includes a commitment to provide rehousing for an agreed number of residents) will be placed in Housing Needs Band A for six months.

The Council agree move-on quotas for care-leavers and other supported housing applicants annually to reflect need and competing demand.

15.16.4 If the applicant has not been rehoused within six months of being placed in Housing Needs Band A, the Council will interview the applicant and decide whether or not they should remain in Band A. At this point the Council may choose to make one direct offer which if refused will lead to the quota award being withdrawn

15.17 Armed Forces quota

15.17.1 To support its commitment to the resettlement of ex-servicemen and women, the Council agree an annual quota of properties to be offered to this client group. This quota is managed by a named agency by way of an approved nominations agreement.

15.18 Applicants in prison

15.18.1 In exceptional circumstances (where tenants have negotiated the surrender of their former council tenancy and Haringey Council has given them an undertaking to make them one offer of social housing upon their release from prison – see section 15.27), they will be placed in Housing Needs Band A six months immediately prior to their scheduled date of release from prison.

15.19 Medical, welfare and hardship

15.19.1 **Important:** priority can be awarded under three headings: medical, welfare and hardship.

15.19.2 Although applicants can be assessed under all three headings, they can only be awarded priority under one heading.

15.19.3 Any medical, welfare or hardship priority can be reassessed if an applicant's circumstances change.

15.20 Medical assessments

15.20.1 Where an applicant's current housing is detrimental to their health, or a move to more suitable accommodation would have a positive effect on their health, they may ask to be awarded medical priority.

15.20.2 Medical priority may also be awarded if the applicant is asking to be rehoused so they can receive care or specialist support.

15.20.3 Applicants accepted for rehousing under the homelessness legislation will not normally be eligible for medical priority because, if their temporary accommodation is detrimental to their health, or a move to more suitable accommodation would have a positive effect on their health, the Council will first look to provide alternative temporary accommodation.

15.20.4 Applications for medical priority will be considered by the Council's specialist housing teams which will assess the extent to which the applicant's health is affected by their housing conditions and the expected benefits of providing suitable alternative housing.

15.20.5 Extra information may be sought from landlords, housing officers, doctors, occupational therapists, health visitors and other parties.

15.20.6 The applicant will be awarded one of four categories and the table below is used as a guide to medical priority:

	EFFECT OF CURRENT HOUSING ON APPLICANT'S HEALTH			
MEDICAL PROBLEM	**Very Serious 1**	**Serious 2**	**Moderate 3**	**Low 4**
Very Serious 1	Band A	Band B	Band C	No award
Serious 2	Band B	Band B	Band C	No award
Moderate 3	Band C	Band C	Band C	No award
Low 4	No award	No award	No award	No award

15.20.7 Applicants who have an urgent need to move because they have a critical medical condition or very serious disability that is being made much worse by their current housing will be placed in Bands A or B.

15.20.8 Where it is decided that the applicant has a medical condition but it is decided that this is not being significantly worsened by their current housing, no medical priority will be awarded.

15.20.9 Although each application for medical priority is assessed on its individual merits, examples of the type of situation in which an applicant may be assessed as having a critical medical housing need include the following:

- The applicant's condition is life threatening and the existing accommodation is a major contributory factor
- The applicant's health is so severely affected by their current housing that it is likely to become life threatening
- The applicant's medical condition is expected to become terminal within a period of 12 months and re-housing is needed to provide a basis for the provision of suitable care
- The applicant is in hospital or residential care and is unable to return to their former home because this would severely worsen their medical condition and/or their mobility is severely restricted and the property cannot be adapted to provide level access.

15.20.10 Where the Council's specialist housing teams decides that medical priority should be awarded, they will also specify the type of housing that is suitable for an applicant. Although applicants will be able to bid for properties that do not meet this specification, offers will be subject to approval of an Occupational Therapist. However, the Council's specialist housing teams' recommendations will be strictly adhered to if the applicant is subject to 'auto-bidding' or is made a 'direct offer' of accommodation.

15.20.11 Where an applicant is placed in Housing Band A because of the seriousness of their medical problems and their urgent need for rehousing, their application and bidding history will be reviewed by the Council's specialist housing teams at least once every six months. If the applicant has not secured suitable accommodation within six months, the Council will interview the applicant and decide whether or not they should remain in Housing Needs Band A.

15.20.12 Medical assessments are an assessment of the impact of the applicant's current housing on their medical condition. Applicants are required to inform the Council of all changes in the circumstances relating to their housing application, including their health and the health of members of their household. Such changes may result in an increase or decrease in the level of priority they are awarded.

15.21 Welfare/Hardship assessments

15.21.1 This applies if at least one person in the household is vulnerable and less able to find settled or suitable accommodation.

15.21.2 These applicants will have a need to move but may not get medical priority because their current housing may be suitable for their needs.

15.21.3 Applicants accepted for rehousing under the homelessness legislation will not normally be eligible for welfare priority because, if their temporary accommodation is unsuitable on welfare grounds, or a move to more suitable accommodation would have a positive effect on their welfare, the Council will first look to provide alternative temporary accommodation.

15.21.4 If a homeless applicant or household is especially vulnerable and they may be at significant risk in temporary accommodation, the Council can consider the Housing Needs Band A category of 'applicants who are in severe need and have been

accepted for rehousing, by Haringey Council, under the homelessness legislation' (see section 15.9).

15.21.5 Applications for welfare priority will be considered by the Council's specialist housing teams who will assess the extent to which the applicant's welfare is affected by their housing conditions and the expected benefits of providing suitable alternative housing.

15.21.6 Extra information may be sought from landlords, doctors, support providers, social care professionals and other parties.

15.21.7 The applicant will be awarded one of three categories and the table below is used as a guide to welfare priority:

	NEED FOR SUITABLE SETTLED HOUSING		
DEGREE OF VULNERABILITY	**High 1**	**Medium 2**	**Low 3**
High 1	Band A	Band B	Band C
Medium 2	Band B	Band B	Band C
Low 3	Band C	Band C	Band C

15.22 Tenants with a home that is bigger than they need

15.22.1 This applies to tenants of Haringey Council and to the tenants of certain Registered Providers (where Haringey Council has nomination rights) who are 'under-occupying' their homes and want to move to a smaller property.

15.22.2 These applicants are given high priority for rehousing because it will free up larger family-sized homes to meet the housing needs of other applicants who are homeless or living in overcrowded or poor quality accommodation. Financial incentives and dedicated advice and support will be provided to help tenants to move.

15.22.3 Tenants who are currently living in accommodation that has more bedrooms than they require and are willing to move to a smaller property which has fewer bedrooms will be placed in Band A.

15.22.4 Consideration will be given to providing separate housing (in two smaller properties) for families that are under-occupying their home. For example, if a couple with an adult child are under-occupying a property with at least 4 bedrooms, they can be considered for two one-bedroom flats rather than one 2-bedroom flat. However, such moves must always achieve a net reduction of at least 2 bedrooms.

15.22.5 Where the applicant has rent arrears, any financial incentive that they are due to receive from moving to smaller accommodation will be used to clear or reduce those arrears. After this has been done, the balance will be paid to the applicant.

15.23 Tenants with a specially adapted home that they no longer need

15.23.1 This applies to tenants of Haringey Council and to the tenants of certain Registered Providers (where Haringey Council has nomination rights) who are occupying a specially adapted home and are willing to transfer to a home more appropriate to their needs.

15.23.2 These applicants are given high priority for rehousing because it will free up specially adapted homes to meet the housing needs of applicants who require disabled facilities and are currently living in unsuitable accommodation or unable to leave hospital or residential care. To assist their move, such tenants will be placed in Band A.

15.23.3 Tenants who are willing to transfer from a family home that has three or more bedrooms and has been substantially adapted to meet the needs of a wheelchair user or someone with very limited mobility may be allowed to under-occupy their new home by one bedroom.

15.24 Applicants offered housing because of the death of a secure tenant

15.24.1 When a Council tenant dies, it may be possible for someone living with them to take over the tenancy. This is known as succession and the person who takes on the tenancy is called a ‘successor’.

15.24.2 To be a ‘successor’ the applicant has to meet certain rules – they must be the tenant’s spouse, civil partner or cohabitee and have occupied the property as their principal home at the time of the tenant’s death. The rules for this are in the tenancy conditions for the property.

15.24.3 Succession can only occur following the death of the tenant. If the deceased tenant was a joint tenant, the only person who may be able to succeed the tenancy is the surviving joint tenant.

15.24.4 A succession can only happen once. This means that, if the deceased tenant was a ‘successor’ to the tenancy, the tenancy cannot be succeeded, again, by a later partner.

15.24.5 The Council’s policy on succession reflects the legal position and the rights of successors as laid out in the Housing Act 1985.

15.24.6 Succession may only take place when all of the following apply:

- The deceased tenant had been using the property as their only or principal home before their death.
- The person wishing to succeed to the tenancy is a spouse, civil partner or cohabitee of the original tenant.
- The partner must have been living with them at the time of the death.

15.24.7 Succession will not occur when:

- The deceased tenant had previously succeeded to the tenancy (including a person who was joint tenant and later became a sole tenant after the other joint tenant died).
- The deceased tenant had been living alone.
- The deceased tenant had left the property and was not using it as their only home.
- The deceased tenant had left the property and been admitted to hospital or a residential home for long-term care or treatment.
- There had previously been an assignment of the tenancy or property adjustment order under the Family Law Act.
- The person asking for succession is unable to prove their relationship to the deceased tenant, or their period of residence at the address.

Statutory Succession

15.24.8 If the tenancy is succeeded by the spouse, civil partner or cohabitee of the deceased tenant, they have a right to stay in the property on a permanent basis (even if the property is larger than they need), subject to the terms and conditions of the tenancy.

Grants of Tenancy instead of Succession

15.24.9 If an occupant has no legal right to succeed to a Council tenancy when the tenant dies, they will be given notice to leave the property. All requests for a grant of tenancy on the death of a tenant where no statutory succession takes place will be considered by the Exceptions Panel. Guidance on this is available in a separate document.

15.25 Applicants offered housing because of a secure joint tenancy ending

15.25.1 This category applies to secure tenants who have a joint tenancy.

15.25.2 If a joint tenant ends the tenancy when moving out, the property is not automatically offered to the tenant remaining.

15.25.3 When one of the joint tenants moves out and the joint tenancy is ended, the remaining former tenant may be offered a sole tenancy of that property or, if appropriate, of an alternative, smaller property. If the leaving former tenant wishes to apply for housing, they must apply to join the register in their own right.

15.25.4 If the remaining former tenant qualifies to be offered the same property, the Council will offer them the tenancy of that property, which will not be part of the choice based lettings scheme.

15.25.5 If the remaining former tenant qualifies to be offered a smaller property, they will be placed in Housing Needs Band A and will be able to express an interest in properties advertised through the choice based lettings scheme. However, if they have not been rehoused within six months of being placed in Housing Needs Band

A, the Council will interview the applicant and decide whether or not to make them a ‘direct offer’.

15.25.6 If the applicant subsequently refuses a suitable offer, they will have no right to remain in their current accommodation.

15.26 Transfers which will release a property that is needed

15.26.1 In exceptional circumstances, council tenants and tenants of partner housing associations will be placed in Housing Needs Band A where their transfer to alternative accommodation will avoid the need for expensive alterations to the property or will meet the urgent housing needs of another household on the Housing Register that would otherwise not be met within a reasonable time.

15.26.2 This may normally only happen when there is not a serious shortage of the type of home the tenant wants to move to.

15.27 Applicants who have negotiated the surrender of their former council tenancy

15.27.1 At the Council’s discretion, former tenants of Haringey Council may be placed in Housing Needs Band A where they have negotiated the surrender of their tenancy on the understanding that they will be offered accommodation upon their release from prison, hospital, rehabilitation or residential care.

15.27.2 Before agreeing to a tenancy surrender, Homes for Haringey must satisfy itself that the tenant meets the following conditions:

- They were a Haringey council tenant when taken into custody and the offence did not mean that they had broken their tenancy; and
- They have been, or are likely, to be sent to prison for more than 13 weeks (including the time spent on remand) and
- They have conducted their tenancy in a reasonable way and have not broken their tenancy agreement and
- Their rent is up to date and
- They have not been served with a ‘notice seeking possession’ and
- They were living alone, require only a bedsit or one-bedroom home and offer to end their tenancy.
- They are entering residential care, hospital or rehabilitation on a long term basis

15.27.3 Applicants in this category will be placed in Housing Needs Band A six months before their scheduled release from prison. They will receive only one offer of suitable accommodation; after which they will lose their priority under this category.

15.27.4 If accommodation is not available at the time the applicant is released from prison, they will have to make their own housing arrangements until they receive their ‘direct offer’.

15.28 Discretionary Powers

15.28.1 The Allocations Policy cannot cover every eventuality. The exceptions or panel (decision panel) has discretionary power to award additional priority and approve offers of housing.

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Report for: Cabinet March 2018

Title: Good Growth Fund – Connecting Wood Green

Report authorised by: Helen Fisher, Strategic Director of Regeneration, Planning and Development

Lead Officer: Beth Kay, Head of Area Regeneration (Wood Green) x2640

Ward(s) affected: Noel Park, Alexandra, Woodside

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1. This report relates to the Greater London Authority Good Growth Fund, which was launched in 2017. The Good Growth Fund is Mayor Sadiq Khan's new £70 million regeneration programme to support growth and community development in London. The fund will support projects that are "inclusive, innovative and which demonstrate an outstanding approach to challenges faced across London".

1.2. Haringey has submitted a Good Growth Fund bid called "Connecting Wood Green". This report is seeking authority to enter into a grant agreement with the Greater London Authority (GLA) in the event of the bid being successful.

2. Cabinet Member Introduction

2.1. The "Connecting Wood Green" proposals mark the beginning of a new chapter in the Wood Green Regeneration Programme.

2.2. This funding will not only unlock some much needed placemaking and public realm improvement projects but also create opportunities for local residents and businesses to become much more involved in and benefit from the regeneration of Wood Green through meaningful engagement, community empowerment, business training and participatory evaluation.

2.3. This funding will be a much needed boost for Wood Green, building on the success of the Green Rooms and Blue House Yard, creating places where people want to visit and spend time and places for communities to come together.

3. Recommendations

Cabinet is asked that

3.1. **I**n the event of the "Connecting Wood Green" application to the GLA's Good Growth Fund being successful**,** give delegated authority to the Strategic Director of Regeneration, Planning and Development and the S151 Officer, after consultation with the Cabinet Member for Economic Development, Social Inclusion and Sustainability, to approve the Good Growth Fund grant agreement with the GLA.

3.2. **I**n the event of the "Connecting Wood Green" application to the GLA's Good Growth Fund being successful**,** give delegated authority to the Strategic Director of Regeneration, Planning and Development and the S151 Officer, after consultation with the Cabinet Member for Economic Development, Social Inclusion and Sustainability, to approve grant agreements with third parties using the sources of funding as set out in the Connecting Wood Green bid proposal, up to the maximum amount of grant funding for each of the three projects as set out in the proposal, subject to compliance with State Aid legislation.

4. Reasons for decision

4.1. Haringey made two Stage 1 applications for the Good Growth Fund in autumn 2017, one for Wood Green and one in partnership with local enterprise Fashion Enter. Both bids were successful in getting to Stage 2 and Stage 2 bids were submitted on 5 January 2018. The GLA will be notifying successful candidates in the week commencing 5th March 2018.

4.2. The Connecting Wood Green bid is for a £700,000 grant plus a £200,000 loan to contribute to projects with a total value of £2.2m. The proposal comprises three capital projects:

- The Gas Works Project (Olympia Trading Estate)
- The Library Hub Project (Post Office Unit)
- Public Realm Interventions (including Penstock Tunnel)

4.3. If the bid is successful, then the GLA will require Haringey to enter into a grant agreement by the 31 March 2018. The decision to enter into the grant funding agreement is an executive function as the value of the grant is above £500,000.

4.4. At the time of writing this report it is not known whether the bid has been successful or not, but in order to meet the deadlines it is necessary to seek conditional approval that, in the event of the bid being successful, Haringey can enter into a grant agreement with the GLA.

5. Alternative options considered

5.1. In January 2018, Cabinet agreed to adopt the Wood Green Strategic Regeneration Framework (SRF), which sets out the overarching vision and objectives for Wood Green. Officers have developed a Development Infrastructure and Investment Funding Study and Delivery Plan, which will set out projects and priorities for the short, medium and long term.

5.2. There are a number of projects and priorities in the Wood Green SRF and draft Delivery Plan. All of the projects in the Connecting Wood Green proposal sit within this framework. The projects in the GGF "Connecting Wood Green" application have been proposed because there is a specific opportunity (in the form of a vacant or underused building) or funding already secured which has been used to lever in additional grant from the GLA.

5.3. If Cabinet does not agree to enter into a grant agreement with the GLA then some projects can still progress but with less funding and some projects will not be able to progress until alternative funding is secured:

5.3.1. The Gas Works Project can still go ahead but with less funding. There is a risk that the scheme may become unviable.

5.3.2. The Library Hub project can still go ahead but with less funding. There is a risk that the scheme may become unviable.

5.3.3. The Public Realm Interventions could not proceed until alternative funding is secured except the Penstock Tunnel refurbishment, which could proceed, but with a reduced scope using secured s106 and TfL funding.

5.4. If the funding is approved and Haringey enters into a grant agreement with the GLA then it will be necessary to enter into back to back grant agreements with third parties as set out in the proposal. The report recommends that delegated authority is given to the Strategic Director of Regeneration, Planning and Development to finalise the grant agreements, this is in order to ensure that the grant agreements can be made by the required deadline of 31 March.

5.5. The alternative option would be to go back to Cabinet in June 2018 with the final grant agreements which would not be acceptable as this is after the grant agreement deadline.

6. Background information

6.1. A summary of the Stage 2 bid can be found in Appendix 2. A summary of the proposal is set out below.

Wood Green Regeneration

6.2. Wood Green is going to be north London's most prosperous and liveable town centre. The council is putting together a strategic framework that will deliver 6,400 homes and 4,000 jobs through the delivery of highly accessible well designed places. The employment led regeneration programme will build the economy, revitalise the town centre and empower existing communities.

6.3. Working with innovative social enterprises, Haringey has already taken steps to draw people back to Wood Green, supporting places like Blue House Yard (packed full of creative makers and sellers for five years) the Green Rooms hotel (which provides a social hub, pop-up food offerings, drinks and entertainment) and Wood Green Works (a co working and business support offer due to open in Summer 2018).

6.4. These test projects are important to the success of the regeneration programme as they help to build relationships with existing residential and business communities and create physical spaces for people to come together.

Good Growth Fund

6.5. The first area of significant change within Wood Green will be the area around the Chocolate Factory and Coburg Road, by the railway lines (also known as the Cultural Quarter) where major planning applications have already been approved, or are in the pipeline, including Clarendon Square (St William) and the Chocolate Factory (Workspace).

6.6. The area around the Chcolate Factory and Coburg Road currently feels cut off from the rest of the town centre and whilst only a 7-minute walk from the main road is difficult to find. The aim of the “Connecting Wood Green” proposal is to deliver a series of public realm interventions, which will draw people from the High Road and Station Road into this area. The project will transform this quiet part of Wood Green into a thriving part of the new town centre and nurture new and existing businesses and communities, laying the foundations for Wood Green’s future development.

6.7. The project will also create new and improved space for existing and new businesses and social enterprises (including Collage Arts artists and local social enterprise Studio 306) and create spaces and opportunities where communities can get involved and help to shape Wood Green regeneration projects and policies over the next two years.

6.8. The Good Growth Fund will contribute towards three capital projects; all projects have match funding secured from the private sector, TfL or Haringey Council.

The Gas Works Project

6.9. The Gas Works Project (GWP) is a meanwhile social enterprise scheme and special project vehicle to be delivered by the team behind The Mill Co Project (TMCP). A lease has been agreed between GWP and landowner St William for the Olympia Trading Estate on Coburg Road, enabling six industrial units to be repurposed for three to five years before the site is redeveloped. The reconfiguration and refurbishment of the building will safeguard existing businesses and create space for new tenants and for cultural and community activities and events which will draw more people to the area.

Library Hub Project (the Post Office)

6.10. Wood Green Library contains a Council operated library and Customer Service Centre and a covered arcade with market stalls and commercial units. Two units are currently vacant including the former Post Office unit. We will work with local organisations to transform vacant units into workspace and space for workshops, classes and meetings and to create a hub for consultation and engagement activities for the wider regeneration programme.

6.11. Both projects will Build Skills and Employability through business support and training provided through local partners including the Wood Green Business Forum, Wood Green Social Enterprise Forum, Haringey Employment and Skills Team (HEST), Haringey Adult Learning Service (HALS), Collage Arts and NWES.

Public Realm Interventions including Penstock Tunnel

6.12. We will develop proposals for a series of capital projects working with local stakeholders to deliver a series of place making public realm interventions along the circular route connecting Station Road, the High Road and the area around the Chocolate Factory and Coburg Road and entrance to Alexandra Park at the Penstock Tunnel. This work will include the refurbishment of Penstock Tunnel, improvements to the Library arcade, investment in green infrastructure, public realm, public art, lighting and signage.

6.13. The Good Growth Fund application also identifies project management costs and the cost of developing two strategic documents as match funding. Project Management costs will be met by the approved Wood Green budget in the Haringey Capital Programme, the cost of The Wood Green Design Guide (Public Realm and Buildings) and Cycle and Walking Strategy and Action Plan are already approved projects in the Regeneration budget.

7. Contribution to strategic outcomes

7.1. Priority 4: Drive Growth from which everyone can benefit. The Wood Green Regeneration Programme, set out in the Wood Green SRF, sends a clear message that Haringey is intending to deliver significant growth whilst being respectful of the existing stakeholders, community and the environment. The plan will deliver urban living at high densities in successful and sustainable neighbourhoods, job growth whilst ensuring that local residents can access the jobs and deliver significant transformation of the town centre whilst safeguarding existing businesses.

7.2. Priority 5: Create homes and communities where people choose to live and are able to thrive. The Wood Green SRF and other Investment Framework documents create a policy framework for the delivery of significant housing growth in the Wood Green area, as well as an enhancement of Wood Green Metropolitan Town Centre, which together will create an enhanced Wood Green in which local residents are proud to live, with excellent access to local services and jobs.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

8.1. This reports seeks cabinet approval, in the event of the “Connecting Wood Green” application to the GLA’s Good Growth Fund being successful, to delegate authority to the Strategic Director of Regeneration, Planning and Development and the S151 Officer, after consultation with the Cabinet Member for Economic Development, Social Inclusion and Sustainability, to:

- Enter into a Good Growth Fund grant agreement with the GLA.
- Enter into grant and loan agreements with third parties using the sources of funding as set out in the Connecting Wood Green bid proposal

8.2. The Connecting Wood Green bid is for a £700,000 grant plus a £200,000 loan to contribute to projects with a total value of £2.2m.

8.3. The proposal comprises three capital projects; to be funded from the following sources as shown in the table below:

Projects	**Sources of Funding**							**Total**
	GLA		**Private Sector**	**S106**	**TFL Quietways**	**Wood Green Capital Prog.**	**Wood Green Revenue Prog.**	
	Grant £'000	**Loan £'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
The Gas Works Project	300	200	500	0	0	0	0	1,000
The Library Hub Project	25	0	100	0	0	25	15	165
Public Realm Intervention	375	0	0	150	100	75	40	740
Comms, PM and Strategy	0	0	0	0	0	100	145	245
Total	**700**	**200**	**600**	**150**	**100**	**200**	**200**	**2,150**

8.4. There is provision in the Wood Green capital budget for the council's £200k contribution to the match funding.

8.5. The £200k revenue match funding for the Library Hub Project, Public Realm Intervention, Communications and Strategy have been provided for in the Wood Green revenue budget.

8.6. There is adequate provisions in the S106 fund for the Public Realm intervention works.

8.7. The £200k loan from GLA will be given out to a third party organisation as loan. Thus adequate controls put in place for its repayment.

8.8. Legal advice is required before entering into grant and loan agreement with third parties to ensure that these are within the State Aid rule.

Legal

8.9. The Assistant Director of Corporate Governance notes the contents of the report.

8.10. The recommendations outlined in paragraph 3 of this report are conditional upon the Council being notified by the GLA that the Connecting Wood Green application for funding has been successful. In the event that the bid is successful, advice from Corporate Legal Services should be sought as prior to entering into a funding agreement with the GLA.

8.11. Under Contract Standing Order 17.1, a Cabinet decision is required for the approval of receipt of grants valued at £500,000 or more.

8.12. The Connecting Wood Green bid is for a £700,000 grant together with a £200,000 loan (repayable funding). The £200,000 loan must fall within the limits for borrowing set by the full Council for the financial year. There is an intention that the Council will use the £200,000 loan funding from the GLA to grant a loan of the same value to The Gas Works Project. The Council has the power to grant the loan to The Gas Works Project under Section 1 of the Localism Act 2011. The full terms associated with the repayment or distribution of the loan are not yet available for consideration, but will form part of the grant funding agreement if the bid is successful.

8.13. Should the Council enter into a grant funding agreement with the GLA for the Connecting Wood Green projects:

8.13.1. the Council will need to comply with the conditions of grant funding, failing which the grant funding may be withdrawn and / or funding may have to be repaid; and

8.13.2. the Council will need to ensure that procurement of any goods, works or services utilising the grant funding is compliant with procurement legislation and the Council's Contract Standing Orders.

8.14. Paragraph 3.2 of the report recommends that, should the Council enter into a funding agreement with the GLA for the Connecting Wood Green projects, Cabinet grant delegated authority to enter into grant agreements with third parties. The Council must ensure that any grant agreements with third parties are compliant with State Aid legislation. The draft terms of the Good Growth Fund grant agreement include provision for aid to be provided by the Council as "de minimis" aid in accordance with the De Minimis block exemption. In the event that grant funding is in excess of the upper threshold for de minimis aid, it will trigger a requirement to notify and cooperate with the GLA in utilising the block exemptions or the notification and approval procedure as required. Advice from Corporate Legal Services must be sought in respect of the application of State Aid legislation prior to the Good Growth Fund grant agreement being entered into with the GLA, and again once the recipients of the grant funding and the value of each grant agreement have been identified.

8.15. Subject to paragraphs 8.2.4-8.2.6 above, the Assistant Director of Corporate Governance sees no legal reasons preventing Members from approving the recommendations in this report.

Equality

8.16. The Council has a public sector equality duty under the Equality Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- advance equality of opportunity between people who share those protected characteristics and people who do not;
- foster good relations between people who share those characteristics and people who do not.

8.17. We have been proactive in consulting with a wide and diverse range of people and stakeholders on the Wood Green Strategic Regeneration Framework and Investment Framework documents. This will include groups that represent those with protected characteristics.

8.18. An Equalities Impact Assessment has been carried out for the Wood Green Strategic Regeneration Framework. The impact assessments focus on the potential impact on the nine protected characteristics, as well as the potential for addressing identified inequalities relating to areas of: employment, connectivity/transport, housing, air quality, education, training, skills, health and wellbeing, diversity and crime.

8.19. The projects set out in the Connecting Wood Green proposals will help the council to meet the priorities which have been identified in the Wood Green SRF EqIA, and will have the following specific benefits:

8.20. The project will benefit Noel Park residents, existing businesses in the Chocolate Factory, local businesses on the High Road including small independent business, and harder to reach groups including BAME women and people with experience of mental health difficulties.

8.21. The additional support to local organisations like Big Local Noel Park and the Wood Green Social Enterprise Forum will create benefits for all residents living in Noel Park (population 15,472 based on latest Mid-Year Estimate, GLA 2016). These residents will benefit from the increased participation and engagement particularly directly impacted households living in Sky City and Page High.

8.22. Some 200 existing and new businesses in the area around the Chocolate Factory and Coburg Road stand to benefit directly from the improved connections. Collage Arts tenants will be safeguarded in the short/ medium term by the provision of meanwhile studio space. There are 500 businesses in the town centre (based on BID catchment area), including 149 small independent businesses who will benefit from the town centre improvements and business support delivered by the BID.

8.23. The socio-economic focus of this project will benefit in particular some harder to reach community groups. Our work with HEST and HALS will aim to reach the disadvantaged labour market in Noel Park, which is significantly higher in comparison to the borough averages. The disadvantaged labour

market, as described by ONS, comprises of six key characteristics: Disabled people, lone parents, people aged 50 and over, lowest qualified, those living in deprived LA wards and ethnic minorities.

9. Use of Appendices

Appendix 1 –Good Growth Fund Grant Agreement Template
Appendix 2 – Wood Green Good Growth Fund Stage 2 Bid Summary

10. Local Government (Access to Information) Act 1985

Good Growth Fund Prospectus
https://www.london.gov.uk/sites/default/files/good_growth_fund_prospectus.pdf

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GREATER LONDON AUTHORITY

AGREEMENT FOR THE PROVISION OF FUNDING RELATING TO [ ]

between

The Greater London Authority

-and-

[ ]

Note: Where the proposed Recipient is also an ESF Sponsor you must ensure that they execute (signs/seals as a deed) both: (i) this Agreement; and (ii) the related ESF Sponsor Agreement, before the GLA executes either.

Summary cover sheet for publication

In compliance with the Local Government Transparency Code 2014

The Greater London Authority must publish details of all grants to voluntary, community and social enterprise organisations. **By signing the grant agreement overleaf, organisations are also accepting the publication of the information** set out below (by GLA officers) and confirming its accuracy:

The beneficiary is:	*A voluntary and community sector organisation:* *A social enterprise:* *Other:* *If "Other" please provide more detail ……..*	☐ ☐ ☐
The award of this grant was formally approved by:	*MD/DD/ADD/DAR*	*number*
The grant is awarded on:	Click here to enter date of signature	
The grant covers the following time period:	*from* DAY/MONTH/YEAR *to* DAY/MONTH/YEAR	
It is awarded by:	*Relevant GLA team and directorate*	
to:	*Name of beneficiary*	
Company or charity registration number:	*Company number: _ _ _ _ _ _ _ _* *Charity number: _ _ _ _ _ _ _ _*	
The grant is for a total of:	*pounds*	
Purpose of the grant:	*Brief explanation*	

IN ORDER FOR THE GLA TO COMPLY WITH THE 2014 LOCAL GOVERNMENT TRANSPARENCY CODE, ***THE GLA OFFICER WILL FORWARD THIS SHEET AND THE FUNDING AGREEMENT WHICH FOLLOWS TO THE GOVERNANCE TEAM*** *AS SOON AS IT IS SIGNED.*

(Azadur Rahman azadur.rahman@london.gov.uk / Post Point 17A / Tel extension: 4818).

THIS AGREEMENT is made this day of 2016

BETWEEN:

(1) **THE GREATER LONDON AUTHORITY** whose principal offices are at City Hall, The Queen's Walk, London, SE1 2AA ("the Authority"); and

(2) **[ ]** (Company/Charity registration no: [ ]) [of/whose principal office is at] [ ] ("the Recipient")

IT IS HEREBY AGREED THAT:

1. Background

1.1 The Recipient requested funding from the Authority and provided to the Authority a proposal for the use of such funding. A copy of the Recipient's proposal is on file at the Greater London Authority.

1.2 Under its powers under Sections 30 and 34 of the Greater London Authority Act 1999 to do anything it considers will facilitate or which is conducive or incidental to the promotion of economic, social development and wealth creation in Greater London, the Authority wishes to assist the Recipient in its programme/project [*add project title and brief description*] by the provision of the GLA Funding to the Recipient.

1.3 The Recipient's total costs of fulfilling the Project Objectives are [*words*] pounds sterling (£[*numbers*], the Recipient has committed itself to meeting the Project Objectives and contributing [*words*] pounds sterling (£[*numbers)* to the Project ("the Recipient's Contribution")] and use all reasonable endeavours to secure Additional Funding for the for use in meeting the Project Objectives.

1.4 This Agreement sets out the terms and conditions upon which the Authority will make the funding available to the Recipient.

1.5 The provision of the GLA Funding amounts to a conditional gift and is therefore not subject to VAT. If, at any time, it is held by the UK government to be subject to VAT, then the Recipient agrees and acknowledges that the GLA Funding shall have included any and all applicable VAT.

1.6 [The Recipient will be required, on or about the date of this Agreement, to enter into Security over certain of its property in favour of the Authority to secure the obligations of the Recipient to the Authority under this Agreement/The Recipient will be required, within such time period as shall be communicated by the Authority to the Recipient in writing, to enter into Security over certain of its property in favour of the Authority to secure the obligations of the Recipient to the Authority under this Agreement*]. ***(*If applicable please select appropriate option and delete other as applicable. If not applicable delete all and mark clause "Not Used")***

1.7 Where the Recipient is an ESF Sponsor it shall also, as a condition of this Agreement cooperate fully with the Authority and provide the Authority with such assistance as the Authority requires in relation to any ESF Project which shall include (without limitation) complying fully with the ESF Sponsor Agreement.

1.8 In this Agreement capitalised terms shall have the meaning prescribed to them in Clause 21.

2. The Project Objectives

2.1 The Recipient shall use the GLA Funding only to meet the Project Objectives in relation to the Project in accordance with this Agreement.

2.2 The Recipient hereby warrants that it has sufficient resources, including competent and qualified personnel, financial resources, premises and other resources as necessary, to meet the Project Objectives fully in accordance with this Agreement.

2.3 The Recipient shall:

(a) promptly and efficiently deliver the Project Objectives and complete the Project fully in accordance with this Agreement; and

(b) where the meeting of Project Objectives consists of the achievement of:

(i) Milestones, notify the Authority in writing immediately upon becoming aware that any Milestones are unlikely to achieved fully in accordance with this Agreement: and

(ii) Deliverables, notify the Authority in writing immediately upon becoming aware that any Deliverables are likely to exceed or are likely to be less than the relevant agreed number of Deliverables set out in the Annex to Schedule 1.

2.4 Where the Project involves any element of urban design, sustainability, streetscape design and or architecture, the Recipient shall submit full details of such proposed design and/or re-design work to the Authority for its consideration and will co-operate and engage fully with the Authority to agree design dialogue arrangements to be followed (in accordance with available guidance issued or published by the Authority from time to time) in the procurement, commissioning and undertaking of agreed design and/or re-design work. To the extent that the undertaking of any agreed design and/or re-design work necessitates in the opinion of the Authority, the amendment of this Agreement all such amendment shall not be valid unless made in accordance with Clause 11.

2A. Designated Capital and Revenue Funding and Recipient's Contribution

2A.1 The Recipient's statutory chief finance officer or other officer validly authorised to act on his or her behalf has certified that: (a) [words]pounds sterling (£[numbers]) will be used solely as a contribution to revenue expenditure; and (b) [words]pounds sterling (£[numbers]) will be used solely as a contribution to capital expenditure, incurred in relation to the Project Objectives such certification being made on the basis that the Recipient's determination of capital expenditure accords fully with all laws and best practice, is estimated to deliver benefits that will accrue over a period of 15 years on average and on the basis that it will recorded in the Recipient's accounts in this manner. A copy of the certification is attached at Schedule 7 to this Agreement.

2A.2 The Recipient shall ensure that it has secured the Recipient's Contribution on or before [31 March 2018]. For the avoidance of doubt where the Recipient's Contribution comprises any sum(s) to provided by a third party such component sum(s) shall not be deemed secured unless a legally binding obligation to provide such sums is in place between the Recipient and such third party funder(s) evidence of which must be provided to the Authority on or before [***date***].

3. Duration of Agreement and Funding breakdown

This Agreement shall commence on the date at the head of this Agreement and, subject to the provisions for early termination set out in this Agreement, shall continue in force until [***date***].

4. Payment, Performance Monitoring and Repayment Arrangements

4.1 Subject to the Recipient complying with all of the terms of this Agreement, the Authority shall pay to the Recipient a sum not exceeding the GLA Funding, such payments to be made in accordance with the Funding Schedule and this Clause 4. For the avoidance of doubt the GLA Funding is capital funding and the Recipient shall not be permitted to make claims for GLA Funding in respect of revenue expenditure.

4.2 Where Project Objectives are to be met on a

(a) Milestone basis the provisions of Part A of the Funding Schedule shall apply to and govern the Recipient's making of claims for and the Authority's making of payments of GLA Funding; and
(b) Project Output basis, the provisions of Part B of the Funding Schedule shall apply to and govern the Recipient's making of claims for and the Authority's making of payments of GLA Funding.

4.3 The Recipient shall use all reasonable endeavours to secure income and/or additional funding for the Project from third parties ("Additional Funding") providing written evidence of the same to the Authority with each Project Monitoring Form. To the extent that Additional Funding is to be applied specifically toward any of the Project Objectives, the Authority may in its discretion reduce any further payments of the GLA Funding by an amount equivalent to that Additional Funding.

4.4 The Recipient shall undertake and report to the Authority on post-Project delivery monitoring and evaluation, evaluating the impacts and outcomes of the Project as follows:

(a) first post-Project delivery monitoring and evaluation report to be supplied to the Authority on the date 6 months after the completion of the final Milestone (in accordance with, as a minimum, the requirements of the self-evaluation template set out at Schedule 8);

b) second post-Project delivery monitoring and evaluation report to be supplied to the Authority on the date 3 years after the completion of the final Milestone (in accordance with, as a minimum, the requirements of the self-evaluation

template set out at Schedule 8); and

c) ongoing post-Project monitoring reports supplied to the Authority bi-annually commencing on the date 5 years after the completion of the final Milestone (in accordance with such requirements as the Authority shall notify the Recipient).

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4.5 The Recipient shall also make all documents of its Sub-Grantees, suppliers and sub-contractors available to the Authority upon demand and procure access to such persons for the Authority and/or its agents, contractors or servants at any time for inspection visits, audit and scrutiny of the involvement of such persons in or about the Project and their respective contributions to the Recipient's delivery of Milestones and/or Project Outputs.

4.6 For the avoidance of doubt the Recipient hereby acknowledges that no further funding shall be provided in respect of such evaluation and warrants that the GLA Funding is sufficient in this regard.

4.7 [The Recipient hereby acknowledges and agrees that:

a) [part of*] the GLA Funding [***[insert relevant amount in words and (£[numbers]) where part repayment only***] and shall be repaid by the Recipient to the Authority on or before [***insert date(s)***] in accordance with the repayment profile outlined in part C of Schedule 2;

b) the Authority may at its discretion review the repayment details prescribed in clause 4.7a) above on or before [***insert long stop review date***] and the Recipient shall cooperate fully with the Authority in this regard, providing the Authority with all information, documents and access to such systems, employees, contractors and agents as the Authority deems necessary in this regard;

c) the repayment profile outlined in part C of Schedule 2reflects the agreed timing in respect of receipt of funds relating to project undertaken using GLA funding, any amendments to this Schedule will be in accordance with the requirements set out in Clause [12]; and

d) such requirement to repay the GLA Funding and any other provision necessary to give effect to that requirement shall survive termination or expiry of this Agreement. In addition, any other provision of this Agreement which by its nature or implication is required to survive the termination or expiry of the Contract shall do so.]

4.8 In the event that the Recipient fails to make any repayment(s) under this agreement whether in accordance with the detail specified by the Authority pursuant to clause 4.7 or otherwise interest shall accrue on such sum(s) at the interest rate of three percent (3%) above the base rate of Bank of England from time to time on all sums due and payable under this Agreement from the due date until the date of actual payment (both before and after judgement as applicable). The interest accrued under these circumstances shall be in addition to the interest rates set out in part C of Schedule 2of this Agreement. All such interest shall be calculated on the basis of the actual number of days elapsed, over a three hundred and sixty five (365) day year

and compounded at monthly intervals. The parties agree that this provision constitutes a substantial remedy for late payment of any sum payable under the Agreement in accordance with section 8(2) of the Late Payment of Commercial Debts (Interest) Act 1998.] ***(Where funding is repayable please use selecting the appropriate option in clause 4.7a), i.e. whether all or part payable also liaising closely with the finance team to: reflect accurately the repayment details and interest rate applicable to repayments at part C of Schedule 2; and ensure that the default interest rate and calculation methodology set out in clause 4.8 remain correct.)***

5. Ineligible Expenditure

5.1 Without prejudice to the fact that the Recipient must only use the GLA Funding for the purpose of meeting the Project Objectives, the Recipient must not use monies paid to it by the Authority under this Agreement for:

a) activities or objectives not listed in Schedule 1 or 2;

b) recoverable input VAT incurred;

c) any liability arising out of the Recipient's negligence or breach of contract;

d) payments for unfair dismissal, constructive dismissal or redundancy to staff employed on fixed term contracts signed after June 1996, where this arises in respect of the expiry of that term without it being renewed; and/or

e) the payment of any Ombudsman's award or recommendation as regards compensation for maladministration.

5.2 The list in Clause 5.1 is not exhaustive and other expenditure not listed in Clause 5.1 may also be ineligible for GLA Funding under the terms of this Agreement and various incorporated documents. The Recipient must consult the Authority if there is any doubt as to whether particular costs are eligible.

6. Financial Accountability

6.1 The Recipient must ensure that the requirements set out in this Agreement, and in any clarification or guidance issued from time to time by the Authority, are complied with. In particular the Recipient shall:

a) agree in writing in advance with the Authority any changes to any of the Project Objectives, Milestones and/or Projects Outputs;

b) establish, implement and utilise effective monitoring and financial systems, so that as a minimum the costs funded by the GLA Funding can be clearly identified and the propriety and regularity of all payments and handling of the GLA Funding are ensured;

c) notify the Authority of the monitoring and financial systems in place, and comply with the Authority's reasonable requirements for these systems;

d) notify the Authority immediately if any financial irregularity in the use of the GLA Funding is suspected, and indicate the steps being taken in response. Irregularity means any fraud or other impropriety, mismanagement or use of funds for any purposes other than those approved;

e) notify the Authority immediately if any other financial irregularity is suspected, and indicate the steps being taken in response;

f) notify the Authority immediately if the Recipient is Insolvent, or if it has no reasonable prospect of avoiding Insolvency in the future;

g) keep a record of all Expenditure Incurred together with full supporting evidence including (without limitation) copy invoices clearly showing Expenditure Incurred on the Milestones and/or Project Outputs or in the absence of such invoices contract documents and transaction listings from the Recipient's finance management system and certified as true and accurate records of such expenditure by the Recipient's Chief Financial Officer) and Additional Funding received. All evidence of Expenditure Incurred such as original invoices, receipts, timesheets and other relevant documents must be kept for at least 6 years after the end date of the Project The Authority and any person nominated by the Authority has the right to audit any and all such evidence at any time during the 6 years after the end date of the Project on giving reasonable notice (whether in writing or verbally) and at any reasonable time to inspect any aspect of the Recipient's performance of the Project and the Recipient shall give all reasonable assistance to the Authority or its nominee in conducting such inspection, including making available documents and staff for interview;

h) make (complying always fully with the requirements of the Data Protection Act 1998 and, from 25 May 2018 only, the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and all applicable regulations) all relevant data, information and documents available and provide access at any time for:

   i) inspection visits and scrutiny of files by the Authority or any other public body undertaking an audit function (whether by itself or its contractors, servants and/or agents);, and

   ii) an external audit and review of the Project Objectives, Milestones and/or Project Outputs and of financial appraisal and monitoring systems;

   and cooperate fully with the Authority and/or anyone acting on their behalf or any other public body undertaking an audit function (whether by itself or its contractors, servants and/or agents) in this regard; and

i) retain and maintain data and systems required (in the reasonable opinion of the Authority) for the verification of the delivery of Project Objectives, Milestones and/or Project Outputs providing the Authority with copies of and access to the same upon request; and

j) notify the Authority in writing of any change in the identity of the Recipient's Representative.

6.2 During its useful life no Capital Asset should be sold charged loaned or otherwise disposed of by the Recipient or cease to be used for the purposes of the Project without the prior written consent of the Authority which (if given) may be conditional on re-payment to the Authority of the relevant part of the GLA Funding and shall be subject to Clauses 6.5 and 6.6 below.

6.3 The Recipient shall procure the maintenance of an insurance policy with an insurer of good repute for every Capital Asset which must cover loss or damage for the full replacement value of those Capital Assets and (for the avoidance of doubt) in the event of any loss of or damage to any Capital Asset the Authority shall not be obliged to pay for its replacement or repair.

6.4 The Recipient shall keep a register of all Capital Assets which shall be accessible to the Authority its agents and auditors upon request at all reasonable times. Where the GLA Funding is used for the purchase of a Capital Asset such item or items must be included on the register of Capital Assets and the register shall include (for each Capital Asset):

a) the date of purchase;

b) a description sufficient to identify it;

c) the purchase price excluding recoverable VAT;

d) any third party interests or charges over the Capital Asset;

e) the location of the documentation showing the Recipient's title to the Capital Asset; and

f) date of disposal and sale proceeds (net of VAT).

6.5 Where a Capital Asset is disposed of (subject always to the Authority having consented to such a disposal being made) the Authority shall require the Recipient to reimburse the Authority with the actual or estimated open market value of the Capital Asset at the time of disposal less any necessary sale expenses reasonably incurred or where the Capital Asset was partly funded by the GLA Funding the Authority may require the reimbursement of the percentage of the net sale value which represents the initial GLA Funding contribution to the purchase.

6.6 Unless otherwise agreed by the Authority all disposals of Capital Assets shall be at the best price reasonably obtainable based on an open market valuation evidenced in writing.

7. Breach of Conditions, Retention, Suspension, Withholding and Recovery of GLA Funding

7.1 The Authority may at its absolute discretion reduce, suspend or withhold GLA

Funding, or require all or part of the GLA Funding to be repaid and, at its option, terminate this Agreement by giving written notice to the Recipient (with such termination to take effect either immediately or at the end of such notice period as the GLA may stipulate), if:

a) the Recipient fails to comply with Clause 1.7;

b) the Recipient fails to comply with Clause 2A.2 and/or apply the Recipient's Contribution to the Project Objectives Milestones and/or Project Outputs;

c) in the Authority's opinion the Recipient fails to deliver or unsatisfactorily delivers the Project Objectives, Milestones and/or Project Outputs;

d) there is a substantial change to the Project or the Project Objectives, Milestones and/or Project Outputs which the Authority has not approved, or any attempt is made to transfer or assign any rights, interests or obligations created under this Agreement or substitute any person in respect of any such rights, interests or obligations, without the prior consent in writing of the Authority;

e) any information provided in the application for funding or in a claim for payment or in subsequent or supporting correspondence is found to be incorrect or incomplete to an extent which the Authority reasonably considers to be material;

f) the Recipient fails to comply with any other term set out in this Agreement;

g) the composition, ownership or control (save where control refers to the makeup of a London Borough Council's elected executive) of the Recipient changes, or the Recipient becomes Insolvent or is dissolved in any way;

h) any other circumstances significantly affect the Recipient's ability to deliver the Project and/or meet the Project Objectives, Milestones and/or Project Outputs or result in or are in the reasonable opinion of the Authority likely to lead to the Project and/or the meeting of the Project Objectives, Milestones and/or Project Outputs as approved not being completed;

i) insufficient measures are taken by the Recipient to investigate and resolve any financial irregularity or the Authority reasonably concludes the GLA Funding is at risk of being misapplied; and/or

j) the Recipient fails to comply with the Authority's policies on sustainability and accessibility from time to time in place in undertaking activity pursuant to the Project including (without limitation) those comprised in the London Plan (http://www.london.gov.uk/priorities/planning/london-plan)) ;

k) the Recipient fails to provide the Authority upon request with:

   (i) copy invoices clearly showing Expenditure Incurred on the Milestones and/or Project Outputs or in the absence of such invoices contract documents and transaction listings from the Recipient's finance management system and certified as true and accurate records of

such expenditure by the Recipient's Chief Financial Officer; or

(ii) documentary evidence verifying (in the opinion of the Authority) the delivery of the Project Objectives, Milestones and/or Project Outputs; and/or

l) the acts or omissions of the Recipient, its contractors, agents, servants of any persons receiving grant funding from the Recipient might (in the reasonable opinion of the Authority) conflict with the objectives of the Authority, bring the Authority into disrepute or adversely affect the reputation of the Authority.

7.2 The Recipient shall notify the Authority immediately and provide the Authority with a full written explanation, if any of the circumstances in Clause 7.1 above arise.

7.3 If the Authority becomes entitled to exercise its rights under Clause 7.1, it may nevertheless decide not to exercise those rights, or not to exercise them to the fullest extent possible, or to delay in exercising those rights. Any decision not to exercise the Authority's rights under Clause 7.1, or to exercise them only partially or to delay in exercising them, may be made on conditions which will be notified to the Recipient provided always that any such decision by the Authority shall not prevent the subsequent enforcement of any subsequent breach of that provision, and shall not be deemed to be a waiver of any subsequent breach of that or any other provisions.

7.4 The Authority may also in addition to but without prejudice to its rights under Clauses 7.1 to 7.3 (inclusive) and at its sole discretion terminate this Agreement at any time by giving two calendar months' notice in writing to the Recipient.

7.5 In the event that the Authority exercises its right to terminate this Agreement under

a) Clause 7.1:

i) the relationship of the parties shall cease and any rights granted under or pursuant to this Agreement shall cease to have effect save as (and to the extent) expressly provided for in this Clause 7.5;

ii) any provision which expressly or by implication is intended to come into or remain in force on or after termination shall continue in full force and effect;

iii) the Recipient shall promptly return to the Authority or dispose of in accordance with the Authority's instructions all information, other data and documents and copies thereof disclosed or supplied to the Recipient by the Authority pursuant to or in relation to this Agreement; and

iv) the Recipient shall repay to the Authority upon demand such amounts of the GLA Funding paid to the Recipient prior to termination as it deems appropriate including (without limitation) such sums of the GLA Funding which are repayable pursuant to Clause 4 for and/or part C of Schedule 2;

b) Clause 7.4:

i) the provisions of Clause 7.5(a) (i) to (iii) shall apply; and

ii) the GLA shall pay the Recipient a pro-rated sum calculated by reference to Expenditure Incurred on or before the date on which notice is served under clause 7.4 and for which it has yet to invoice the Authority provided always that the Recipient provides the Authority with an invoice for the same with all supporting documentation required by the GLA in accordance with Clause 4 of this Agreement and the Funding Schedule.

7.6 Where the Authority exercises its right to reduce, suspend or withhold GLA Funding, or requires all or part of the GLA Funding to be repaid pursuant to Clause 7.1, where the sums in question relate to GLA Funding paid in respect of Project Outputs, the GLA Funding may be re-calculated based on the revised maximum number of Sustained Outcomes deemed achievable by the Authority (at its discretion) and multiplied by the Overall Unit Cost, regardless of the associated value of the volume of prior Project Outputs achieved at the date on which the GLA notifies the Recipient of its exercise of its Clause 7.1 rights, provided always that the Authority reserves the right to apply an alternative methodology to re-calculate the GLA Funding amount.

8. Procurement and State Aid

8.1 All procurement of works, equipment, goods and services shall be based on value for money and suitable skills and experience and conducted:

a) using a fair and transparent documented decision making process taking account of public sector accountability and probity;

b) in accordance with all relevant law including the Public Contracts Regulations 2015 and GLA Contracts and Funding Code and in any event, where the Recipient is a London Borough Council, in accordance with its relevant contracting and/or procurement procedures and rules, which for the avoidance of doubt the Recipient hereby warrants are compliant with the aforementioned regulations and related best practice; and

c) in accordance with government best practice relating to procurement practices and procedures.

8.2 In accepting and disbursing the GLA Funding the Recipient shall comply with all applicable European Union rules on State Aid and shall ensure that all requirements for any application of the Block Exemptions or notification and approval by the European Commission under such rules are met.

8.3 Unless otherwise notified by the Authority when utilising the GLA Funding to fund Relevant Aid to a Relevant Enterprise under the Project (whether directly by the Recipient itself or by funding the Relevant Enterprise in question to do so) the Recipient shall ensure that such aid is provided as “de minimis aid” in accordance with the De Minimis Aid Exemption.

8.4 In order to prevent any single Relevant Enterprise receiving aid in excess of the De Minimis Threshold (whether under the Project or otherwise from the Authority or any other public body or public source) the Recipient shall:

a) obtain a completed De Minimis Disclosure Form from the Relevant Enterprise before allowing it to participate in the Project, providing it with any Relevant Aid or releasing any funding to it;

b) only provide Relevant Aid to a Relevant Enterprise when satisfied that doing so will not raise the total amount of Relevant Aid received by that Relevant Enterprise from the Authority or any other public body or public source above the De Minimis Threshold;

c) maintain copies of the De Minimis Disclosure Forms and information about the amount and nature of the Relevant Aid provided for a period (in each and every case) of ten financial years after the date on which the Relevant Aid is provided to the Relevant Enterprise in question; and

d) permit the Authority its auditors and agents access to the Minimis Disclosure Forms and to any other related records and information it considers necessary for assessing whether relevant State Aid rules have been complied with within ten (10) working days of a request for the same which the Authority may then disclose to the Department of Business Energy & Industrial Strategy and European Commission.

8.5 The Recipient shall notify the Authority when;

(a) the value of Relevant Aid provided under the Project to any single Relevant Enterprise reaches the Relevant Aid Trigger Point; and

(b) the Recipient envisages that the Relevant Enterprise's continued participation is required in the Project.

8.6 Following the Recipient notifying the Authority in accordance with Clause 8.5, the Authority may consider what measures need to be implemented to ensure that any further Relevant Aid received by the Relevant Enterprise complies with State Aid rules, including (without limitation) directing the Recipient:

a) not to provide the Relevant Enterprise with any further Relevant Aid;

b) to utilise the Block Exemptions or any other applicable exemption or European Commission notification and approval procedure.

8.6 If the Authority directs it to do so the Recipient shall itself complete a De Minimis Disclosure Form in respect of any portion of the GLA Funding utilised by the Recipient that the Authority considers to be Relevant Aid to the Recipient as a Relevant Enterprise and shall fully cooperate with the Authority in utilising the Block Exemptions or any other applicable exemption or European Commission notification and approval procedure to comply with State Aid rules.

8.7 The Authority reserves the right to vary the requirements relating to State Aid in line with changes to relevant European legislation from time to time.

8.8 The Authority may monitor the Recipient's compliance with the requirements of this Clause 8 (where applicable).

9. Publicity and Intellectual Property

9.1 The Recipient shall ensure that publicity is given to the Project and the fact that the Authority, and/or the London Economic Action Partnership (LEAP) is financially supporting the Project. In acknowledging the contribution made by the Authority, the Recipient must comply with any guidance on publicity and/or branding provided by the Authority from time to time and the Authority's logos (in the form set out in Schedule 3) shall be used wherever possible including (without limitation) on hoardings/construction signboards.

9.2 All publicity generated by the Recipient referring to the Mayor of London, the Authority, and/or the London Economic Action Partnership (LEAP) and/or each of their respective names, logos or branding including (without limitation) all press and media releases must be approved in writing at least two weeks in advance of any release of publicity material (in any form) by the Authority's Representative. The Recipient shall also ensure that any proposals for any launch or other related publicity activity are approved in writing by the Authority at least one month before the date of such proposed launch or other related publicity activity.

9.3 The Recipient shall ensure that it does not by its own actions or omissions, or those of its contractors or agents, harm the Authority's reputation or bring the Authority into disrepute.

9.4 If any part of the GLA Funding is used directly or indirectly to purchase or develop any Intellectual Property Rights then the Recipient shall take all necessary steps to protect such rights and hereby grants a perpetual, royalty-free licence to the Authority to use the same for the purposes related to, and connected with, policies, initiatives and campaigns, and related to, or connected with, the Authority's discharge of its statutory duties and powers.

10. Agency

10.1 The Recipient is not and shall in no circumstances hold itself out as being the agent or partner of the Authority.

10.2 The Recipient is not and shall in no circumstances hold itself out as being authorised to enter into any contract on behalf of the Authority, or in any other way to bind the Authority, to the performance, variation, release or discharge of any obligation or power; or to make any statement on behalf of the Authority (unless approved in writing in advance).

10.3 The employees of the Recipient are not, shall not hold themselves out to be, and shall not be held out by the Recipient as being, employees of the Authority for any purpose whatsoever.

11. Amendment

The Recipient understands that amendments to this Agreement may be necessary in accordance with instructions and guidance issued by the Authority. No amendment to this Agreement shall be effective unless it is in writing and signed by or on behalf of each of the parties hereto, but the Recipient shall comply with any formal procedures for amending agreements which the Authority may have in place from time to time, and shall not unreasonably withhold or delay its consent to any amendment proposed by the Authority.

12 Review, Consultation and Final Report

12.1 In preparation for each of the Review Meetings (as that term is defined in Clause 12.2), the Recipient shall not less than 7 days before the date of the relevant Review Meeting submit to the Authority a report detailing the Recipient's activities in relation to meeting the Project Objectives, Milestones and/or Project Outputs.

12.2 The Recipient and the Authority shall meet to review the progress of the Project and the meeting of the Project Objectives, Milestones and/or Project Outputs ("Review Meeting") from time to time on a regular basis, at such times as agreed by the parties. Review Meetings will be organised by the Authority.

12.3 The agenda for the Review Meeting (which shall be attended by the Recipient's Representative) shall be informed by the Recipient's claims for payment and Project Monitoring Forms and shall include but not be limited to:

a) the progress and delivery of the Project and Project Objectives, Milestones and/or Project Outputs against the Milestones, any risks which may have any cost, funding, programme delay or quality implications and/or which may affect the delivery of the Project Objectives, Milestones and/or Project Outputs or any part thereof fully in accordance with this Agreement and the action the Recipient proposes to take to prevent and/or mitigate such risks adversely affecting the Recipient's ability to deliver the Project Objectives, Milestones and/or Project Outputs;

b) the amount of Additional Funding secured by the Recipient;

c) the Recipient's proposals for publicising, branding and acknowledging the Authority's funding of the Project; and

d) any revisions that may be necessary to the Project Objectives, Milestones and/or Project Outputs for whatever reason.

12.4 Any variations to this Agreement that appear to be necessary as a result of a Review Meeting shall be made in accordance with Clause 11.

12.5 In addition to the Review Meetings, throughout the term of this Agreement, the Recipient shall:.

a) comply fully with the requirements set out at Schedule 10;

b) cooperate fully with and provide the Authority and its agents including, but not limited to the IMS, servants and contractors with all information and

assistance that it reasonably requests from time to time including (without limitation) participating in and supporting the Authority's evaluation of the Project;

c) procure that its agents, servants and contractors cooperate fully with and provide the Authority and its agents including, but not limited to the IMS, servants and contractors with all information and assistance that it reasonably requests from time to time including (without limitation) participating in and supporting the Authority's evaluation of the Project and the Authority's Skills for Londoners Capital Fund and related programmes; and

d) provide upon request the IMS with such information and materials as the Authority requests;

e) take all steps necessary to facilitate the Authority and/or the IMS conducting visits to the site(s) of GLA funded activity as notified by the Authority from time to time; and

f) enable attendance at and provide reasonable notice and meeting papers for project team meetings by the Authority or its nominee including (without limitation) the IMS.

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13. Compliance with Legislation and Policies

13.1 The Recipient shall ensure that it, and anyone acting on its behalf, complies with the law for the time being in force in England and Wales, and in particular:

a) shall take all necessary steps to secure the health, safety and welfare of all persons involved in or attending the Project;

b) shall ensure it complies and its Sub-Grantees, suppliers and sub-contractors comply with the provisions of Bribery Act 2010 and any guidance issued by the Secretary of State under the same (whether or not so obliged expressly by that act or such guidance); and

c) shall have in place appropriate equal opportunities and complaints policy/procedures and shall not unlawfully discriminate against any person.

13.2 The Recipient warrants that it has or will obtain the necessary authority (legislative or otherwise) to deliver the Project.

13.3 Without prejudice and in addition to Clauses 13.1 and 13.2 the Recipient:

(a) shall comply with all relevant enactments in force from time to time relating to discrimination in employment and the promotion of equal opportunities;

(b) acknowledges that the Authority is under a duty under section 149 of the Equality Act 2010 to demonstrate it has paid due regard to the need to:

(i) eliminate unlawful discrimination and harassment;
(ii) advance equality of opportunity between groups who share protected characteristics and those that do not, in particular, minimise disadvantage suffered by the equality groups; taking steps to meet the needs of equality groups that are different from the needs of others; encouraging equality groups to participate in public life or in any other activity (such as elected office or management positions) in which their participation is disproportionately low.
(iii) Foster good relations between people who share a protected characteristic and those that do not.

The protected characteristics noted in the Equality Act include: age, race, sex, disability, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity. For the first tenet, marriage and civil partnership would also be applicable. In undertaking any activity concerning the Project the Recipient shall assist and cooperate with the Authority where possible in satisfying this duty in respect of the Authority's compliance with its duties under Clause 13.3(b); and

(c) shall assist and co-operate with the Authority where possible with the Authority's compliance with its duties under section 149 of the Equality Act 2010 and section 1 when it comes into force, including any amendment or re-enactment of section 1 or section 149, and any guidance, enactment, order, regulation or instrument made pursuant to these sections;

(d) shall (before the commencement of the Project):

(i) undertake Disclosure and Barring Service checks in respect of all persons engaged in or about the Project (by the Recipient, any agent, sub-recipient of GLA Funding, contractor or sub-contractor) where such persons shall be working with children or vulnerable persons or have access to personal data (as defined by the Data Protection Act 1998 and, from 25 May 2018 only, the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as applicable) concerning such children and vulnerable persons in relation as part of the Project; and

(ii) have in place (and maintain throughout the continuance of the Project) appropriate child and vulnerable persons safeguarding policies, which must, for the avoidance of doubt meet any requirements of the GLA's related policies in this place from time to time, including (without limitation) the GLA's Child Policy and Protection Procedures;

(e) shall if required by the Authority , ensure that the Project shall incorporate and be carried out in accordance with the Responsible Procurement Policy in which case, if requested by the Authority, the Recipient shall develop a responsible procurement plan (the "Recipient's Responsible Procurement Plan") setting out how the Recipient intends to carry out the Project in accordance with the Responsible Procurement Policy, and the Recipient shall submit the Recipient's Responsible Procurement Plan to the Authority for approval, such approval not to be unreasonably withheld. The Authority

shall monitor the Recipient's compliance with this clause and the Recipient's Responsible Procurement Plan, and any failure to comply with such requirements shall constitute a material breach of this Agreement; and

(f) shall if relevant to the Project be fully responsible for complying with all obligations on the part of the "client" contained in the Construction (Design and Management) Regulations 2015 and the Recipient shall indemnify the Authority in respect of all liabilities which the Authority may incur or suffer in relation to such Regulations.

(g) shall make reasonable efforts to utilise and adhere to the Authority's Sustainability Charter

[https://lep.london/sites/default/files/FE%20Capital%20sustainability%20charter%20final.pdf];

14. Liability and Insurance

14.1 The Recipient shall be liable for and shall indemnify and keep indemnified the Authority from and against any loss or damage incurred and any injury (including death) suffered and all actions, claims, costs, demands, proceedings, damages, charges and expenses whatsoever brought against the Authority and arising in connection with the management (including financial management) and delivery of the Project to the extent that such loss, damage, injury (including death), actions, claims, costs, demands, proceedings, damages, charges and expenses are due to the negligence of the Recipient or the default of the Recipient in carrying out its obligations under this Agreement.

14.2 The Recipient shall ensure that at all material times it maintains in force policies of insurance with an insurance company of long-standing and good repute in respect of:

a) public liability for a minimum amount of five million pounds sterling (£5,000,000.00) in respect of any one occurrence or a series of occurrences arising out of any one event; and

b) such other insurance as may be required in order to fulfill the conditions of this Agreement including (without limitation) employers liability insurance for the statutory minimum amount of cover.

14.3 The Recipient shall on the written request of the Authority from time to time allow the Authority to inspect and/or provide the Authority with evidence that it has all necessary policies of insurance in place.

15. Data Protection, Freedom of Information, Confidentiality and Transparency

15.1 The Recipient shall ensure that at all times it complies with its obligations under this Agreement in such manner so as to comply with the Data Protection Act 1998 (and, from 25 May 2018 only, the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement

of such data) and all applicable regulations including (without limitation) the maintenance of an appropriate registration with the Information Commissioner.

15.2 The Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR) gives a general right of access to information held by a public authority. Subject to any exemptions applicable, the Recipient shall co-operate fully with the Authority as reasonably requested by the Authority in respect of any request for information made to the Authority in connection with this Agreement pursuant to the FOIA, EIR or other applicable legislation.

15.3 Subject to Clauses 15.2, 15.4 and/or 15.5 the parties shall keep confidential any information exchanged between the parties which either party has specified as confidential or which would be likely to prejudice the interests of either party commercially or otherwise.

15.4 The obligations under Clause 15.3 above shall not apply to:

(a) information which at the time of disclosure is in the public domain;

(b) information which is required to be disclosed by law (including the Parties' under the FOIA);

(c) information which is disclosed with the consent of the disclosing party.

15.5 Both Parties acknowledges and agrees that the Authority:

(a) is subject to the Transparency Commitment and accordingly, notwithstanding Clause 15.3 hereby gives their consent for the other Party to publish the Agreement Information to the general public; and

(b) may in its absolute discretion redact all or part of the Agreement Information prior to its publication. In so doing and in its absolute discretion the Authority may take account of the exemptions/exceptions that would be available in relation to information requested under FOIA. The Authority may in its absolute discretion consult with the Recipient regarding any redactions to the Agreement Information to be published pursuant to this Clause 15.5. The Authority shall make the final decision regarding publication and/or redaction of the Agreement Information.

15.6 For the avoidance of doubt in the event that the Authority consents to the Recipient's disposal or cessation of use in the Project of any Capital Asset (pursuant to Clause 6.2) the Recipient shall ensure all data collected used or in any way related to or connected with the Project is erased (so that it cannot be recovered there from) from the Capital Assets to which such consent relates.

16. Entire Agreement

This document sets out the entire agreement between the parties and supersedes all prior oral or written agreements, arrangements or understandings between them. The parties acknowledge that they are not relying on any representation, agreement, term or condition, which is not set out in this Agreement.

17. Force Majeure

17.1 Either party shall notify the other in writing of any Force Majeure Event as soon as it is aware of it.

17.2 Neither party shall be in breach of the Agreement by reason of any Force Majeure event. Each party shall bear their own costs arising as a consequence of the Force Majeure Event.

18. Governing law and jurisdiction

This agreement and any dispute or claim arising out of it or in connection with it or its subject matter or formation (including non-contractual disputes or claims) shall be governed by and construed in accordance with the law of England and Wales. The parties irrevocably agree that the courts of England and Wales shall have exclusive jurisdiction to settle any dispute or claim that arises out of or in connection with this agreement or its subject matter or formation (including non-contractual disputes or claims).

19. Contracts (Rights of Third Parties) Act 1999

A party who is not a party to this agreement shall not have any rights under the Contracts (Rights of Third Parties) Act 1999 to enforce any term of this agreement.

20. Severance

If any court or competent authority finds that any provision of this agreement (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision shall, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this agreement shall not be affected

21. Definition of Terms

In this Agreement the following terms shall have the following meanings:

21.1 **"Additional Funding"** has the meaning prescribed to that term in clause 4.3 of this Agreement.

21.2 **"Agreement Information"** means (i) this Agreement in its entirety (including from time to time agreed changes to the Agreement) and (ii) data extracted from the claims made under this Agreement which shall consist of the Recipient's name, the expenditure account code, the expenditure account code description, the document number, the clearing date and the claim amount;

21.3 "**Authority's Representative"** means any person nominated by the Authority from time to time to be its representative for any matters relating to this Agreement.

21.4 **"Block Exemptions"** the Commission Regulation 651/2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty of the Functioning of the European Union. .

21.5 **"Certificate of Output Delivery"** means (where applicable) the certificate to be completed and submitted to the Authority in accordance with part B of the Funding Schedule 2, in the form set out Schedule 8 as amended by the Authority from time to time.

21.5 **"De Minimis Aid Exemption"** means the De Minimis block exemption (EC Regulation 1407/2013 of 18 December 2013 on the application of Article 107 and 108 of the Treaty of the Functioning of the European Union.

21.6 **"De Minimis Disclosure Form"** means the form attached at Schedule 4 or such other disclosure form as the Authority may on the giving of notice to the Recipient require it to use.

21.7 **"De Minimis Threshold"** means the ceiling on Relevant Aid provided under the De Minimis Block Exemption to a Relevant Enterprise as more particularly set out in the De Minimis Disclosure Form.

21.8 **"Deliverables"** means any deliverables including the Sustained Deliverables to be met by the Recipient and as may be set out in the Annex to Schedule 1 and/or to any annexure thereto and any amendment thereto agreed between the parties in accordance with clauses 11 and 12, and to be carried out in accordance with the undertakings set out in Schedule 1 and the achievement of which for the avoidance of doubt shall be measured by reference to Output and Outcomes Framework.

21.9 **"Output and Outcomes Framework"** means the Good Growth Fund Output and Outcomes Framework as amended from time to time and the current version of which can be found at https://www.london.gov.uk/what-we-do/regeneration/funding-opportunities/good-growth-fund-supporting-regeneration-london

21.10 **"ESF Project"** means any Project that is part-funded with funding from the European Social Fund.

21.11 **"ESF Sponsor"** means a person having entered into an ESF Sponsor Agreement with the Authority on the same date as having entered into this Funding Agreement.

21.12 **"ESF Sponsor Agreement"** means an agreement governing the Recipient's provision (as an ESF Sponsor) to the Authority (acting as agent for the Department of Work and Pensions in the award of European Social Funding) in such from as is issued by the Authority from time to time.

21.13 **"Capital Asset"** means any item of equipment or other asset which has a purchase value of five thousand pounds sterling (£5,000.00) or more and which on the date of its purchase by the Recipient has a useful life of more than three (3) years and is purchased wholly or partly out of the GLA Funding.

21.14 **"Expenditure Incurred"** means expenditure connected with the Project in respect of which the Recipient has received relevant goods and services, or in respect of which it has entered into contractual obligations, for which payment has been made or is due to be made.

21.15 **"Financial Year"** means the annual period from 1 April to 31 March.

21.16 **"FOIA"** has the meaning given to it in Clause 15.2.

21.17 "**"Force Majeure"** means any of the following: riot, civil unrest, war, act of terrorism, threat or perceived threat of act of terrorism, fire, earthquake, extraordinary storm, flood, abnormal weather conditions or other natural catastrophe or strikes, lock-outs or other industrial disputes to the extent that such event has materially affected the ability of the Party relying on the Force Majeure Event ("Affected Party") to perform its obligations in accordance with the terms of the Agreement but excluding any such event insofar as it arises from or is attributable to the willful act, omission or negligence of the Affected Party or the failure on the part of the Affected Party to take reasonable precautions to prevent such Force Majeure Event or its impact .

21.18 **"Funding Schedule"** means the schedule of payments agreed between the parties as set out in Schedule 2 to this Agreement

21.19 **"GLA Funding"** means a sum of up to [*words*] pounds sterling (£[*numbers*]) to be paid to the Recipient by the Authority in accordance with the terms and conditions of this Agreement.

21.20 **"IMS"** refers to any independent monitoring surveyor, acting on behalf of the Authority from time to time.

21.21 **"Insolvent"** means:

- where the Recipient is an individual (or if more than one individual than any one of them):

  (a) the subject of a bankruptcy petition;

  (b) is the subject of an application for an interim order under Part VIII of the Insolvency Act 1986 as amended by the Insolvency Act 2000 and the Enterprise Act 2002;

  (c) enters into any composition, moratorium or other arrangement with its creditors, whether or not in connection with any proceeding under the Insolvency Act 1986 as amended by the Insolvency Act 2000 and the Enterprise Act 2002; and

- where the Recipient is a body corporate (or if more than one body corporate than any one of them):

  (a) a proposal for a voluntary arrangement is made under Part 1 of the Insolvency Act 1986 as amended by the Insolvency Act 2000 and the Enterprise Act 2002 or the Directors of the Recipient resolve to make such a proposal;

  (b) a petition for an administration order is presented under Part II of the Insolvency Act 1986 as amended by the Insolvency Act 2000 and the

Enterprise Act 2002 or the Directors of the Recipient resolve to present such a petition;

(c) a receiver (including a receiver under section 101 of the Law of Property Act 1925 or manager or administrative receiver of its property (or part of it) is appointed;

(d) a resolution for its voluntary winding up is passed under Part 1V of the Insolvency Act 1986 as amended by the Insolvency Act 2000 and the Enterprise Act 2002 or a meeting of its creditors is called for the purpose of considering that it be wound up voluntarily (in either case, other than a voluntary winding up whilst solvent for the purposes of and followed by a solvent reconstruction or amalgamation);

(e) a petition for its winding up is presented to the court under Part IV or by virtue of Part V of the Insolvency Act 1986 as amended by the Insolvency Act 2000 and the Enterprise Act 2002 or a resolution is passed that it be wound up;

(f) an application is made under section 895 of the Companies Act 2006 or a proposal is made which could result in such an application;

(g) entry into or a proposal to enter into any arrangement, moratorium or composition (other than any referred to above) with its creditors; or

(h) the dissolution or removal from the Register of Companies of the Recipient or it ceasing to exist (whether or not capable of reinstatement or reconstruction).

21.22 **"Intellectual Property Rights"** means copyright, patents, registered and unregistered trade marks, registered and unregistered designs and all other industrial and intellectual property rights anywhere in the world whether registered or unregistered and including any applications for any of those rights

21.23 **"Milestones"** means the milestones for the Recipient's fulfillment of the Project Objectives set out in part A of Schedule 2.

21.24 **"Output Related Funding"** means (where applicable) the any GLA funding paid in respect of Project Outputs as may be set out in Part B of Schedule 2.

21.25 **"Outputs Value Return"** means (where applicable) the return confirming Outputs delivered in a quarterly claim period and cumulatively from which, using the Unit Rates, the claim amount for the Quarter will be calculated as well as the cumulative amount claimed to date in the form set out at Schedule 5(c) as amended by the Authority from time to time.

21.26 **"Project Outputs"** means (where applicable) any outputs including the Sustained Outcomes to be met by the Recipient and as may be set out in the Annex to Schedule 1 and/or to any annexure thereto and any amendment thereto agreed between the parties in accordance with clauses 11 and 12, and to be carried out in accordance with the undertakings set out in Schedule 1.

21.27 **"Project"** means the [*insert project title*].

21.28 **"Project Monitoring Form(s)"** means the form(s) to be completed and submitted to the Authority by the Recipient under Clause 4.2 and which shall take the form of the template set out at Schedule 5a.

21.29 **"Project Objectives"** means the objectives to be met by the Recipient as set out in Schedule 1, including (without limitation the Deliverables) and any amendment thereto agreed between the parties in accordance with clauses 11 and 12, and to be carried out in accordance with the undertakings set out in Schedule 1.

21.30 **"Quarter"** means the following periods in the relevant calendar year (i) 1 April to 30 June, (ii) 1 July to 30 September, (iii) 1 October to 31 December and (iv) 1 January to 31 March.

21.31 **"Recipient's Chief Financial Officer"** has the meaning given to it in paragraph 1 of Part A of Schedule 2.

21.32 **"Recipient's Representative"** means the representative of the Recipient responsible for ensuring the effective delivery and management of the Project whom as at the date of the commencement of this Agreement is [ ].

21.33 **"Recipient's Responsible Procurement Plan"** has the meaning given to it in Clause 13.3(e).

21.34 **"Relevant Aid"** means any financial or non-financial aid or assistance provided to a Relevant Enterprise incusing (without limitation) any capital or revenue grant payments any diagnosis and/or consultancy services and/or training services provided to a Relevant Enterprise and/or its employees at less than market value and subsidies towards the normal operating costs of the Relevant Enterprise any guarantees against any of its liabilities and loans charged at less than market interest rates (in the case of novel or contentious forms of aid and assistance the Recipient should seek the Authority's advice).

21.35 **"Relevant Aid Trigger Point"** means unless the Authority notifies the Recipient otherwise the value of the Euro equivalent (at the date of this Agreement) of fifty thousand pounds sterling (£50,000.00) of Relevant Aid provided by the Recipient to a Relevant Enterprise within the last three consecutive financial years.

21.36 **"Relevant Enterprise"** means an entrepreneur sole trader partnership firm of business (whether incorporated or not) or other body (public or private) undertaking activities of a commercial character or conducted with a view to profit or providing goods and services in an environment for which there is a commercial market but (for the avoidance of doubt) excluding aid and assistance to children young people and adults in education unemployed persons apprentices persons on work placements and employees where the Relevant Aid provided does not directly assist their employer.

21.37 **"Responsible Procurement Policy"** means the GLA Group Responsible Procurement Policy in place from time to time and the current version of which can

be obtained from https://www.london.gov.uk/priorities/business-economy/vision-and-strategy/focus-areas/responsible-procurement/responsible-procurement-policy.

21.38 **"Review Meeting"** has the meaning given to it in Clause 12.2.

21.39 "**State Aid**" means aid defined by the Treaty of the Functioning of the European Union, Article 107(1). It is granted through state resources in any form which could distort competition and affect trade by favouring certain undertakings or the production or certain goods is incompatible with the common market unless the Treaty of the Functioning of the European Union allows otherwise.

21.40 **"Schedule"** means a schedule to this Agreement which shall form part of this Agreement as if set out here.

21.41 **"Statement of GLA Funding Expenditure"** means the statement to be provided by the Recipient to the Authority in accordance with section 1 of Part B of the Funding Schedule setting out full details of Expenditure incurred on the Project and in respect of which claims for GLA Funding have been made [in the previous Financial Year], which shall be accompanied by copy invoices clearly showing Expenditure Incurred on the Project Outputs or in the absence of such invoices contract documents and transaction listings from the Recipient's finance management system and certified as true and accurate records of such expenditure by the Recipient's Chief Financial Officer in the form set out in Schedule 7 as amended by the Authority from time to time.

21.42 **"Sub-Grantee"** means any person which the Recipient funds in whole or in part from the GLA Funding.

21.43 **"Sustainability Charter"** means the Authority's policies and guidance on sustainability as comprised in the Sustainability Charter (https://lep.london/sites/default/files/FE%20Capital%20sustainability%20charter%20final.pdf),

21.44 **"Sustained Deliverables"** means any deliverables including the Sustained Deliverables to be met by the Recipient and as may be set out in the Annex to Schedule 1 and/or to any annexure thereto and any amendment thereto agreed between the parties in accordance with clauses 11 and 12, and to be carried out in accordance with the undertakings set out in Schedule 1.

21.45 **"Sustained Outcomes"** means (where applicable) any outputs or outcomes which by their nature are to be measured over a sustained period as may be set out at Annex 1 to Schedule 1.

21.46 **"Transparency Commitment"** means the Authority's commitment to publishing its agreements, contracts, tender documents and data from invoices and claims received in accordance with the Local Government Transparency Code 2015 and the GLA's Contracts and Funding Code..

21.47 **"Unit Rates"** means (where applicable) the values associated with each specific Project Output as set out in Schedules 1 and/or 2 or any annexure thereto.

22. A reference to any statute, enactment, order, regulation or other similar instrument shall be construed as a reference to the statute, enactment, order, regulation or instrument as amended or re-enacted by any subsequent statute, enactment, order, regulation or instrument and shall include all statutory instruments or orders made pursuant to it whether replaced before or after the date of execution of this Agreement.

IN WITNESS OF THE ABOVE the parties have executed and delivered this Funding Agreement as a deed on the date written at the head of this document.

The Corporate Seal of the)
GREATER LONDON AUTHORITY)
hereto affixed is authenticated by:)

.....
(Signature of Authorised Signatory)

.....
(Print Name)

.....
(Date)

[***Execution block to be obtained from recipient and inserted***]

Schedule 1

Project Objectives

[PROJECT TITLE]

Project Summary

Design Management Arrangements

Annex to Schedule 1

Deliverables

Deliverables	**Baseline**	**Target**	**Monitoring Approach Overview**	**Information Collected**
	Where applicable include a baseline figure	*What is your overall aim against this Deliverable?*	*Please insert a brief description of the approach you will take*	*List monitoring & verification information you intend to collect*
Number of people who actively participate in a project				
Number of people entering into employment				
Number of people sustaining employment				
Number of people progressing in work				
Amount of public realm being created or improved (m^2)				
Increase in visitor satisfaction %				
Increase in footfall %				
Number of new jobs being created				
Number of existing jobs being protected and safeguarded				
Amount of commercial / business space being created or improved (m2)				
Increase in business turnover (£ or %)				

PLEASE INCLUDE A BRIEF DESCRIPTION HERE OF HOW EACH DELIVERABLE RELATES TO THE OVERALL PROJECT – e.g. This project will deliver 1250 m2 of public realm as part of the redevelopment of XXXX, or this project will deliver 10 jobs as part of XXXX.

Schedule 2

Funding Schedule
Part A: Milestone Related GLA Funding

1. In addition and without prejudice to its other reporting obligations, on achievement of the Milestones and in any event no less than once per quarter, the Recipient shall submit a claim form in the form set out at part b of Schedule 5 (with supporting evidence of Expenditure Incurred on the Project Objectives including copies of third party invoices, and/or contract documents and transaction listings from the Recipient's finance management system and certified as true and accurate records of such expenditure by its statutory chief financial officer (which shall mean where the Recipient is a London borough council including, without limitation, the Royal Boroughs, the City of Westminster and Corporation of London, the officer of the Recipient who is responsible for the proper administration of its financial affairs pursuant section 151 of the Local Government Act 1972 (Recipient's Chief Financial Officer) or where the Recipient is not a London borough council, such officer validly authorised to act in such capacity on the Recipient's behalf) to the Authority for the appropriate amounts as set out in the Funding Schedule for the relevant Milestone such claims to be accompanied by:

   (a) a written report detailing progress in meeting the Project Objectives, the application of the Recipient's Contribution to the Project Objectives and its efforts to secure and the details of any Additional Funding secured together with such evidence and other information as the Authority may reasonably require (in the form of the forms set out at part a of Schedule 5); and

   (b) such other evidence and information as the GLA may require from time to time (as set out in the Funding Schedule or otherwise).

2. The Authority shall make payment to the Recipient, or as otherwise directed in accordance with the Funding Schedule, within 30 days of receipt of a valid invoices which the Recipient may issue following the approval by the Authority of valid claim forms submitted in accordance with paragraph 1 above.

3. If the report referred to in Clause 6.1(g) of this Agreement shows that the GLA Funding paid to the Recipient as at the date of the report is in excess of the total Expenditure Incurred by the Recipient for the achievement of the Project Objectives, then the Recipient shall repay that excess amount to the Authority forthwith and in all circumstances no later than 30 days following the approval of the report by the Authority in accordance with Clause 6.1(g) of this Agreement. Without prejudice to this obligation, the Authority may recover this excess by reduction of any funding still to be paid under this Agreement, or by set off against any other money due or to be due from the Authority to the Recipient.

GOOD GROWTH FUND MILESTONE AND FUNDING SCHEDULE

Milestone	Description of activity	Evidence (e.g. consultant brief, contract, invoices, staff day rates and timesheets/cost codes, photos)	GLA budget totals	GLA budget forecast															
				2018/19				2019/2020				2020/201				2021/22 (Match Only)			
			Capital	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
			£0																
			£0																
			£0																
			£0																
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			£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
			£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
				£0				£0				£0				£0			
				£0															

Match Funding 2017/18 - 2021/22			
Recepient Match		Non Recipient Match	
Capital	Revenue	Capital	Revenue
£0	£0	£0	£0
£0	£0	£0	£0
£0		£0	
£0		£0	

		Match Funding Totals	Match budget forecast															
			2018/19				2019/20				2020/21				2021/22			
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Recepient Match	Capital	£0																
	Revenue	£0																
Non Recipient Match	Capital	£0																
	Revenue	£0																

Definition
Capital: *Expenditure on the acquisition or creation of, or adding to, a tangible fixed asset.*
Revenue: *The operating, maintainance, management or development costs incurred during the project.*

Sample - to be completed in separate spreadsheet and inserted

Part B: Output Related GLA Funding

1. The Recipient shall complete and submit to the Authority, within 14 days of the end of each quarter (Quarters commencing on 1 April 201[ ], for the term of this Agreement, a:

   (a) completed Outputs Value Return (in the form set out at part C of Schedule 5as amended by the Authority from time to time).The Recipient shall ensure that all Project Outputs claimed meet the eligibility criteria as specified in Schedule 9 (Programme/Project Output Definitions & Evidence Requirements);

   (b) written report detailing progress in meeting the Project Outputs, the application of the Recipient's Contribution to the Project Outputs and its efforts to secure and the details of any Additional Funding secured together with such evidence and other information as the Authority may reasonably require from time to time (in the form of the Monitoring Forms set out at Schedule 5);

   (c) in addition and without prejudice to the forgoing provisions of this paragraph 1 the Recipient shall prepare and submit to the Authority an end of financial year estimate claim which shall confirm actual Project Outputs delivered pursuant to the Project to date and the associated drawdown of GLA Funding and provide a prudent estimate of all outstanding Project Outputs to be delivered pursuant to the Project to the end of that financial year no later than 4 March in each Financial Year in respect of which GLA Funding has been or is to be sought;

   (d) the Recipient shall no later than fifteen (15) working days after the end of a Financial Year in respect of which GLA Funding has been or is to be sought submit to the Authority a fourth Quarter actual claim indicating actual Project Outputs delivered in the fourth quarter (January-March) of the previous financial year; and

   (e) as soon as reasonably practicable after the end of each Financial Year in respect of which GLA Funding has been or is to be sought and by such date as the Authority shall specify (provided always that such date shall be no later than 31 July in the Financial Year immediately succeeding that financial year) the Recipient shall submit to the Authority a Certificate of Output Delivery which shall confirm actual Outputs delivered and the associated drawdown of GLA Funding.

2. The Authority shall make payment to the Recipient in accordance with the Funding Schedule, within 30 days of receipt of a valid invoice which the Recipient may issue following the approval by the Authority of valid claim forms submitted in accordance with paragraph 1 above provided always that Recipient hereby acknowledges and agrees that in any event the Authority shall not pay any claim(s) for the final ten percent (10%) of the GLA Funding until it is satisfied, that the Recipient has adhered to its obligations under this Part B of Schedule 2 under this Agreement, having conducted any final monitoring and/or verification exercises which it considers, in its absolute discretion, necessary or otherwise.

3. The Recipient shall only include in any claims made in respect of Project Outputs made under this Agreement sums calculated in accordance with the Unit Rates for delivered Project Outputs as set out in this Output Related Funding Schedule and which meet the eligibility criteria as specified in Schedule 9.].

4. If the Certificate of Output Delivery shows that the GLA Funding paid to the Recipient as at the date of the submission exceeds the Project Outputs delivered in the period to which the Certificate of Output Delivery relates, then the Recipient shall repay that excess amount to the Authority forthwith and in all circumstances no later than 30 days following submission of the Certificate of Output Delivery to the Authority. Without prejudice to this obligation, the Authority may recover this excess by reduction of any GLA Funding still to be paid under this Agreement, or by set off against any other money due or to be due from the Authority to the Recipient.

5. In accordance with the guidance set out in the Output Definitions & Evidence Requirements document (Schedule 9 of this Agreement), the Recipient shall retain data and systems needed for verification of each Output that has been delivered. This information shall be reviewed by the Authority at review meetings in accordance with Clause 12 of this Agreement.

Part C – Repayment Profile

[*Insert*]

Schedule 3

The Authority's Logo







Schedule 4

De Minimis Disclosure Form

GREATER LONDON AUTHORITY

DE MINIMIS AID DISCLOSURE FORM
DE MINIMIS DECLARATION

The GLA is considering giving you de minimis aid under Commission Regulation (EC) No. 1407/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid (OJ L 352 ("the Regulation")[1] up to a maximum of the GLA Funding (applicable Euro/Sterling exchange rate [enter details of applicable rate]) in relation to the Project

Under the Regulation, the GLA is required to check whether you will have received more than €200,000 (€100,000 if you are an entity operating in the road freight transport sector) of de minimis aid within the Member State in question (i.e. the UK) in this fiscal year (based on your accounting year e.g. by reference to your accounting reference date) and in the previous 2 fiscal years when combined with the proposed Project de minimis aid. **Please note if you are part of a group of companies your declaration needs to relate to funds received by all entities within that group for these purposes (see definition of "single undertaking" under Article 2 of the Regulation for further information).**

Please note you do not need to include funding that you may have received under a scheme or individual award which has been notified to and approved by the European Commission or under the State aid General Block Exemption Regulation unless such funding has been/is intended to be used by you in relation to the same costs as the proposed Project de minimis funding. If you have (in this fiscal year or the 2 fiscal years prior to that) received any de minimis aid or public funding in respect of costs to which you are intending to apply the de minimis aid proposed to be provided to you under the Project (as detailed above), you must inform the Grantor (through the contact provided below) of details of such sums by completing the tables set out below. If you have received no such funding please insert "None" in the Amount column in the relevant table(s). **Please also provide details of any de minimis aid not yet received but which you already have a legal right to receive during the remainder of this fiscal year.**

Accordingly please complete and return this documents having signed and dated it and (where applicable) having completed the tables below. Please then return the document to goodgrowthfund@london.gov.uk. If you do not return the document signed and dated (and provided detail of relevant funding, if any, as requested), the Grantor will be unable to provide you with a de minimis grant in relation to the Project.

Provider of de minimis aid	Purpose and Name of specific entity receiving de minimis aid	Amount	Date

Amount of other public funding applied/ to be	Provider of other funding	Date (if already granted)

[1] http://ec.europa.eu/competition/state_aid/legislation/de_minimis_regulation_en.pdf

applied towards same costs as the required de minimis aid		

I confirm the above details are correct as at the date below.

Name	Position	Signature	Date

Schedule 5

a) Monthly Monitoring Form

GREATER LONDON AUTHORITY
Monthly monitoring form

Organisation:		Project:	

1. Delivery progress — G

Please provide an update on progress made in the last month highlighting the achievement of any key milestones, delivery of outputs / outcomes and any communications activities undertaken

2. Current top three items to report

1	
2	
3	

3. Project risks & issues — R

Top 3 risks

	Risk description (cause, 'risk event', potential impacts)	Mitigation / Risk response	Probability (1 to 4)	Impact (1 to 4)	RAG	Project owner (name)
1					G	
2					G	
3					G	

Top 3 current issues

	Issue description	Potential Impact	RAG	Action plan	Project owner (name)
1			G		
2			G		
3			G		

4. Milestones

#	Chronological milestones: what are the key actions and steps to be undertaken to deliver the project from inception to completion	Planned date	Revised date	Complete?
1		dd/mm/yyyy	dd/mm/yyyy	N
2		dd/mm/yyyy	dd/mm/yyyy	N
3		dd/mm/yyyy	dd/mm/yyyy	N
4		dd/mm/yyyy	dd/mm/yyyy	N
5		dd/mm/yyyy	dd/mm/yyyy	N
6		dd/mm/yyyy	dd/mm/yyyy	N
7		dd/mm/yyyy	dd/mm/yyyy	N
8		dd/mm/yyyy	dd/mm/yyyy	N
9		dd/mm/yyyy	dd/mm/yyyy	N
10		dd/mm/yyyy	dd/mm/yyyy	N

5. Outputs

The project has been commissioned to deliver: Lifetime number of GLA KPI

What is the definition? How is it calculated?:

	Delivered in previous years	Q1	Q2	Q3	Q4	2015-16 total	Future years
Target profile as at Apr 15						0	
If required, revised profile as at XX 15							
Delivered to date						0	

The project has been commissioned to deliver: Lifetime number of GLA KPI

What is the definition? How is it calculated?:

	Delivered in previous years	Q1	Q2	Q3	Q4	2015-16 total	Future years
Target profile as at Apr 15						0	
If required, revised profile as at XX 15							
Delivered to date						0	

The project has been commissioned to deliver: Lifetime number of GLA KPI

What is the definition? How is it calculated?:

	Delivered in previous years	Q1	Q2	Q3	Q4	2015-16 total	Future years
Target profile as at Apr 15						0	
If required, revised profile as at XX 15							
Delivered to date						0	

6. Finance

	Previous years	Q1 2018-19	Q2 2018-19	Q3 2018-19	Q4 2018-19	2018-19 total	Future years
REVENUE							
	Budget profile					0	
	Revised profile					0	
	Actual spend					0	
	Previous years	**Q1 2018-19**	**Q2 2018-19**	**Q3 2018-19**	**Q4 2018-19**	**2018-19 total**	**Future years**
CAPITAL							
	Budget profile					0	
	Revised profile					0	
	Actual spend					0	

7.Communiciations

List out the details of any upcoming events (i.e. markets, festivals, openings, launches, etc.) and list out the details of any communications materials (press releases, articles, leaflets, website screen shots, photographs) you are attaching. Please be sure to attach the relevant material when you submit this form to your GLA project manager

Date	Upcoming News items	Description

Sample - to be provided in spreadsheet at a later date

b) Quarterly Claim Form

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Schedule 6 Section B

Cover Sheet

For delivery partner use	*Org Name:*	*For internal use*	*GLA Lead:* .....
	Project name:		*Date submitted to GLA Programme Manager:* .....
	Project Manager:		
	Start Date:		
	Completion:		

Contents	Guidance
Section I	Please submit an electronic copy of this claim form signed by your Section 151 Officer/Chief Finance Officer, and follow up with an hard copy. Electronic copies should be returned to: your project manager and programme manager. Hard copies should be returned to: your project manager, Greater London Authority, City Hall, The Queen's Walk, London, SE1 2AA Please attach evidence of expenditure (see section II for guidance on acceptable evidence).
Section II	Set out the details of your use of GLA funding on the project objectives to date (with evidence of expenditure, e.g. third party invoices, purchase orders and/or contract documents and transactions listings from your finance management system and certified as true and accurate records of such expenditure and or committed expenditure by your secition 151 officer/Chief Finance Officer).
Section III	A declaration that you have read, understood and complied with all the conditions of the grant set out in the Funding Agreement to which the particular claim refers. Please note, although we will not be asking delivery partners to evidence their match funding expenditure, a signed quarterly claim from your section 151 officer will act as a declaration that monies have been spent as agreed in the Funding Agreement. Should there be any slippage, an explanation would need to be provided. This declaration must be signed by both the project manager and the section 151 officer/Chief Finance Officer.
Section IV	A reminder of the deadlines for quarterly claim submissions and monthly monitoring forms. Please note, should you miss these claim deadlines, you will be required to wait until the following quarter to submit your claim.

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Section I: Quarterly Claim Form Guidance

Organisation Name	
Project Name	
Quarter	
Name(s) of officer applying for grant	
Position in Organisation	
Email address	
Correspondence address	
Postcode	
Telephone Number	
Mobile Number	

Samples - to be provided in spreadsheet at a later date

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Section II: Milestones and Grant Claim

Guidance

Guidance on completing table:

A: Each Claim should have a unique ID. It should be in the order it is listed in on the claim form. Mark the claim form with the unique ID given below.

B: Projects should match with the projects set out in Schedule 2 of the funding agreement.

C: Workstream should match the projects set out in schedule 2 of the funding agreement.

D. Milestones should match with the milestones set out in Schedule 2 of the funding agreement

E. Only submit evidence relevant to this particular claim. Please indicate the nature of the evidence provided to support this expenditure. The evidence should be a copy of an invoice, or in the absence of such an invoice, transaction listings from your finance management system showing actual expenditure.

F. Self-explanatory

G. Budget should match the budget set out in Schedule 2 of the funding agreement.

H. Cumulative spend to date on this project against this milestone (i.e to include all previous claims against this milestone if relevant)

I. Total amount claiming for this item in this claim.

A: Unique ID	B: Project	C: Workstream	D: Milestone	E: Evidence	F. Supplier name and invoice number	G. Budget (£)		H. Cumulative spend to date (£)		I. Claim from the GLA (£)	
						Capital	Revenue	Capital	Revenue	Capital	Revenue
eg.											
TOTAL						0.00	0.00	0.00	0.00	0.00	0.00

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Performance Reporting Schedule 2018/19

Financial period	Deadline for quarter (n) submissions by delivery partners
Quarter 1	20th July 2018
Quarter 2	19th October 2018
Quarter 3	18th January 2019
Quarter 4*	15th March 2019*

*Subject to change

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Section III: Declaration and undertaking

Guidance

We declare that:

- We have read, understood and complied with all the conditions of the grant set out in the Funding Agreement to which this claim refers.
- The information on this form is correct to the best of our knowledge and belief and I/we accept full responsibility for it;

  We undertake that we will keep accounts, invoices and receipts for 5 years after the last date grant is paid in connection with this grant and make them available for inspection on request by GLA officers;
- We have taken delivery of and/or incurred expenditure on the project objectives for which we are claiming grant and our claim covers only the amounts spent on the items described in this form. Our claim is for the net costs of the items, excluding recoverable VAT.
- We undertake that we will notify the GLA immediately in writing or by email of any changes to the details provided in this form.
- We confirm that this claim is for the following amount and relates to the following quarter:

Capital		Q1
Revenue		Q1

- We confirm that the following **match funding** has been spent on the project this quarter as set out in the schedule 4 of the funding agreement:

Delivery Partner	Forecast (£)	Actual (£)	Variance	Comments
			0.00	
			0.00	

- We confirm that the following is an accurate reflection of the **GLA** funding drawdown to date:

GLA Funds	Project Lifetime Budget	Previous Years Spend	FY 18/19 Budget	FY 18/19 YTD	18/19 Remaining Budget	Future Years Budget
Capital					0.00	
Revenue					0.00	

- We confirm that the following is an accurate reflection of the **match funding** accounts:

Match Funds	Project Lifetime Budget	Previous Years Spend	FY 18/19 Budget	FY 18/19 YTD	18/19 Remaining Budget	Future Years Budget
Capital					0.00	
Revenue					0.00	

- We confirm that the following is an accurate reflection of the overall project accounts, including both **match and GLA funds**:

Total Project Budget (inc GLA and Match funds)	Project Lifetime Budget	Previous Years Spend	FY 18/19 Budget	FY 18/19 YTD	18/19 Remaining Budget	Future Years Budget
Capital	**0.00**	**0.00**	**0.00**	0.00	0.00	**0.00**
Revenue	**0.00**	**0.00**	**0.00**	0.00	0.00	**0.00**

This declaration must be signed by the project manager and the Section 151 Officer/Chief Finance Officer

Signature	Name in BLOCK letters	Position	Date
		(Project Manager)	
		(S151/Chief Finance Officer)	

c. Output Values Return

Not applicable

Schedule 6

Self Evaluation Template

Section 1: Project Information

Note: this section is required for submission to the GLA, but may be excluded in versions of the evaluation for publication / sharing with your local partners.

Project Summary: please insert short description of your project	
Place and Borough	
Lead Delivery Organisation	
GLA Project Manager	
Self-evaluation lead	
Total GLA funding for project	
Total lifetime cost of project	
Other public/private investment	
Actual Project start date	
Actual Project end date	
Evaluation methodology: please include a short summary of the approach that you have taken to completing the self-evaluation, including the groups and individuals you have consulted with, and the primary research you have undertaken.	

Section 2: Stand-out Messages

A one page summary of your project and key achievements and/or lessons learned. This might include:

- A quick introduction to the project and what's been delivered
- A summary of impacts achieved to date
- An overview of wider achievements and lessons learned
- Project legacy.

Section 3: Project Context and Objectives and Design

This section will provide an overview of the context of the project and summarise how the project was designed to respond to this. This section effectively summarises the information and set out within your bid for funding, and within your grant agreement. It provides a basis against which to test the performance of project delivery.

Please complete the assessment under the following headings:

3.1: Project background: a summary of the local socio-economic and strategic context that you project was responding too.

3.2 Project rationale: a summary of how your project was designed to respond to this context, and the rationale for public sector intervention (i.e. the need for Good Growth Funding).

3.3 Project aims and objectives: an outline of the specific objectives identified by your project at outset.

3.4 Project design and delivery activities: please provide a short overview of the project delivery activities agreed at outset.

3.5 Funding and delivery mechanisms: please provide an overview of the GLA and match funding agreement for your project (as agreed at outset), and the delivery mechanisms that you were expecting to in place to deliver the project.

3.6 Project targets: please set out here the specific output and outcome targets that have been agreed with the GLA, along with any wider measures that you will be assessing your project performance against.

3.7 Project logic chain: *please insert your project logic chain which in effect summarises the above information.*

Section 4: Project delivery

This section will provide a review of the delivery process after grant agreement stage, including activities delivered, performance in terms of delivery timescales, funding, and outputs (deliverables):

Section 4.1: Overview of Project Design Process: a summary of how the project design process, including commentary on stakeholder and community engagement

Section 4.2: Activities Delivered: this section should provide an overview of the activities which have been delivered. It should include:

A table summarised the different strands of delivery activity, and a summary of delivery progress

Commentary on each of the strands of delivery activity, outlining what has been delivered and outlining any way in which this evolved from original plans. Photos / plans may help to illustrate this.

Commentary on any strands of delivery not delivered, outlining the reasons for this and how funding was reallocated

Section 4.3: Delivery Timescales. A summary of delivery timescales, reflecting on how the project progressed versus the timescales planned at outset, and any reasons for delays.

Section 4.4: Funding Performance. A summary of how the project has performed financially. Please include a table which compares actual spend to budgeted spend for each funding source. Please include commentary on any reasons for variance.

Section 4.5: Delivery Mechanics. A summary of the mechanisms underpinning delivery. This should consider:

A summary of external support procured (to support design, construction, and delivery), and approach taken to procurement

A summary of project management mechanisms

A summary of any project governance mechanisms put in place (eg project boards or steering groups).

Section 4.6: Summary of delivery performance: drawing on the above consideration, a brief summary of delivery performance. As part of this, please include a table outlining how the project has performed against the output targets agreed with the GLA at inception (note: this should focus on output targets only; outcome targets are considered in the next section). The table should include the output target, the agreed definition, the achieved figure (the timing of this figure should be recorded), and commentary which explains variance.

Section 5: Project impacts:

This section will focus on the impacts of the project to date.

Section 5.1: A review of economic, social and environmental impacts achieved to date.

The structure of this section will need to be developed to reflect the specific characteristics of the project and should explore the impact of your project on the places, communities, people, and businesses it has sought to support. Example impact themes include (but are not limited to): impact on town centre vitality; impact on skills and employment outcomes; impact on business / enterprise performance; impact on community inclusion and vitality.

The analysis is likely to need to draw upon bespoke research on or with the project beneficiaries: this might comprise surveys, focus groups, consultations, or observational research.

Analysis should draw on both quantitative and qualitative insights. Case studies of beneficiaries can be used to supplement quantitative analysis, and are helpful in telling the story of your project.

Section 5.2: A review of strategic and financial impacts achieved to date:

> Please provide an overview of the strategic impacts of your project. This might include improvements in partnership working, strong leadership shown by partner organisations in working towards shared objectives, improving efficiency by testing new ideas / approaches, or putting in place new systems /structures, or levering in in new funding / resource
>
> If there are any financial impacts of your project (e.g. generation of new business rates, council tax, or improved financial resilience of delivery organisations), please summarise these here. This section can be excluded if not.

Section 5.3: Future Impact. A short section exploring how the impacts achieved might be expected to evolve over the coming years (acknowledging that it mind it may take time for certain impacts to emerge).

Section 5.4: Summary of impacts to date performance: drawing on the above consideration, a brief summary of impact achieved to date. As part of this, please include a table outlining how the project has performed against the outcome targets agreed with the GLA at inception. The table should include the outcome target, the agreed definition, the achieved figure (the timing of this figure should be recorded), and commentary which explains variance.

Section 6: Project achievements and lessons:

Building on the assessment of delivery performance and impacts achieved, this section should provide an overview of overall achievements and lessons learnt. Please complete the assessment under the following headings:

6.1: Project achievements: building on the preceding section, identify the areas of greatest achievement for the project. These might relate to any aspect of delivery (from stakeholder engagement, to impacts achieved).

6.2: Barriers to achievement: please identify any challenges experienced which acted as barriers to achievement. This might include practical issues (such as problems during construction, to strategic issues (such as challenges securing agreement on designs).

6.3: Lessons to take forward: please identify the main lessons that you will take forward in delivering future projects of this nature.

Section 7: Project legacy and forward plan

Please provide a summary of the legacy of the project and next steps. Please complete the assessment under the following headings:

7.1: Project Legacy: a overview of the legacy of the project. This might include ongoing / complementary delivery activities, the physical / operational legacy of the project, and planned next steps to embed and build on the legacy

7.2: Challenges and Opportunities: a summary of remaining challenges or emerging opportunities. These might relate to the delivery / bedding in / long term management of the project, or the surrounding socio-economic context

7.3: Recommendations: drawing on the research undertaken, a summary of recommendations to inform ongoing project delivery, or future areas for action / intervention.

Section 8: Conclusions

To conclude, please provide short assessment of the extent to which project objectives have been achieved to date, with specific reference to each of the objectives listed in section 3. This should acknowledge where there is further / ongoing work needed to help achieve objectives.

Schedule 7

Name of programme: **Good Growth Fund**

Name of applicant organisation: **[ ]**

	Total project value (GLA + Match)	Total GLA funding	GLA capital funding	GLA revenue funding	Total Match	Recipient Match	Non Recipient Match	Recipient Match capital	Recipient Match revenue	Non Recipient match capital	Non Recipient match revenue
2017-18											
2018-19											
2019-20											
2020-21											

I hereby certify that:

1. the organisation named above is eligible to provide public match funding

2. the match funding provided does not contain any funds which have been provided by the GLA group

Signed: _____

Name: _____

Date: _____

Schedule 8

Certificate of Output Delivery

Not applicable

Schedule 9

Programme/Project Output Definitions & Evidence Requirements

Not applicable

Schedule 10

Performance reporting

The Recipient shall unless otherwise agreed in advance by the Authority in writing submit updates on performance to the Authority in the forms set out at :

- Part a of Schedule 5 on a monthly basis; and
- Part b of this Schedule 5 on a Quarterly basis.

Without prejudice and in addition to the foregoing the Recipient shall also provide the GLA and/or the IMS with:

- such information as is requested and in such form as notified by the GLA and/or the IMS at regular intervals as set by GLA Officers; and
- notice of, access and invitations to Project sites, Project meetings and board meetings of the Recipient (as an observer at board meetings of the Recipient) and all documentation relating to such Project meetings including (without limitation) agendas for the same at least five working days in advance.

Appendix 2

Connecting Wood Green

Regeneration, Planning and Development

Good Growth Fund

Stage 2 Bid Summary – February 2018



1 Project Summary and Design

1a Project Summary

Wood Green will be north London's most prosperous and green town centre. The council is developing a strategic framework that will deliver 6,400 homes and 4,000 jobs through the delivery of highly accessible well-designed places. The employment led regeneration will create opportunities on people's doorstep, deliver sustainable urban living and revitalise the town centre.

Major landowners are already developing proposals for sites in Wood Green. The area which will undergo the most change in the first 5 years is the Cultural Quarter. Planning applications have now been received for three sites in the Cultural Quarter totaling 2,000 homes and circa 15,000 m2 employment space. Haringey is progressing plans to build its own new Council Accommodation including a new Library and Customer Services Centre in the same area.

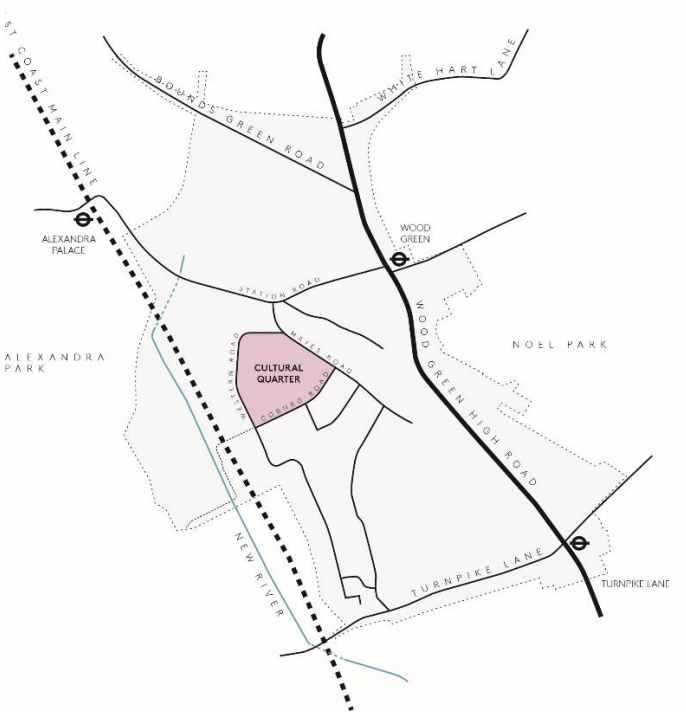


Image 1 – Wood Green and the Cultural Quarter

The Cultural Quarter currently feels cut off from the rest of the town centre and whilst only a 7-minute walk from the main road is difficult to find. The aim of this project is to deliver a series of interventions, which will draw people from the High Road and Station Road into the Cultural Quarter to transform this quiet area of Wood Green into a thriving part of the new town centre and nurture new and existing businesses and communities, laying the "soft" foundations for Wood Green's future development.

Working with innovative social enterprises, Haringey has already taken steps to draw people back to Wood Green, supporting places like Blue House Yard – packed full of creative sellers for five years on an old council car park as it awaits comprehensive redevelopment – and the Green Rooms hotel, which provides a social hub, pop-up food offerings, drinks and entertainment. These test projects are important to the success of the regeneration programme as they help to build relationships with existing residential and business communities and create physical spaces for people to come together.

The Good Growth Fund will contribute towards three new capital projects, which sit within the overarching meanwhile strategy (Image 2 – Current and Future Meanwhile Projects in Wood Green). The capital projects will enable Haringey to reach out to communities and create a forum where stakeholders can get involved and help to shape Wood Green projects and strategies which are coming forward.

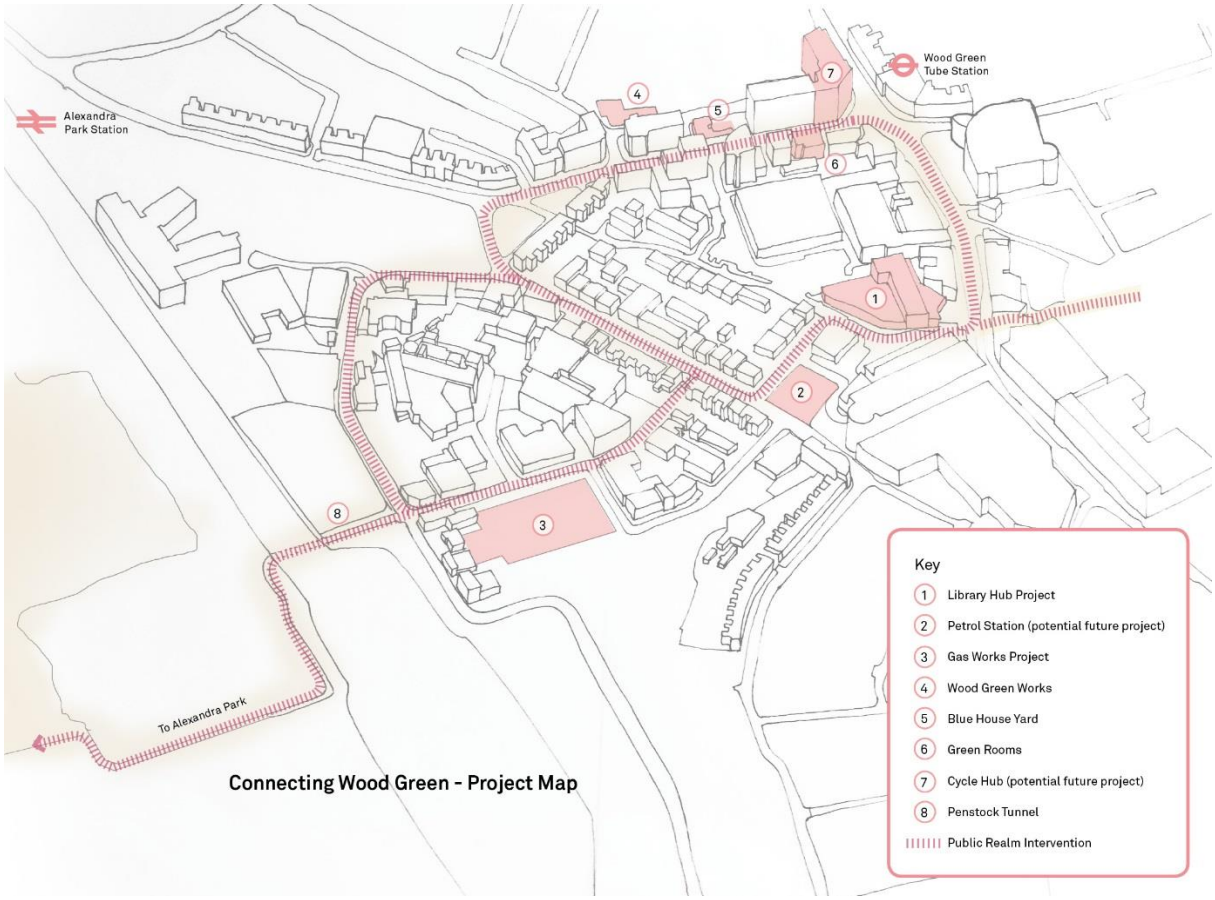


Image 2 – Current and Future Meanwhile Projects in Wood Green**.** Good Growth Funding will contribute towards the Library Hub Project, Gas Works Project, Penstock Tunnel and a range of Public Realm Interventions

The Gas Works Project

The Gas Works Project (GWP) is a meanwhile social enterprise scheme and special project vehicle to be delivered by the team behind The Mill Co Project (TMCP). A lease has been agreed between GWP and landowner St William for the Olympia Trading Estate on Coburg Road, enabling six industrial units (totalling 5,575 m2/ 60,000 ft2) to be repurposed for three to five years before the site is redeveloped. The reconfiguration and refurbishment of the building will safeguard existing businesses and create space for new tenants and also for cultural and community activities and events which will draw more people to the area.

Library Hub Project (the Post Office)

Wood Green Library contains a Council operated library and Customer Service Centre and also a covered Mall with market stalls and commercial units. Two units are currently vacant including the former Post Office unit of 400m2 (4,275 ft2). We will work with local organisations to transform vacant units into workspace and space for workshops, classes and meetings and to create a hub for consultation and engagement activities for the wider regeneration programme.

Both projects will Build Skills and Employability through business support and training provided through local partners including the Wood Green Business Forum, Wood Green Social Enterprise Forum, HEST/ HALS, Collage Arts and NWES.

Public Realm Interventions including Penstock Tunnel

We will commission a consultant who will work with local stakeholders to deliver a series of placemaking public realm interventions along the circular route connecting Station Road, the High Road and the Cultural Quarter and entrance to Alexandra Park at the Penstock Tunnel. This commission will include the refurbishment of Penstock Tunnel, improvements to the Library Mall, investment in green infrastructure, public realm, public art, lighting and signage.

Haringey led Projects and Project Management

The proposals already sit within the emerging Wood Green Strategic Regeneration Framework and Three Year Delivery Plan. Haringey has commissioned an Economy and Employment Space Study, which includes a business survey and will form the basis for a business relocation plan. As part of the Connecting Wood Green Project, further strategic documents will be prepared, in consultation with stakeholders:

- Design Code (Public Realm and Buildings)
- Cycling and Walking Strategy

The three separate capital projects will be coordinated by a Regeneration Officer in the Wood Green Team who will also be working with our Programme Management Team and local stakeholders to coordinate and carry out engagement, participation, monitoring and evaluation.

The aim of the project is to:

Empower People	• **Develop civic infrastructure** for people to meet, participate in civic life, train, capacity build, and access culture and the arts • **Deliver community-led regeneration** by giving stakeholders the opportunity to participate and become partners in the development of Wood Green policies and projects • **Drive innovation** and work towards an inclusive economy by supporting existing and new social enterprise
Make Better Places	• **Enhance public space** by creating accessible, active and attractive routes linking the Cultural Quarter to Station Road, High Road and Alexandra Park • **Secure a legacy of good design** by commissioning a Design Guide and Walking and Cycling Strategy to ensure that the future Wood Green is well designed, accessible, resilient and healthy • **Invest in green infrastructure** including trees in Wood Green
Grow Prosperity	• Safeguard existing and bring in new creative and social enterprises by **securing and creating workspace** and space to showcase work • **Build skills and employability** by providing support, skills and training for business and enterprise • **Back small business** by supporting the Wood Green BID, Business Forum and Turnpike Lane Traders

Context Overview

Wood Green is the borough's principal town centre, and is home to the Council's main civic offices. It is one of only 14 Metropolitan town centres across London (in the draft London Plan 2018) and plays a vital role in meeting residents' retail, leisure and civic needs in Haringey and surrounding boroughs.

The Council has identified Wood Green as a Growth Area in the Local Plan, and one of two regeneration priorities in the Council's Corporate Plan. Since 2014, Haringey has been developing the vision and objectives for Wood Green in consultation with residents, businesses, landowners and other stakeholders.

The vision is that Wood Green will become North London's most prosperous and green town centre – a place where people can succeed and are proud to live and work. It will combine outstanding and sustainable places for people to shop, socialise and create, with a wide and varied range of businesses. It will be a focus for opportunity and growth, a productive economic capital for Haringey, where people can come together, exchange ideas and put them into action.

Based on community feedback we have identified the three overarching themes and nine objectives to underpin the sustainable transformation of Wood Green.

Opportunities on your Doorstep	**Sustainable Urban Living**	**Revitalise the Town Centre**
Build a bigger Metropolitan Town Centre with more employment space, delivering 4,000 new jobs	Deliver 6,400 new homes for existing and new residents to rent and buy in high quality, characterful neighbourhoods	Secure investment in a well-connected, destination which draws people from Haringey and beyond
Maximise opportunities for local residents through education, training, skills and employment	Invest in social and community infrastructure, including parks and a new library	Celebrate, protect and build on Wood Green's diversity and heritage
Support a business destination with the infrastructure in place for existing businesses to grow and to attract new businesses	Design a healthy and accessible town centre with welcoming spaces where people enjoy spending time	Make Wood Green a destination of choice, with a strong cultural offer both day and evening

Specific socio-economic characteristics the project responds to:

Wood Green suffers from poor connectivity and marked inequality. The railway line that divides Haringey is both a physical barrier, with few crossing points, and is the boundary between the east and west of the borough where life chances vary greatly. In the east, the experiences of growing, working and aging in the borough are significantly different to the west with communities living parallel lives.

Noel Park, the main ward in Wood Green is one of the six most deprived areas in Haringey. Noel Park residents live in a disadvantaged labour market, with the area high in the numbers of disabled people, lone parents, people aged 50 and over and the lowest qualified. In Noel Park, there are 2.6% more households with dependent children and no adult in employment than the borough average. In contrast, wards to the west of the railway line are relatively affluent and the proportion of residents who have never worked or are long term unemployed is the lowest in the borough and higher proportions of residents report good health.

Employment opportunities in Haringey and in Wood Green are limited and the borough has the fourth lowest number of jobs per working age resident of any borough in London. We do have residents who commute to other areas of London, but many others are unemployed, or in low-paid and insecure employment. More people also claim Employment Support Allowance for mental health issues in Wood Green than in Haringey.

Wood Green also has challenges with the built environment. The High Road is linear, with east west accessibility and lack of choice in the retail and leisure offer. The Cultural Quarter is currently cut off, difficult to find and not easy to navigate. This is an issue for businesses in the Cultural Quarter and means that residents and visitors do not choose to visit the area.

The current regeneration plans for Wood Green are creating both opportunities and challenges. The Mountview Theatre School, for many years an anchor tenant in the area is moving out of the borough. The lease on Chocolate Factory 1 is due to expire creating uncertainty for artists, makers and creative businesses. Collage Arts, the local workspace operator, needs to identify 22,200 square feet of space by the end of 2018 to create 40 studios, which will safeguard artists, makers and creative businesses, equivalent to 101 full time jobs.

Beneficiary groups:

The project will benefit Noel Park residents, existing businesses in the Cultural Quarter, local businesses on the High Road including small independent business, and harder to reach groups including BAME women and people with experience of mental health difficulties.

The additional support to local organisations like Big Local Noel Park and the Wood Green Social Enterprise Forum will create benefits for all residents living in Noel Park (population 15,472 based on latest Mid-Year Estimate, GLA 2016). These residents will benefit from the increased participation and engagement particularly directly affected households living in Sky City and Page High.

Some 200 existing and new businesses in the Cultural Quarter stand to benefit directly from the improved connections. Collage Arts tenants will be safeguarded by the provision of new studio space. There are 500 businesses in the town centre (based on BID catchment area), including 149 small independent businesses who will benefit from the town centre improvements and business support delivered by the BID.

The socio-economic focus of this project will benefit in particular some harder to reach community groups. Our work with HEST and HALS will aim to reach the disadvantaged labour market in Noel Park, which is significantly higher in comparison to the borough averages. The disadvantaged labour market, as described by ONS, comprises of six key characteristics: Disabled people, lone parents, people aged 50 and over, lowest qualified, those living in deprived LA wards and ethnic minorities.

The Gas Works Project

Project Summary

Our main partner in this bid is **The Gas Works Project (TGWP)**, which will be established and delivered by the team behind **The Mill Co. Project (TMCP**). TMCP has an agreement with St William to repurpose and activate the Olympia Trading Estate on Coburg Road. The Gas Works Project will be a meanwhile social enterprise scheme for 3-5 years before the site is redeveloped. Good Growth capital funding will be used to pay for refurbishment and fit out, revenue from rental income will be reinvested in the project for further fit out, management and marketing.

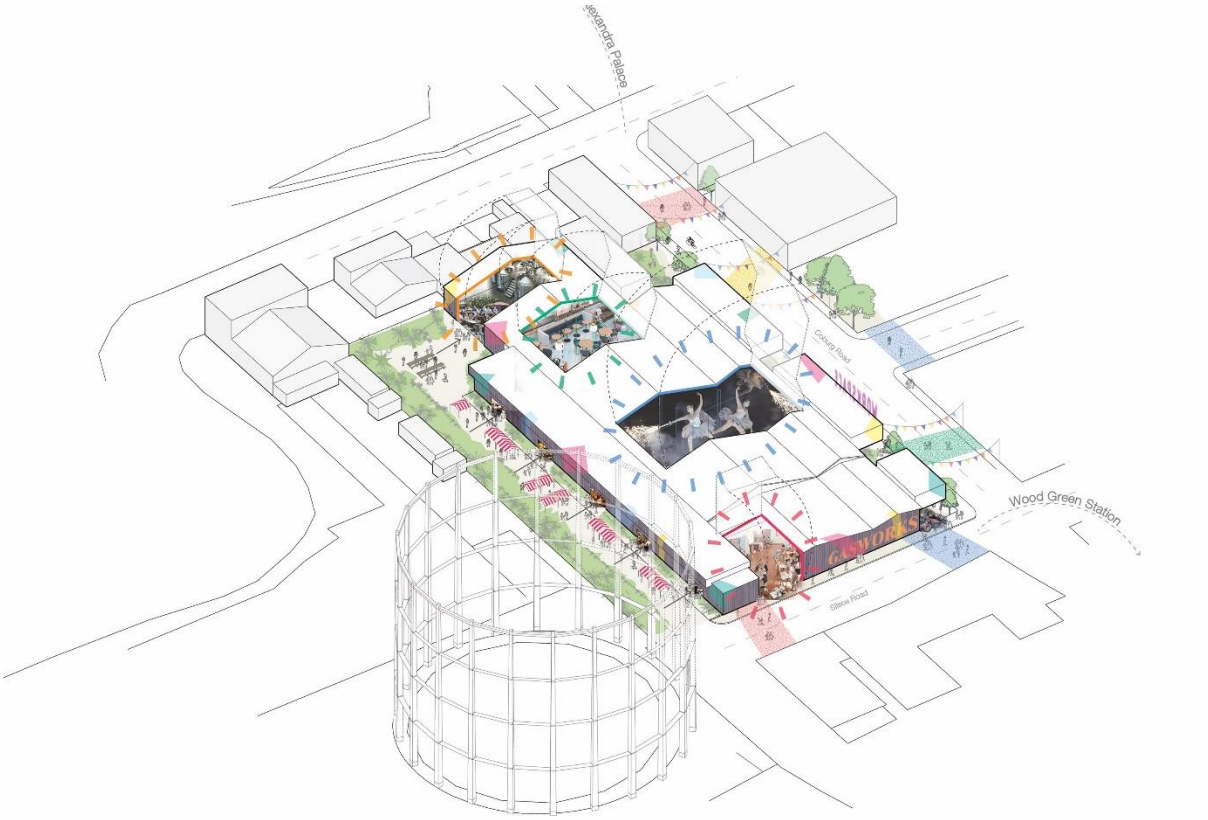


Image 3 – Gas Works Project Axonometric

Safeguarding Businesses and New Opportunities for Start Ups

The Gas Works Project site comprises five interconnected warehouse units and one auxiliary building, with three adjoining raised offices at the front (on Coburg Road) and a wide access road and small car parking area round the back.

The site is currently occupied by a timber merchant who is due to leave in early 2018, Turnaround Publishing whose warehousing facility is due to relocate to Enfield in 2018 but whose office function will remain on site, and a furniture collector/ eBay seller who is due to downsize his business in 2018.

The reconfiguration and refurbishment of the building will create space for new tenants and for events which will help to activate and animate the area. The individual warehouse units will be co-designed with the tenants to give them control over the look and feel of their workspaces.

Tenants will be prioritised based on local benefit. Priority has been given to businesses, which are local and can demonstrate a social impact, with not for profit organisations prioritised over profit making organisations including:

Collage Arts: an arts development, training and creative regeneration charity based in the Haringey Cultural Quarter for over 30 years. Collage Arts has tenants in three buildings in Wood Green and currently tenants in Chocolate Factory 1 are under threat as the site is due to be redeveloped. The Gas Works Project will provide essential decant space for artists, businesses and social enterprises from Chocolate Factory 1 until alternative more secure accommodation is secured.

The Goodness Brewery and Tap: (a local brewing start up) will have a dedicated brewing section, plus a taproom / events and exhibition area, with a new entrance on Coburg Road.

St William will be retaining part of the building as its office and marketing suite. The space could also be used as an employment and skills training centre, as this will be required by St William as part of its s106 contributions.

GROW N22: The space to the rear of the building will be an exciting and dramatic outdoor area, with a green oasis, planters, small community gardens and growing spaces, to be set up and managed by the GROW N22 collective. There will also be a hop garden, a cleverly designed outside bar and a number of lightweight street food vendors.

Affordable workspace in Wood Green

There is demonstrable demand for affordable workspace in the area, which is heavily oversubscribed. The team behind The Gas Works Project already runs four sites in the Borough (Gaunson House, Cannon Factory, Carvall Warehouse and Ashley House) through TMCP, and there are long waiting lists for work studios in all of them. 2011 Census figures show that more and more people in Haringey are working in 'skilled trade' jobs. It 2001 it was 9.4 per cent, by 2011 this figure had increased to 11.5 per cent.

Competitor rents for similar workspace in the area vary considerably. On average the price is £20 psf, though some charge considerably more (Greenhouse Studios in Tottenham and Workspace at The Chocolate Factory). Space at the Gas Works will be charged at no more than £15 psf, which is a 25 per cent discount to market rate.

Collage Arts will be repurposing unit one from February 2018. It will feature scores of small and medium sized work studios. The space will be managed and run by Collage Arts. TMCP will ensure that Collage Arts charges end users a fair price for space – the cost per sq. foot will be significantly below market rate.

Community Benefit, Participation and Evaluation

Clauses are being written into contracts for tenants at The Gas Works Project making them legally required to give back to the community. The clauses will specify that tenants must:

- Employ local people through apprenticeships and work placement schemes. These are in partnership with A New Direction and The College of Haringey, Enfield and North East London (CONEL) on Tottenham High Road.

- Take part in annual open days where workspace studios are opened up for local people and local secondary school children to see makers in action (Heartlands High School and The Greek Secondary School of London)
- Give time back through additional community projects (minimum x2 per year).

One member of the Goodness Brewery and Tap is training in Participatory Appraisal with the School for Social Entrepreneurs. It is proposed that in return for capital investment into the fit out for the brewery the tenants facilitate a Participatory Appraisal of the whole Connecting Wood Green project over the three years.



Image 4 - Plan of The Gas Works Project

Library Hub Project (the Post Office)

Project Summary

The Wood Green Library building contains Wood Green Library and Customer Service Centre and a covered Mall with market stalls and commercial units. Two of the commercial units are currently vacant including the former Post Office. We will work with local organisations to transform these spaces into workspace and space for workshops, classes and meetings and to be a hub for consultation and engagement for the regeneration programme.

Working with local Providers and Stakeholder Groups

Our vision for Wood Green is a programme of employment-led regeneration to vitalise the area and the community. We want to ensure these benefits are experienced and opportunities accessed by existing residents and businesses. There are already a number of existing local providers and stakeholder groups in Wood Green doing very valuable work and this project will create new opportunities to work with these local groups.

Haringey is in the process of negotiating a lease with a local workspace operator for the Post Office Unit who will bring in two existing local social enterprises.

Studio 306 is a Community Interest Company providing studio space for skilled arts and craft practitioners recovering from mental illness, who have come together as a community enterprise. The studio is currently located in the top floor of 40 Cumberland Road which is unsuitable as it is difficult to access and the building is not allowed to have a kiln so the ceramics side of the enterprise is not able to operate. Since moving to Cumberland Road Studio 306 has lost clients. It needs a ground floor Town Centre space which can accommodate a kiln, and somewhere to showcase work.

Create Your Future is an employability project run by Collage Arts with ESF and Big Lottery funding for the next two years. CYF aims to build better opportunities for women from Black, Asian and Ethnic Minority communities in Haringey and Enfield who are unemployed or economically inactive, and facing challenges with accessing work, education and/or starting their own businesses. It provides life coaching, mentorship and creativity and wellbeing workshops. CYF is currently located in Chocolate Factory 1, but the lease for this building is due to expire shortly, therefore the project is in need of space.

The Post Office will also be fitted out to be able to accommodate workshops and meetings in the main shop front space. In return for the capital investment in the unit and a rent subsidy agreed with Haringey Collage Arts will make the space available free to community groups for four half days or evenings every month and available at an affordable hire price for another four half days or evenings every month.

The community meeting space will be made available to local groups like Noel Park Big Local and the Wood Green Social Enterprise Forum. Noel Park was selected as one of 150 Big Local areas, awarded £1m to improve their community. Through the Library Hub project, we can provide Noel Park Big Local access to meeting space in the heart of the Town Centre which is accessible, we can enable the group to meet regularly in order to make decisions on their small grants programmes which will work to impact local people's priorities for Noel Park. We anticipate that during the project at least

£20k of small grants will be awarded to local social enterprises. Further funding is available through UnLtd which hasn't been included as match funding in this bid.

Support will also be provided specifically to the social enterprises and small businesses in Wood Green. Wood Green has an established Social Enterprise Forum, which has been operating since 2016, led by a resident who is also involved in the Big Local, arising from the high numbers of social enterprises in Noel Park. The Forum needs an accessible and affordable place to meet on a monthly basis.

During the next three years', significant progress will be made in the development of local policies and development proposals and it is essential the local stakeholders, some of whom are directly affected by the change, are meaningfully involved in this process. The meeting space will also be used to host exhibitions, workshops and meetings on all of the projects described in this bid and also other projects including the town centre masterplan which seeks to demolish the Mall and create a "town centre, not a shopping centre", the Library site and the development of new and reprovided community spaces including a Turkish Islamic Cultural Centre.

Subject to a "yes" vote at ballot in March 2018, a second small unit will be leased to the emerging Wood Green Business Improvement District. This would be a particular success story of continuity and impact from GLA funding; the emerging BID develops from a Business Forum both of which have grown through a previous GLA funded meanwhile project in Wood Green, using HSF funding. With the BID established and moving into the vacant office space, this should create 7 new jobs. This unit needs rewiring and GGF capital will be used to make the unit fit for purpose. The BID will use this space and the Post Office space for training.

In the lease agreements with operators, we will ensure space is utilised regularly for community engagement and training. The Council has two service teams based in Wood Green Library, which will be working on delivering training for local businesses and people. Haringey Employment and Skills Team (HEST) and Haringey Adult Learning Service (HALS), having expertise in engaging the disadvantaged labour market, will provide support and training to local people and businesses. HEST and HALS will support entry into employment for 20 residents from the disadvantaged labour market.

Public Realm Interventions (including Penstock Tunnel)

Project Summary

We will commission a consultant who will work with local stakeholders to deliver a series of placemaking public realm interventions along the circular route connecting Station Road, the High Road and the Cultural Quarter and entrance to Alexandra Park at the Penstock Tunnel. This commission will include the refurbishment of Penstock Tunnel, improvements to the Library Mall, investment in green infrastructure, public realm, public art, lighting and signage.

Improving connections

There is the opportunity and need to deliver a series of public realm interventions linking Wood Green Underground Station, Station Road, the High Road, Cultural Quarter and Alexandra Park to improve pedestrian and cycle connectivity across the growth area. Good Growth Funding will be used to match s106, TfL and Haringey Capital to deliver an extensive programme of public realm interventions.

Haringey carried out public consultation on the draft Wood Green AAP in March 2017 and, using the Commonplace website, also gathered opinions about the area in order to inform priority setting within the delivery programme (Appendix J). Overall, across all comments, respondents would like to see the Wood Green area regenerated and the top five tags were cleaner, pleasanter streets; more street planting; easier to walk and cycle; better pedestrian links and better designed buildings

In order to ensure quality in design and delivery and to make sure that the interventions are cohesive and have an identity, which is unique to Wood Green, a landscape architect/ urban designer/ consultation and participation professional will be appointed through the ADUP panel to design and deliver this project.

Following the appointment of the consultant there will be an initial feasibility stage, which will include consultation and engagement with local stakeholders. Haringey has allocated £40,000 revenue funding for this initial scoping stage.

After a vision and strategy is agreed for the project a series of discrete capital projects will be designed and delivered including refurbishment and public realm works, investment in the Library and Library Mall including a new entrance cut in the side of the building to make a better connection to the Cultural Quarter, a series of public realm interventions including public art and green infrastructure will be commissioned along the circular route linking the three character areas.

Haringey Green Grid

Haringey' s recently adopted Local Plan includes a Green Grid Policy which is currently being developed into a more comprehensive vision for the green grid, along with a set of proposed projects. Key objectives include increasing access to open space; to support and increase biodiversity across the borough and to improve sustainable transport connections between green spaces

The green grid will work in conjunction with the councils emerging Open Space Strategy, Walking and Cycling Strategy and Design Guide and will be integral to the Public Realm Intervention Project. External guidance including the Trees in Hard Landscapes guidance will also be key.

Penstock Tunnel

A major part of this project will be the refurbishment of Penstock Tunnel. Funding has already been secured to carry out remedial work to reduce the impact of water drips onto pedestrians and cyclists or reduce the causes of undue surface water on the Tunnel. This funding will be matched with GGF and Haringey capital to deliver a comprehensive intervention to improve this essential gateway.

The Commonplace consultation carried out in March 2017 identified Penstock Tunnel as being in need of improvements, to increase the feeling of safety. Comments included more lighting, making it feel less enclosed – less fences, designing tunnel so that the end can be seen when entering and upkeep and tidying.

Haringey has already appointed Project Centre to scope works at Penstock Tunnel and the new link to Alexandra Palace and Park in order to inform s106 negotiations on two major planning applications. This work will help to inform the brief for the public realm interventions which will be delivered in the next stage.

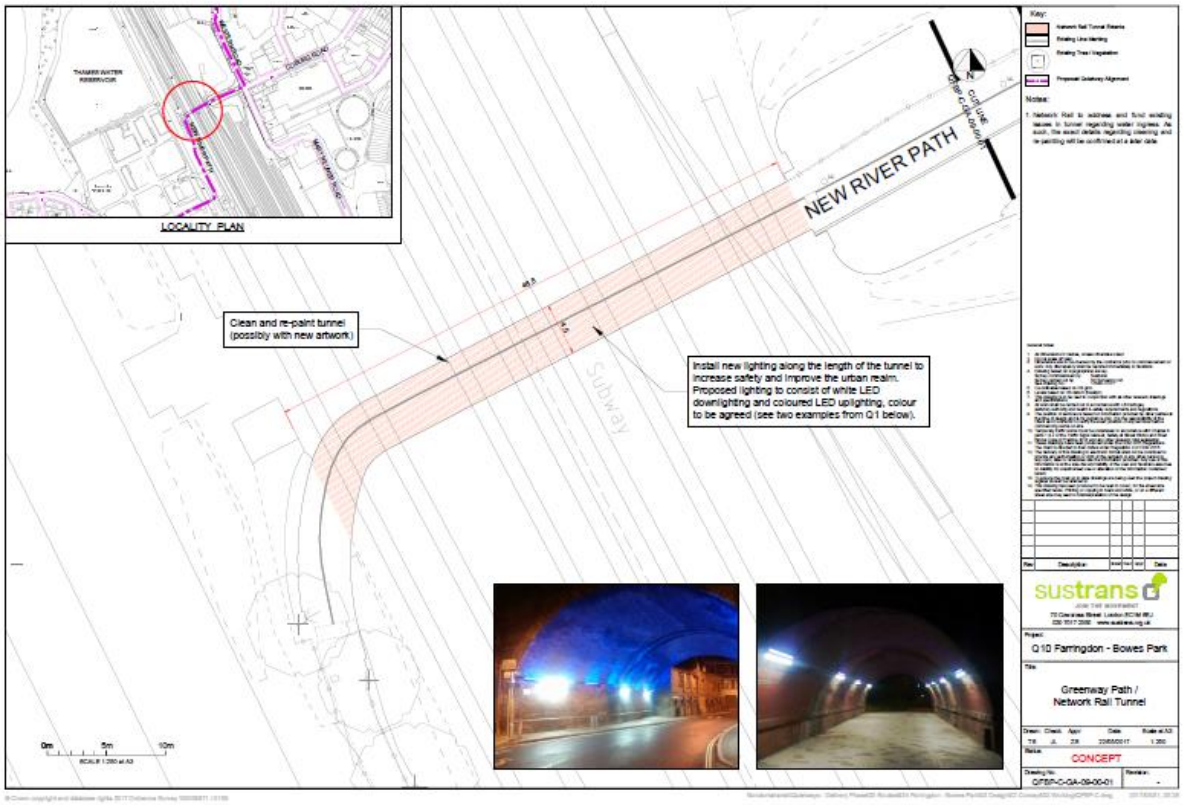


Image 5 – See Appendix for Concept Image for Penstock Tunnel

Haringey led Projects and Project Management

Project Summary

The proposals already sit within the emerging Wood Green Strategic Regeneration Framework and Three Year Delivery Plan. Haringey has commissioned an Economy and Employment Space Study, which includes a business survey and will form the basis for a business relocation plan. As part of the Connecting Wood Green Project, further strategic documents will be prepared, in consultation with stakeholders:

- Design Code (Public Realm and Buildings)
- Walking and Cycling Strategy

The three separate capital projects will be coordinated by a Regeneration Officer in the Wood Green Team who will also be working with our Programme Management Team and local stakeholders to coordinate and carry out engagement, participation, monitoring and evaluation.

Wood Green Design Code

In the initial stage, the Council will develop a tender brief for a consultant to work on developing a Design Code using a participatory approach. This Design Code will help to develop the design principles which will be included in the Wood Green Area Action Plan, therefore conditioned to ensure that planning applications brought forward under the AAP conform with the Code. The tender will be developed in line co-ordination with the Architecture Design Urbanism Panel framework.

The Design Code will:

- Ensure high quality design for architecture and the public realm
- Define the range of characteristics of the physical environment across the AAP area and identify the key design requirements that should be placed on new developments to support and enhance these characteristics.
- Identify how new developments can be designed in order to create flexible, high quality buildings, routes and adjacent spaces, while meeting the employment and housing needs of the borough.

The feasibility and stakeholder engagement process will be participatory, and will include workshops with 8-10 stakeholder organisations including LBH officers, St William, Workspace, Capital and Regional, Lend lease, MillCo, Metropolitan and applicants for High Street Planning applications. The landowners will contribute to the cost of a masterplan as the Design Code will affect and benefit their land, and potentially speed up the process of planning applications they submit being approved.

The brief will also include a requirement for working with local school children. 10 local schools within the network learning community in Wood Green will have workshops, working with children to come up with how they want the look and feel of Wood Green to be.

As Wood Green has a higher proportion of people with mobility issues compared to the borough average, the Design Code draft and then final report will be required to have a focus on ensuring accessibility is embedded into all design.

Walking and Cycling Strategy

Haringey Council has secured consultancy support to assist in the development of a walking and cycling strategy. Our vision is to make Haringey one of the most cycling and pedestrian friendly boroughs in London. By promoting more sustainable modes of travel, we are aiming to reduce the need to use motor vehicles.

The planned growth in Wood Green will need to provide new networks for cycling routes and facilities to cater for the increase in trips.

A key part of the consultant's contract is to develop cycling interventions in Wood Green. The consultants have been asked to consider the existing policy framework for Wood Green and produce a 'Shopping list' of detailed and costed interventions for the Wood Green area. These will reflect:

- The new and proposed development projects in Wood Green and the need to access these locations by cycle
- The needs of cyclists travelling through Wood Green, north/south and east/west, including linking into the Mini-Holland projects to the north (Enfield) and to the East (Waltham Forest) and the proposed TfL Quietway
- The existing cycle route network, identifying where improvements can be made on these routes and if any routes are not required
- The need for direct and safer routes to encourage cycling between the popular destinations in Wood Green
- Trends in cycling, for example cycle couriers, cycle hire and company cycling incentives

High-level costings and designs for the cycling interventions will also be developed, identifying quick wins. The proposals will be prioritised to enable the Council to bid for funding. Public and stakeholder engagement will take place to develop the Action Plan.

3. Evaluation and Impact Strategy

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1 Context and Rationale

Wood Green suffers from poor connectivity and marked inequality, heightened by the physical barriers between two sides of the borough.

Life outcomes of people in Noel Park are significantly worse than those in neighbouring Muswell Hill, Alexandra Palace and Crouch End.

Employment space is limited in Haringey and Wood Green, and BAME residents and those with mental health challenges face additional barriers to accessing the labour market.

The project will safeguard existing businesses in the Cultural Quarter, residents and businesses in the Town Centre, small businesses and social enterprises and harder to reach groups including BAME women and people recovering from mental health illness.

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2 Aims and Objectives

Empower People

- Create new and much needed spaces for people to meet and participate
- Work with stakeholders on developing policies and projects
- Supporting existing and new social enterprise

Make Better Places

- Create an accessible, active and attractive connections
- Develop a Walking and Cycling Strategy and Design Guide to ensure quality
- Invest in green infrastructure

Grow Prosperity

- Safeguard existing business
- Provide support, skills and training
- Support the Wood Green BID

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4 Outputs and Outcomes

- Increased participation, influence and engagement.
- More inclusive and effective regeneration and improvement schemes.
- Empowered and effective residents and community organisations.
- Delivery of new and improved community led services.
- Local people are supported to move closer to the labour market.
- Perceptions of the area are improved
- Public spaces are greener, more accessible and improved
- Better place for local residents and visitors to the area.
- Employment space is increased.
- Businesses are supported
- Employment is created and sustained
- Improved marketing exposure for local maker businesses and increased business activities

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3 Project Design and Activities

- Gas Works Project (1M) – Repurpose Olympia Trading Estate for meanwhile workspace use.
- Library Hub (£80K) - Repurpose commercial units for social enterprise, meeting/ training and a for skills and employability training.
- Public Realm Interventions (£755K) – a series of projects connecting Station Road, High Road, Cultural Quarter and entrance to Alexandra Palace at Penstock Tunnel.
- Participation and Engagement – embedded throughout
- Cycle and Walking Strategy (£50k)–Strategic documents to be prepared by LBH in consultation with stakeholders.
- Design Code (£80k) – consultant to use participatory approach to produce Design Code, which will be included in AAP.
- Resource inputs (£80k) – Regeneration Officer and programme management support.

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Report for: **6 March 2018** Cabinet

Title: Planning Obligations SPD

Report Authorised by: Helen Fisher – Interim Strategic Director of Planning, Regeneration and Development

Lead Officer: Matthew Paterson, Head of Strategic Planning, Transport and Infrastructure

Ward(s) affected: All

Report for Key/ Non Key Decision: Key

1 Describe the issue under consideration

1.1. Consultation on the Draft Planning Obligations Supplementary Planning Document (SPD) was held from 3rd November to 15th December 2017. This revised and updated the Council's adopted (2014) Planning Obligations SPD. This was necessary to take account of changes to: relevant policies within the new Local Plan (adopted July 2017); Haringey's revised CIL Regulation 123 list (adopted November 2017); other central government regulations and guidance; and the recent Mayoral guidance on affordable housing and development viability.

1.2. The purpose of this report is to provide a summary of the comments received to consultation, highlighting the key issues raised, and how we intend to address these in finalising the Planning Obligations SPD.

2 Cabinet member introduction

2.1. We recently adopted our new Local Plan for Haringey that will enable the determination of planning applications for new development proposals that will meet our identified needs for housing, including affordable housing, employment, community facilities, and infrastructure.

2.2. It is therefore essential that we update our guidance on planning obligations to ensure we secure the necessary commitments and funding from new development to deliver the infrastructure and community benefits needed to realise our ambitions for the borough, its residents, businesses and environment.

3 Recommendations

3.1 That Cabinet note the comments received to consultation on the draft Planning Obligations Supplementary Planning Document (SPD) and the Council's

proposed response, as set out in the Consultation Statement at Appendix A and in the tracked changes version of the final Planning Obligations SPD at Appendix B.

3.2 That Cabinet adopt the revised Planning Obligations SPD (provided at Appendix B) as a material consideration in the determination of planning applications.

4 Reasons for decision

4.1 The revised Planning Obligations Supplementary Planning Document (SPD) will give greater clarity to the Council's procedures and requirements for securing planning obligations, including financial contributions and affordable housing.

5 Alternative options considered

5.1 No other alternative options have been considered on the basis that planning obligations are necessary to ensure the economic, social and environmental impacts arising as a result of a new development proposal are appropriately considered and mitigated.

6 Background information

6.1 Where a development proposal does not meet the standards required of local planning policy, it may be possible to make it acceptable through the use of planning obligations. Planning obligations are used to secure measures which are essential for the development to proceed and measures which are required to mitigate the impact of the development.

6.2 Planning obligations do this through: Prescribing the nature of a development (e.g. by requiring a proportion of affordable housing); Securing a contribution from a developer to compensate or re-provide for loss or damage created by a development (e.g. through the transfer of land, the requiring of a cash payment to be made, or new habitats to be created etc); and mitigating a development's impact on the locality (e.g. through the securing of environmental improvements and the provision of both on and off-site infrastructure and facilities to serve the development such as new roads or junction improvements which, without the proposed development taking place, would not necessarily be required).

6.3 The outcome of the use of planning obligations should be that the proposed development is brought into compliance with the Local Plan policies and that any development specific works are undertaken satisfactorily. Used properly, planning obligations can significantly increase the quality of development.

6.4 While planning obligations can secure benefits capable of mitigating the adverse impacts of a development, they cannot however, be used to make a bad application good where, for example, a scheme does not comply with the spatial strategy and land use principles of the Local Plan.

<u>Responses to consultation on the Draft Planning Obligations SPD</u>

6.5 We received 18 written representations to the consultation. These were predominantly from the development industry, statutory agencies and non-governmental organisations. The list of respondents, their detailed comments, and the Council's proposed response to these, are set out in the Consultation Statement attached at Appendix A.

6.6 In summary, with respect to the statutory agencies, Natural England and Highways England wrote to confirm they had no comment. It is proposed the SPD be amended to take account of Historic England's comment that on-site improvements to public realm be included as a potential obligation. Also the Environment Agency's comment that development affecting a main or ordinary watercourse should be obligated to restore or improve its condition, in accordance with Local Plan Policy DM29.

6.7 With regard to the non-governmental organisations, the Canals and Rivers Trust queried whether an obligation could be secured towards improvement of the Lee Navigation towpath. In response it was confirmed it could, for development impacting upon and within the vicinity of the towpath, but that this was too specific for inclusion in the SPD.

6.8 Sport England's representation noted that Haringey included sports and leisure facilities provision within its CIL Regulation 123 (with the exception of replacement facilities) and wished to ensure the Council was directed CIL funding towards appropriate sporting provision to meet the needs generated by new development. In response it was outlined that the sports and leisure facilities needed to support growth were identified in the Council's Infrastructure Delivery Plan and, once the trigger threshold had been reached, would be included on the Council's Capital Programme and identified as eligible for CIL funding.

6.9 Thames Water's representation acknowledged that obligations could not be required to be used to secure water and waste water infrastructure upgrades. Nevertheless, they sought amendments to the SPD requiring developers to engage with water and waste water providers, in studies if required, to determine if there are capacity issues. Where capacity constraints are identified, they wished to include a requirement upon the developer to set out what appropriate improvements are needed and how they will be delivered. In response it was noted that this wording was already included in support of Policy DM29, which expects a drainage strategy to be submitted with a planning application and any mitigation measures delivered as part of the development scheme, conditioned if necessary. It was not considered necessary to repeat this again in this SPD, especially as this was not relevant to securing possible obligations.

6.10 The representation from the Education and Skills Funding Agency made the case that the SPD should seek contributions towards the delivery of schools, where relevant, through provision of land and/or a financial contribution to the capital costs of delivery new schools in lieu of CIL. In response it was clarified that, whilst CIL is the Council's main mechanism for securing funding towards school provision required to support the cumulative demands from development, there will be instances where an individual development gives

rise to their own requirement. It is therefore proposed that a new section be added to secure school provision as an obligation, where the need for a new school arises entirely as a result of an individual development.

6.11 Energence Energy Savings Trust sought the inclusion of a financial obligation for the monitoring of renewable energy or combined heat and power/district heat supply on new schemes. In response it was clarified that, in Haringey, the monitoring of compliance with an agreed Energy Statement/Energy Strategy, including the achievement of targets/performance, was dealt with as a planning condition with the developer responsible for meeting the cost of any required monitoring equipment and assessments. No change is therefore proposed.

6.12 In respect of the one representation received from a residents' association, this put forward suggested amendments to enable community associations to identify and seek specific mitigation via an obligation and that any costs should be 'offset' against the CIL due. In responses it was highlighted that consultation on a planning application enabled interested parties to draw the Council's attention to potential impacts and necessary mitigation measures. Further, the legislation governing the collection of CIL did not allow the Council to offset a CIL liability as suggested.

6.13 The representations received from, or on behalf of, the development industry were very detailed. That made by McCarthy and Stone Retirement Lifestyles Ltd concerned older persons housing, such as extra care housing. Their representation sought to make the case that this form of housing should be considered by the Council as Use Class C2, rather than general housing (Use Class C3), and should therefore not be subject to an obligation for affordable housing and reduced obligations for on-site amenity requirements.

6.14 In response it was clarified that extra care housing was considered to fall within Use Class C3, being self-contained accommodation for market rent and/or sale, unless the applicant can provide acceptable justification that would enable the Planning Authority, on a case-by-case basis, to determine otherwise. In respect of on-site amenity, it was noted that the Local Plan requires all development to be well designed, of high quality and sustainable, and that this applies to all forms of housing. In addition, the standards applicable within the SPD take into account unit size / number of bed rooms / occupancy levels etc in determining the appropriate level of applicable amenity requirements and therefore the quantity to be secured in the obligations due.

6.15 In respect of the other developer representations, these raised a number of common issues or concerns. These included, ensuring the obligations sought did not undermine development viability and deliverability. In response, it was noted that the policy requirements of the Local Plan had themselves been the recent subject of viability assessment to ensure their combined application did not put development at viability or delivery risk. Through the examination process, it was concluded that these were reasonable and were subsequently found to be 'sound' by the independent planning inspector. It was further noted that each development would be considered on its own merits, having regard to site and development circumstances, with the obligations due negotiated in accordance with the legal tests.

6.16 Concern was raised with the need for applicants to submit heads of terms at the pre-application and with the planning application. It was considered that this was unnecessary and such heads of terms would be subject to further negotiation and change throughout the application process. In response it is noted that draft heads of terms should be submitted with a planning application and that this is required by our local validation list. It is accepted that these may evolve through the life of the application.

6.17 There was concern with the SPD's assertion that the Council always prepares the first draft of the obligations using the Council's standardised template. The developers considered there were exceptional circumstances, in respect of strategic sites, where it would benefit the process if the applicant prepared the first draft. In response, it is accepted that in exceptional circumstances and as agreed with the Head of Development Management or Assistant Director Planning that the applicant may prepare the first draft.

6.18 More flexibility was requested on when obligations would be triggered, including triggers for the review of a scheme's viability. The SPD has been amended to account of phased developments and also to acknowledge that there will be flexibility, particularly taking account of cash flow and viability, with regard to trigger points although the default position remains for the majority of payments to be made on commencement.

6.19 Of particular concern was the requirement for the submission of a 'short form' viability statement, which was considered to be inconsistent with, and would undermine, the Mayor's new 'fast-track' approach to securing affordable housing. In response it was clarified that such a requirement was justified and considered necessary to provide a benchmark against which to enable any subsequent revisions to the submitted or approved scheme to be assessed. It was also noted that this was not considered a burdensome requirement and had no implications for the fast tracking of applications that secured 35% affordable housing and a policy compliant tenure split, in accordance with the Mayor's Affordable Housing and Viability SPG (2017).

6.20 Issue was taken with the requirement that all major mixed-use development within a Local Employment Area/Regeneration Area would be required to make provision for affordable workspace. In response it was point out that this requirement is in line with the Local Plan policy, which seeks to ensure that the introduction of other land uses into these specific employment areas provides new employment floorspace, a proportion of which needed to be affordable to existing or new local businesses, including Haringey's SME sector. Where viability was a concern in complying with this policy requirement, it was noted that this consideration was already addressed at para 5.47 – 5.50 in the SPD, which dealt with the viability of obligations generally.

6.21 There were concerns with the approach to employment and training contributions, which developers considered did not properly reflect individual circumstances, and for which they asked that additional flexibility be introduced to take into account. In response, it was considered the SPD appropriately, and in line with Local Plan policies, sought to secure employment opportunities for local residents from new development. Further, it did not consider that the SPD

needed to be amended to introduce the flexibility requested, as planning legislation enshrines that all applications be dealt with on their merit and obligations be considered and negotiated have regard to the individual site and scheme circumstances.

6.22 Lastly, it was considered that there was no justification or evidence provided to support the increase in the price per tonne of carbon for an offset payment from £1,800 per tonne in the Mayor's Sustainable Design and Construction SPG to £2,700 as set out in the draft SPD. On the basis of a lack of evidence, it is proposed that the SPD be amended to refer to the latest published rate by the Mayor for London, noting that the rate set by the Mayor is subject to frequent review and is likely to be revised upwards shortly anyway.

Summary

6.23 The main changes proposed to the SPD are as follows:

- Clarifications that there is flexibility relating to trigger points for payments, the drafting of agreements by the applicant in exceptional circumstances and accepting that index-linking is from the date of the decision notice.
- Amendments to ensure that the viability assessment approach matches that of the Mayor of London
- Addition of reference to the portfolio approach to affordable housing in Tottenham
- The carbon offsetting contribution is set at the figure put forward by the Mayor (currently £1,800 per tonne) rather than the £2,700 per tonne previously proposed. It should be noted that it is understood that the Mayor intends to increase this shortly in any case.

7 Contribution to strategic outcomes

7.1 Priority 4: Drive Growth from which everyone can benefit. Updating the Planning Obligations SPD ensures new development contributes towards the creation of sustainable communities through maximising the community benefits to be realised.

7.2 Priority 5: Create homes and communities where people choose to live and are able to thrive. The revised Planning Obligations SPD reflect Local Plan requirements for the provision of economic, social and environmental benefits, including securing a proportion of new housing and employment floorspace on proposed major development schemes as 'affordable'.

8 Comments of Chief Financial Officer

8.1 This report seeks approval of the revised Planning Obligations Supplementary Planning Document (SPD), which will give greater clarity to the Council's

procedures and requirements for securing planning obligations, including financial contributions and benefits in kind.

8.2 The effective application of Local Plan policies and the guidance in SPD will ensure that new development mitigates any potential impacts arising directly from the development and will make adequate provision, onsite to meet the immediate needs of the development.

8.3 It will also ensure that the Council continues to secure affordable housing on applicable residential schemes in accordance with the Council's Local Plan and Housing policies.

8.4 It is not possible at this stage to estimate how many legal agreements may be forthcoming, over the next year, because of adoption of the revised Planning Obligations SPD. However, the adoption of it will ensure there is a good mechanism in place to realise a good outcome for the council.

8.5 There is a potential fee income of up to £50,000 from a developer for adequate monitoring of the implementation of S106 agreements.

8.6 There is no net cost to the council because of the adoption of the revised Planning Obligation SPD.

9 Comments of Chief Legal Officer

9.1 The Assistant Director of Corporate Governance notes the contents of this report on which Legal Services have been consulted.

9.2 In line with government guidance in the National Planning Policy Framework, a SPD should only be prepared where necessary and be used to help applicants make successful applications or aid infrastructure delivery, and not be used to add unnecessarily to the financial burden on development.

9.3 As the SPD concerns planning obligations, the Legal Team have been closely involved in the evolution of the SPD following consultation.

10 Comments from Equalities Officer

10.0 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and those people who do not
- Foster good relations between people who share those characteristics and people who do not.

10.1 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

10.2 This proposal sets out the additional planning obligations that the Council expects to see in major development proposals, with regard to the additional infrastructure and community benefits that should be included. This will ensure that all residents benefit from major new developments and regeneration schemes, in terms of commitments to new affordable housing and workspace, public realm and environmental sustainability, and new social infrastructure such as schools and leisure facilities. This is also designed to ensure that current residents near proposed developments are not adversely impacted in terms of their access to services and the new opportunities created through regeneration. Together this represents the Council's commitment to advancing equality of opportunity for all of our residents.

10.3 As noted in the report these proposals reflect a number of major existing regeneration and development strategies in Haringey, most notably the Tottenham Strategic Regeneration Framework, Wood Green Strategic Regeneration Framework, Haringey's Housing Strategy 2017- 22, and the renewed Local Plan 2017. Each of these was subject to a full Equalities Impact Assessment (EqIA) prior to their adoption by Cabinet and can be reviewed with the relevant Cabinet decision. These EqIAs set out the implications of Regeneration and Planning decisions for all residents who might be impacted and how existing inequalities will be addressed through those decisions.

11 Use of Appendices

- Appendix A – Draft Consultation Statement to consultation on the Draft Planning Obligations Supplementary Planning Document
- Appendix B – Final version of the Planning Obligations Supplementary Planning Document, including tracked changes.

12 Local Government (Access to Information) Act 1985

The current Planning Obligations SPD, adopted by Cabinet on 14th October 2014
http://www.haringey.gov.uk/sites/haringeygovuk/files/planning_obligations_spd_final.pdf
Report to Cabinet (17th October 2017) seeking approval to consultation on the revised Planning Obligations SPD, and to adopt the revised Regulation 123 List for inclusion in Haringey's CIL Charging Schedule
http://www.minutes.haringey.gov.uk/documents/s96913/CIL_Planning%20Obs%20SPD%20Cabinet%20Report%20021017%20003.pdf

Consultation Statement

Consultation to the Planning Obligations SPD

1. Introduction

1.1 Consultation on the draft Planning Obligations SPD took place between 3rd November and 15th December 2017. Consultation was undertaken in accordance with the Council's Statement of Community Involvement and in line with regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 This Consultation Statement sets out the consultation undertaken, a summary of the main issues raised in response to that consultation, and to detail the Council's response to comments made.

2. Summary of consultation

2.1 On 17th October 2017, Haringey's Cabinet considered the draft Planning Obligations SPD and resolved to publish the document for consultation for a period of six weeks.

2.3 Formal notification of the draft Planning Obligations SPD was given on 3rd November 2017, and representations were invited for a six-week period ending 15th December 2017.

2.4 A formal notice setting out the proposals matters and representations procedure was placed in the local newspaper on the 2nd and 9th of November. In addition, on 2nd November, a total of 1,845 notifications were sent by post or email to all contacts on the Local Plans database, including all specific consultation bodies and appropriate general consultation bodies. Enclosed with the letter was the Statement of the Representations Procedure. Those emailed were also provided with the web link to the document on the Council's web page.

2.5 Hard copies of the draft Planning Obligations SPD and the Statement of the Representations Procedure were made available at the Council's offices at both the Civic Centre reception and at 6th Floor River Park House, as well as at all public libraries across the Borough. The draft SPD was also made available to view and download from the Council's website.

3. Who responded and number of representations received

3.1 There were 18 representations received to the draft Planning Obligations SPD consultation. These came from statutory or neighbouring local planning authorities (6), developers and agents (6), amenity and interest groups, including non-departmental public bodies (5), and one residents' association. **Table 3.1** below provides a full list of the respondents. In total, over 90 individual comments were made that were considered and responded to by the Council (see **Table 4.1**).

Table 3.1: Respondents to the Pre-Submission Site Allocations DPD Consultation

ID	Respondent	ID	Respondent
1	Kingsley Place Residents Association	11	LB Waltham Forest
2	Barton Willmore obo Capital and Regional	12	London Parks and Gardens Trust
3	Barton Willmore obo Workspace Management Limited	13	McCarthy and Stone Retirement Lifestyles Ltd
4	Canals and Riverside Trust	14	Natural England
5	Collective Planning obo Provewell Limited	15	Quod obo Argent Related
6	Education & Skills Funding Agency	16	Quod obo St William
7	Energence Energy Saving Trust	17	Sport England
8	Environment Agency	18	Thames Water Utilities
9	Highways Agency		
10	Historic England		

4. Summary of the main issues/comments raised to the Site Allocations DPD Pre-Submission consultation

4.1 The following paragraphs set out the main issues raised in respect of each chapter of the draft SPD.

General

4.2 There were a number of general comments received on behalf of developers/ landowners, as well as from three statutory bodies and LB Waltham Forest.

4.3 Those on behalf of developers were concerned with ensuring the SPD was sufficiently clear throughout that any obligations sought should not impede development viability and delivery. In this respect, they felt that the SPD should be more flexible in having regard to changing circumstance. In response, it was pointed out that the policies of the recently adopted Local Plan, including those for affordable housing, were subject to viability assessment to ensure they were reasonable and did not render development unviable. It was also noted that the SPD states that obligations are to be negotiated having regard material considerations, including development viability. It was therefore considered that no amendments were necessary to take account of this concern.

4.3 A number of the developers also pointed out that there were inconsistencies between the SPD and the Mayor of London's Affordable Housing and Viability SPD (2017). In response, the Council noted it had sought to be consistent with the Mayor's SPG but considered there were a limited number of areas where we slightly disagreed with the Mayor's approach and have set these out in the SPD. A further paragraph has also been added to the introduction to clarify the status of the document as a material consideration and to highlight that it will also be subject to review and monitoring to take account of changes that may place it at odds with national or regional policy.

4.4 Two of the statutory bodies (Highways Agency and Natural England) wrote to confirm they had no concerns or comments to make in respect of the SPD. Sport England's representation noted that Haringey included sports and leisure facilities provision on its CIL Regulation 123 (with the exception of replacement facilities) and wished to ensure the Council was directed CIL funding towards appropriate sporting provision to meet the needs generated by new development. In response, it was outlined that the sports and leisure

facilities needed to support growth were identified in the Council's IDP and once the trigger threshold had been reached, would be included on the Council's Capital Programme and identified as eligible for CIL funding.

4.5 The representation from LB Waltham Forest ask whether Haringey had considered including CCTV, non-standard health and winter fuel, as being applicable for securing via an obligation. In response, it was clarified that CCTV provision, and 'non-standard health' would fall to CIL to fund, and that funding for winter fuel support was not appropriate under either CIL or an obligation.

Section 4: Policy Context

4.6 The only representation received to this section of the SPD was from the Kingsley Place Residents Association, which put forward specific suggested amendments to paragraph 4.5, such that community associations should be able to identify and seek specific mitigation via an obligation and that the CIL due be reduced to cover the cost. In responses it was highlighted that the legislation governing the collection of CIL was quite prescriptive, and did not allow the Council to offset a CIL liability to cover the cost of infrastructure required to mitigate the impact of a development to make it acceptable in planning terms.

Section 5: LBH's Approach to Planning Obligations

4.7 The greatest number of comments were received to this section of the SPD, with five of the six developers/landowners responding. The representations queried whether it was appropriate to require a 'draft 'Head of Terms' be prepared for discussion at the pre-application stage or for one to be submitted with the planning application. The retention of these requirements was considered appropriate by the Council, given their intention was to expedite to efficient consideration and agreement of obligations alongside the planning application.

4.8 It was suggested that it may be preferable for the developer to take the lead in draft the legal agreement, in preference to the Council always preparing the first draft, as suggested in the SPD. In response it was noted that the Council's use of a standardised template and that it usually prepared the first draft, was to ensure consistency across the numerous obligation agreements it signs up to every year, and to aid in subsequent monitoring. In exceptional circumstances, an alternative approach will be considered.

4.9 It was suggested that index linking of financial contributions should occur from the date of the decision notice rather than from the date of the Committee resolution. This was agreed and the SPD amended, on the basis that there can be a long delay between the committee and the issuing of the decision notice, with the latter also better reflecting the date formal permission is granted.

4.10 There was concern raised about seeking a blanket monitoring fee, with reference made to recent case law. In response, it was noted that the court decision hinges on the circumstances of the particular case concerned and it is difficult to derive any general principles from it at this stage. In the circumstances the Council intends to charge for its services but will keep the position under review.

4.11 There was strong resistance to the requirement to prepare a short form Viability Statement for development that complied with the Mayor's SPG in providing 35% affordable housing provision without grant and with a policy compliant split. In response it was clarified

that this would not affect the fast tracking of compliant applications but that it was considered necessary to provide a benchmark against which to enable any subsequent revisions to the submitted or approved scheme to be considered and assessed.

4.12 Several respondents raised concerns with the Council proposed approach to requiring development appraisal reviews and the suggested timing for when these should be triggered. While it was agreed that reviews should not be required for schemes that complied with the Mayor's SPG (i.e. that would provide 35% affordable housing provision without grant and with a policy compliant split), the Council maintains that reviews are essential to ensure policy compliance. The Council also noted that development viability often improves between the time an application is assessed and when it is built, and therefore the development can and should deliver all obligations due and, preferably, on-site before the development completes. The proposed approach is in line with the Mayor's SPG.

Section 6: Affordable Housing

4.13 A detailed representation was made by McCarthy and Stone Retirement Lifestyles Ltd, which sought to make the case that extra-care housing should be classified as Use Class C2, and therefore not be subject to the requirement for affordable housing. In response the Council clarified that it considers it appropriate that Extra Care housing falls within Use Class C3, being self-contained accommodation for market rent and/or sale, unless the applicant can provide acceptable justification that would enable the Council, on a case-by-case basis, to determine otherwise.

4.14 Two representations sought clarification on the 'baseline' level of affordable housing the Council would use in reviewing a revised scheme, with one stating that this should not apply to schemes that initially complied with the Mayor's 35% provision. The relevant paragraph within the SPD has been amended to clarity that the 'baseline' level is that agreed when the initial scheme permission was granted and seeks to ensure there is no reduction in the proportion of affordable housing if the scheme is subsequently subject to revision.

Section 7: Economic Development, Employment & Skills Training

4.28 Three representations did not like that all major mixed-use development within a Local Employment Area/Regeneration Area would be required to make provision for affordable workspace. However, this requirement is in line with the Local Plan policy, which seeks to ensure that the introduction of other land uses into these specific employment areas provides new employment floorspace, a proportion of which is affordable to existing or new local businesses, including Haringey's SME sector. Where viability is a consideration, this is covered off at para 5.47 – 5.50 in the SPD. This approach is in line with the new London Plan.

4.29 A number of representations were concerned with the approach to employment and training contributions, which they considered did not properly reflect individual circumstances, and for which they asked that additional flexibility be introduced. In response, the Council considers the SPD appropriately, and in line with Local Plan policies, seeks to secure employment opportunities for local residents from new development. Further, it did not consider that the SPD needed to be amended to introduce the flexibility sought, as planning

legislation enshrines that all applications be dealt with on their merit and obligations considered have regard to the individual site and scheme circumstances.

Section 9: Open Space and Public Realm

4.30 The Canals and Riverside Trust wrote to ask whether an obligation regarding open space could be used for improvements to the Lee Navigation towpath. It was confirmed it could, for development impacting upon and within the vicinity of the towpath, but that this was too specific for inclusion in the SPD.

4.31 McCarthy and Stone Retirement Lifestyles Ltd sought to make the case that obligations for on-site public amenities and facilities should be reduced to reflect lower cumulative impact on such facilities arising from specific forms of development, such as older person housing. In response, the Council noted that the Local Plan requires all development to be well designed, of high quality and sustainable, and that this applies to all forms of housing. In addition, the standards applicable within the SPD take into account unit size / number of bed rooms/ occupancy levels etc in determining the appropriate level of applicable amenity requirements.

4.32 Historic England's representation suggested that the SPD should include a section addressing public realm improvements. The Council noted that this was an omission, and have amended the SPD to reflect obligations that may arise as a result of the Local Plan requirement that all new development is to contribute to the delivery of a high quality public realm that is accessible, safe, attractive and well maintained, irrespective of whether the land is in public or private ownership.

Section 11: Environmental Sustainability

4.33 The representation from Energence Energy Savings Trust sought the inclusion of financial obligation for monitoring of renewable energy or combined heat and power/district heat supply on new schemes. In response it was clarified that, in Haringey, the monitoring of compliance with an agreed Energy Statement/Energy Strategy, including the achievement of targets/performance, is dealt with as a planning condition, with the developer responsible for meeting the cost of any required monitoring equipment, assessments, and reporting arrangements. However, it is appropriate to include additional text within the SPD to clarify this, especially as this may require the securing of an obligation for post occupation monitoring and reporting.

4.34 Two representations raised concerns with the price of £2,700 per tonne of carbon dioxide to be off-set, which they considered was a significant increase on the price set out in the Mayor's Sustainable Design and Construction SPG of £1,800. They noted that there was no evidence provided in the SPD to justify this increased price. On this basis, the Council agreed that this be amended to refer to the latest published rate by the Mayor for London, noting that the rate set by the Mayor is subject to frequent review and is likely to be revised upwards shortly anyway.

4.35 The Council agreed with the Environment Agency's representation, that the SPD should appropriately reflect the Local Plan policies that require new development to protect and enhance watercourses and flood defences. The SPD has therefore been

amended to require development that includes or adjoins a main river or ordinary watercourse, to demonstrate how opportunities to restore the river/watercourse or improve its condition could be secured.

Omissions

4.36 The Education and Skills Funding Agency made the case that the SPD should seek contributions towards the delivery of schools, where relevant, through provision of land and/or a financial contribution to the capital costs of delivery new schools in lieu of CIL.

4.37 As Haringey's Regulation 123 List clarifies, whilst CIL will be the Council's main mechanism for securing funding towards school provision required to support the cumulative demands from development, there will be some instances where an individual development gives rise to their own requirement and, in such circumstances, it is appropriate to secure school provision as an obligation to make the development acceptable in planning terms.

4.38 A new section has therefore been added to the SPD on social and community facilities. This requires development, which on its own gives rise to the need for replacement, expanded or a new facility (such as a school, GP surgery, sports pitch community hall etc.), to provide for its provision as an obligation. However, the new section also clarifies that the Council may, in respect of development on large sites (i.e. 2ha+), negotiate for land to be made available for delivering a community facility needed to meet the demand arising from cumulative development. In such circumstances, it is appropriate that the cost of the land and the new facility are paid for from traditional sources (e.g. NHS, EFA, Council's capital programme) and/or CIL.

4.39 The representation by Thames Water acknowledged that obligations cannot be required to be used to secure water and waste water infrastructure upgrades. However, they sought the inclusion in the SPD of the need for developers to engage with water and waste water providers, in studies if required, to determine if there are capacity issues and, where there is an infrastructure capacity constraint, require the developer to set out what appropriate improvements are required and how they will be delivered. The Council noted that this wording was already included in support of Policy DM29 and expects a drainage strategy to be submitted with the planning application and any mitigation measures delivered as part of the development scheme, conditioned if necessary to secure these ahead of occupation. It was therefore not considered necessary to repeat this again in this SPD.

Table 4.1: Responses to the Planning Obligations SPD in Document Order

ID	Para / Figure /Topic	Response	Change Sought	Council's Comments / Response
2	General	**Legislative and Policy Context** The NPPF Para 173 defines viable development as that which provides a competitive return to a	We consider this principle should be made explicitly clear throughout the SPD.	The Council's planning policy requirements, including its affordable housing

		willing land owner and willing developer and is deliverable. As such, the NPPF considers contributions for affordable housing should not impede the viability and delivery of development.		requirements, have been established having regard to a detailed borough-wide viability assessment, in line with the NPPF. The Council considers that para 4.2 already clarifies the NPPF position with respect to viability and the delivery of sustainable development.
2	General	We consider that greater detail should be provided within the SPD to explain how changes that may be brought forward at national and regional level, including the current consultation on the replacement London Plan, will be taken into account.	Explain how changes that may be brought forward at national and regional level will be taken into account.	**Agreed. Section 13, has been amended to include circumstances triggering a review of the SPD including relevant changes to national or regional policy.**
2	General	There are inconsistencies between the draft SPD and The Mayor's Affordable Housing and Viability SPG (adopted 2017) and Sustainable Design and Construction SPG (adopted 2014), some of which we comment on below.	An explanation should be provided within the Planning Obligations SPD as to what policy tool will take precedence if a conflict arises e.g. NPPF/NPPG, The Mayor's SPGs, or the London Borough of Haringey Planning Obligations SPD.	**Agreed. Insert new para 1.4 confirming the SPD is a material consideration, and is subject to monitoring and review to take account of and, if necessary, bring it into align, with any changes that may put it at odds with the national or regional approach. NB: The Council has sought to limit the potential for conflicts in the application of planning obligations it seeks to secure.**
2	General - Flexibility	We consider that the draft SPD is not sufficiently flexible to enable individual scheme considerations to be taken into account and also to respond to changing circumstances.	The final version should include greater flexibility to avoid the risk of unnecessarily stifling development in the borough.	The Council disagrees and considers it essential to clearly set out our approach to securing planning obligations. Flexibility is inherent in the ability of applicants to provide additional site specific evidence for Council's consideration, that may justify varying from the approach set down.

9	General	Having examined the consultation document, we do not offer any comments at this time.	We are content with the information included within the draft planning obligations supplementary planning document.	Noted
11	General - Pooling restrictions	Whether pooling restrictions are still applicable on S106 Agreements.	None stated	CIL Regulation 123(3) has not been amended to remove the pooling restriction. Such amendments are due in Autumn 2018. In preference to further updating the SPD post adoption, to reflect this imminent change, the SPD omits reference to the current pooling restrictions.
11	General – community safety	Whether you will consider CCTV as applicable for S106 spend.	None stated	Community safety measures are included in Haringey's recently revised CIL Regulation 123 list. Therefore, only if needs arise directly as a result of the development proposal would it be considered appropriate to secure this via an obligation.
11	General – Non-standard health	Whether you will consider non-standard 'health' as applicable for S106 spend e.g. community projects delivered at pharmacies to provide respiratory monitors.	*None stated*	No. Community projects, such as that described, are considered to fall to CIL to fund and deliver.
11	General – winter fuel	Whether you will consider 'winter-fuel' support as applicable for S106 spend and if so will you categorise this as 'health' or 'air quality/carbon' spending.	*None stated*	The Council does not consider that winter-fuel would meet the tests for use of obligations.
11	General -	How Housing can spend your S106 contributions received-how this relates to affordable housing provision within your borough.	*None stated*	Housing is expected to spend commuted sums secured in lieu of on-site affordable housing provision. **Section 13 will be amended to list the delivery of affordable housing using in lieu contributions, as one the monitoring and reporting requirements.**

14	General	**Natural England does not consider that this SPD poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.** The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.	*None stated*	Noted
16	General	St William welcomes the opportunity to work with Haringey Council as it undertakes consultation on the SPD. St William has already worked closely with the Council on its preparation of policy, and in consultation with local residents and other stakeholders in the development of the proposals for Clarendon Gas Works. Large strategic sites, especially those such as former gasworks which require remediation, require significant investment to create a high quality new place. This will include land remediation costs, site infrastructure and early investment in public realm and landscaping as well as high quality design. In an era of Community Infrastructure Levy, and with the strong emphasis placed on delivering affordable housing, it is important that any further planning obligations are carefully considered and do not undermine development viability and deliverability. St William is concerned that the draft SPD risks placing obligations on sites in excess of what they are able to viably support, which could risk delivery or lead to protracted negotiations.	To ensure that the obligations are deliverable we suggest that the SPD undergoes viability testing.	Disagree. The SPD implements recently adopted Local Plan policy requirements, including affordable housing requirements, that were established and found sound having regard to a detailed borough-wide viability assessment, in line with the NPPF. Discussions on individual planning applications will always look at and consider viability in the round.
16	General - viability	The Mayor of London and Central Government through the Housing White Paper (2017), Planning for the Right Homes in the Right Places (2017), and the Draft New London Plan are seeking to substantially increase housing supply. The SPD should enable to this strategic policy objective to be achieved.	We would like to work with Haringey to ensure that the SPD is fully compliant with the NPPF to ensure that any obligations that are proposed do not add unnecessarily to the financial burdens of development. In particular this relates to	The Local Plan engages with the Mayor's and Government's agendas to substantially increase housing supply. However, the NPPF and London Plan remain clear that new

		The National Planning Policy Framework states that obligations should not be placed on developers that inhibit the viability of development. As a result we believe that the drafting of the SPD should be compliant with Regulation 122 of the CIL Regulations which states that obligations may only constitute a reason for granting planning permission if they meet the following tests. **a) Necessary to make the development acceptable in planning terms;** **b) Directly related to the development; and** **c) Fairly and reasonably related in scale and kind to the development.** Paragraph 153 of the NPPF states that any additional development plan documents should only be used where "clearly justified". The NPPF states that SPDs should only be used where they can help applicants make successful applications or aid infrastructure delivery, and should "not be used to add unnecessarily to the financial burdens on development". Paragraph 173 of the NPPF also states that:- **"To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable."**	the current drafting of obligations relating to affordable housing; variations to planning permissions; monitoring costs; employment and training; open space and environmental sustainability. We comment on these further below.	development must still be sustainable, contributing to the economic, social and environmental wellbeing of the community. As set out in the SPD, the purpose of planning obligations is to make unacceptable development acceptable in planning terms. Further, the Local Plan policy requirements (only recently adopted) have been subject to viability assessment to ensure they do not render development unviable – this was considered through the independent examination with the Planning Inspector concluding the Local Plan policies were 'sound'. The Council therefore considers that the SPD is compliant with Government policy, including Regulation 122, noting that development proposals will be considered on their own merits and the obligations negotiated having regard to all relevant material considerations.
17	General - Outdoor sports facilities	<u>Infrastructure Provision Secured through Section 106 Agreements</u> As many infrastructure types including sport offer potential to be provided directly by developers through planning obligations as well as through CIL, the document should provide guidance for developers and the community on the relationship between CIL	*None stated*	Sports and Leisure facilities are included in Haringey's recently adopted revised CIL Regulation 123 list. As stated in the informative to the list, this excludes infrastructure project that are required to make a development acceptable in

		and site specific infrastructure requirements associated with major developments. I note that there is an existing IDP; however unless it is possible to collect s106 contributions relating to off-site provision where justified, the improvements to various sites recommended in any Playing Pitch Strategy are unlikely to come forward. If sports facilities are not included in a Reg 123 list, or a particular facility type/project is not included and does not fall under a generic title, then planning obligations can be used to meet the needs generated from a development for the facility type(s)/project. A LA may also state in their Reg 123 list that specific facility types or developments are excluded from the list therefore enabling planning obligations to be used, e.g. strategic scale developments. I note that while Haringay's 123 list includes sports and leisure, it also states that it specifically excludes infrastructure required to make a development acceptable in planning terms; this is useful as this means that replacement pitches or facility improvements may be linked to a specific development, for example, could be dealt with via S106. Planning obligations will not be able to be used for any infrastructure types or projects that are included within the Reg 123 list (unless this is to mitigate the loss of existing sporting facilities in line with the requirements of Paragraph 74 of the NPPF). This includes any facility types that may fall under a generic infrastructure heading included in a Reg 123 list (e.g. outdoor sports facilities). In this situation, by including the provision in the Reg123 list the LA has taken the decision that the needs generated from new development for the relevant sports facilities will be met through their CIL. However, there is no requirement on a LA to ensure that the infrastructure		planning terms in accordance with the planning policies set out in the Council's Local Plan. Development on or impacting existing outdoor pitches or other leisure facilities would need to mitigate the impact on such facilities through improvements secured via planning conditions or obligations. However, increased demand and pressure on facilities as a result of cumulative growth would fall to CIL to fund any necessary improvements. The sports and leisure projects identified in the IDP and through the Council's own service delivery plans, will make their way onto the Capital Programme to be delivered via CIL and other funding streams.

		listed in the Reg 123 list is delivered as it will be their decision which facility types/projects on the list are funded with CIL receipts. In addition, there are likely to be a number of competing infrastructure priorities on the list. Advocacy is therefore important with, and within, a LA to help ensure that CIL funds are directed to appropriate sporting provision to meet the needs generated by new development.		
1	4.5	We are concerned by the content of para 4.5 of the draft SPD. We fully realise that NPPF guidance is to avoid 'double counting [or implicit duplication]' of monies attracted by CIL and also required by any s106 agreement. However, by the same token, residents' associations and like bodies might well be prevented from seeking essential s106 agreements which required identifiable expenditure by applicants who were required to make CIL payments. It seems to me that 'double counting' might be easily avoided by the 'offsetting' of the probable costs of such an agreement against the identifiable and known costs of a CIL Levy.	Para 4.5 be revised as follows: "Relative to developer contributions, the CIL has not replaced s106 agreements. The introduction of CIL resulted in revised statutory tests for such agreements. By means of these agreements, developer contributions should be focussed on addressing the specific mitigation required by new development as sought by locally representative bodies such as established community associations. CIL has been introduced to address the broader impacts of development. There should be no circumstances where a developer is paying both CIL and entering into a s106 agreement for the same infrastructure in relation to the same development. They should consequently be allowed to offset any identifiable costs incurred by the agreement against the overall sum required by the appropriate contribution, specified by the locally –determined CIL.	Not agreed. Consultation on planning applications provides the opportunity for interested parties to highlight potential impacts for the Council to consider and determine whether an obligation is necessary and appropriate. Further, there are no provisions in the legislation governing CIL that enables the 'offsetting' of a CIL liability to pay for infrastructure that arises as a result of a development and should be secured via an obligation. Rather, the onus is on the developer to factor these essential development costs (both CIL and planning obligations) into the price paid for the land, adequately mitigating the potential impacts of a development. If the development cannot secure the infrastructure necessary to 'make it acceptable in planning terms', planning permission should not be given.
2	5.11-5.16	Our client agrees that early discussion of all aspects of development is critical to the swift and efficient processing of applications and ultimately the delivery of new homes. However,	The pre-application stage is often used to establish the principle of development, and as such, we do not consider it appropriate to require the	As set out in paras 5.11 – 5.14, the Council expects applicant to fully consider the likely impacts of their proposal and considers it

		for major developments the nature, mix and scale of development is likely to evolve considerably as result of discussions with the planning authority and consultation pre-and post-submission.	submission of draft 'Heads of Terms' as part of the pre-application submission documentation.	helpful to set these out in a draft 'heads of terms', to inform discussion during the pre-application stage. **However, the Council accepts that this may follow an initial pre-application meeting on the acceptability of the principal of the development proposal and has amended para 5.14 accordingly.** It is accepted that negotiations will be ongoing.
2	5.18	Paragraph 5.18 of the draft SPD indicates that the draft "Heads of Terms" submitted with planning applications should quantify the nature and scale of obligations. Given the complexity and evolving nature of viability assessments, it is not possible to accurately quantify obligations at this stage.	We consider that the draft 'Heads of Terms' should be submitted alongside viability assessments, when key aspects of the proposed scheme have been finalised, unless, the viability will influence the Council's approach to design etc. It should be recognised that applications for major developments will evolve as a result of continued discussions and feedback from consultation, including statutory consultees. This is recognised to some extent in latter sections of the draft SPD, for example, Paragraph 6.7 recognises that affordable housing negotiations will need to have regard to development viability and other planning benefits that may be achieved. However, for consistency we would welcome the Council's acknowledgement that development schemes will evolve post submission and the viability assessment and consequently the 'Heads of Terms' will also need to evolve in response.	Disagree. The Council considers that all relevant information, including likely obligations and their scope, should be submitted with the planning application following detailed pre-application discussions. It is accepted that schemes may continue to evolve and change as a result of consultation and further discussion. Alongside the application, the Council envisages negotiations on the obligations will also be ongoing, with the draft Head of Terms updated/refined as appropriate.
3	5.23	Paragraph 5.23, as currently drafted, directs Applicants to submit all necessary title and deed	It is not considered reasonable or appropriate to submit ownership details at	Agree in part. This requirement is not in respect of ensuring

		information as part of the submission of the relevant planning application. It is not considered reasonable or appropriate to submit ownership details at the point that the application is submitted. Land ownership can and does often change during the course of a planning application. For example, where an option agreement is in place, land may be purchased at the point of resolution to grant or on the grant of planning permission. Through the process of serving notice, all landowners are advised on the submission of the planning application and this information is provided on the planning application form.	the point that the application is submitted. Land ownership can and does often change during the course of a planning application. For example, where an option agreement is in place, land may be purchased at the point of resolution to grant or on the grant of planning permission. Through the process of serving notice, all landowners are advised on the submission of the planning application and this information is provided on the planning application form.	landowners are notified of the planning application but rather to enable the preparation of the legal agreement ensuring it correctly references the land parcels and land ownership, noting that it is the landowner that is ultimately responsible for meeting the obligations. **Where the land ownership changes during the course of the planning application, the new title and deed information should be provided to the Council.**
2	5.27	Paragraph 5.27 states that the Council will always prepare the first draft of the planning obligation, based on a standard template, and only deviate from this in exceptional circumstances.	We consider there should be greater flexibility on this matter, particularly in relation to complex strategic schemes, which often do not fit into standard templates and where the Council may prefer for the developer to take the lead in drafting the legal agreement.	For consistency across the numerous planning obligations the Council agrees, it is essential for public confidence and monitoring purposes that these are drafted by the Council in the first instances and utilising a standard template. **However, it is recognised that in exceptional circumstances an alternative approach may be acceptable and the SPD has been amended to reflect this.**
15	5.27	This states that the Council will always prepare the first draft of a S106 agreement "*based on the Council's standard template*" and that changes "*will only be allowed in exceptional circumstances"*. From experience standard templates do not work well for very large complex planning permissions such as those which would be required for the AR sites and a more bespoke approach is required.	It is recommended that the phrase '*exceptional circumstances'* is **replaced** with '*by agreement with the Council*…'	For consistency across the numerous planning obligations the Council agrees, it is essential for public confidence and monitoring purposes that these are drafted by the Council in the first instances and utilising a standard template. **However, it is recognised that in exceptional circumstances an alternative approach may be**

				acceptable and the SPD has been amended to reflect this.
16	5.27	We do not believe that it is practical for the Council to always issue a first draft s.106 based on the Council's standard template with changes made only in "exceptional circumstances".	For strategic sites a more bespoke approach is needed and we would suggest that in these instances the applicant supplied the first draft of the S106 agreement, based on the template as far as is possible/appropriate.	For consistency across the numerous planning obligations the Council agrees, it is essential for public confidence and monitoring purposes that these are drafted by the Council in the first instances and utilising a standard template. **However, it is recognised that in exceptional circumstances an alternative approach may be acceptable and the SPD has been amended to reflect this.**
2	5.31	We welcome acknowledgement in Paragraph 5.31, that where facilities are intended for wider use, maintenance costs and other recurrent expenditure should be borne by the authority. However, Paragraph 5.31 also states that "A one off financial contribution may be required to cover ongoing maintenance requirements…..".	In the event that such a contribution is agreed between the Council and developer, the SPD should be sufficiently flexible to allow for staged payments, given that any contribution would relate to an ongoing requirement.	**Agreed. Para 5.32 amended to include the consideration of staged payments**
2	5.33	Paragraph 5.33 indicates that contributions will be index linked from the date of Committee resolution to the date of payment.	We consider this should be amended so that index linking is from the date on the decision notice, to avoid ambiguity should schemes be referred to more than one committee. Additionally, the decision notice date is more readily recognised. The provisions included in paragraph 5.67 of the draft SPD seek to minimise the time lag between Committee resolution and issuing of decisions, so there should be no need to index link to the resolution date.	**Agreed. Para 5.33 is amended to refer to the decision notice date rather than the Committee decision date for the purposes of indexation.**
3	5.33	Paragraph 5.33 states that all financial contributions, including maintenance sums, should be indexed linked from the date of the Committee resolution until	It is not appropriate that indexation is linked to the date of the Committee resolution. Planning permission for the	**Agreed. Para 5.33 is amended to refer to the decision notice date rather than the**

		the time of payment. Planning obligations are required to be indexed from the date that planning permission was granted to the due date for payment.	development is not granted until the relevant Section 106 Agreement is signed and the Decision Notice issued and therefore the related planning obligations (for which the indexation relates) are not secured until this time. Such a requirement would also create ambiguity for developments determined by way of delegated powers, which are not reported to Planning Committee.	**Committee decision date for the purposes of indexation.**
2	5.35-5.37	This section (Paragraphs 5.35-5.37) should be expanded to make clear that phased trigger points will be acceptable for larger schemes, to ensure that developments are not unnecessarily burdened with significant upfront costs, to mitigate all parts of a development, when some phases may not be delivered for some time.	Amend to include phased trigger points for larger schemes	**Agreed. Add 'or phase therein' to the last three trigger points listed at para 5.35**
16	5.35	For large, complex, phased developments standard trigger points are not reflective of the complicated nature of a construction and delivery programme, or indeed when impacts arising from the development should be mitigated.	We suggest that a bespoke strategy for trigger points could be put in place for large developments.	**Agreed in part. To account for the nature of large phased developments, the Council accepts it is appropriate to amend the last three trigger points listed at para 5.35 to include the wording 'or phase therein'.**
15	5.40	It requires monitoring fees equivalent to 5% of the costs of the value of the planning obligations but then also seeks a contribution based on a rate of £500 per each non-financial obligation. It is therefore unclear which applies, either or both costs. It also requires the contribution to be paid upon the completion of the agreement, irrespective of whether the permission is implemented or not. Recent case law1 suggests that monitoring fees will not meet the CIL Obligation Test of 'necessity' particularly where, like is suggested here, obligations are standardised and payable in advance of commencement of development.	This paragraph should be **deleted or substantially revised** because it is unclear, onerous and does not meet the CIL Obligation Tests.	Disagree. In the decision referred to, the court recognised that whether administration /monitoring contributions were "necessary" in particular cases was a matter for planning judgement, and it was common ground that there may be circumstances in which it is appropriate to seek such contributions using section 106. This decision hinges on the circumstances of the particular case concerned and it is difficult

				to derive any general principles from it at this stage. In the circumstances the Council intends to charge for its services but will keep the position under review.
16	5.40	In light of recent case law it is not appropriate to seek a blanket monitoring fee in advance of development (Oxfordshire County Council vs Secretary of State for Communities and Local Government and Others [2015] EWHC 186 (Admin)).	We therefore suggest that the proposed monitoring fee of 5% of the cost value and a flat rate fee is revised or deleted.	Disagree. In the decision referred to, the court recognised that whether administration /monitoring contributions were "necessary" in particular cases was a matter for planning judgement, and it was common ground that there may be circumstances in which it is appropriate to seek such contributions using section 106. This decision hinges on the circumstances of the particular case concerned and it is difficult to derive any general principles from it at this stage. In the circumstances the Council intends to charge for its services but will keep the position under review.
15	5.48	Aside from the missing page reference at the end of this paragraph, this paragraph should be **reviewed** to recognise that the draft CIL Charging Schedule is subject to objections in relation to the assessments of viability. Page 5 of the (attached) AR representations to the Council's Draft CIL Charging Schedule expresses fundamental concerns about the necessary supporting viability evidence base in the context of a more than 8-fold increase in the proposed CIL charging rates for Tottenham Hale.	This paragraph should be **reviewed** to recognise that the draft CIL Charging Schedule is subject to objections in relation to the assessments of viability.	The omission of the page reference is noted but the details on open book appraisals actually appears on the same page and therefore this sentence has been removed. While the Council notes the objections to the preliminary draft charging schedule, for its CIL review, para 5.48 is in respect of the current CIL rates implemented 1st November 2014.

3	5.47-5.73	With regards to commentary on planning obligations relating to viability matters (paragraphs 5.47 to 5.73), there is considered to be an overall lack of clarity on obligations as drafted in comparison to the previously adopted 2014 SPD. Whilst the Council's webpage provides a summary of changes, this is only an overview and leaves remaining ambiguity.	The draft SPD repeats requirements of the Mayor of London's Affordable Housing and Viability SPG (August 2017). This is unnecessary duplication, which should be removed. In some instances, the obligations in the draft SPD entail a departure from the contents of the Mayor's SPG. Such departures should be justified appropriately and the reasoning readily understandable for both the Applicant and the Greater London Authority, in the instance that conflicts occur between the Mayor's SPG and LBH's SPD in development management terms.	Noted. The Council considers that SPD to be in-line with the Mayor's SPG but where it considers necessary, has justify why a departure is necessary and appropriate.
2	5.50	We accept that the Council's proposed use of EUV+, as indicated in Paragraph 5.50 bullet point 4, is consistent with the Mayor's Affordable Housing and Viability SPG.	However, we consider that in order to balance the need to release land for development with the need to deliver public benefits, greater flexibility should be included in the approach rather than only in 'extremely limited circumstances' as currently indicated. We are aware that a large number of objections were made to the Mayor's SPD viability methodology and the Mayor dismissed these in adopting his SPD. Irrespective of this, we remain of the view that the matters raised by the development industry, such as the use of site values, market value, alternative use values in establishing the benchmark land value as an input to viability appraisals, remain valid and should be reflected. We consider the Council should demonstrate how these issues have been considered and not just dismiss them because the Mayor has.	Disagree. The Council has not just relied upon the Mayor's SPD to arrive at EUV+ but rather has supported and defended the use of EUV+ over a number of years through the commissioning of its own viability evidence for the Local Plan, through the assessment of hundreds of planning applications, and through numerous planning appeals. The Council's Scrutiny Committee has also undertaken an independent review of viability assessments that determined EUV+ was the most appropriate baseline benchmark.

3	5.50	Paragraph 5.50 directs that a short form Viability Statement will be required for developments that provide 35% affordable housing provision without grant and with a policy compliant split. It is stated that a short form statement is required in order to provide a benchmark for any subsequent changes to the scheme and in order to undertake an assessment on deliverability. The Mayor's 2017 SPG aims to increase the amount of affordable housing being delivered and accelerate delivery for those applicants delivering greater proportions of affordable housing. It introduces a Fast Track Route for applications that meet or exceed 35% affordable housing provision without public subsidy, provided on-site with the specified tenure mix and meet other planning requirements and obligations to the satisfaction of the LPA and Mayor (para 9). For schemes that accord with this, the Mayor's approach is that viability information is not normally required at the application stage (para 3.59).	The SPG is therefore inconsistent with the Mayor's approach by requiring a short form Viability Statement. The LBH should review the need for this request given its conflict to the Mayor's SPG and intended purpose to incentivise an increase in affordable housing delivery. If the Council is to proceed, the requirement for a short form Viability Statement should be fully justified within the SPD together with clarification as to how this will not compromise the timely delivery of affordable housing.	This is fully justified in the SPD, in that the Council considers the submission a short form viability statement is necessary to provide a benchmark against which to enable any subsequent revisions to the submitted or approved scheme to be assessed. This requirement has no implications for the fast tracking of applications and is consistent with the Mayor's approach.
13	5.50 – Open Book Appraisals	This refers to an "open book" approach. This is misleading as it suggests that a viability assessment should be based on the individuals own costs and revenues, effectively a tax on the individual builder's performance. It is well established that viability modelling of this nature is based on generic inputs particularly relating to revenues and build costs.	Reference to "open book" should therefore be deleted with sole reference to "transparent process" being entirely adequate and presumably what is really being sought here.	Disagree. The requirements set out are those the Council considers are 'standard' and are later to ensure clarity, consistency and transparency.
15	5.50	As set out in the Mayor of London's Affordable Housing and Viability SPG (AHV SPG), the whole purpose of his Threshold Approach is to facilitate timely planning decisions and it is intended to encourage applicants to respond positively to providing 35% or more affordable housing. Policy at all levels is also clear; viability information is only required if a scheme fails to meet the defined proportion of affordable housing. Having to submit a viability statement even for a scheme which provides, theoretically, 100% affordable housing directly conflicts with such policy. The Council justifies this on	The requirement to submit a "short form viability statement" even if the development provides above 35% affordable housing should be **deleted** as it creates unnecessary burdens on both the applicant and planning authority.	Disagree. The Council considers the submission a short form viability statement is necessary to provide a benchmark against which to enable any subsequent revisions to the submitted or approved scheme to be assessed. This requirement has no implications for the fast tracking of applications and is not considered to place an unnecessary burden on the

		the basis that it provides a benchmark for subsequent changes to a scheme. However, any changes to schemes need to be considered on their own merits and agreed through a S73 or new planning application and, indeed, only if the proportion of affordable housing falls below the relevant policy threshold at that time. Overall the Council's approach runs contrary to the imperative in national and strategic policy to streamline the planning process and facilitate development, not create additional, unnecessary bureaucracy.		applicant.
16	5.50	The Mayor introduced the fasttrack approach in order to speed up the planning determination process and ultimately the delivery of new homes..	Asking for a 'short form' viability statement undermines this approach and we therefore suggest that it is deleted	Disagree. The Council considers the submission a short form viability statement is necessary to provide a benchmark against which to enable any subsequent revisions to the submitted or approved scheme to be assessed. This requirement has no implications for the fast tracking of applications and is not considered to place an unnecessary burden on the applicant.
2	5.54	We disagree with the default position set out in Paragraph 5.54, that full viability appraisals will be released into the public domain when affordable housing negotiations have concluded. Whilst the general release of costs and values for residential development is not always commercially sensitive, many assessments include information which is commercially sensitive. For example, this could include allowances for the acquisition of third party land, rights of light, vacant possession, commercial rents, compensation costs or other information that would severely compromise the applicant's commercial position, which could in turn compromise scheme deliverability.	If there are elements of the assessment which the applicant considers should not be disclosed on the basis of commercial sensitivity, the option to redact information should be available. While Paragraph 5.54 allows for requests to be made to redact certain elements of appraisals, there are no assurances that this will be agreed by the Council. We are concerned about the adverse effect that incorrect disclosure could have on developers. As such, we consider that the SPD should confirm that the Council will notify the applicant of any	Disagree. Viability appraisals play a significant role in Council's determination of the acceptability of a planning application. It is therefore important that this information is shared so that the decision making process is, as far as practicable, transparent to the general public. As set out in para 5.54, if the applicant considers elements of the appraisal to be commercially sensitive, then they can request that such elements be redacted.

			relevant Freedom of Information (FOI) requests received, and if disclosure is agreed to by the applicant, then the process can be managed accordingly. There should be no general assumption that sharing commercially sensitive viability information without express permission from applicants, is acceptable.	
13	5.55	The SPD as drafted explains that proposals which do not meet the 35% threshold will be subject to a review mechanism. Paragraph 5.55 advises that proposals that do this and provide affordable housing on site and meet the tenure mix will not need be subject to viability review. **This means that retirement housing will always be subject to the review mechanism**, in that: 1 Given its specific nature and costs, it will rarely, if ever be able to provide 35% provision. 2 It is generally accepted that Affordable housing is not appropriate within a block of specialized housing for the elderly Attached is a report that generally considers the application of the Mayoral review mechanism which the Council is effectively looking to follow. The effective requirement for a review mechanism from all forms of retirement housing puts the ability of the sector to compete in the land market at considerable disadvantage as it will add additional uncertainties in an already high risk sector when compared with conventional residential developers that it will be competing with for land. This puts into considerable jeopardy the delivery of the required retirement housing in order to: 1. Address the Critical need identified in the NPPG; **2.** Meet the expectations of the London Plan for the provision of 100 such units per year; **80 of which are**	Because retirement housing will always be subject to the review mechanism, it is submitted that the SPD as drafted is not legally compliant as it is not in general conformity with the London Plan and is not sound in that it is neither positively prepared, justified and consistent with national policy.	Disagree. The Council maintains that Extra Care housing falls within Use Class C3, being self-contained accommodation for market rent and/or sale. Proposals for 10 or more units or 1,000sqm floorspace, are therefore subject to the affordable housing requirements of the Local Plan. The requirement to subject proposals that do not meet the 35% threshold to a review mechanism is justified on the basis that the Local Plan policy seeks the maximum reasonable provision and the review mechanisms ensures policy compliance is achieved. However, in relation to extra care housing proposals, each application will be treated on its own merits, and applicants can provide evidence to justify why they consider their proposal should be treated as Use Class C2, as a material consideration, and therefore would not be subject to affordable housing requirements. .

		for required for open market sale 3. The meeting of the Council's own adopted Policy DM15 in respect of specialist accommodation. Whilst the Mayor in publishing the Affordable Housing and Viability SPG has determined not to entertain the representations made in respect of the review mechanism, it is submitted that this is not a viable option for the Council as it would clearly conflict with its own policy towards addressing the specialist housing needs of older people, it, itself identifies. We consider the requirement for a review mechanism would be in clear contravention of the PPG (paragraph 017, Reference ID: 10-017-20140306) which makes clear that *'planning applications should be considered in today's circumstances'* unless a scheme phases delivery over a medium or longer term. This principle is further confirmed by paragraph 10 of the Government's 'Section 106 Affordable Housing Requirements Review and Appeal' guidance document and RICS Professional Guidance GN 94/2012 Financial Viability in Planning (para.3.6.4.1). We are dealing here with a proposed development of apartments which needs to be built a single phase because of the need for all apartments to have access to common communal areas. There are a number of recent appeal decisions have make it clear that a planning obligation seeking to require a compulsory reappraisal in these circumstances is not compatible with Regulation 122 of the CIL Regulations. In light of the above we consider that the proposed review mechanism if applied to 'single phased' development schemes is both contrary to the PPG and would not accord with the provisions of Regulation 122 of the Community Infrastructure Levy 2010. Of considerable concern too, is the nature of the review. Whereas in accordance with policy, and all good practice in order not to stifle or prevent development, nor to effectively impose a tax on an		

		individual developer and penalise it for its efficiencies, the initial review appears to continue to be based upon generic costs and values (for example the use of BCIS as opposed to a developers actual forecast costs), the review is based on actual out turn values and actual achieved costs. This will prove a very considerable disincentive to development, particularly where it carries a high risk, such as housing for older people where build has to be completed 100% before sales are realised. Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents in order to be feasible and small scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.		
15	5.55	This paragraph is insufficiently clear and inconsistent with the AHV SPG.	It needs to be **updated** to confirm that that a late viability review is not necessary on a scheme which meets or exceeds the 35% affordable housing threshold. It incorrectly indicates (in the third bullet point) that a review would be required at 75% completion irrespective of whether a scheme has achieved or exceeded the 35% threshold.	**Agreed. This bullet point will be amended to clarify that the later phase review will only apply to scheme where less than 35% affordable housing.**
3	5.55 – bullet point 1 & 2	Paragraph 5.55 sets out the requirements for review mechanisms to be attached to the grant of planning permission. The Mayor's 2017 SPG directs that both Fast Track and Viability Tested schemes should be subject to an early review which is triggered when an agreed level of progress on implementation has not been reached after two years of the grant of planning permission or as agreed with the LPA and the GLA (where relevant), on a site-by-site basis (para 3.56). Paragraph 5.55 (bullets 1 & 2) of LBH's draft SPD	No justification is provided for this departure from the Mayor's guidance, which should be reasonably explained and acknowledged in the SPD.	**Agreed. The first bullet point to be amended to be 24 months or as agreed by the LPA**

		however proposes an 18-month review period in comparison to the Mayor's 2-year period.		
2	5.55 – 3rd bullet point	Paragraph 5.55 bullet point 3 should be amended to require a review at 75% sales, as opposed to completions, to reflect that values can only be known at the point of sale whether this be before or after completion.	Amend to require a review at 75% sales	Disagree. While it may be that at 75% completion, not all of the completed units will have sold, it should enable enough for benchmarking and provides that 25% of development still remains to complete, ensuring, where appropriate, further on-site provision can be secured if an uplift in sales values is demonstrated. If the trigger was on 75% sales, as suggested, by that time the entire scheme could have been built out.
3	5.55 – bullet point 3	Additionally, Paragraph 5.55 (bullet 3) directs that a review at 75% completion will be required to allow an assessment based on values achieved and costs incurred. It does not specify whether this is sought for schemes with a policy compliant 35% affordable housing provision or those that fall short of this requirement. The Mayor's SPG directs that only Viability Tested schemes (i.e. less than 35% affordable housing provision) should be subject to late reviews once 75% of homes are sold, or at a point in time agreed by the LPA.	The SPD should either make this distinction in that Viability Tested schemes are subject to a review once 75% of homes are sold, or provide justification for this departure from the Mayor's SPG.	The Council maintains the review should be based on 75% completion and not 75% sales ensuring, where appropriate, further on-site affordable housing provision can be secured if an uplift in sales values is demonstrated. If the trigger was on 75% sales, as suggested, by that time the entire scheme could have been built out and would necessitate an 'in lieu' payment which is least preferable. **This justification will be made in the SPD.**
2	5.55 – 4th bullet point	Paragraph 5.55 bullet point 4 should be expanded or amended to clarify that reviews will only be required where there has been an appropriate time lapse since the previous review, otherwise a review is meaningless.	We request that the SPD should include provision to allow the timing of viability reviews for outline, hybrid planning permissions and phased schemes to be agreed between the applicant and the Council, so that these fall at an appropriate time, or	Agreed in part. While the Council is content to **amend the 4th bullet point to say that the timing of any review(s) for outlined and large phased scheme will be agreed with the applicant**, the Council

			times, throughout the build of the development at the point of consent of outline or hybrid permission. We consider that provision should be included to ensure that any revisions will still be subject to a viability review at the appropriate and agreed time. Typically, on long term developments significant sums are invested at risk on site preparation and the provision of early infrastructure. Any review must take account of cost increases, and start at the position that the development is not in deficit. We note that there is no provision or mention that the review should allow for a reduction in the previously consented planning obligations should the viability have lessened between the initial application/consent stage and review stage (i.e. an upward and downward review mechanism). Reviews can also act as a barrier to bank lending on certain sites, which can in turn, prevent sites from coming forward for development.	disagrees that reviews are a barrier to bank lending or that it should take account of cost increases, and start from the position that the development is not in deficit. Such development risk is inherent in the viability appraisal process. Further, there are other avenues available to the applicant should circumstances change such that the development was rendered unviable during the build out stage, including varying the scheme/obligations, resubmission, delay or slowing down of construction until greater market certainty is achieved. Such options are not available to the Council through the grant of permission.
3	5.55 – bullet point 4	Paragraph 5.55 (bullet 4) directs that a review mechanism may be required for phased scheme on the submission of the first Reserved Matters application. The Mayor's SPG however only gives consideration to reviews for longer-term phased schemes at an early stage where the scheme has stalled and has not met the threshold level of affordable housing (para 3.62) or mid-term reviews triggered prior to the implementation of phases.	The SPG does not give regard to a review on the submission of the first Reserved Matters application. This requirement should either be amended to accord with the Mayor's guidance or suitable justification should be provided for this departure.	The Council considers its approach to be much clearer in respect of the review triggers on large phased schemes. The Reverse Matters stage ensures the details for the next phase will be known. **This SPD will be amended to clarify why the Council's approach is justified.**
3	5.56	Paragraph 5.56 states that an obligation will likely be	Suitable reasoning is therefore necessary	Disagree. This simply clarifies

		sought to prevent commencement of development until the review of the scheme's viability has been approved by the Council. This requirement generates a high degree of ambiguity, for example whether it relates to Fast Track or Viability Tested schemes, and how such a requirement would apply to phased schemes. Additionally, no such requirement has been sought by the Mayor. Notably, the 2017 SPG aims to increase the amount of affordable housing and accelerate delivery. Such a requirement could create delays to the construction and implementation of affordable housing.	to justify this requirement.	that where a review trigger is applicable, the Council will seek to include a clause in the agreement that prevents the development subject of the review, to commence, until the review appraisal has been approved by the Council.
2	5.57 bullet points 2 & 6	We welcome recognition in Paragraph 5.57 bullet point 2, of the need for a priority return to the developer, to ensure that an agreed profit level is reached before profit is considered as 'surplus'. We welcome the acknowledgement of developers' legitimate right to a share in any 'surplus' profit (Paragraph 5.57 bullet point 6).	However, we consider that the details should be amended to a 60/40 split in favour of the developer to provide the necessary incentive to maximise the scheme outputs. If it is less than this, it will be counterproductive. Similarly, in relation to developer profit levels, it is important to ensure there is sufficient flexibility built into the SPD, to allow negotiations to reflect the different risks associated with different schemes, such that the developer profit levels can be reflective of the risk profile to ensure schemes are worthwhile to pursue.	Disagree. The review mechanism acknowledges that the Council is effectively providing the development with a discount on its full obligations due (see the purpose of planning obligations). Where a development is able to contribute more, as demonstrated through the review, a larger portion of any surplus should be given to making up the obligations deficit.
2	5.57 – 7th bullet point	In relation to bullet point 7, for outline/hybrid applications, where there is no residential unit layout, it would not be possible to indicate which units might change to affordable units until reserved matters have been submitted.	As such this matter is best addressed through the determination of reserved matters submissions, and should be removed from the SPD.	Disagree. For outline/hybrid applications the review trigger would be on submission of the reserve matters, when the residential units are known and, therefore, the 7th bullet point remains relevant.
3	5.59	Paragraph 5.59 states that if, at any stage, it becomes clear that the Council cannot recommend approval of a planning application then discussions on planning obligations will be suspended.	*None stated*	There is no conflict with this statement and Para 187 of the NPPF. The latter applies to the planning application where the

		This statement contradicts the intentions of decision-taking, notably the National Planning Policy Framework (paragraph 187) directs local planning authorities to look for solutions rather than problems. This also contradicts paragraph 5.69 of the SPD which states that the Council will continue negotiations with the developer to establish and set out the nature of planning obligations that would be sought should the application be permitted.		Council will work with applicants to arrive at an acceptable proposal. However, in those circumstances where it is not possible to resolve fundamental issues with the planning applicant itself, and the Council is therefore unable to support the planning application, para 5.59 of the SPD simply clarifies that, in such circumstances, it is not considered appropriate to continue discussions on the details of any planning obligations arising – this would be unproductive and a waste of public resource and money.
16	5.68	The paragraph states that if the planning obligations are not formally completed and sealed by the end of 3 months, and an extension to the period is not agreed, the application will automatically default to a refusal.	We suggest that for strategic sites the time period should be extended for a mutually agreeable period of time.	Disagreed. The Council seeks to ensure the timely completion of planning obligations following the grant of planning permission. Provision is made for an extension period if the parties deem and agree this is necessary.
13	Section 6	The SPD particularly through its proposed review mechanism, and inflexible stance on on-site affordable housing provision puts into jeopardy the delivery of retirement housing for the elderly. The National Planning Policy Framework stipulates that the planning system should be *'supporting strong, vibrant and healthy communities'* and highlights the need to *'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community… such as… older people'* (emphasis	*None stated*	The Council notes and understands the current policy position in respect of housing and, therein, specialist housing for the elderly.

		added). The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled *"**How should the needs for all types of housing be addressed?** (*Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for "***Housing for older people"***. This stipulates that *"the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important"* (My emphasis). The *'Housing White Paper: Fixing our broken housing market'* clearly signals that greater consideration must be given to meeting the needs of older persons' in Local Plans stipulating that *'Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of*		

		accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services82. It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible 9housing to meet local need. ***In addition, we will explore ways to stimulate the market to deliver new homes for older people.'*** (Para 4.42) (My emphasis). This is now being progressed in part through the DCLG Consultation '***the right homes in the right places****'*. (August 17) Haringey's Local Plan (Adopted July 2017) notes that Haringey has an established need for Special Needs Housing. Para 3.28 states that: *"It remains a priority for the Council to provide safe environments which facilitate independent living for vulnerable residents and older people in Haringey."* Para 3.30 continues: *"The Council will seek to work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites."* Policy DM15: Specialist Housing notes that there is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy.		
13	Section 6 - Extra Care Housing & Affordable	<u>General Principle of SPD in respect of prescription of affordable housing practices and definitions of specialised housing for the older people</u> It is established practice that changes in planning	The SPD in prescribing revised threshold and a review mechanism for all forms of residential development introduces policy beyond that of the current Local Plan. It	Disagree. The Council is content that the SPD does not introduce policy but rather provides guidance and clarity on the

	Housing	policy should only be made through Local Plans (Planning and Compulsory Purchase Act, 2004, Section 17 (3)). Supplementary Planning Documents should not be used to introduce new policy especially when this will add financial burdens to development (NPPF, paragraph 153). Therefore, in line with national policy and planning practice, the SPD should only build upon and provide more detailed guidance on the policies that are already included in the London Plan.	also establishes without exception that all Extra Care housing falls within Class C3. It cannot do so and is also erroneous in this regard. In doing so it puts the delivery of housing which is supported in the Local plan itself into jeopardy.	interpretation and implementation of Local Plan policies, aiding applicants to make successful planning applications and enabling applications to be dealt with more efficiently and quickly. The Council maintains that Extra Care housing falls within Use Class C3, being self-contained accommodation for market rent and/or sale. However, each application will be treated on its own merits, and applicants can provide evidence to justify why they consider their proposal should be treated as Use Class C2, such as the level of institutional care/support to be secured via an obligation, as a material consideration.
15	6.8	AR, like a number of other developers, are responding positively to the Council's 'Portfolio Approach' to the delivery of housing; where the Council takes a strategic overview in a particular area and then sets out requirements for individual sites taking into account a site's characteristics, strategic infrastructure requirements and urban design considerations. The Portfolio Approach is described in the supporting text to policy AAP3 of the Tottenham Area Action Plan (Paragraph 4.14) and states as follows: **"In order to meet both of these aims, a "portfolio" approach where a group of sites can be seen to work together to meet the overall objectives of the Plan will be encouraged. This could for example mean that two or more sites working in parallel deliver different mixes or tenures of units which together make a policy compliant outcome in the**	**Paragraph 6.8 should be revised** to confirm that the Portfolio Approach applies in Tottenham Hale and this should, across a portfolio of sites, deliver a target level of affordable housing, with individual sites being required to show how, in providing higher or lower percentages and mixes how they contribute to the achievement of the Portfolio Approach.	**Agreed. Para 6.8 has been amended as suggested**

		area. To support delivery of inclusive and mixed communities the Council will give consideration to the most appropriate housing mix and tenure to be delivered on individual schemes, in line with Policy DM13(C).” The AHV SPG recognises that LPAs can impose their own local affordable housing thresholds and, within these, adjustments can be made locally to housing mix and tenure (Paragraph 2.84). It is therefore important for the Council to **provide clarity with additional guidance** which explains how the Council’s Portfolio Approach responds to the guidance in the AHV SPG.		
15	6.24	Generally, the Council should ensure that the affordable housing requirements being introduced are entirely consistent with those in the AHV SPG. Paragraph 6.24 relating to varying existing planning permissions, for instance, is different to paragraph 2.14 of the Mayor’s guidance with the former requiring full viability testing if additional residential is proposed, but the latter only where the changes alter the economic circumstances of a scheme. To avoid such inconsistencies, the SPD should cross refer to the Mayor’s guidance rather than duplicating it in a potentially different and inconsistent manner.	Ensure that the affordable housing requirements being introduced are entirely consistent with those in the AHV SPG.	Noted. The Council considers that SPD to be in-line with the Mayor’s SPG but where it considers necessary, has justify why a departure is necessary and appropriate.
16	6.24	We note that one of the reasons that Haringey is updating the SPD is to ensure conformity with the Mayor's new Affordable Housing and Viability SPG. Whilst the SPD is not policy, it is a material consideration. The SPD considers how development viability will be assessed, including triggers for further re-appraisals prior to development commencing, during construction, and post completion. We look forward to working with Haringey to ensure that there is consistency with the NPPF on this part of the SPD as there will need to be flexibility for large complex regeneration proposals to ensure that the development can be delivered in a viable manner.	As a point of consistency, the Mayor’s SPG (paragraph 2.14) requires viability testing only where changes “alter the economic circumstances of a scheme”. We believe that the Haringey SPD should adopt this test within paragraph 6.24.	Noted. The Council considers that SPD to be in-line with the Mayor’s SPG but where it considers necessary, has justify why a departure is necessary and appropriate.
13	6.26	Sheltered Housing and Extra Care Homes	Sheltered housing and extra-care housing	Disagree. The Council notes

		Para 6.26 is negatively worded and as printed would preclude the development of specialist housing for older people in Haringey, in direct conflict with the Council's own adopted Policy DM15. The paragraph asserts that "*Sheltered housing and extra care homes are classified as falling within Use Class C3".* It is not for an SPD or for that matter a Local Plan to make such an assertion. This a matter for the Use Classes Order and informed by precedent, appeal precedent and case law. It is also erroneous. Most forms of Extra Care Accommodation fall within Use Class C2 and Appeal precedent has confirmed that self-containment of accommodation is not the determining factor as to Use Class. Where Extra Care accommodation falls under use class C2 it should not be liable for affordable housing. Attached is a paper that discusses the McCarthy & Stone Extra Care model and its relationship with the Use Classes Order. This establishes, principally by citing relevant appeal precedent for other similar developments that whereas some forms of Extra care housing will not be, the McCarthy and Stone model does fall within Class C2. Delivering beneficial Sheltered Housing and Extra Care Accommodation should be prioritised in Haringey to meet its identified housing needs and not unnecessarily confused or complicated by erroneous and misleading statements. It is well established that it is inappropriate to mix specialist housing for the elderly with other (family/younger persons) housing in a single flatted block. Given the nature of the Borough, that is where most, if not all the new stock will come from. Also given that due to the specific economics of development the 35% threshold will seldom, if ever be met, this means that almost all, if not all l retirement schemes will be subject to the proposed review mechanism. This puts such development at a	should not be treated as Use Class C3. It is not for an SPD or for that matter a Local Plan to make such an assertion. This a matter for the Use Classes Order and informed by precedent, appeal precedent and case law.	that case law remains unclear, with the exception that a material consideration to determine whether a proposal falls within C3 or C2 Use Class is the level of institutional care/support to be secured via an obligation. The Council considers it appropriate that Extra Care housing falls within Use Class C3, being self-contained accommodation for market rent and/or sale, unless material. considerations indicate otherwise

		significant competitive disadvantage given the uncertainties that it places when competing for generally scarce sites. Therefore such housing is unlikely to be delivered. Well located and designed specialist housing for older home owners is a highly sustainable form of housing. Given the critical need for older person's accommodation in Haringey there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate policy within the document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with independence and security. In effect there should be more of a positive policy supporting older people's accommodation in the same way that affordable housing is given a high priority.		
2	6.32	We welcome the commitment at Paragraph 6.32 that the Council will work with developers on a site by site basis to ensure policy compliant on-site affordable housing provisions, while ensuring that these requirements do not make development unviable. This approach is consistent with Paragraph 173 of the NPPF as set out above.	*None stated*	Noted
2	6.38	In some instances, scheme viability may mean that there is a need to negotiate the level of 'in lieu' payment to be provided.	Paragraph 6.38 should be amended to allow the viability appraisal and other planning benefits to be taken into account in calculating the 'in lieu' payment, as is proposed to be the case with on-site provision.	While the Council agrees that viability could be a consideration in respect of development of the facilitating site, it considers this would be an exception, given the provision of 100% market housing. The SPD already allows for the consideration of

				development viability in determining the obligations to be secured and the amount/level/cost of these. However, in respect of an 'in-lieu' payment, as such funding must then go to deliver the required development on an alternative site that would itself have regard to viability and other planning benefits. It could not be that such matters where in effect 'double counted' across two sites to the detriment of affordable housing provision.
2	6.42	Paragraph 6.42 refers to a 'baseline' level of affordable housing.	This paragraph should be expanded to explain where this figure is derived from and/or how it is calculated.	**Agreed. Para 6.42 will be expanded to clarify that the 'baseline' level of affordable housing is that level already agreed through the original grant of permission.**
3	6.42	Paragraph 6.42 directs that any applications which are re-submitted by means of extension of time, renewal or variation of planning permission will be subject to a 'baseline' level of affordable housing requirements and on which negotiations will commence on resubmission. This is to ensure that the level of affordable housing cannot be negotiated below the baseline in the event of resubmitted proposals. This requirement contradicts with the Mayor's SPG (para 2.14), which states that any applications to vary consents approved under the Fast Track Route will not be required to submit viability information, provided that the resultant development meets the 35% threshold and required tenure split and does not otherwise result in a reduction in affordable housing or affordability.	As such, LBH's SPD should be amended to make clear that where schemes that provide 35% affordable housing and which is not proposed to be altered, affordable housing negotiations will not be required. Similarly, the SPD should make clear that for schemes that do not meet the 35% threshold or required tenure split, or where a proposed amended would cause the scheme to no longer meet these criteria, viability information will be required and assessed under the Viability Tested Route. This requirement is in line with the Mayor's SPG (paras 2.15 & 2.16).	The Council disagrees that this represents a contradiction with the Mayor's SPG. Para 2.14 of the SPG provides that the 35% is the baseline. Both the SPD and SPG seek to ensure the baseline is maintained even where it is proposed to alter the scheme.
2	6.47 –	This section should be expanded to include	Include reference to phased developments	**Agreed. Para 6.47 will be**

	6.48	reference to phased developments, as per our comments above in relation to trigger points.		**amended to include reference to phased development.**
3	7.6	Paragraph 7.6 states that all major mixed-use development within a Local Employment Area/Regeneration Area will be required to make provision for affordable workspace. This requirement contradicts with LBH's Site Allocation DPD (July 2017) forming part of the Council's Development Plan. In respect of Site Allocation SA19: Wood Green Cultural Quarter (South) it states that affordable rent may be sought having regard to the viability of the scheme as a whole. This is therefore not an explicit policy requirement, but rather a consideration that will be taken in the context of the scheme as a whole. Notably, Paragraph 7.9 of the SPD acknowledges the impact of costs associated with affordable workspace on the overall viability of the development.	Paragraph 7.6 should therefore be amended to ensure that it does not contradict with the provisions of the Council's own Development Plan.	Disagree. It is clearly the case that the requirement for affordable workspace is applicable to all proposals for major mixed-use development on LEA-RA sites. However, all policy requirements of the Local Plan are subject to viability considerations. It is not necessary or appropriate to include this caveat throughout the SPD as it is covered off at para 5.47 – 5.50.
3	7.12	Paragraph 7.12 sets out requirements for affordable workspace that should be addressed in the agreement of draft planning obligations Heads of Terms. The requirements relate to tenancy agreements, lease terms, rent reviews, service charges and sub-letting restrictions.	The requirements are considered to be overly restrictive and beyond the scope of planning policy. As such, these items should be removed. If necessary, such elements can be put forward and discussed between the Applicant and LBH on a site-by-site basis.	Disagree. The requirements set out are those necessary to secure the workspace as 'affordable'. It is appropriate, for clarity and transparency, that they are set out in the SPD. All applications are dealt with on their merit and obligations considered have regard to the individual site and scheme.
5	7.12	The consultation document at paragraph 7.12 sets out the example Heads of Terms which need to be addressed when securing obligations around affordable workspace. However, previously at section 7.10 it is stated that the Council recognises that the securing of an element of affordable workspace, in preference to an element of conventional employment floorspace will make a deeper per/m2 cut into the viability of a development. It is thus acknowledged that for the same amount of development of a higher value use, a smaller amount of affordable workspace	A more reasonable scenario would not require all major mixed-use development within LEA-RAs to make provision for affordable workspace but only those where a significant surplus profit can be shown within a viability exercise. Furthermore, lease terms cannot be defined by the SPD as the nature of the evolving employment market in Haringey is catered towards shorter flexible leases and smaller businesses making use of the workspace.	The SPD outlines how the requirements of the adopted Local Plan policies will be secured. It is not for the SPD to re-write / alter the intent of local plan policies, which themselves have been the subject of viability appraisal to ensure they do not hinder sustainable development coming forward. The owners of warehouse living

		will be secured than for a conventional employment product. Policy DM38 of the Development Management Plan requires a provision for affordable workspace where viable in Local Employment Areas – Regeneration Areas. However, where there is limited commercial demand, paragraph 173 of the National Planning Policy Framework states the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed is threatened. The commercial viability of schemes in local employment areas such as the Warehouse District is threatened by the lack of flexibility in the proposed obligations set out in paragraph 7.12 of the consultation document. There are already significant viability issues surrounding warehouse living due to the affordable nature of the use combined with the large communal character of the development, bigger bedrooms, more internal height etc. Requirements surrounding lease lengths and conditions on rent would hinder the development potential of sites. The Local Plan seeks to proactively manage Haringey's stock of industrial land and it is recognised that the Council will apply a more flexible approach to the development of some employment sites supporting employment led, mixed-use schemes where they will facilitate site regeneration and renewal. This approach is needed to help make employment development more viable, to ensure sites continue to make a positive contribution to Haringey's economy and deliver an uplift in local job numbers. Therefore, the revisions to the Planning Obligations SPD, especially part 7.6, seems to contradict the Local Plan in this area.	Thus the terms in the SPD are restrictive where they intend to negotiate affordable workspace. It should be noted that the proposed increase in CIL and the introduction of CIL for warehouse living combined with the affordable workspace requirement in the obligations will have a significant impact on the viability of a viable schemes to come forward. This is already impacting the potential for schemes to be brought forward and therefore this extra burden will frustrate the delivery of further key sites in Regeneration Areas. These regeneration areas have been identified as such due to the need for regeneration. The additional burden of an affordable workspace obligation will not allow these sites to come forward for redevelopment and therefore will conflict with the aims of the local plan. Our client advises that greater flexibility within the terms of affordable workspace will allow a more efficient provision of policy compliant workspace within mixed use developments rather than reducing the ability for such sites to come forward in the first place. Paragraph 173 of the NPPF states that to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. It is within this context that our client challenges paragraphs 7.9-7.13 of the	sites have created the need for this bespoke sui generis product. The local policy has legitimised this use and seeks to ensure this need continues to be met on these sites, including its affordability, albeit in buildings that are fit for habitation. LEA-RAs are employment land sites, where employment outcomes are to be maximised, including securing local employment opportunities through provision of affordable workspace. In failing to secure an element of affordable workspace, the objectives of the local plan policy would not be met. The Council's view is that the flexibility sought is already provided for within the local plan policies for LEA-RAs in providing for a mix of uses on these site to address viability concerns with the delivery of new employment floorspace, including affordable workspace.

			revisions. Competitive returns will only occur when the scheme is operational and a restriction on the occupation of other elements until such time as the affordable workspace has been leased is far too restrictive, and an unreasonable obligation requirement. Thus we request this requirement is removed or re-worded so that it is not linked to the occupation of the other elements of a scheme.	
2	7.18	Our Client supports the Council's aspiration to maximise job opportunities for local residents. However, in relation to complex construction projects, it is unrealistic to assume that all of the necessary expertise is available locally.	As such, in relation to the 'Notification of Vacancies' in Paragraph 7.18, our Client objects to the requirement for all job vacancies to be advertised exclusively to local residents for minimum period.	Disagree. The exclusivity period is only for a minimum period, after which, if vacancies cannot be filled by local residents, posts can be advertised more widely.
2	7.18	While the minimum requirement of 20% local labour, including local trainees, is considered acceptable, this requirement should be applied flexibly, to reflect different stages of the construction process, where for example, some construction stages may require a large percentage of specialists on site, meaning the percentage of local labour and trainees may be lower at a given time, but higher at another stage in the construction process.	The 20% requirement should be applied flexibly.	Disagree. The requirement is for the 20% to apply 'during' the construction phase rather than 'throughout', providing the flexibility sought and enabling periods where the percentage may be lower or higher.
2	7.18	In relation to apprenticeships, our Client objects to the requirement to pay a support fee of £1,500 per apprentice (Paragraph 7.18), to cover the recruitment process, as well as providing the recruitment opportunity itself. It is unclear what the basis is for this requirement and what the payment would be spent on.	This requirement should be deleted from the SPD.	The fee is to cover the Council's job brokerage costs, ensuring potential local candidates for apprenticeships have already been vetted and identified to take up roles as a result of new development as they become available.
2	7.18	Additionally, in relation to contractors and sub-contractors, our Client is willing to include reasonable local employment clauses in building contracts and to encourage engagement	*None stated*	Noted. The Council acknowledges that the legal obligation will be with the developer to ensure compliance

		between the contractors and the Council's Employment and Skills team. However, should contractors/sub-contractors not comply with these clauses, it will be at the developers discretion whether to terminate the contract, taking account of wider considerations for the delivery of the development.		with the requirements of the agreement.
3	7.28	Paragraph 7.28 states that the Council will seek to ensure that local residents have the opportunity to access new job opportunities created by developments.	This requirement should be considered by a site-by-site basis and not a blanket requirement for all developments. It will be necessary to have regard to the nature of the community offer as part of the development and any related restrictions/obligations.	Disagree. The Council considers it appropriate and in line with Local Plan policies to seek to secure employment opportunities for local residents from new development. All applications are dealt with on their merit and obligations considered have regard to the individual site and scheme circumstances.
15	7.28	We are concerned that the blanket approach to employment and training contributions does not properly reflect individual circumstances and therefore additional **flexibility should be introduced** into the wording. The End User Phase Skills requirements (paragraph 7.28 onwards) fails to recognise the generally positive effect of development on creating job opportunities and there is no justification why contributions are required at all. It is also not clear why the obligations apply only to development of between 1,000 and 10,000m² of employment floorspace. Paragraph 7.8 merely states that 'all major developments will need to contribute…' and there is no explanation how this meets either the 'necessity' nor the 'directly related' CIL Obligation Tests. The requirement for contributions does not take into account bespoke employment initiatives which Developers, such as AR, often promote themselves and there should be flexibility in the wording of the SPD to allow for this.	Additional flexibility should be introduced into the wording to reflect individual scheme circumstances.	Disagree. The Council considers it appropriate and in line with Local Plan policies to seek to secure employment opportunities for local residents from all new development, noting that the local plan polices were the subject of recent examination and found to be sound, based upon robust local evidence of need. All applications are dealt with on their merit and obligations considered have regard to the individual site and scheme. This would include schemes that the developer themselves may already promote. Para 7.32 deals with schemes proposing more than 10,000sqm and advocates a more bespoke

				approach recognising the scale of the opportunity that such very large proposals may provide.
16	7.28	We believe that the employment and training contributions within Section 7 could be revised to better reflect the individual circumstances of large scale developments by allowing additional flexibility, in particular:- The End User Phase Skills requirements (paragraph 7.28 onwards) does not yet recognise the generally positive effect employment development will have on creating job opportunities, and we suggest additional wording is included to reflect this. We would welcome further clarification why obligations apply only to development of between 1,000 and 10,000 m² of employment floorspace. St William contributes significantly towards bespoke employment initiatives through training, investment and apprenticeship schemes outside of the planning obligations framework.	Suggest additional wording is included to recognise the generally positive effect employment development will have on creating job opportunities.	Disagree. The Council considers it appropriate and in line with Local Plan policies to seek to secure employment opportunities for local residents from all new development, noting that the local plan polices were the subject of recent examination and found to be sound, based upon robust local evidence of need. All applications are dealt with on their merit and obligations considered have regard to the individual site and scheme. This would include the use of training schemes that the developer themselves may already promote. Para 7.32 deals with schemes proposing more than 10,000sqm and advocates a more bespoke approach recognising the scale of the opportunity that such very large proposals may provide.
2	7.31	This section of the SPD seems to suggest that irrespective of whether local residents are employed as a result of a development, the Council will require a financial contribution based on floorspace created. While we note the Council's comments at Paragraph 7.17, regarding the Council's historic difficulties in enforcing local employment schemes, and also the potential to agree a bespoke plan for larger schemes, set out in Paragraph 7.32, as actual employment should be the priority, we consider	That the financial 'penalty' should only come into effect, if the developer cannot demonstrate that they have either achieved an agreed local employment target or that reasonable steps have been taken to seek to achieve the agreed target. In the event that the SPD is not amended to reflect the above comments, Paragraph 7.31 should be	As noted at para 7.29, this financial obligation is about targeting local residents who are long-term unemployed and ensuring they are provided the training and skills necessary to access the new employment opportunities created by the new development. This specific outcome is distinct from a local employment target and more

		that a financial 'penalty' should only come into effect, if the developer cannot demonstrate that they have either achieved an agreed local employment target or that reasonable steps have been taken to seek to achieve the agreed target.	amended to require payment prior to occupation of the development, rather than commencement of the development, as the payment is effectively a compensation of not employing local residents in a completed development, and does not relate to the construction phase.	appropriately undertaken by the Council using its existing job brokerage services. The Council also disagrees to this payment being made 'prior to occupation' as by that stage it is too late to train and upskill local residents to enable them the opportunity to compete for the new jobs the end user may offer.
2	7.32	Paragraph 7.32 states that while a bespoke plan will be required, the Council might still require a financial contribution.	The SPD should be expanded to provide an explanation of the circumstances in which a financial contribution will be required, instead of direct provision.	**Agreed. Amended to state that direct provision may be sought instead of a financial contribution.**
15	8.13	Paragraph 8.13 should be **revised** to recognise that the Developer may carry out s278 works if previously agreed with the Council. Such an approach is common on major schemes.	Revise para 8.13 to recognise that the Developer may carry out s278 works if previously agreed with the Council.	**Agreed. Para 8.13 amended as suggested.**
10	Section 9- Public Realm	We note that section 9 is entitled Open Space and Public Realm, although the text does not explicitly refer to public realm improvements as a potential type of planning obligation. While all designated heritage assets are potential beneficiaries of a planning obligation, there may be particular justification where sites include assets currently at risk from neglect, decay, under-use or redundancy. Each year Historic England publishes a *Heritage at Risk Register*, which comprises information on all listed buildings, scheduled monuments, conservation areas and registered parks & gardens that are vulnerable through neglect or other threats. The 2017 Register is available on Historic England's website: https://historicengland.org.uk/advice/heritage-at-risk/.	We would therefore suggest that including public realm improvements be added to section 10.	**Agreed. But in preference to inclusion in Section 10 Heritage, Section 9 of the SPD, Public Realm and Open Space, will be expanded to include public realm improvements as a specific obligation.**
4	9.10	The Lee Navigation towpath provides a convenient link for walking and cycling, and should be recognised	We would query if this could include contributions to the open space of the Lee	Yes an obligation could be sought to secure improvements

		as a sustainable transport network here. We would support improvements to the towpath in order to promote and mitigate for increased use of the towpath. Paragraph 9.10, Open Space, states "Obligations may be sought … to secure public access to, and use of, existing open space."	Navigation towpath, for development proposals near this waterway? Development can bring additional residents and visitors to the waterways, and our infrastructure can often require improvement to be able to cope with this increased demand and raised expectation.	to the Lee Navigation towpath if the statutory tests are met. However, it is not appropriate to specifically name potential improvement projects – these would be specific to the application and its location, and is too detailed for inclusion in the SPD.
13	9.10-9.22	Picking up on the Community Infrastructure Levy Regulations 2010, which with the inclusion of paragraph 122(2) states; *A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—* *(a) necessary to make the development acceptable in planning terms;* *(b) directly related to the development; and* *(c) fairly and reasonably related in scale and kind to the development.* This is now a legal requirement as opposed to previous policy guidance meaning that any planning obligations have to be 'necessary' to make the consent lawful. Unfortunately, the use of such a wide-reaching tariff to cover all types of residential including specialist retirement housing would fail the "necessary" test as well as contributions not being calculated in a fair and reasonable way relating in scale and kind to the nature of my Client's specialist residential developments for older people. It is assumed that specialist retirement housing would be exempt from elements of the contributions where there is limited or no direct relevance or mitigation to be addressed. This perhaps needs to be clarified further in the SPD. The need for play areas, schools, education and open space elements would clearly not be directly relevant and yet may be treated the same as say a 4-bedroom house. Specialist housing for the elderly by its very nature	On this basis we request that the requirement to seek contributions for play areas, schools, education and open space elements is either: A) Reduced to reflect lower cumulative impact on the facilities arising from these forms of development, or, B) Decided on a case by case basis with developer contributions mitigating the impact on facilities likely to be impacted by older persons housing.	Disagree. The Council maintains that Extra Care housing falls within Use Class C3, being self-contained accommodation for market rent and/or sale. To be of high quality, well designed and sustainable it should comply with the policy standards applicable to all forms of C3 housing, which take into account unit size / number of bed rooms/ occupancy levels etc in determining the appropriate level of applicable amenity requirements. However, all applications are treated on their own merits, and applicants can provide evidence to justify why they consider their proposal should not be subject to specific policy requirements of the Local Plan and therefore not be subject to the applicable obligations as set out in the SPD.

		does not accommodate children and in so doing the contributions related to infrastructure for children does not meet the test of the Community Infrastructure Levy Regulations 2010, paragraph 122(2). We note that contributions will be sought to mitigate the effects of residential development on Recreation, sports and leisure in an area. Whist we accept that this is not as clear cut as, for example children's education, the various forms of specialist accommodation for the elderly will not have the same impact on sports facilities as family or 'general needs housing'. McCarthy and Stone's Retirement Living developments are aimed at the elderly. Residents of such developments tend to be on average 79 years old and suffer from lower mobility. Consequently, the cumulative impact on sports and recreation facilities arising from residents in such developments would be less than that of family or 'general needs housing'. Seeking development contributions from older persons housing developments at a fixed rate does not therefore *'fairly and reasonably relate in scale and kind to the proposed development'.*		
16	9.21-9.22	St William, as part of its place making and cultural approach to regeneration, will include public art within its landscape and design strategy for major sites.	We believe that Chapter 9 Paragraph 9.21 and 9.22 could recognise that public art can be delivered as part of a design led landscaped approach, in lieu of a specific standalone commission	Disagree. As set out in the SPD, the Public art should be integrated into the design of the proposal but should be identifiable in its own right.
12	Section 9 & 10	LPGT supports the approach to planning obligations for heritage assets and for public open space and wishes to ensure the SPD is clear that: • development which benefits from its proximity to a public open space contributes to its ongoing maintenance. Development sites should contribute to the ongoing maintenance of designed landscapes and invest in them to ensure they can withstand greater pressure arising from the increased population using them.	In para 10.4 delete "Repair, restoration or maintenance of a heritage asset(s) and their setting;" and replace with "conservation, enhancement, restoration and/or maintenance of a heritage asset(s) and their setting;	**Agreed. Para 10.4 will be amended as suggested.**

		• the remit of the heritage section includes designed landscapes such as public parks, grounds of historic houses, and sites, churchyards, cemeteries and town squares, not only statutorily but also non-statutorily designated historic green spaces. (Ref Policy DM9)		
10	Section 10	We note that the purpose of the SPD is to set out the Council's approach, policies and procedures in respect of the use of planning obligations. We very much welcome the inclusion of historic environment considerations (section 10) within the document and the identification of the various types of heritage-related obligations at paragraph 10.4.	We would however point out that the contents list on page 2 omits to mention section 10 as it stands.	Noted, the Council will update the Table of Contents to address this omission
15	Section 11	AR is working with the Council to ensure that their sites in Tottenham Hale provide a comprehensive response to energy and sustainability requirements and fully support the Council's emerging plans for a district energy network. It is important, however, that obligations facilitate rather than stifle delivery and in this respect we recommend that the Council carefully review aspects of the draft SPD. First, the SPD **should be revised** to recognise that any S106 contributions secured for carbon offsetting, as set out in section 11 of the draft SPD, should be capable of being used to contribute towards measures which deliver local district energy infrastructure. In setting carbon offsetting levies, the Mayor of London's Sustainable Design and Construction SPG stresses that, it is essential for boroughs to identify a suitable range of projects that can be funded through the carbon dioxide offset fund (paragraph 2.5.18). However, there is no evidence to indicate that the Council has identified such a range of projects in the draft SPD. Using S106 carbon offsetting contributions for local district heating infrastructure would, subject to avoiding CIL pooling restrictions, help to underpin the delivery of this infrastructure. It is noted that the Council's draft revised CIL charging schedule (April 2017) and the draft Regulation 123 list included	Revise the text in the draft SPD to confirm that offsetting contributions can be used for the purposes of district heating infrastructure. Paragraph 11.21 should also be **updated** to include '*decentralised energy systems and associated infrastructure*';	Disagree. The Council's revised Reg123 list includes the provision of a '*District Energy Network and associated infrastructure'* beyond a development site boundary as falling to CIL. It is not therefore possible to also use offsetting contributions towards the same infrastructure.

		district heating as a form of infrastructure which could be used for the purposes of CIL which could preclude S106 contributions to district heating.		
15	Section 11	Consistent with national policy, the Mayor of London's Sustainable Design and Construction SPG (paragraph 2.5.11) states that the price set should not put an unreasonable burden on development and should enable schemes to remain viable. Viability in Opportunity Areas and Housing Zones is by definition challenging and the Council has not demonstrated how the application of a flat offsetting charge across the borough will not undermine viability. Paragraph 11.10 of the draft SPD merely states that the cost has been agreed. Compounded by an absence of information about what receipts will be spent on, it is not evident how the proposed charge meets the CIL Obligation Tests to be 'directly related' in scale and kind to the development nor meets the viability requirements of the NPPF. In our view, the rate set must be justified, not just borough wide, but also in Opportunity Areas and Housing Zones. Further, the Council needs to explain why, for instance, a rate of £1,800 per tonne (as cited in the Mayor of London's Sustainable Design and Construction SPG) would not be appropriate.	Review and clarify the draft Regulation 123 list to ensure that there is not 'double-dipping' from CIL and S106 in respect of District Heating. Second, the scale of the carbon-offsetting contribution charge (at £2,700 per tonne) has not been justified and should be reviewed.	The inclusion of '*District Energy Network and associated infrastructure'* within the revised Reg123 list relates to the network beyond the site boundary while the SPD clearly sets out that the obligation on the development is to provide a site-wide DEN and to connect to an existing network or to design the development such that it can be easily connected to a future network if one is planned but does not currently exist.
15	Section 11	Third, the SPD should be **revised** to make it clear that infrastructure delivered directly for sustainable infrastructure as part of a planning consent, for example district heating pipe network, can be deducted from the amount payable for offsetting.	The SPD should be **revised** to make it clear that infrastructure delivered directly for sustainable infrastructure as part of a planning consent, for example district heating pipe network, can be deducted from the amount payable for offsetting.	Disagree. The target in the plan relates to the scheme as a whole, including the allowable solutions being implemented. However, if these solutions, including a DEN, are not sufficient to enable compliance with the policy, then the cost of these should not be deducted from any offset contribution due.
15	Section 11	Finally, this section should be reviewed for accuracy, relevance and grammar. Paragraph 11.8, for instance, appears to be generic text taken from another	**R**eview Section 11 for accuracy, relevance and grammar.	**Agreed. Amendments have been made**

		document (it refers to the 'relevant borough') and paragraph 11.11 starts with an 'And'.		
16	Section 11	We would welcome further dialogue with Haringey on the issue of off-site financial obligations in relation to carbon management.	We feel that the proposed obligation of an equivalent £90/year should be supported by an evidence base as it increases payments beyond those evidenced by the GLA which are £60/year. This could have significant effects on the viability of major development sites as recognised by the Mayor of London's Sustainable Design and Construction SPG (paragraph 2.5.11) which states that the price set should not put an unreasonable burden on development and should enable schemes to remain viable.	**Agreed. For consistency, the SPD will refer to the latest published rate by the Mayor for London.**
2	11.18	Paragraph 11.18 of the draft SPD sets out the formula for calculating the required carbon offset payment. The SPD indicates payment should be based on £2,700 per tonne of carbon dioxide to be off-set. This is a significant increase over the Mayor's Sustainable Design and Construction SPD, which states that using the Zero Carbon Hub price equates to £60 x 30 years i.e. £1,800 per tonne of carbon dioxide to be off-set.	No explanation is given for this significant departure, as such we consider that the SPD should be revised to ensure consistency with the Mayor's SPD.	**Agreed. For consistency, the SPD will refer to the latest published rate by the Mayor for London.**
3	11.19	Paragraph 11.19 currently states that offsetting payment for carbon dioxide will be collected under a Section 106 Agreement and will be collected at the point of commencement.	It is necessary that the triggers for offsetting payment are amended to require 50% at the time of commencement on site and 50% on completion. This is considered to be reasonable to allow payments to be staggered across stages of site development.	Disagree. The offsetting only applies where a development fails to be designed to achieve the required standard. This is distinctly not as a result of development viability. Therefore, there is no justification for a phased payment in respect of this obligation.
7	11.22 – 11.27 Monitoring DEN	This equipment monitoring requirement has been in place in LB Ealing since January 2013, and is to be included as a new policy in LB Hounslow. It is also quoted as an example of Best Practice in the GLA Sustainable Design & Construction SPG (Policy	There should be a specific monitoring obligation regarding the performance monitoring of renewable energy or Combined Heat & Power/District Heat supply on development schemes. This is	Agreed in part. Haringey requires the Energy Strategy for a proposal to set out the monitoring and reporting arrangements to be agreed. If

		2.5.36 – page 54). The monitoring requirement /policy is made financially viable through a minimal S106 fee (approximately £750 for a major development). The fee funds the provision of an Automated Energy Monitoring (web) Platform (external service), and part funds an energy officer (who evaluates the development's Energy Strategy). There have been no developer complaints about the monitoring requirement in Ealing since it was introduced in 2013.	necessary to be able to confirm compliance with Local Plan and GLA policies (particularly London Plan policy 5.2).	appropriate, this may include an obligation for post occupation monitoring and report. **It is appropriate to update the SPD to clarify this expectation.**
8	11.28-11.29	We welcome paragraphs 11.28 and 11.29 recognising the role planning obligations can have in mitigating for biodiversity impacts. Paragraph 11.30 references the London Plan and development assisting in achieving targets in biodiversity action plans. Councils are also a key partner in helping to deliver the objectives and action measures of the Thames River Basin Management Plan (relating to the Water Framework Directive and aim for all waterbodies to achieve good ecological status or potential by 2021/27).	We recommend the paragraphs on Biodiversity are revised to include reference to the role planning obligations can have in restoring rivers to an improved condition and thus helping to achieve the aims of the Thames River Basin Management Plan. This links with your policy DM28 "Protecting and enhancing watercourses and flood defences" and paragraph 4.101 of your Development Management Policies DPD. An example of this is deculverting the Moselle Brook where a development can make a contribution towards this either on-site or off-site (due to site-specific impacts). The Moselle Brook is currently failing to reach good ecological potential and deculverting and restoration of this watercourse can contribute to improving biodiversity both on-site and in terms of creating a green and blue infrastructure network. There are stretches of the Moselle Brook where the current condition of the culvert is poor. Where de-culverting has been demonstrated not to be feasible, contributions should be sought to improve the condition of the culvert to better protect	**Agreed. Para 11.29 is to be amended to include reference to the requirements within policy DM28 and para 11.30 amended to include the opportunity to secure river/watercourse restoration or improvements to its condition.**

			properties from the risk of flooding.	
15	11.33-11.34	AR are supportive of the Considerate Constructors Scheme but this should, in accordance with national guidance, be secured by planning conditions not obligations.	Paragraphs 11.33 and 11.34 should be **deleted**.	Noted. However, as set out in the SPD, the Considerate Constructors Scheme is best practice beyond the statutory requirements and therefore the Council can only encourage developers to register their scheme not require it. **The text has been amended to more appropriate reflect this**
15	12.3-12.6	Paragraph 12.3-12.6 should also be **revised**. The requirement for ultrafast broadband needs to be caveated to recognise that there will need to be exceptions where there are practical and financial difficulties of connecting to the wider network which are likely to be out of the control of the applicant.	Revise to recognise that there will need to be exceptions where there are practical and financial difficulties of connecting to the wider network which are likely to be out of the control of the applicant.	Disagree. Exceptional circumstances are unique and not therefore not appropriate for caveating. The Council would expect the developer to raise such difficulties with the Council to enable the to intervene to resolve the issue.
6	Omission - Schools	The ESFA strongly supports the use of planning obligations to secure developer contributions to education facilities where housing development generates the need for school places. The ESFA notes that significant growth in housing stock is expected in the borough. However, the draft SPD makes very little mention of education, other than the preference for promoting adult education use if loss of employment space occurs. Ensuring adequate developer contributions and a supply of sites for schools is essential to ensure that LB Haringey can swiftly and flexibly respond to existing and future need for school places to meet the needs of the borough over the plan period. It would therefore be helpful if the SPD text be amended to include reference to seeking contributions towards schools (see para 11 below) and key strategic policies to secure developer contributions for	National Planning Policy Framework (NPPF) advice notes that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities, and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. LB Haringey should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on	**Agreed. A new section will be added to the SPD on social and community infrastructure, to include education facilities**.

		schools are explicitly referenced or signposted within the document:	*'Planning for Schools Development'*[1] (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. The ESFA note that Haringey CIL (partial review of which was adopted Nov 2017) identifies Education as the infrastructure type with the largest funding gap (£73m) over the Local Plan period and as such, Education is appropriately identified on the Reg 123 list. LB Haringey seek to ensure appropriate rates are levied and the right infrastructure is secured across the borough, taking into account the type, amount and location of infrastructure required to support anticipated growth, as set out in the Council's Infrastructure Delivery Plan. The ESFA support the Council's approach to ensure developer contributions secured through CIL address the impacts arising from growth. **However, the ESFA request the Planning Obligations SPD be amended to confirm that s106 contributions towards delivery of schools will be sought, where relevant, through provision of land for schools and/or contributions towards capital costs of school delivery (in lieu of a CIL contribution for education, where appropriate).**	
18	Omission – Water Supply	**Omission of Section on Water Supply and Waste Water Infrastructure** It is important to consider the net increase in water	"**Wastewater/Sewerage and Water Supply Infrastructure** ***Developers will be required to***	It is also the Council's understanding that obligations cannot be required to be used to

[1] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf

	and Waste Water	and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. It is therefore important that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. It is Thames Water's understanding that Section 106 Agreements can not be required to be used to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. Water and sewerage undertakers also have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing and Local Plan policies or the use of conditions attached to planning permissions. Thames Water therefore consider that the following section should also be added to the SPD:	***demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered. "***	secure water and waste water infrastructure upgrades. However, we also note that Policy DM29 within the Development Management DPD addresses the need for development proposals to demonstrate that there is adequate surface water, foul drainage and sewerage treatment capacity to serve all existing and new development. The policy and its supporting text essentially covers off the suggested text, including the need for developers to engage with Thames Water, in studies if required, to determine if there are capacity issues, and where no improvements are programmed, the policy requires the applicant to contact the water or wastewater company to agree what improvements are required. Such improvements are appropriately delivered as a planning condition. As the wording sought for inclusion in the SPD is already included in the supporting text to Policy DM29, the Council does not consider it necessary to repeat this again in the SPD.
18		Thames Water are funded in 5 year periods called Asset Management Plans (AMPs). We are currently in AMP6 (6th since privatisation) which runs from 1st April 2015 to 31st March 2020. Details of Thames Water's 5 year plan for AMP6 can be viewed on their website at: http://ourplan.thameswater.co.uk/water-	It is crucial that any such additional infrastructure is provided in time to service development to avoid unacceptable impacts on the environment and this is the reason that Thames Water seeks adequate policy coverage and support for	Disagree. Policy DM29 within the Development Management DPP addresses the need for development proposals to demonstrate that there is adequate surface water, foul

		sewerage/ Thames Water's growth plans are based on planning information in the public domain and as such, Local Plans play an extremely important role in our growth assumption planning. As part of Thames Water's five year business plan they advise OFWAT on the funding required to accommodate growth at their treatment works. As a result Thames Water base their investment programmes on development plan allocations which form the clearest picture of the shape of the community as set out in the National Planning Policy Framework (paragraph 162) and the National Planning Practice Guidance. The time to deliver solutions should not be underestimated. For example, local network upgrades take around 18 months and Treatment Works upgrades can take 3-5 years. Thames Water are currently working on the draft Business Plan for the next Price Review in 2019 (PR19) which will cover AMP7 (1st April 2020 to 31st March 2025). It may be necessary for new or upgraded water and waste water infrastructure to be provided in respect of individual developments, depending on the type, scale and location of development. The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per dwelling. From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections will change. The economic regulator Ofwat has published new rules, which say our charges should reflect: □ fairness and affordability □ environmental protection	Water/Wastewater Infrastructure within Local Plans and related planning policy documents. The Council, through the development plan and consideration of planning applications, should seek to ensure that there is adequate water/wastewater infrastructure to serve all new developments. Developers should be required to demonstrate that there is adequate water supply, wastewater capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances this will make it necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and wastewater/sewerage infrastructure. Drainage on the site must maintain separation of foul and surface flows. With regard to surface water drainage, Thames Water request that the following paragraph should be included in the SPD ***:*** ***"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***	drainage and sewerage treatment capacity to serve all existing and new development. Para 4.107 of the supporting text to the policy clarifies that developers may be required to prepare a drainage strategy in liaison with Thames Water, that may include detailed modelling of the network capacity to determine if mitigation is required. The Council expects the drainage strategy to be submitted with the planning application and any mitigation measures delivered as part of the development scheme, conditioned if necessary. It should be noted that the Council publishes an Authority's Monitoring Report annually that includes details of the major development proposals granted planning permission. Thames Water are advised to refer to this for its investment programming. Policy 25 of the Development Management DPD sets out the requirements to manage surface water drainage. Where applicable, SuDs are to be delivered as an integrated part of the development design, and conditioned to ensure these can achieve the required runoff rates specified and are appropriately managed and maintained. The

		stability and predictability transparency and customer-focused service The changes will mean that more of the water company charges will be fixed and published, rather than provided on application, enabling the developer to estimate their costs without needing to contact the water company. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. Thames Water will publish their new charges on 1 February 2018. Please see Thames Water's website for further information: https://developers.thameswater.co.uk/New-connections-charging **SUDS** With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SUDS that limits as far as possible the volume of and rate at which surface		need for an obligation would only arise where the management and maintenance responsibilities were transfer to the Council. This would only be in exceptional circumstances and would necessitate the securing of an appropriate financial contribution.

		water enters the public sewer system. By doing this, SUDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SUDS not only help to mitigate flooding, they can also help to: □ improve water quality □ provide opportunities for water efficiency □ provide enhanced landscape and visual features □ support wildlife □ and provide amenity and recreational benefits. With regard to surface water drainage, Thames Water request that the following paragraph should be included in the SPD ***: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***		

Appendix B

LB Haringey

Planning Obligations Supplementary Planning Document

March 2018

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1. Introduction

1.1 The purpose of this document is to set out the Council's approach, policies and procedures in respect of the use of planning obligations. It has been prepared as a 'Supplementary Planning Document' ("SPD") to support policies SP17 and DM 48 of Haringey's Local Plan, and to clarify the relationship between the use of planning obligations and the application of Haringey' Community Infrastructure Levy ("CIL") adopted in July 2014.

The Aim of this SPD

1.2 The aim of this SPD is to provide guidance on what, how, and when planning obligations will operate in Haringey. Specifically, it will:

- Provide transparency and certainty in regard to the functioning of the planning application process and procedures for securing planning obligations;
- Set out the types of planning obligations that may be sought with various development proposals;
- Detail the relationship between planning obligations and CIL;
- Assist in the delivery of sustainable development in accordance with policies in Haringey's Local Plan, which includes the London Plan, Strategic Policies DPD (2017 as amended with Alterations), the Development Management DPD (2017); the Site Allocations DPD (2017); and the Tottenham Area Action Plan (2017).

1.3 The obligations listed in this SPD are those that might be expected given the types of development provided for by the Local Plan. However, it should be noted that other types obligations, not covered within this SPD, may be required to mitigate a specific development's impacts.

Status

1.4 This SPD is a material consideration in the determination of planning applications. The SPD will be subject to monitoring and review (see Section 14) and updated as necessary to ensure it remains consistent with relevant legislation and national and regional policy and guidance.

Replacement of Existing Guidance

~~1.4~~1.5 This document when adopted will replace the existing Planning Obligations SPD (2014).

2. Background

Mitigating the impact of new development

2.1 In Haringey a minimum of 19,802 new homes are planned to be built and 12,000 new jobs created by 2026. This growth will result in increased pressure on local infrastructure, services and facilities, creating demands for new provision. The Council and developers have a responsibility, through the planning process to manage the impact of this growth and ensure that any harm caused by development is mitigated and that the necessary infrastructure is provided.

2.2 The infrastructure required to support Haringey's planned growth has been identified in the Council's Infrastructure Delivery Plan ("IDP"). The Council expects new development to contribute to site related and wider infrastructure needs through a combination of the following mechanisms:

- Planning conditions (site/development related);
- Planning obligations to secure developer contributions or works in kind e.g. s106 agreements (site/development related);
- CIL (strategic local and borough-wide infrastructure).

What are Planning Conditions?

2.3 Planning conditions are requirements made by the local planning authority ("LPA"), in the granting of planning permission, to ensure that certain actions or elements related to the development proposal are carried out. Planning conditions are likely to cover, amongst other things, the submission of reserve matters; controls over the materials to be used; controls over the occupation of new buildings or further stages of development until certain other actions are completed; the requirement to undertake further investigations as work proceeds (e.g. archaeological recording); construction in accordance with the submitted method statement; and the requirement to implement works in accordance with the submitted plans such as landscaping, tree planting, drainage works etc.; and requirements for the certification of works following completion.

2.4 Where there is a choice between imposing planning conditions and entering into a planning obligation to manage the impacts of a new development, the use of planning conditions is always preferable.

What are Planning Obligations?

2.5 Where a development proposal does not meet the standards required of local planning policy, it may be possible to make acceptable development proposals which might otherwise be unacceptable through the use of planning obligations.

2.6 Planning obligations are used to secure measures which are essential for the development to proceed and measures which are required to mitigate the impact of the development. Planning obligations do this through: Prescribing the nature of a development (e.g. by requiring a proportion of affordable housing); Securing a contribution from a developer to compensate or re-provide for loss or damage created by a development (e.g. through the transfer of land, the requiring of a cash

payment to be made, or new habitats to be created etc); and mitigating a development's impact on the locality (e.g. through the securing of environmental improvements and the provision of both on and off-site infrastructure and facilities to serve the development such as new roads or junction improvements which, without the proposed development taking place, would not necessarily be required).

2.7 The outcome of the use of planning obligations should be that the proposed development is brought into compliance with the Local Plan policies and that any development specific works are undertaken satisfactorily. Used properly, planning obligations can significantly increase the quality of development.

2.8 While planning obligations can secure benefits capable of mitigating the adverse impacts of a development, they cannot however, be used to make a bad application good where, for example, a scheme does not comply with the spatial strategy and land use principals of the Local Plan.

3. Legislative Context

National

3.1 Planning obligations can be made pursuant to several different legislative provisions, including section 106 of the Town & Country Planning Act 1990 (as amended) ("the Act"), section 16 of the Greater London Council (General Powers) Act 1974, and section 1 of the Localism Act 2011 (as amended), amongst others. The term 'S106 Agreement' refers to a planning obligation only made pursuant to the Act.

3.2 Planning obligations:

- May be either positive, i.e. requiring a person to carry out a specified action, or negative, i.e. restricting a person from developing or using the land in a specified way;
- May be entered into either by agreement with the LPA or by an undertaking by the developer to which the LPA is not a party (e.g. unilateral undertaking), although the latter will not normally be appropriate or accepted by the Council other than for simple one off financial obligations;
- Must be entered into by means of a deed;
- Must be registered as a local land charge (for the purposes of the Local Land Charges Act 1975);
- Run with the land and may be enforced against the person entering into it and against any successors in title; and
- Can be enforced by means of injunction.

3.3 Further detail on these aspects of planning obligations is provided in Section 5 of the SPD.

3.4 Further statutory provisions are set out in Regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010 (as amended) ("the CIL Regulations") for S106 Agreements.

3.5 The CIL Regulations place into law for the first time, the Government's policy tests on the use of S106 Agreements. As of 6 April 2010 it became unlawful for a S106 Agreement be taken into account when determining a planning application for a development, if the obligation does not meet any of the following tests:

a. necessary to make the development acceptable in planning terms;
b. directly related to the development; and
c. fairly and reasonably related in scale and kind to the development.

3.6 The CIL Regulations seek to clearly delineate the different roles that both CIL and S106 Agreements have, when used in tandem, to secure the delivery of social and physical improvements and infrastructure required of and to support new development.

4. Policy Context

National Planning Policy Framework (NPPF)

4.1 At the national level the National Planning Policy Framework (2012) (NPPF) sets out the Government's economic, environmental and social planning policies for England. Paragraphs 203 to 206 of the NPPF, deal with the use of planning conditions and S106 Agreements. These reiterate the tests for use of S106 Agreements set out in the CIL Regulations; uphold the long standing principal that planning conditions are preferable to planning obligations; and requires LPAs to ensure policies on planning obligations take account of changes in market conditions over time and, wherever appropriate, are sufficiently flexible to prevent planned development being stalled.

4.2 The NPPF also advises that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-making. Accordingly, sites and the scale of development identified in local plans should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, infrastructure contributions and other standards or requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing developer to enable the development to be deliverable.

4.3 The Government has also published more detailed Planning Practice Guidance ("PPG"). On S106 Agreements, this echoes the NPPF regarding their purpose and use. It states that where the CIL is in place for an area, the charging authority should work with developers to ensure they are clear about their infrastructure needs and what developers will be expected to pay for through which route – there should not be actual or perceived "double dipping". It emphasises the importance of ensuring that policy for seeking obligations should be grounded in an understanding of development viability and that on individual schemes applicants should submit evidence on scheme viability where obligations are under consideration.

4.4 The NPPG also provides guidance on the CIL, how it is set, collected and used. It also explains the relationship between CIL, S106 Agreements and highway agreements.

S106 Agreements and CIL

4.5 In terms of developer contributions, the CIL has not replaced S106 Agreements. The introduction of CIL resulted in introducing statutory tests for S106 Agreements. S106 Agreements, in terms of developer contributions, should be focused on addressing the specific mitigation required by a new development. CIL has been developed to address the broader impacts of development. There should be no circumstances where a developer is paying CIL and S106 Agreement for the same infrastructure in relation to the same development.

4.6 The balance between the use of S106 Agreements and CIL will be different depending on the nature of the area and the type of development being undertaken.

There is further guidance on the balance between s106 and CIL set out in the CIL section of the PPG ("CIL Guidance").

London Plan (2016 as amended with Alterations)

4.7 The London Plan outlines the Mayor's approach to dealing with issues of strategic importance across London. Policy 8.2 specifically deals with planning obligations, and sets out that the Mayor of London will provide guidance on the preparation of frameworks for negotiating obligations in DPDs and the wish that there is a voluntary system of pooling contributions for the provision of facilities related to proposed developments. The policy also sets out that development proposals should address strategic as well as local priorities in planning obligations and that the areas of highest importance are Affordable Housing, funding of Crossrail and other public transport improvements. Climate change, learning and skills, health facilities, childcare provisions and the provision of small shops are also raised as high-importance areas to be addressed in planning obligations.

Local Plan 2017

4.8 Haringey's Local Plan: Strategic Policies DPD was adopted in March 2013, with Alterations adopted in July 2017. This document sets out policies guiding development to fulfil the strategic vision for the borough. There are 17 overarching policies covering many areas, the ones for which planning obligations will be relevant and applicable include:

- SP1 Managing growth
- SP2 Housing
- SP7 Transport
- SP8 Employment
- SP9 Improving skills and training
- SP10 Town centres
- SP13 Open space and biodiversity
- SP14 Health and well-being
- SP15 Culture and leisure
- SP16 Community facilities

4.9 Policy SP17 sets out how the Council will deliver and monitor the Local Plan. This policy introduces the Haringey Infrastructure Delivery Plan (IDP), which is an iterative document that identifies the levels of infrastructure (including education, health, transport, leisure, community facilities and others) required to meet the needs of Haringey's expanding and changing population. It also identifies where the delivery could be met, including through the securing of planning obligations. This document will be updated as necessary to take into account evolving plan making developments, and trends in infrastructure provision.

4.10 The Site Allocations DPD (2017) provides an indication of site specific infrastructure that will need to be provided on and around a site through development proposals.

4.11 To support the implementation of the Local Plan, the Council's Development Management DPD establishes the Council's policy in relation to planning obligations at Policy DM48.

Tottenham Charter

4.12 Haringey Council encourages all developers in Tottenham to sign up to the Tottenham Charter. The aim of the Tottenham Charter is to bring together key delivery partners and secure beneficial pledges. These pledges are in addition to any obligations due, and will support our aim to provide local residents with skills and experiences that will enable them to make the most of their own opportunity and ambition. These will seek to:

- Inspire local young people through offering more world of work experiences, paid internships, apprenticeships and employment opportunities.
- Support local people and businesses by offering access to employment and training opportunities and creating opportunities for local business.
- Build the capacity of local community and voluntary sector groups by offering pro bono support, free use of events spaces and generating volunteering opportunities.

4.13 Tottenham Charter will help us ensure the regeneration and development of Tottenham is about so much more than bricks and mortar; that it is built around the best interests of our residents and our diverse communities.

4.14 The Council will also expect developers to sign up to a borough-wide charter should one develop in the future.

5. ~~LBH's~~ The Council's Approach to Planning Obligations

5.1 This section of the SPD sets out the process for negotiating, preparing and completing planning obligations in association with the handling of planning applications in an efficient and timely manner.

5.2 It details the actions required to be undertaken by the applicant and the Council at the pre-application and application stages of the planning application process. The main objectives are to ensure that, as far as possible:

- All appropriate information is provided by the applicant and is available from the date of submission of the application (this information should enable the Council and consultees to respond properly to applications); and
- Where approval is recommended, the detailed proposed 'Heads of Terms' have been agreed, prior to the application being considered by the Planning Sub-Committee or the Assistant Director/Head of Development Management for delegated decisions; such that
- The time taken to complete and issue the agreement (assuming approval is granted) is kept to a minimum.

5.3 The main stages of the procedure are:

- Stage 1: Pre-application;
- Stage 2: Submission of the planning application (including accompanying proposed Heads of Terms or draft planning obligations); and
- Stage 3: Appraisal, validation and agreement of a related planning obligations.

Pre-application Stage

What types of Obligations might be sought?

5.4 In accordance with the Act, the Council will consider each application on its merits against relevant policy and other material considerations, and will negotiate and secure planning obligations on a site-by-site and application-by-application basis.

5.5 While the Council expects most impacts of development to be mitigated through good design and layout (in accordance with Policy DM1), some development specific impacts are likely to require physical works or other forms of improvement to mitigate them.

5.6 The possible obligations, set out in this document, are not exhaustive. The SPD focuses on the policy requirements of the Local Plan, and the types of obligations likely to arise as a result of applying these. However, the nature of site specific impacts means they may vary widely depending on the site, its local context, and the nature of the development proposed. It is therefore not possible to list every type of development that might be subject to a planning obligation or to ascribe a set of circumstances under which certain types of obligations will be sought as a norm.

5.7 The Council may therefore wish to negotiate other obligations, not included in this SPD, where they are relevant and necessary to a particular development.

5.8 Nevertheless, the purpose in setting out possible obligations is to assist applicants in preparing their planning applications, and to facilitate pre-application discussions around policy requirements, including affordable housing, development impacts, and appropriate mitigation. It is hoped that this ensures negotiations on obligations are conducted in a way that is seen to be fair, open and reasonable.

5.9 Where development sites are subdivided or developed in phases to ensure that the separate planning applications fall below any specified policy threshold for which obligations may be sought, the Council will, as far as possible, consider sites in their totality. Similarly, proposals which are judged not to make the best use of land, so as to result in underdevelopment, will be resisted and a revised scheme will be sought.

5.10 This SPD does not only cover financial contributions but also benefits in kind negotiated as part of planning applications. In many cases provision in kind is preferable and suitable, especially where this secures timely delivery.

Pre-Application Discussions

5.11 In preparing the planning application, the applicant should fully consider the impacts of the proposed development and any planning conditions or obligations that might be required to mitigate those impacts. To assist this process, applicants should have regard to the relevant policies of the development plan and any other material considerations, including supplementary guidance as appropriate.

5.12 Applicants, agents and developers are encouraged to seek pre-application advice prior to the formal submission of major development proposals [1] within the Borough. The pre-application process offers the opportunity for the applicant and Council officers to discuss, without prejudice, the acceptability of the proposed scheme.

5.13 While the Council considers that most impacts are capable of mitigation through the consideration of massing, design and layout, or through appropriate conditions, some impacts will require obligations to mitigate them. In this respect, the Pre-application process enables discussion as to the types of obligations to be entered into, and whether these can or should be provided 'in-kind' either on or off site, or whether a financial contribution towards provision is appropriate.

5.14 Applicants should use this SPD alongside an analysis of their proposed works to consider the impacts of the proposed scheme and any planning obligations likely to be required to mitigate the impacts of development. Following initial discussions to agree the land use principles applicable to the proposal site, ~~T~~these details should be submitted as a draft 'Heads of Terms' document as part of the pre-application

[1] Major development is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) as development of 10 residential units or more (or if not known how many dwellinghouses on a site with an area of 0.5ha or more) or consisting of floorspace of 1000sqm or more or on a site with an area of 1ha or greater

submission documentation, to allow officers sufficient time to consider whether the obligations indicated are appropriate.

5.15 During the course of pre-application discussions, where negotiations fail to result in agreement on the draft 'Heads of Terms', the applicant is invited to provide alternative proposals and related justification which will be taken into consideration during the assessment of any future application.

5.16 Where the planning application meets the criteria for referral to the Mayor of London or affects a TfL managed asset, the applicant should also engage with the Greater London Authority[2] and/or Transport for London[3] ("TfL") in pre-application discussions.

Application Stage

Submission of the Planning Application

5.17 Where it is identified that a planning obligation will be required, the Council's validation checklist requires the applicant to submit, with their planning application, a draft 'Heads of Terms' should be submitted.

5.18 In respect of each obligation, the draft proposed 'Head of Terms' should quantify the nature and scale of the obligation, taking account of the requirements of the local plan policy and this SPD, and specify how provision is to be made. In respect of major development, it may be appropriate to submit this information as a separate Planning Obligations Statement alongside the draft 'Heads of Terms'.

5.19 In accordance with national planning policy, there is a presumption that infrastructure to be provided through planning obligations should be provided 'in-kind' and 'on-site'. Where an obligation is to be provided other than 'in-kind' and on site, the draft proposed 'Heads of Terms' should explain the reason why this is, and should specify whether provision is to be made on an alternative site or by means of a payment in-lieu. Where an obligation is to be provided off-site or by means of a payment in-lieu, the applicant should identify the level of contribution applicable to their proposed development.

5.20 If the applicant considers that, in respect of a particular obligation, no provision should be made, the applicant will need to provide sufficient information with their planning application to support their position.

5.21 Major applications that are submitted without a draft 'Heads of Terms' / Planning Obligations Statement will not be validated until this information is provided.

Title Information

[2] https://www.london.gov.uk/priorities/planning/strategic-planning-applications/preplanning-application-meeting-service
[3] https://www.tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-advice

5.22 Obligations are legally enforceable against the owner(s) (including their successors in title) of the land to which they relate. Only those persons having a legal interest in the land can enter into obligations even if a prospective purchaser/developer of the land has applied for the planning permission (although it is possible for prospective purchasers to also be party to the obligations where they have exchanged contracts to purchase).

5.23 Because planning obligations run with the land, all owners, lessees and mortgagees must be signatories. Therefore, in addition to the draft planning obligations agreement or 'Heads of Terms', applicants should submit with their planning application all necessary title and deed information as appropriate. Once the planning obligation has been completed, the owner/developer will have to register the obligations as a charge on the land at the Land Registry Local Land Charges Register.

5.24 Applicants' solicitors are expected to provide relevant title information to the Council and the Council should be notified and informed of any changes in land ownership throughout the application process. Prior to completion, confirmation that there have been no changes in title will be required.

~~5.23~~5.25 Applicants shall warrant within the planning obligation that apart from the parties thereto no other persons have any interest in the development site.

Matters to be Taken into Account in the Drafting Planning Obligations

Legal Costs

~~5.24~~5.26 The legal costs of drafting an agreement are an impact of a development, one which the Council would not have to bear if the development were not to take place.

~~5.25~~5.27 Therefore, the applicant will be asked to cover the Council's legal costs associated with the preparation of the planning obligation. The Developer's legal adviser will be expected to provide the Council's Legal Services with a solicitor's undertaking (in the Council's standard format) to pay the Council's reasonable legal fees before Legal Services commences any work related to the matter. In the limited circumstances where a Developer is not legally represented, and as such cannot provide a solicitor's undertaking, the Developer will be expected to make a payment on account of costs prior to any work being undertaken by Legal Services. If paying on account, in the event that the actual fees incurred amount to less than the sum paid on account, the difference will be repaid.

~~5.26~~5.28 The Council's Legal Service will be able to advise applicants on the legal fees (typically between £3,000 and £5,000 depending on the complexity of the obligation), but with more complex obligations the costs may be higher. Also, protracted negotiation by the developer's lawyer will also result in higher legal costs. The Council's legal fees are payable whether or not the matter proceeds to

completion e.g. in the event that the planning obligation is drafted but not completed for whatever reason.

Process for Drafting Planning Obligations

~~5.27~~5.29 The Council will ~~always~~ usually prepare the first draft of the planning obligation, based on the Council's standard template, and officers will approve this before being sent to the developer to agree. Any departure from this approach will need to be agreed with the Head of Development Management or the AD of Planning. Changes to the Council's standard template will only be allowed in exceptional circumstances, which the developer will have to justify. The Council's legal team will draft the planning obligation once the applicant (or their lawyer) has supplied all the title information and costs undertaking and officers have confirmed the proposed 'Heads of Terms'.

~~5.28~~5.30 Any party to the planning obligation based overseas will have to provide a legal opinion from independent lawyers in that jurisdiction that they will be bound by the planning obligation before the obligation is completed by the Council.

Financial Contributions

~~5.29~~5.31 Financial contributions will be payable at specific stages in the development process (see Trigger Points below).

~~5.30~~5.32 A payment form as standard will be appended to the agreement and any payments should be made using this form, following the instructions provided. The payment can be made through BACS/CHAPS, cheque or postal order. Once received, the payment will be logged onto the Council's systems.

Maintenance Payments

~~5.31~~5.33 Where obligations are secured towards the provision of facilities, it may be appropriate for the applicant to make provision for the physical upkeep of those facilities. A one off financial contribution may be required to cover ongoing maintenance requirements, although generally where an asset is intended for wider use, the maintenance costs and other recurrent expenditure associated with the developer's contributions should be borne by the authority in which the asset is invested.

~~5.32~~5.34 For all maintenance payments, the LPA and the developer will need to negotiate the type of payments to be made, including staged payments for phased development, if appropriate.

Index Linking

~~5.33~~5.35 All financial contributions, including maintenance sums, will be indexed to the retail price index so as to allow for the effects of increased costs to implement the necessary actions required by the agreement. Contributions will be indexed linked from the date of the ~~Committee resolution~~Decision Notice until the time of payment. Indexation provisions will require that the financial contribution due shall not fall below the figure set out in the planning obligation as a result of indexation.

Transfer of Land

~~5.34~~5.36 Occasionally obligations will require land to be transferred to the Council or another public body, usually in respect of public realm or open space obligations. In such cases the planning obligation will contain a requirement to pay the Council's or public body's legal costs in respect of the land transfer and provisions relating to the condition of the land to be transferred.

Trigger Points

~~5.35~~5.37 During the process of drafting planning obligations, trigger points for each obligation will be agreed upon between the applicant and the Council. There are established trigger points which are suitable for planning obligations and triggers selected in each case will be based on the nature of the obligation and the stage at which the mitigation is required. The established trigger points are:

- Upon the date the planning obligation is ~~agreed~~completed;
- Upon or prior to commencement of the development or phase therein;
- Upon or prior to practical completion of the development or phase therein (as confirmed by the Council); and
- Upon or prior to occupation of the development or phase therein.

~~5.36~~5.38 To ensure consistency, the Council will encourage the use of these four identified triggers in negotiations, with the commencement of the development being the preferred point for an obligation to be delivered upon. The Council does however note the cash flow implications and these will be considered. There may be cases where a different trigger point is required on an obligation to those listed above. Any ~~alternative~~ trigger date should be easily identifiable and enforceable e.g. occupation of the development, and any payment obligation will have a corresponding restriction on the development to prevent commencement (or whatever other trigger is agreed) until the payment has been received in full by the Council

~~5.37~~5.39 Particularly with regard the monitoring of obligations, there may also be a need to have annually linked trigger points to any of the four above, for example monitoring of travel plans, or biodiversity facilities.

Monitoring and Administration Costs

~~5.38~~5.40 The Council's costs incurred in monitoring and administering planning obligations are an impact of a development, one which the Council would not have to bear if the development were not to take place. Monitoring of obligations will be undertaken by the Council to ensure all obligations entered into are complied with on the part of both the developer and the Council.

~~5.39~~5.41 Developers entering into planning obligations will be required to pay a monitoring contribution in order to contribute towards the Council's costs incurred in the administration, monitoring, and reporting of the discharge of the obligation. Work involved includes maintaining the database, logging individual obligations, checking triggers, ensuring indexed amounts are correct, arranging receipt of

contributions, alerting service areas of receipts so that the required actions can be programmed, checking the completion of actions, making sure that records are kept of discharge of clauses, removing discharged obligations from the Local Land Charges Register, etc.

~~5.40~~5.42 The monitoring contribution will typically be based on five percent (5%) of the cost value of the planning obligations included in the agreement, up to a maximum of £50,000. The contribution will be a flat rate of £500 per each non-financial obligation. The monitoring contribution will normally be payable upon completion of the agreement or later in exceptional cases ~~at a clearly defined stage when monitoring will first be required~~.

Enforcement and Late Payments

~~5.41~~5.43 The landowner/developer is bound within each planning obligation to notify the Council upon commencement of the development (and such other triggers that are linked to performance of obligations e.g. occupation). Where the Council is not notified of these and obligations become overdue the Council will seek to enforce the obligation and, in the case of financial obligations, there will be a late payment clause. In the event of any delay in making any payment required under a planning obligation, interest shall be charged on the amount payable at the rate of four per cent (4%) per annum above Barclays Bank Plc base lending rate from time to time in force, from the date that the relevant payment falls due (as determined by the Council) to the date of actual payment.

~~5.42~~5.44 The Council will enforce obligations through the relevant legal channels once other reasonable approaches to address non-compliance with obligations have been taken. In such cases, the Council will seek to retrieve its legal costs in taking action from the party that is in breach of its obligations as well as any additional indexation or interest on the sum that is due.

Appraisal, Validation and Agreement of a Related Planning Obligation

Statutory Consultation

~~5.43~~5.45 Consultation will be undertaken by the Council as soon as possible after applications have been validated and registered. As necessary, other relevant departments of Council will also be consulted on both the detail of the planning application and the proposed planning obligations offered or to be sought in the draft 'Heads of Terms'.

~~5.44~~5.46 For applications of potential strategic importance, these will be referred to the Mayor as soon as practicable after receiving the planning application for Stage 1 comments.

Assessment

~~5.45~~5.47 In assessing the merits of the planning application and associated material, account will be had to requirements of the SPD as they relate to the proposed

development, any formal comments made in respect of the application, and to the detail provided in the draft 'Heads of Terms'.

~~5.46~~5.48 All of these matters will form part of the assessment of the application and the planning obligations to be sought. It is the responsibility of the Council's Head of Development Management and his/her officers to consider whether it is appropriate, in policy and legal terms, to seek or accept planning obligations in respect of an individual application. Where appropriate, the Case Officer will obtain, from Legal Services, legal advice as to the scope of permissible planning obligations and the content and form of the proposed agreement.

Viability Considerations

~~5.47~~5.49 Planning obligations, like CIL, are a necessary cost of development and it will be expected that the likely cost of obligations, including requirements for affordable housing provision, will be factored into the development cost from an early stage.

~~5.48~~5.50 Furthermore, the policies of the Local Plan and Haringey's CIL have been subject to assessments of viability to ensure that what is sought is viable in the local borough context. Therefore, if an applicant considered that the viability of a scheme is jeopardised due to exceptional site constraints or other factors, the onus will be on the applicant to provide robust information order to determine such applications, the applicant is required to submit an open book viability assessment to the Council for its consideration.

~~5.49~~5.51 The development appraisal should be completed in accordance with the guidelines set out in the Mayor of London's Affordable Housing and Viability SPG (2017) ("Mayors SPG") and should use a recognised appraisal model, such as the GLA's Affordable Housing Development Control Toolkit. The requirements for open book appraisals are provided below. It is important that the information provided for use in the development appraisal is accurate and assumptions will need to be clearly shown in any model used, so the Council can understand how the assumptions are made. For complex development proposals, the Council would recommend that applicants first agree the form and methodology of the appraisal with the Council's officers.

~~5.50~~5.52 As set out in the Mayor's SPG, if a development provides 35% affordable housing, without grant, and with a policy compliant split, then a full viability assessment will not be required. However, a short form viability statement will need to be provided in order to provide a benchmark for any subsequent changes to the scheme and in order for an assessment of deliverability to be made.

Requirements for Open Book Appraisals

- Identify and justify (with comparable evidence where appropriate) all development value and cost variables specify any 'exceptional' cost items with supporting evidence in writing from a reputable cost consultant;

- Adhere to the standard conventions in terms of appraisal calculations not least regarding developer's profit;
- Specify all assumptions made concerning the provision of affordable housing and planning obligations;
- Appraisals should generally be based on Existing Use Value plus. Appraisals based on Market Value will only be accepted in extremely limited circumstances;
- Provide Red Book, or other appropriate valuations (bank draft) to support Existing Use Values, where they are affected;
- Identify in cash flow terms the effect of deferred contributions;
- Demonstrate that the development proposal in financial terms is the only feasible option when compared to other possibilities including any role played by public sectors providers of 'gap' funding; and
- Satisfy where necessary any Independent Assessor's evaluation.

5.515.53 In cases where a dispute relates to the viability of a proposal, and in any case, where the Council considers it appropriate, an independent financial assessor may be required. The assessor will be appointed by the Council and the reasonable costs of the assessment will be met by the applicant. The independent financial assessor's report will be provided to the Council and the applicant.

~~5.52 Issues regarding viability must be resolved, to the satisfaction of the Council, before any meaningful negotiations between the applicant and Council can commence.~~

5.535.54 Where the Council is satisfied that the proposed development cannot, for financial viability reasons, fully provide the obligations due, it will be for the Council to determine the balance of obligations. In this respect, priority will be given to those obligations necessary to manage the most significant impacts of the proposed development and to the priorities provided in policy or as determined by the Council, taking account of the specifics of the site.

Transparency

5.545.55 In line with the requirements of the Council's Validation Requirements list and the Mayor's SPG applicants are required to submit a redacted viability assessment with their application and the default position is that the full viability assessment, together with the independent assessment, will be published when affordable housing negotiations have concluded. Any requests to redact certain elements will be considered on a case-by-case basis and would need to be robustly justified.

Reviews

5.555.56 On applications for major developments upon which a negotiation has taken place, the Council will require a review mechanism ~~to be attached to the grant of planning permission~~ to be included in the obligation, and this will be in line with the Mayor's SPG. This will be:

- For schemes with a 35% policy compliant mix affordable offer with no grant submitted without detailed viability submissions a review will be secured prior to substantial implementation (as defined in the planning obligation) should this not take place within 18 months;
- For schemes with less than 35% affordable housing a review will be secured prior to substantial implementation should this not take place within 18 months;
- For schemes with less than 35% affordable housing, the Council will require a~~A~~ review at 75% disposals which will allow the review to be based on values achieved and costs incurred;
- For phased schemes, the timing of any initial required review is to be agreed between the Council and the applicant but typically will~~mechanisms may~~ be required prior to ~~on~~ the submission of the first reserved matters application for each phase of an outline permission; ~~and~~ and/or prior to commencement of a further phase of the development (i.e. such that units or land could be set aside in the latter phase(s) to enable ~~discounted~~ obligations to be met on-site, such as the provision of additional affordable housing);

~~5.56~~5.57 The obligation will likely contain a covenant preventing substantial commencement and/or further disposals (as appropriate) until the review of the scheme's viability has been approved by the Council.

Terms of viability review mechanisms (in line with the Mayor's SPG):

~~5.57~~5.58 Whenever review mechanisms are used in an obligation, these should:

- Identify the point(s) at which the reappraisal review should be carried out;
- Establish a threshold level(s) of viability at which additional planning obligations will be required based on the target profit agreed by the LPA, at the application stage. The review mechanisms should determine whether a 'surplus' is generated over and above the returns necessary for a scheme to be deemed viable;
- Establish what the review will assess – the Council will assess changes to gross development values and build costs;
- Be based on the most robust and up-to-date information available - this will generally be the price paid or rental value for the completed unit. However, this will depend on the timing and the specifics of the review(s);
- Set a 'cap' on the additional provision that will be sought which should be a minimum 40 per cent affordable housing or 50% on publically owned land;
- Determine whether any surplus profit should be split between the developer and borough once the threshold level of viability has been reached to ensure that a developer remains incentivised to maximise value from a scheme. This will not typically be appropriate for Early Stage Reviews at which point the majority of sales and lettings will not have taken place. For Late Stage Reviews this should be split 60/40 between the Council and developer with 60 per cent of surplus profit used for additional affordable housing;
- Set out the expectation for additional homes on- or off-site, or for receiving a financial contribution. The Local Plan prioritises on-site affordable housing. For

Early Stage Reviews, additional affordable housing should be provided on-site where a sufficient surplus profit is identified through the review (with the Planning Obligations ~~Section 106 agreement~~ identifying the units which would change to affordable units in the event of an increase in viability). However, for Late Stage Reviews on residential build for sale schemes, account should be taken of the potential practical implications of delivering an increased amount of affordable housing on-site in which case an off-site or commuted sum contribution would be acceptable. Although additional affordable housing must be the priority, the review mechanism may also be used to improve the affordability of secured affordable homes or contribute to other policy requirements which may not have been viable according to the initial assessment~~:~~

- The above should be based on the formulas in the Mayor's SPD.

Negotiation and Reporting

~~5.58~~5.59 Initially, the Council will write to the applicant to advise whether the draft planning obligations or proposed 'Heads of Terms', provided at the time the planning application was submitted, are acceptable.

~~5.59~~5.60 If, at any stage, it becomes clear that the Council cannot recommend approval of a planning application, the discussions on the planning obligation will be suspended.

~~5.60~~ For minor planning applications, where the Council considers the draft planning obligations to be acceptable, the Council may request the applicant to sign and return the agreement prior to the planning application being determined by delegated decision~~.~~

5.61 For major planning applications, where the Council considers the draft planning obligations or proposed 'Heads of Terms' to be acceptable, the Council will agree with the applicant that this be reported, along with the planning application and any other material considerations, to the Planning Sub-Committee for determination.

~~In those circumstances where the Council is not satisfied with the proposed obligations or the form of the draft agreement or proposed 'Heads of Terms', it will advise the applicant of this, will set out what the Council considers would be acceptable obligations to be sought, and will provide an indicative timeframe for continued negotiations.~~

~~5.62 If, in the unlikely circumstance, the Council and applicant cannot reach an amicable agreement, an independent expert, may be consulted to assist in mediation.~~

~~5.63~~5.62 The Council, in the majority of cases, will not present applications for approval unless the applicant agrees in principle to the draft obligations or to the detailed proposed 'Heads of Terms' to be reflected in a planning obligation. Should the planning obligations or 'Heads of Terms' not be completed or agreed in principle within the timescale for reporting the planning application, the Council officers will

take the application to Committee with a recommendation that the application be refused.

~~5.64~~5.63 For applications of potential strategic importance (i.e. referable to the Mayor), unless the Mayor has notified the Council that he does not wish further involvement in the determination of the application, prior to the Council determining the application it will send all relevant material to the Mayor for his consideration, including any draft planning obligations. In such circumstances the Mayor will advise the Council whether he:

- Is content for the authority to determine the application; or
- Will direct the authority to refuse the application; or
- Will determine the application.

~~5.65~~5.64 The Council will advise the applicant of the outcome of the Mayor's decision. Where the Mayor decides to act as the local planning authority for determining the application, the applicant will need to deal directly with the Mayor in subsequent negotiations of the planning obligations to be sought.

Post Application Determination Process

~~5.66~~5.65 When the Council resolves to grant planning permission~~a planning application is approved~~, either by way of delegated powers or Committee decision, this ~~approval~~ resolution will be subject to the completion of the planning obligations. The planning obligations will usually need to be formally completed and sealed within an appropriate timescale (3 months as standard) prior to the decision notice being issued and the obligations being placed on the local land charges register.

~~5.67~~5.66 If the planning obligations are not formally completed ~~and sealed~~ by the end of the 3 months, and the Council and applicant have not agreed an extension to this period, the application will automatically default to a refusal (this trigger being included in the recommendations of the Planning Sub-Committee report or the planning officer report if made under delegated authority).

Appeals and Call-in

~~5.68~~5.67 Planning applications may be appealed, or the Mayor or Secretary of State may call-in an application for their determination. In such cases, the Council will be unable to finally determine the details of the planning obligation but can continue negotiations with the developer to establish and set out the nature of the planning obligations which would be sought, should the application be granted.

Complying with In-Kind Contributions and Non-Financial Obligations – the Developer

~~5.69~~5.68 Where an in-kind obligation is required (such as the provision of district energy network hub for example) through a planning obligation, including non-financial obligations, the developer should provide evidence of compliance with the

obligation to the Council, as outlined in the terms of the specific clauses. This evidence should be provided to the Council's Planning Obligations Officer. If approval is required from the Council on an element of the in-kind obligation, the Planning Obligations Officer should be the first point of contact - contact details are provided on the Council's website ~~at xxx~~.

Complying with Financial Contributions and Non-Financial Obligations – the Council

~~5.70~~5.69 The triggering of non-financial contributions will be monitored by the Planning Obligations Officer who will liaise with the appropriate service areas responsible for project delivery. For example, where there is an Affordable Housing element to a legal agreement, the Planning Obligations Officer will liaise with the Affordable Housing Team to ensure the affordable housing terms of the planning obligation are being complied with, including the tenure mix and unit sizes, transfer to a Registered Social Landlord, nominations, and the phasing of completions.

~~5.71~~5.70 Once a financial contribution is received by the Planning Obligations Officer, they will contact the service provider or organisation with the responsibility for delivery of the project to inform them. The responsible service provider will then be expected to include the specific project within their forthcoming works programme to enable timely delivery. They will also need to put a project BID into the Planning Obligations Officer for review and approval by the Assistant Director of Planning to confirm the project complies with the terms of the obligation.

~~5.72~~5.71 Upon completion of the project, the service area will provide evidence of the completed works and will request the releasing of the agreed funds. The Planning Obligations Officer will confirm the discharge of the obligation and will arrange for the monies to be transferred and the obligation to be removed from the Local Land Changes Register.

6 Affordable Housing

6.1 The cost of housing in and around the borough is increasing and there is a severe shortfall in the availability of affordable housing.

6.2 Haringey's Strategic Housing Market Assessment (SHMA) (2014) shows that demand for affordable housing far outstrips capacity and supply, and that this demand will continue to increase.

6.3 The SHMA suggests a significant shortfall of affordable housing of all sizes of accommodation, most notably one and two bedroom homes. However, the greatest need, relative to supply, is for family affordable housing, which also reflects the inability of market housing to cater for lower income larger households.

6.4 The demand for affordable housing is projected to continue increasing due to shortages in overall housing supply; the need for large deposits to access home ownership; increasing housing costs particularly in the private rented sector, and the impacts of government welfare reforms.

6.5 A reasonable supply of good quality affordable housing for rent, especially for families, is vital to meet the needs of local households in priority need who are priced out of the private sector housing market in Haringey. In addition, the Council wishes to enable first time buyers, particularly existing social housing tenants who will free up social housing stock, to purchase low cost home ownership properties in the Borough.

Policy Context

6.6 Local Plan Policy SP2 states that sites capable of delivering 10 units or more will be required to meet a Borough-wide affordable housing target of 40%, based on habitable rooms.

Amount of Affordable Housing and Tenure Split

6.7 Strategic Policy SP2 is supported by Policy DM13 of the Development Management DPD, which states that the Council will seek the maximum reasonable amount of affordable housing provision when negotiating on individual private residential and mixed-use schemes with site capacity to accommodate ~~more than~~ 10 or more dwellings, having regard to:

a Policy SP2 and the achievement of the Borough-wide target of 40% affordable housing provision;
b The need for 60% provision to be social/ affordable rent and 40% intermediate housing;
c The preferred affordable housing size mix as set out in the Council's Housing Strategy;
d The individual circumstances of the site;
e The availability of public subsidy;
f Development viability; and

g Other planning benefits that may be achieved.

6.8 Policy AAP3 of Tottenham AAP, establishes that, within the Tottenham area, the affordable housing tenure split will be 60% intermediate and 40% affordable/social rent. The Tottenham AAP also provides for a portfolio approach where, across a portfolio of sites, development will deliver a target level of affordable housing, with individual sites being required to show how, in providing higher or lower percentages and mixes, they contribute to the achievement of policy compliant affordable housing across the whole portfolio.

6.9 The Haringey Housing Strategy 2017-2022 provides more detail on definitions of the different forms or affordable housing, including the levels of rent or discount the Council considers necessary to ensure these products remain affordable to Haringey residents http://www.haringey.gov.uk/housing/housing-strategies-policies-and-plans/housing-strategy.

6.10 There may be instances when the Council considers that an alternative mix between social/affordable rented and intermediate housing is appropriate, for example, in areas that are deemed to have an existing predominance of a particular housing tenure or are unsuitable for family occupation. Applicants are therefore encouraged to discuss their proposal, and the affordable housing provision, with Council officers at the pre-application stage.

6.11 Should the Council consider that the amount of affordable housing, or the proposed mix between social/affordable rented and intermediate housing, is not acceptable, permission for the development may be refused.

Affordable Housing Units Size Mix

6.12 The Council seeks to ensure that the mix of dwellings, types, sizes and tenures in large housing development reflects the housing needs of the Borough (Policy DM11). The target mix for affordable rented/social and intermediate affordable housing in Haringey is given at Appendix C of the Haringey Housing Strategy 2017-2022 (http://www.haringey.gov.uk/housing/housing-strategies-policies-and-plans/housing-strategy) and has been formulated using evidence from the SHMA (2014) and current local housing register information.

6.13 The Council recognises that different sites will pose different design challenges in terms of providing family accommodation, especially on sites suited to developments of flats. However, even in blocks of flats, good quality family accommodation can be provided, for example, at ground floor level, with access to a private garden or private communal amenity space. It is crucial that well-designed family housing with access to private or communal gardens is ‘designed-in’ to achieve the expected dwelling mix on a site.

6.14 On sites that the Council considers to be particularly suitable for family housing, the Council may seek a proportion of affordable family housing above the requirement specified in in the Housing Strategy at Appendix C. Should this have implications on

viability (as demonstrated through a development appraisal), the Council will consider the tenure provision or the total provision of the affordable housing requirement.

6.15 The Council will not accept a reduced proportion of affordable family homes with 3 or more bedrooms on sites where this could clearly be achieved.

6.16 Again, it therefore recommended that applicants discuss the affordable dwelling size mix, alongside the amount and tenure mix, with Haringey Council officers at the pre-application stage.

Negotiation of Affordable Housing

6.17 The Council will seek the maximum reasonable proportion of affordable housing on qualifying sites and ideally ~~will expect~~ negotiations should ~~to~~ be concluded ~~with the Council's Housing Team~~ during the pre-application stage, in order to streamline the passage of the application through the planning process.

6.18 The Council recognises that a number of factors can impact on the ability of a development to provide the expected proportion, tenure split and mix of affordable housing and comply with the affordable housing policy. However, the Council will not accept an inflated land value as justification for a departure from the requirements of the Local Plan and will use the existing use value plus approach to viability ~~of the site in its current permitted use as the viability benchmark~~, noting also that Haringey's CIL has been deliberately set at a level that seeks to ensure that affordable housing will continue to be viably delivered.

6.19 Applicants should not automatically assume that affordable housing grant will be made available for private sector developments. Typically, applications for grant are only considered for schemes that can demonstrate additionality (i.e. that the grant will enable more affordable housing to be delivered than policy requirements alone would deliver). The applicant should consult with the Council's Housing Enabling Team at the pre-application stage, preferably in cooperation with a Registered Provider ("RP") partner, to establish whether grant or an alternative source of funding is likely to be secured.

6.20 The Council will support bids to the GLA where the amount and type of affordable housing is consistent with policy and demonstrates additionality, or where the bid is in support of other corporate Council initiatives such as the regeneration of a specific area.

6.21 The Council has established good relationships with a number of RPs that operate effectively in the Borough to provide affordable housing that meets local housing need. As such, the Council encourages developers to meet their affordable housing obligations by forming a partnership with one of the Council's preferred RPs following discussion with the Housing Enabling Team. ~~Where possible, RPs who are to be involved in the delivery of affordable housing will be expected to be party to the planning obligation.~~

Development Triggering an Obligation

6.22 Residential developments, including mixed-use developments, with site capacity to accommodate ~~more than~~ 10 or more dwellings.

6.23 The Council will look closely at proposals that fall short of providing 10 or more units to make sure the optimum use of land is achieved. This includes the situation where sites are artificially sub-divided or re-developed in phases, where development of the larger site(s) would be within the above policy threshold. Where the Council determines this to be the case, such proposals will be subject to affordable housing obligations.

Varying Existing Planning Permissions

6.24 In the event that planning permission is granted for a residential or mixed-use scheme, and a subsequent application seeks to vary a use from a non-residential element to residential use, or increase the number of residential units, this will trigger a reassessment of the requirement for affordable housing to be provided on the site.

Prior Approvals

6.25 Where ~~P~~prior ~~A~~approval for a change of use to residential has been granted, but the development has not been completed, further applications to increase the number of residential units beyond that permitted (e.g. by extension or further change of use requiring planning permission), will be considered cumulatively as a gross number of units, in terms of calculating the affordable housing requirement ~~will be calculated on the total (gross) residential units~~ to be provided on site.

Sheltered Housing and Extra Care Homes

6.26 Sheltered housing and extra care homes are classified as falling within Use Class C3. Policy SP2 and DM13 therefore apply to schemes for sheltered housing and extra care homes that fall within the thresholds. However, where an applicant is proposing a scheme for sheltered, extra care or other forms of self-contained supported accommodation the Council strongly recommends that the Council's Housing Enabling Team is contacted to confirm whether or not there is a need for affordable accommodation of the type proposed. If there is, the required amount of affordable sheltered or supported housing will be sought on site. If there is no identified need for such affordable housing, the developer will be required to provide an element of general needs housing on site, through re-design exercises if necessary.

Residential Care and Nursing Homes

6.27 Residential care homes and nursing homes, where the accommodation is non-self-contained, fall within Use Class C2 (Residential Institutions) and are not subject to the affordable housing policy.

Student Housing

6.28 Policy DM15 states that, where the student accommodation is not secured by agreement for occupation by members of specified educational institution(s), it will be subject to the requirement for affordable housing, where the Council will expect an element of affordable student accommodation to be secured.

Hostels

6.29 Hostels (classified as sui generis) are not required to provide additional affordable housing.

Warehouse Living

6.30 The residential element of Warehousing Living (classified as sui generis) are not required to provide affordable housing.

Live/Work Units

6.31 While the Local Plan expressly resists live/work units, should an application for live/work units be granted, such units are considered to be residential for the purposes of assessing whether policies SP2 and DM12 apply. However, live/work units are not deemed to be appropriate for the provision of affordable housing. Where a scheme for live/work units, including live/work as part of a mix of residential or commercial uses, triggers the affordable housing requirement, the affordable element should be provided in the form of wholly residential units.

Form in which Obligations Should Be Made

On-Site Provision

6.32 On-site provision is the Council's preference for how affordable housing will be provided by developers. The Council will work with developers on a site-by-site basis to ensure policy-compliant on-site affordable housing provision and to maximise the benefit for the community, while ensuring that these requirements do not make development unviable.

Off-Site Provision

6.33 Only where exceptional circumstances exist, and where the Council is satisfied that it would be appropriate, will off-site provision be accepted. In accordance with London Plan, exceptional circumstances include those where it can be robustly demonstrated that on-site provision is not feasible, and where it would be possible to achieve the following:

- Secure a higher level of provision on an alternative site;
- Better address priority needs, especially for affordable family housing; or
- Secure a more balanced community.

6.34 In instances where it is accepted that off-site provision is appropriate, the onus will be upon the developer to find and acquire a more suitable site which would not otherwise be expected to come forward for affordable housing, within the vicinity of the originating development.

6.35 Off-site provision should be financially-neutral, i.e. there should be no financial advantage to a developer in providing the housing this way.

6.36 In instances where the site providing the affordable housing off-site is large enough that, if it were developed independently it would be required to provide affordable housing, the amount of affordable housing will be negotiated as a proportion of both sites combined.

Calculation of Payment in Lieu

6.37 Although the Council's preference is to negotiate on-site affordable housing there may be circumstances where the Council agrees that a cash in lieu of provision contribution may be suitable. Cases where a case for financial payment could be made are:

- Where no RP is identified, or the ~~Local Authority~~Council not is willing to take the units on;
- The size of the site is too small; or
- Practicalities of design and management.

6.38 The financial contribution sought will reflect the fact that the facilitating site achieved 100% private market housing. Therefore, the financial contribution should be sufficient to develop the same amount of affordable housing, as units on the facilitating site, elsewhere in the borough. The contribution should allow the units to be developed without subsidy.

6.39 Commuted sums in lieu of on-site affordable housing provision received by the Council will be ring-fenced to secure efficient delivery of new affordable housing through (but not limited to) the following:

- The delivery of conventional new affordable housing
- The delivery of private rented housing that is affordable to people in housing need on the Council's housing register
- Estate regeneration
- Bringing long term vacant properties back into use
- The acquisition of existing properties

Viability Appraisal and Reviews

6.40 All schemes that propose off-site provision or a cash-in-lieu payment are required to provide a detailed viability appraisal to justify this approach (see Section 5 above).

Extension of Time

6.41 Any applications which are re-submitted by means of extension of time, renewal or variation of the planning permission will be subject to the requirements of policies SP2 and DM13, and this SPD.

6.42 The negotiation process will re-start on re-submission. Scheme proposals will be subject to ~~a~~ the 'baseline' level of affordable housing requirement~~s~~ already agreed through the original or last grant of permission. This will ensure that, in the event of

any re-submission of the proposal, the level of affordable housing cannot be negotiated below the 'baseline'.

6.43 Where it is concluded that the scheme can sustain a greater quantum of affordable housing and/or a more policy compliant affordable housing tenure mix can be provided, the Council will elect to seek the following or a combination of the following:

- A higher proportion of affordable housing on-site.
- Amend the tenure mix for the affordable housing element (where the scheme design permits).
- Amend the affordability requirements for shared ownership units, where proposed.
- A cash in lieu contribution.

Perpetuity

6.44 The Council requires all affordable housing to be provided in perpetuity (subject to below exceptions), through the planning obligation agreement. In order to ensure that affordable housing continues to be affordable to those in housing need, and managed to acceptable standards, the Council requires the legal interest and management of the affordable housing produced through the planning obligation to be transferred to an RP, the Council or equivalent. Social rented homes subsidised by grant funding are subject to the legal Right to Buy/Acquire provisions.

6.45 Intermediate housing products will remain affordable in perpetuity but may be subject to occupiers 'stair-casing' to full ownership by purchasing additional equity in the property. The grant that was initially invested in the additional equity purchased by the occupier is to be recycled by the RP or equivalent to fund new affordable housing provision elsewhere in the Borough.

6.46 For rented affordable properties, the Council will nominate 100% of initial lettings and 75% of relets, all of whom will be on the Council's register and will be allocated in accordance with the Council lettings system. For shared ownership properties the Council will retain the right to nominate 100% of sales and resales. The Council's nominations will be secured through a nominations agreement entered into by the RP or equivalent.

Further Restrictions

6.47 When applicable there will be a restriction on commencing the development, or phase therein, until the affordable housing details (e.g. location, type etc.) have been approved by the Council, and thereafter there will be an obligation to comply with the approved details. The Council will impose a restriction on the development or subsequent phase, preventing sale and/or occupation of the private market units on site until such time as the affordable housing units are either completed and/or transferred to an RP (or the Council).

6.48 Where the intermediate housing is being marketed to different income groups within the Borough, the Council will seek to restrict the occupation of such units until it has approved the marketing details and the marketing has been carried out in accordance with the approved details to the Council's satisfaction for a specified period of time (a minimum of 3 months).

7. Economic Development, Employment and Skills Training

7.1 The profile of Haringey-based jobs continues to change so that manufacturing, retail and public sector employment are less dominant, and there is a greater portion of jobs in more highly skill sectors, such as sustainable technologies, digital design and craft manufacturing. In addition to meeting housing need, the borough must ensure jobs growth is also catered for. In respect of the latter, Haringey's future economic prosperity relies on regeneration and growth transforming our existing stock of low grade, low job density, warehouses and industrial buildings into more intensive and productive employment generating uses. This gives rise to further policy challenges, which are:

- To ensure the transformation of lesser quality non-designated employment floorspace does not result in a significant reduction in the overall quantum of employment floorspace;
- To ensure the new employment floorspace is not unaffordable to existing or new local businesses, including Haringey's SME sector; and
- To ensure Haringey residence benefit from the growth and regeneration by being equipped to take advantage of the wider London employment and customer base.

Policy Context

7.2 The London Plan cites the need to improve London's skills base, improve employment opportunities and remove barriers to employment, and identifies learning and skills as two key priorities for planning obligations. For the purpose of this SPD, this includes a wide range of activities and covers:

- Employment and training, including construction training and the use of local labour;
- Local regeneration initiatives, such as the development of incubator space for small businesses;
- Tourism; and
- Town centre improvement and management.

7.3 Policy 4.12 of the London Plan ~~2011~~ 2016 states "Strategic development proposals should support local employment, skills development and training opportunities", and goes on to state in the supporting text (para 4.62) that planning should aid in "providing for training facilities in new developments creating high levels of jobs, to help the skills of local people match the needs of London's growing economy".

7.4 Policy DM38 of the Local Plan, seek that an element of affordable workspace may be sought as a part of the commercial offer on employment-led mixed use developments on local employment areas designated as Regeneration Areas.

7.5 Policy DM40 of the Local Plan seeks to resist the loss of non-designated employment floorspace in recognition of the significant cumulative role this floorspace plays in supporting local employment and Haringey's economy.

However, the policy acknowledges that there may be circumstances where sites are no longer suitable for continued employment or commercial use. In such circumstances, Policy DM40 states that, where proposals involve the total loss of non-designated employment floorspace, a financial contribution towards employment related activities may be sought.

Development Triggering an Obligation

Affordable Workspace

7.6 All major mixed-use development within a Local Employment Area – Regeneration Area will be required to make provision for affordable workspace.

Local Employment and Training

7.7 All development, including mixed-use development, that results in the total loss of the existing non-designated employment floorspace, will need to contribute to local employment and training.

7.8 All major developments will need to contribute to local employment and training.

Form in which Obligations Should Be Made

Affordable Workspace

7.9 The Council recognises that there is a cost associated with the provision of affordable workspace which will impact on the overall viability of the development. As all of these sites will be mixed use typology and the employment element of the scheme should be maximised, it is expected that a viability study will be required to accompany any application under Policy DM38.

7.10 The Council recognises that the securing of an element of affordable workspace, in preference to an element of conventional employment floorspace will make a deeper per/m^2 cut into the viability of a development. It is thus acknowledged that for the same amount of development of a higher value use, a smaller amount of affordable workspace will be secured than for a conventional employment product.

7.11 There may be circumstances when residential is used to cross subsidise an affordable workspace use, and the Council will require the viability study to identify what level of affordable workspace and affordable housing are possible on a site.

7.12 The following points should be addressed in the agreement of draft planning obligation Heads of Terms:

Landlord	Should be able to demonstrate ability and commitment to manage space as affordable workspace.
Tenant	• Landlords proposals should set out the basis for the selection of tenants as follows: • Priority should be given to tenants (or possibly owner occupiers) whose current premises are due for redevelopment;

	• Space over 500m^2 should be let to workspace providers with experience of managing affordable workspace who then let to start up/SME businesses; • Smaller spaces should be let directly to start up/SME businesses.
Term of lease	• Lease should be for a term of 20 years with tenant only breaks every 5 years. • This is linked to the viability appraisal and the affordable rent should be valued for the full 20-year term. • If it has been valued in perpetuity, then the commitment to provide the space at an affordable rent should match this. • Smaller spaces let to SMEs etc. could be on shorter terms but with a commitment to let to second SME tenant if first one out grows premises within term.
Initial rent	• Initial rents to be agreed by Council should be based on lower quartile rents being achieved for second hand stock within the Borough, as confirmed by a reputable local commercial letting agent, at the time the space is let to a new tenant. • A small (i.e. less than 10%) uplift may be permissible to recognise the improved quality of the employment floorspace, where it is demonstrated the suggested affordable rent level would harm development viability. • The landlord should not be entitled to ask for a premium for the lease.
Landlord's fit out	The landlord's fit out should be agreed and include as a minimum: • Power and basic lighting • Floor finishes • WC and kitchenette
Rent reviews	These will be based on Retail Price Index and subject to review periods, ideally 3-yearly.
Sub-letting	There will be a restriction on sub-letting space by tenants of spaces less than 500m^2 and subletting should be at no more than the rent payable on the head lease with no premium on the sub-lease. If the lease of the affordable workspace is taken by a Council recognised and approved workspace provider, then they will not be able to sublet at more than twice the head lease rent and the occupier's rent should include services and rates.
Service charge	The initial service charge should be based on actual demonstrable costs and increases should not exceed CPI/RPI, as agreed.
Security of Tenure	Leases will have the protection of the Landlord and Tenant Act 1954.

7.13 The obligation will include a restriction on the occupation of other elements of the scheme, until such time as the affordable workspace has been leased to a Council recognised and approved workspace provider, or marketing materials, showing the affordable rent levels for the affordable workspace, have been agreed by the Council and provided to a local reputable commercial lettings agent.

Local Employment & Training

7.14 Haringey has an above average unemployment level within Greater London, and a relatively low ratio of jobs to working age residents. Currently 48% of jobs within Haringey are taken up by Haringey residents. There is also a skills mismatch, with

new employment opportunities requiring skills which are not widely available within the borough's current residential population. There are a number of barriers to getting into work for the first time and returning to work after a period of absence. These include access to childcare as well as training and access to these opportunities. Employment opportunities should be provided through new development to local residents, with training made available to up-skill residents, including programmes to make residents work ready to compete for jobs within the borough.

7.15 For all new development in the borough the construction phase provides opportunities for local employment, apprenticeships, work experience placements and careers support. Commercial developments within the borough bring new employment, apprenticeship, work-experience and careers support opportunities for residents during the end-user phase. This adds increased pressure on the Council to provide access for residents to appropriate employment and skills training. Apprenticeships, work experience placements, removing barriers to employment and careers support will enable residents to develop an appropriate skill-set for existing and future employment opportunities within the borough, from an early age.

Construction Phase Skills and Training

7.16 The Council will seek to ensure that jobs are provided for local people, both in the construction phase of development and, where appropriate, by the end-users. To enable local people to benefit from development growth, the Council, with partners, has introduced a number of programmes to support job brokerage, employer-led training, construction skill training and apprenticeships and work experience placements.

7.17 The 2011/12 Annual Monitoring Report highlighted the difficulty in enforcing on-site local employment schemes in the construction phase, compared to the relative success of collecting agreed financial contributions. It is therefore logical that this practice is standardised.

7.18 All developments of 10 residential units or more, or 1,000m^2 or more of non-residential floorspace, will be required to comply with planning obligations relating to:

Notification of Vacancies: the developer will arrange for the notification of job vacancies to be made to the Haringey's Economic Development Team or other nominated agencies, to be advertised exclusively to local residents via the Economic Development Team's brokerage mechanism for a minimum period. The developer will also ensure that its contractors and sub-contractors within the supply chain comply with this obligation.
Local Labour: The period of exclusivity is designed to maximise the supply of job ready local labour into the vacancies arising. A minimum of 20% of the onsite workforce during construction shall comprise local Haringey residents, including local trainees. The proportion of local trainees should be agreed in advance.

Candidates for work based learning and training opportunities will be nominated by Haringey Council (or another agency as agreed by the Council).
Apprenticeships: The developer will be expected to agree a specified proportion of the total number of construction and ancillary jobs as ~~A~~apprenticeships. The expected level will be 1 Apprentice per £3 million development cost, up to a maximum of 10% of the construction workforce at its anticipated maximum provision on site. A support fee of £1,500 per apprentice placement will also be payable to cover the recruitment process. The developer or its supply chain will be expected to employ Apprentices at least at the London minimum wage and support training/college release arrangements until attainment of their qualification at a minimum of NVQ Level 2. Candidates for Apprenticeship places will be nominated by the Council's Economic Development Team (or other agency as agreed by the Council).

7.19 In order to achieve the maximisation of local labour as proposed via the above obligations the Developer and main contractor will provide construction phasing information and labour forecasting data to the Council to enable appropriate, job ready local candidates to be matched to job opportunities as they arise.

7.20 The Developer will enter into a Local Training and Employment Plan with the Council based on the obligations above which will establish greater detail for the supply of local labour within the development programme. This will include; the provision for training opportunities and local recruitment by the owner/developer and their contractors.

7.21 The Local Training and Employment Plan will need to be agreed by the Council prior to the commencement of construction works and should include details of how performance is to be monitored and reported on. Following agreement of the Training and Employment Plan the owner/developer, and their contractors, will work with Haringey's Employment and Skills team to implement and, where necessary, procure implementation and promote the objectives of the approved Plan. The Developer will also identify a named contact responsible for implementation of the provisions within the Local Training and Employment Plan.

7.22 The Haringey's Employment and Skills team or Council's nominated representative will support the owner/developer and their contractors to advertise and promote employment and training opportunities, identify recruits for employment and training, and to act as a liaison with local and sub-regional employment and training providers.

7.23 Contractors and sub-contractors will be requested to ensure that their labour agencies engage with Haringey Council to facilitate local unemployed residents access job opportunities.

7.24 Where appropriate the Council may consider whether a developer's in-house training programme can be utilised in lieu of using the Haringey Employment and Skills team, on the basis that the minimum requirement for local labour can be

secured through an in-kind obligation. The appropriateness of the in-house training will be assessed by the Council on a case by case basis.

7.25 On very large developments, defined as having a construction contract value in excess of £60 million, the Council is willing to work with the developer and the contractor to negotiate different ratios and rates.

7.26 In exceptional circumstances, where a developer is unable to provide such local employment opportunities as required, the Council may accept a commuted sum to enable adequate alternative employment opportunity to be provided. This would be calculated based on the cost of Construction Training Placement £2,800 multiplied by the gross internal area of development (sqm)/ 1,000 (sqm).

7.27 The support fee, and any in lieu financial contribution, are payable upon agreement of the Local Training and Employment Plan.

End-user Phase Skills and Training, Local Enterprise arrangements, and Apprenticeships

7.28 For the end-user phase of commercial developments, the Council will seek to ensure that local residents have the opportunity to access the new job opportunities created by the development.

7.29 Developments of between 1,000m^2 and 10,000m^2 of commercial floorspace will be required to make a financial contribution which will be used by the Council to provide and procure the support necessary for local people who have been out of employment and/or do not have the skills set required for the jobs created.

7.30 The required contribution can be calculated as follows:

- Stage 1: Calculate the number of local employees expected to be employed on the site: This equates to 48% of workers, using 16m^2/worker in the new development.
- Stage 2: Calculate the cost of providing support to access new roles to that proportion of residents expected to require such support. This equates to 29% of local residents, using £2,800 as the cost of providing training.
- The calculation: (new commercial floorspace m^2/16) * 48% * 29% * £2,800
- This equates to **£24/m^2** of new commercial (B1, B2, B8) floorspace.

7.31 The contribution will be payable on commencement of the development.

Bespoke Plan for Larger End-Use Sites

7.32 For commercial developments of 10,000m^2 or greater a bespoke plan will be required, of at least equivalent value to the formula set out in paragraph 7.30. Direct provision by the developer ~~A financial contribution~~ may be sought instead of ~~direct provision~~ a financial contribution.

7.33 The plan will include forecasting and notification of vacancies to the council and its employment and skills partners to allow for appropriate training and support to be put in place.

Loss of Non-Designated Employment Floorspace

7.34 Where proposals result in the total loss of the non-designated employment floorspace a financial contribution will be secured for use in promoting employment and adult education for Haringey residents. The financial contribution calculation is based on the amount of floorspace being lost and the displacement cost of supporting a Haringey resident, losing a job as a consequence of the development, into a new role.

7.35 The potential net loss of employment (B class) floorspace in terms of job numbers is one job for each 44m^2, based on the borough average identified in the 'From Around Here Study' (2013). On average 48% of roles in any Haringey workspace are filled by Haringey residents. The estimated cost of supporting and retraining a redundant worker to access a new role is £2,800. Costs payable per development are calculated as follows:

- Stage 1: Calculate the potential local jobs lost to Haringey Residents: this equates to 48% of the lost potential jobs on the site, using 44m^2/worker on the site at present.
- Stage 2: Apply the support and training contribution to the numbers of jobs lost: (answer to Stage 1) * £2,800
- The calculation: (lost employment floorspace m^2 / 44) *48% * £2,800
- This equates to **£30/m^2** of lost employment floorspace.

7.36 The above financial contribution will be payable upon commencement.

7.37 Developments where there is a reprovision of employment floorspace, in whole or part, will pay no compensation, where it is demonstrated to the Council's satisfaction that the resulting employment floorspace is functional and letable, and does not result in a net reduction in total jobs provision.

8. Transport and Highways

8.1 The provision of a safe, accessible, efficient, sustainable and integrated transport network is important to ensuring everyone has access to services within and outside the borough. The Council is committed to promoting high quality public transport services and delivering an attractive, well designed street network that reduces the need for travel by private modes of transport.

8.2 New development in the borough will place additional stress on the borough's transport and highway networks.

8.3 Transport Aassessments and Ttransport Sstatements will be required to establish the impacts of the development on surrounding transport networks. These will be used to identify issues for which conditions and planning obligations will be required to mitigate.

Policy Context

8.4 Policies SP7, DM31, DM32 and AAP7, and the associated supporting text, provide the main policy background relating to achieving a safe and sustainable relationship between development and transport.

Development Triggering an Obligation

8.5 While Ttransport Aassessments and Ttravel Pplans are required for all major development, there is no overall minimum development threshold below which obligations will not be sought.

8.6 Obligations will be sought where there is a requirement to improve existing, or construct new, highway infrastructure in order to access development in a safe and appropriate manner or to mitigate the effects of the development on the highway network. Consequently, there is no trigger below which a highway infrastructure obligation may not be required and there are no types of development that would be exempt from highway infrastructure requirements.

Types of obligations

8.7 A range of traffic and highway measures may be required as the result of individual schemes. The Council's Transport team will normally advise on the requirements for individual applications, and/or such works will be identified as a result of submitted Transport Assessments. However, the mains types of obligations are:

Travel Plans

8.8 A Travel Plan is a package of practical measures to reduce car travel to and from a proposed site, and to encourage the promotion of more sustainable forms of transport by increasing the awareness of travel options, such as walking and

cycling, and through the provision of facilities to support such options, such as shower facilities and secure cycle parking.

8.9 Travel plans should be prepared in line with TfL guidance. The guidance sets thresholds for travel plan statements and full travel plans, and what is expected from each type of document. Where the Council deems it necessary, it may require a travel plan on sites below the threshold set in the TfL guidance. Travel Plans should include targets for the reduction in travel related impacts and include resources for supporting and maintaining the travel plan. Travel plans may include provision for financial penalties to fund the promotion or provision of sustainable transport until travel plan objectives are met.

8.10 Travel plans will usually be required for separate components of a development. E.g. for residential, commercial etc. Travel plans must be submitted and approved prior to occupation. The Council will also required payment of a monitoring contribution (currently £3,000 per travel plan) payable prior to occupation.

Works to Enable Site Access

~~8.9~~8.11 Highway amendments and improvements that may be necessary, specific to development, to enable site access at both construction and occupation stages. Such amendments and improvements may include, but are not limited to, the provision, removal or relocation of street furniture, dropped kerbs, crossovers, pedestrian crossings, bus stops and street trees.

Network Impacts

~~8.10~~8.12 There will be occasions where transport demand created by development may not be satisfactorily mitigated by the measures in a travel plan or site specific highways improvements. While the Council will endeavour to improve the wider transport network through CIL and other mainstream funding, there will be occasions where a particular site requires public transport services, or highway or traffic management mitigation to the wider network, that has not been identified for investment. This may include increased highway capacity within the network, junction improvements and/or traffic management measures, including the potential introduction or extension of parking controls, subject to consultation. Where individual developments will cause a site-specific impact which should be directly addressed through the development itself, the Council will use planning obligations to mitigate the impact of the development.

~~8.11~~8.13 Any necessary alterations to the transport/highway network within or in the vicinity of new development will be expected to be incorporated within proposals, and permission will be refused if the developer is unwilling or unable to provide the necessary solutions/improvements to mitigate the impact of the travel demand they generate.

8.14 The scope of any off site works required to mitigate the impact of a development within the vicinity of the site will be secured either by condition and/or ~~a~~ planning obligation. Any highway works identified as part of the planning obligation will either

be carried out by the Council or by the developer (if previously agreed with the Council) with the developer responsible for meeting all costs associated with the design and implementation of schemes. This may be secured through a section 278 agreement under the Highways Act 1980 (as amended) at the developer's expense. This or any other obligation relating to highways will include a full indemnity to the Council for any claim arising out of the highway works and the occupation of the development shall be restricted until the relevant works have been completed to the Council's satisfaction.

~~8.12~~8.15 Where on-street car or cycle parking is required as part of a planning application, these should be paid for by the developer, and installed by the highways authority. Contributions will help to ensure that 20% all new car parking have active charging facilities, with passive provision for all remaining spaces ~~are capable of accommodating electrical charging~~ in accordance with ~~Policy 6.13 of~~ the London Plan.

Parking restrictions

~~8.13~~8.16 The extension of on street parking controls, waiting restrictions, parking permit eligibility restrictions, and permit free housing will be promoted to mitigate the impacts of development on parking conditions and the local highway network. Planning obligations will be required to secure a financial contribution to the Council to implement parking controls and to ensure that owners or occupiers of car-free residential units are not entitled to apply for parking permits. The owner will be required to market/notify the occupiers of the car-free restriction.

Car Clubs

8.17 A Car Club provides an environmentally sound and financially attractive alternative to private car ownership by offering pay as you go short term vehicle hire. Car club related planning obligations can be sought in order to achieve reduced levels of on-site parking provision or, in some circumstances, in order to provide an on-street car club bay in the vicinity of the site. Car club related initiatives can also be included in ~~T~~travel ~~P~~plans.

8.18 Typically, a developer will be required to use all reasonable endeavours to establish a car club within the vicinity of a development site and to include car parking bays for the club. The developer will also pay the membership costs of a car club and a credit (currently £50) for up to two occupiers of each residential unit for usually at least two years of that unit. Occupation will be restricted until the car club has been established and the Council is satisfied that these obligations have been complied with.

Public Rights of Way

~~8.14~~8.19 The Council's Rights of Way Improvement Plan (November 2008) highlights the important resource Haringey's network of footpaths, bridleways and byways are for recreation, healthy living and sustainable transport. Contributions towards wider footpath and cycle network improvements will be through CIL. However, where required, on-site links and routes, to connect to the wider network, will still be

sought through a planning obligation. Such obligations may include requirements for maintenance of newly created or existing rights of way.

Managing the Impact of Construction

8.20 Largescale regeneration projects generate signification construction activity over a number of years that can impact upon the local environment, the local highway network, and access and movement for local businesses and residents. Whilst each developer and project will be required to produce and enforce an individual Construction Management Plan for their location, additional collaborative initiatives are also required to mitigate the cumulative impact of the construction, improve safety and ease congestion on the highway network, and promote efficiency and best practice.

8.21 Obligations will be required on major development within designated Growth Areas to ensure coordination of standards and procedures for managing the environmental impacts during the construction period, together with specific measures that will be implemented on an area wide basis. These will mitigate adverse effects on highway safety and movement, public health and the environment, access for local residents and businesses, the local economy and the general travelling public and visitors.

8.22 Applicants will be required to work with other developers within the Growth Area to provide, fund, and secure a construction coordinator or a financial obligation will be provided to secure a Construction Coordinator.

Form in which Obligations Should Be Made

~~8.15~~8.23 It is essential that travel plan, infrastructure and traffic management measures are provided in a timescale commensurate with the proposed phasing of the development and the Council will seek to approve trigger points through the appropriate planning obligations.

~~8.16~~8.24 The planning obligation can be secured either through a financial contribution, paid to the Council to carry out the identified works, or through developer provision of the identified works. Financial contributions will be determined on the basis of the cost of works required. In cases where the developer is providing infrastructure improvements a licence would be required for the developer to work on the public highway, which could require a s278 Agreement to be entered into. Further guidance on this is available by contacting the Council's Transport team.

9. Open Space and Public Realm

9.1 The borough as a whole is deficient in open space and publically accessible open space. New and improved space and improved access to existing open space is required to serve the growing population in Haringey. In accordance with the Local Plan: Strategic Policies, the Council will seek to deliver a network of open space through maximising opportunities for new publically accessible open space and connection to the Haringey Green Grid.

9.2 The quality of the public realm has an impact upon the way in which an area is perceived and experienced. A high quality public realm offers many benefits to people, communities, the environment and local economy and functions as an important place for community cohesion and leisure activities. It also has direct benefits for local people by improving safety, wellbeing, legibility of the built environment, and links between key services such as schools, health services, town centres and places of employment.

Policy Context

9.3 Strategic Policy SP13 seeks to improve the quality and accessibility to existing green spaces and, where appropriate, to secure opportunities for additional publically accessible open space, including extensions to existing boundaries. Policy DM20 seeks the provision of new open space as part of major new development proposals, and provides for the reconfiguration of existing open space, where this would address, amongst other things, deficiencies in accessibility.

9.4 Policy DM3 addresses the requirements around public realm. In respect of the management of privately-owned public realm, the policy clarifies that this should be managed by the landowner of the property and secured by planning obligation.

Development Triggering an Obligation

Open Space

9.5 Major residential and town centre development proposals, including mixed-use development is to make on-site provision for new open space, including civic space.

9.6 Development proposals on sites that include an area of existing private open space, where opportunity exists to secure public access to the open space.

Amenity Space

9.7 All new residential development, including mixed-use development, is to make provision for adequate amenity space.

Children's Play Space

9.8 All major residential developments, including mixed-use development, resulting in a child yield will be required to make provision for on-site children's play space.

Public Art

9.9 All major development that has a significant impact on its physical environment and setting will be required to make provision for ~~P~~public ~~A~~art.

Public Realm

9.10 All new development is to contribute to the delivery of a high quality public realm that is accessible, safe, attractive and well maintained, irrespective of whether the land is in public or private ownership.

Types of Obligations

Open Space

~~9.10~~9.11 Obligations may be sought to secure new open space provision on-site, including civic space, or to secure public access to, and use of, existing open space. The maximum area reasonable will be sought, having regard to site size, layout, topography, accessibility, relationship to the wider open space network, and the need for resultant open space to be contiguous and functional in accordance with its purpose.

~~9.11~~9.12 The Council will typically condition the submission of a management plan demonstrating how the open space is to be managed and public access maintained. However, where appropriate, a planning obligation, or a financial contribution, may ~~also~~ be sought for the provision and or management and/or maintenance of the newly created open space.

Amenity Space

~~9.12~~9.13 New residential development is expected to incorporate amenity space on-site within their design to meet the need generated. The standard of provision is set out in the Mayor's Housing Design Guide SPG as being a minimum of 5m^2 of private outdoor space to be provided for a 1-2 person dwelling, and an extra 1m^2 to be provided for each additional occupant. Balconies can be included in the calculation of amenity space. However, the minimum depth of all balconies and other amenity open space must be 1.5m.

~~9.13~~9.14 If in exceptional circumstances, and agreed by the Council, the amount of on-site amenity space proposed by the applicant does not meet the above requirement, then the quality of that proposed will be assessed to determine whether it is considered acceptable and usable for the enjoyment of residents. If the space is not considered appropriate by the Council, then a commuted sum may be acceptable to improve access to and use of local parks.

~~9.14~~9.15 The commuted sum will be payable on commencement, and based on the above standard of on-site amenity space to be provided by the scheme, minus any on-site provision towards meeting the required level of provision, multiplied by £70 per m^2, which represents the lower end cost of improvements to bring local open

space in the Borough up to the audit standard set out in Haringey's Open Space and Biodiversity Study (October 2014).

~~9.15~~9.16 The proximity and adequacy of existing public parks and playground space will not be a factor in determining the amount and form of amenity space provided for within a new development.

Children's Play Space

~~9.16~~9.17 New major residential development is expected to incorporate children's play facilities on-site within their design to meet the need generated. Provision is to be made in accordance with the standards set out in the Mayor's Housing SPG, and Shaping Neighbourhoods: Play and Informal Recreation SPG.

~~9.17~~9.18 Where development is phased, the London Plan requires the provision of play space to be made within the early phases of the development.

~~9.18~~9.19 While the requirement is usually for on-site provision, off-site provision, including the creation of new children's play space or improvements to existing provision may be considered acceptable where such provision can be made within 200m of the development site and where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents. In such instances, the obligation can be secured either through a financial contribution, paid to the Council to carry out the identified works, or through developer provision of the identified works. Off-site provision will need to be secured prior to occupation of the development.

~~9.19~~9.20 Where a financial contribution is required for off-site provision, this will be based on the child yield from the development, multiplied by 10m^2 of play space provision per child, multiplied by £95, which is the average cost per sq m of provision.

~~9.20~~9.21 A planning obligation, or a financial contribution, may also be sought for the maintenance of newly created on-site or off-site children's play space.

Public Art

~~9.21~~9.22 Qualifying development schemes will normally be expected to provide public and artist designed elements up to a maximum of £50,000. A proportion of that art is expected to be free standing from the development or an independently commissioned art work, supporting the Mayor's Cultural Strategy and local artists. The final design proposal will need to be approved by the Council. The overall public art provision will be subject to consideration in light of other planning obligations sought, including the creation of new or improved public realm, and the design and architectural merits of the development proposed.

~~9.22~~9.23 As appropriate, the funding of art can be by means of a sum set aside to be spent by the developer or a financial contribution to the Council. A transparent

process of commissioning public art work, involving professional art organisations and/or stakeholder community engagement will be expected.

Public Realm

9.24 All new development is expected to secure improvements to the capacity or condition of the public realm, either within and/or in the vicinity of the development, linked with construction and/or occupation and/or use of the development. Details of the public realm standards that the Council will seek are set out in the Haringey Streetscape Guide, while relevant open space projects are outlined in the Haringey Green Grid.

9.25 The Council and developer will agree whether the improvements to the public realm will be undertaken as works in kind or through a financial contribution. The later will be calculated based on the relevant materials costs as set out in the Haringey Streetscape Guide, including any street furniture provision that may be applicable.

9.26 A planning obligation, or a financial contribution, may also be sought for maintenance.

9.27 A Public Realm plan may be required by the Council to secure the delivery of the public realm and ensure the public have unrestricted access at all times.

Further Consideration

~~9.23~~9.28 For all site-specific undertakings for open space and public realm, it will be expected that any items provided on-site will dovetail with strategic pieces of public realm enhancement. How this is achieved will be negotiated on a site-by-site basis.

10. Heritage

10.1 The London Borough of Haringey has a wide range of heritage assets, and the Council has a duty to conserve and enhance the significance, character and setting of the borough's historic environment.

Policy Context

10.2 London Plan Policy 7.8 and Policies SP12, DM9 and AAP5 detail the Council's policy requirements in relation to managing the historic environment, including archaeological assessment requirements.

Development Triggering an Obligation

10.3 Development proposals that include, or may impact, an identified heritage asset or its setting.

Types of Obligations

10.4 Where appropriate, the range of matters that could be included as part of a ~~s106 agreement~~ planning obligation in relation to heritage assets include:

- ~~Repair~~Conservation, enhancement, restoration and/or maintenance of a heritage asset(s) and their setting;
- Increased public access and improved signage to and from heritage assets;
- Interpretation panels/ historical information and public open days;
- Production and implementation of a Conservation Management Plans;
- Measures for preservation or investigation and recovery of archaeological remains and sites;
- Display of archaeological sites;
- Dissemination of historic environment information for public/school education and research; and
- Sustainability improvements (such as loft insulation) for historic buildings.

Form in which Obligations Should Be Made

10.5 It is essential that heritage works are provided in a timescale commensurate with the proposed phasing of the development and the Council will seek to approve trigger points through the ~~s106 agreement~~planning obligation.

10.6 The obligation will be secured through developer provision of the identified works. Where appropriate, the obligation may include provision for the long-term maintenance of the heritage asset.

10.7 Where the proposal involves enabling development to secure the repair, restoration and maintenance of the heritage asset, the Council will require any identified funds raised through provision of the enabling development to be held in an escrow account, and appropriate arrangement put in place to manage the spending of such funds.

11. Environmental Sustainability

11.1 The promotion of renewable, sustainable forms of energy and enhancements to wildlife biodiversity within Haringey is important to ensuring the borough is environmentally sustainable. Local Plan policy SP4 sets out how the ~~c~~Council will ensure all new development contributes to securing a low carbon future for the borough.

Policy Context – Carbon Management

11.2 Alongside the Mayor of London, ~~the leader of~~ Haringey has agreed to work towards ~~Haringey~~ becoming a Zero Carbon authority by 2050. This ambition will supersede the 2020 target~~–~~ for CO2 ~~R~~reduction. The London Plan Policy 5.2 states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with an energy hierarchy that gives the highest priority to using less energy, over supplying energy efficiently and then using renewable energy. It sets targets for emission reductions which are seen in table 11.1 below.

Table 11.1. Carbon reduction targets for all major development in London		
	Year Improvement on 2010 Building Regulations	
	Domestic Development	Non-domestic Development
2010 – 2013	25 per cent	25 per cent
2013 – 2016	40 per cent	40 per cent
2016 – 2019	Zero Carbon	As per building regulations requirements
2019 – 2031	Zero Carbon	Zero carbon

11.3 Policy 5.3 of the London Plan states that the highest standards of sustainable design and construction should be achieved to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance on sustainable design and construction, which include those for minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems).

11.4 London Plan Policy 5.4 deals with retrofitting existing buildings, and states that these should be brought up to the Mayor's standards on sustainable design and construction. In particular, those to reduce carbon emissions from the existing building stock by identifying potential synergies between new developments and existing buildings through the retrofitting of energy efficiency measures, decentralised energy and renewable energy opportunities.

11.5 The Mayor has published supplementary planning guidance on Energy Strategies: http://www.london.gov.uk/priorities/planning/strategic-planning-applications/preplanningapplication-meeting-service/energy-planning-gla-guidance-

on-preparing-energy-assessments which gives detailed guidance on the sustainable design standards that should be applied to new development in London.

11.6 In Haringey Councils Strategic Planning Policies, policy SP:4 states that development will reduce energy use and emissions that contribute to climate change during the life-cycle of the development. It highlights that this carbon reduction is one of the Councils core priorities and major challenges. Within this policy it reaffirms the London Plan policies and gives guidance on its implementation.

11.7 The Council's Policy DM28 on Allowable Solutions requires that where it is demonstrated that it is not possible to meet required CO2 reductions on-site, either due to technical feasibility or economic viability, the Council will require that the identified shortfall is offset.

Potential off-site financial Obligation: Carbon Management

11.8 The carbon dioxide reduction targets should be met on-site, as demonstrated through the submission of an energy strategy for the development proposal that includes details for monitoring and reporting on energy performance.

~~11.8~~11.9 Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through an ~~cash~~ in lieu contribution ~~to the relevant borough~~ to be ring fenced to secure delivery of carbon dioxide savings elsewhere.

~~11.9~~11.10 Payments in lieu should be calculated by reference to a "carbon price" – which in Haringey is the most recently published ~~the cost of reducing offsetting carbon emissions calculated for Haringey having regard to the cost and feasibility in the particular circumstances that exist here as suggested by paragraph 2.5.10 of the Mayor's~~ Mayor for London's non-trade price~~supplementary guidance on sustainable design and construction~~.

~~11.9 This cost has been agreed for Haringey based on the cost of steps to reduce emissions on the scale required here is set at £2,700 per tonne.~~

Policy standard and application

~~11.10~~11.11 And these will be required to apply the carbon reduction targets set out in table 11.12 below, based on the London Plan policies indicated:

Table 11.2 Summary of the energy targets required in Policy 5.2 and 5.4 of the London Plan		
	Onsite carbon reduction target (over Building Regulations part L 2013 Target Emissions Rate) (as of Oct 2016)	Policy Source
New build residential of 10 or more units	Zero Carbon	London Plan 5.2

Change of use to Residential or refurbishment >1000m²	Zero Carbon	London Plan 5.2/5.4
New Build non-residential >1000m²	35% improvement over building regulations	London Plan 5.2
Extensions >1000m² (excl. Listed building)	35% improvement over building regulations	London Plan 5.2/5.4
Change of use to non Residential / refurbishment >1000m²	35% improvement over building regulations	London Plan 5.2/5.4

~~11.11~~11.12 Where mixed used developments come forward the schemes energy footprint will be split and carbon proportioned between these two elements (domestic and non-domestic). How this is calculated and presented is seen below in Tables 11.3 through 11.6.

~~11.12~~11.13 Carbon reductions will be sought on-site, in most cases through design features inherent to the development. These design features will be secured by planning condition and be expected to be maintained in perpetuity. Where necessary, is may be appropriate to secure an obligation for agreed post occupation monitoring and reporting provisions, including the installation/maintenance of monitoring equipment and reporting arrangements.

Method of Demonstrating Carbon Reduction and Calculations for Offsetting

~~11.13~~11.14 Developers should follow the approach described in the GLA's guidance on preparing energy assessments in the calculation of offsetting payments in lieu. This involves providing some key input data as set out in table 11.3 below

Table 11.3 Required input data	
	Carbon Dioxide Carbon Tonnes (per annum) Emissions from regulated Energy
Baseline Building Regulations Compliant Scheme	A
After Energy Efficiency measures have been included (Lean)	B
After Community Heating and CHP have been included (Clean)	C
After renewable technologies have been included (Green)	D

~~11.14~~11.15 The values in each row should be the regulated CO_2 emissions (expressed in Tonnes CO_2 per annum) after each stage of the Energy Hierarchy (expressed in tonnes of CO_2 per annum, not $kgCO_2/m^2$ per annum). These will need to be calculated for the domestic part of the development and also the non-domestic part of the development.

~~11.15~~11.16 The inputs are applied into the calculation shown in tables 11.4 and 11.5 below to give the savings from each stage of the energy hierarchy, and the shortfall required (where the development fails to achieve the required target).

Table 11.4 Calculations required demonstrating regulated carbon dioxide savings from each stage of the Energy Hierarchy for domestic buildings		
Regulated domestic carbon dioxide savings		
	(Tonnes CO_2 per annum)	%
Savings from energy demand reduction	A - B	(A – B)/A * 100
Savings from Community heating / CHP	B - C	(B – C)/B * 100
Savings from renewable energy	C - D	(C – D)/C*100
Total Cumulative Savings	A - D = E	(A – D)/A*100
Carbon emissions required for off-set payment	–A - E = F	

Table 11.5. Calculations required demonstrating regulated carbon dioxide savings from each stage of the Energy Hierarchy for non-domestic buildings.		
Regulated non-domestic carbon dioxide savings		
	(Tonnes CO_2 per annum)	%
Savings from energy demand Reduction	A - B	(A – B)/A * 100
Savings from Community heating / CHP	B - C	(B – C)/B * 100
Savings from renewable energy	C - D	(C – D)/C*100
Total Cumulative Savings	A - D = E	(A – D)/A*100
Total Target Savings	A * 0.35 = F	
Shortfall carbon emissions required for off-set payment	F - E = G	

~~11.16~~11.17 These calculations will then be combined and presented in a summary table 11.6 below.

Table 11.6. Site wide regulated carbon dioxide emissions and savings			
	Total regulated emissions (Tonnes CO_2/year)	CO_2 savings (Tonnes CO_2/year)	Percentage staving (%)
Part L 2013 baseline	A domestic + A non-domestic		

Savings from energy demand reduction (Lean)	B domestic + B non-domestic	Total A – Total B	(Total A – Total B)/Total A * 100
Savings from Community heating / CHP (Clean)	C domestic + C non-domestic	Total B- Total C	(Total B – Total C)/Total A * 100
Savings from renewable energy (Green)	D domestic + D non-domestic	Total C – Total D	(Total C – Total D)/Total A*100
		CO2 savings off-set (Tonnes CO2)	
Amount of tonnes of CO_2 to be off-set		F domestic + G non-domestic	

~~11.17~~11.18 The amount of carbon dioxide to then be offset (as seen in table 6) is then multiplied by the ~~Council's~~ Mayor of London's most recently published cost of carbon. ~~This is:~~

~~Amount of tonnes of Carbon Dioxide to be off-set x £2,700 = Offset payment.~~

Offsetting payment and projects

~~11.18~~11.19 The offsetting payment will be collected under a ~~section 106 agreement~~planning obligation, and will be collected at the commencement on site. This fund will then be used to support and fund the delivery of carbon reduction projects within the borough. There's also likely to be a need for later energy plan at the developer's expense to assess the energy efficiency of the development and to determine if a further carbon offsetting contribution is required.

~~11.19~~11.20 Carbon offsetting guidelines by DCLG set out how the development would deliver their remaining emissions and support a low carbon economy and compensate for their environmental impact. The DCLG guidelines set out how this finance should be used. This includes renewable energy, retrofitting energy efficiency measures, low carbon transportation projects, and local greening projects which generate reductions in greenhouse gas emissions. In order to ensure this finance delivers genuine results, all projects which are supported must be 'additional', proving that they would not happen without the carbon offsetting.

~~11.20~~11.21 Projects that the Haringey Carbon Offset Fund will finance include:

- Living walls and living roof opportunities;
- Trees planting schemes;
- Renewable energy projects;
- Retrofitting projects for both dwellings and commercial development;
- Education and awareness raising projects;
- Kick starting innovative energy and carbon reduction projects;
- Energy Master planning and the management of these projects.

Decentralised Energy

~~11.21~~11.22 The London Plan sets the target of 25 per cent of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. In order to achieve this target, the Mayor prioritises the development of decentralised heating and cooling networks at the development and area wide levels, including larger scale heat transmission networks. It also states that development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites. Major development proposals should select energy systems in accordance with the following hierarchy:

1 Connection to existing heating or cooling networks;
2 Site wide CHP network;
3 Communal heating and cooling;

~~11.22~~11.23 The Local Plan policy SP4: Working towards a Low Carbon Haringey requires all developments to assess, identify, and implement, where viable, site-wide and area-wide decentralised energy facilities including the potential to link into a wider network, and prioritise connection to existing or planned networks where feasible.

~~11.23~~11.24 Where a decentralised energy network exists proximate to a site, it will be expected that the site is connected to it.

~~11.24~~11.25 Where an identified future decentralised energy network exists proximate to a site it will be expected that the site is designed so that it can easily be connected to the future network when it is delivered. A future connection will only be required for sites proximate to networks identified in the Council's decentralised energy plan.

Non-financial Obligation: Connection to existing or future decentralised energy networks

~~11.25~~11.26 Where a site is located within a suitable distance (as identified in the Development Management DPD), it will be expected to connect to an existing or make provision for connection to a future proposed local decentralised energy network, at the developer's expense.

Non-financial Obligation: Creation of decentralised energy hubs

~~11.26~~11.27 Where identified in the Council's Decentralised Energy Plan and/or Site Allocations DPD, developments will be expected to incorporate decentralised energy hubs into new developments.

Biodiversity

~~11.27~~11.28 The quality of the physical environment is under increasing pressure in Haringey with a growing population and significant development demands. The Council recognises the importance of responding to the impacts of climate change

and an increasingly dense cityscape by maintaining and encouraging biodiversity within the Borough.

~~11.28~~11.29 Policy SP13 of the Local Plan manages how new development should protect and improve the biodiversity and habitats that exist on a site during a redevelopment. In particular, new ways of creating habitat within dense urban development including green roofs and walls and rain gardens will be supported, and obligations will be secured to ensure these are appropriately maintained. Policy DM28 requires major developments, and encourages minor developments, to investigate and secure environmental enhancements to main rivers or ordinary watercourses, including de-culverting, helping to achieve the aims of the Thames River Basin Management Plan.

Financial/Non-financial Obligation: Mitigation of impact on biodiversity

~~11.29~~11.30 The London Plan states that in addition to making a positive contribution to protecting, enhancing, creating and managing biodiversity, development should prioritise assisting in achieving targets in biodiversity action plans or improve access to nature in areas deficient in accessible wildlife sites. Where a development includes or adjoins a main river or ordinary watercourse, should demonstrate how opportunities to restore the river/watercourse or improve its condition could be secured.

~~11.30~~11.31 In very exceptional cases where a developer cannot protect an ecological habitat on or adjacent to the site and permission to develop is granted, a planning obligation will be required to provide compensatory measures of equal or greater value. This should be located as close to the site as possible, and could include enlarging or enhancing existing nature conservation assets.

~~11.31~~11.32 The works should be guided by a report from a qualified member of CIEEM and agreed by the Council. However, the developer needs to demonstrate how they will identify and secure funding to carry out the works to enhance the site and where necessary purchase a site.

Considerate Constructor Obligation

~~11.32~~11.33 Sustainable development includes the impacts that the construction process of the development proposals may have on neighbouring activities, the general public, and the environment. For most forms of development, the Council will usually include a condition requiring the applicant to submit a construction management plan (CMP) prior to any work commencing. The CMP typically details the hours of construction activity, confirms the access arrangement, the times when HGV movements should take place, safety procedures, and environmental mitigation, such as wheel washing facilities and watering to prevent dust.

~~11.33~~11.34 The construction industry has established its own Consideration Constructors Scheme to encourage best practice beyond statutory requirements. The Council's supports this Scheme and will typically require that, prior to the commencement of any works the site ~~will need~~should to be registered with the

Consideration Constructors Scheme. Proof of registration ~~will need to~~should be sent to the Council.

12 Telecommunications

12.1 The Council, as part of its plans for growth in the borough, has ambitions to provide full coverage of superfast broadband (above 25MB/s) to all residents and business within the Borough, and ultrafast connections (above 100MB/s) in Regeneration Areas.

Policy Context

12.2 Policies DM38 and DM54 of the Development Management DPD, require new developments (both housing and commercial) to be directly served by high quality fibre networks. Supporting high quality communications infrastructure, which provide a next generation network, is essential to ensuring Haringey is able to attract key growth business sectors, including SMEs, creative and tech industries, as well as supporting the increasing number of internet-capable devises in the home.

Development Triggering an Obligation

12.3 Within designated Regeneration Areas, as shown on the Policies Map, all new build residential, commercial, retail and community development must be designed to be capable of facilitating connection to ultrafast broadband (above 100MB/s). Across the remainder of the Borough, all new build residential, commercial, retail and community development must be designed to be capable of facilitating connection to superfast broadband (above 25MB/s).

Form in which Obligation Should Be Made

12.4 It is the Council's preference that broadband connectivity should be designed into the development at the masterplan stage and implemented through a planning condition.

12.5 If the development proposal does not adequately address the requirement for superfast or ultrafast broadband connectivity, the Council may request a financial contribution to improve linkages to an available backhaul, exchange and/or the upgrading of an exchange where this has been identified as necessary to ensure the required broadband speeds can be provided. An internet plan showing how the above will be achieved may also be required.

12.6 The Council will negotiate with the developer over the appropriate level of financial contribution required.

13 Social and Community Infrastructure

13.1 New development will give rise to the need for new or expanded community services and facilities. Subject to what is said below, the Council acknowledges that the Haringey CIL is the principle source of funding for the provision of new or enhanced social and community infrastructure.

Policy Context

13.2 Para 17 of the NPPF includes as one of the 12 core principles, that the planning system should '*take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs*'. Further, para 70 addresses the delivery of social recreational and cultural facilities and services that communities need, stating that policies and decisions should plan positively for their provision, guard again their loss and ensure they are appropriately located to serve the community.

13.3 Policy 3.16 of the London Plan deals with the protection and enhancement of social infrastructure (such as community, cultural, and play facilities, places of worship, fire stations, policing etc) to meet the needs of its growing and diverse population. There are specific policies dealing with health and social care facilities (Policy 3.17), education facilities (Policy 3.18) and sports facilities (3.19), all of which support delivery through the planning process.

13.4 Policies DM49 of the Development Management DPD, states that existing social and community facilities will be protected unless a replacement facility is provided; proposals for new or extended facilities are to be supported; that that consolidation of facilities is supported where this results in equal or enhanced provision to meet needs; and that new major development may be required to accommodate new infrastructure.

Development Triggering an Obligation

13.5 Development proposals that involve the replacement of an existing facility, or a single proposal that generates the need for an entire new facility to serve the needs of the development – this is only likely to apply to significantly large major development proposals - or major development in the right location and with capacity to accommodate identified social or community facilities needed to serve the wider community.

Form in which Obligation Should Be Made

13.6 The Council's preference is that replacement or new, social and community infrastructure, the need for which is generated by a single development, should be delivered on-site and be integrated into the design of the development at the masterplan stage and implemented through a planning condition.

13.7 If the development proposal is providing land or works in kind necessary to accommodate a facility to serve the wider community (i.e. needs beyond the proposal site) the Council will negotiate with the developer over the appropriate level

of financial compensation that will need to be paid to the developer either by the Council or the service provider (e.g. NHS in respect of healthcare facilities; Education & Skills Funding Agency in respect of primary or secondary school provision; the Council in respect of indoor sports facilities). The Council will also agree with the developer the timing of funding payments, when the facility should be constructed; its transfer to the relevant service provider; and when occupation and operations can commence.

~~13~~14 Reporting, ~~and~~ Monitoring and Review

~~13.1~~14.1 The performance of the SPD will be assessed and reported on as part of the Council's Authority's Monitoring Report. The Council has therefore established the following set of monitoring requirements in respect of this SPD:

- The types of obligations being secured and compliance with the requirements of this SPD;
- The affordable housing delivered using commuted sums received in lieu of on-site affordable housing provision;
- Monitoring time taken for decisions where a planning obligation has been required as part of the application; and
- Monitoring of delivery (i.e. the completion of obligations including those to be undertaken by delivery agents other than the developer).

~~13.2~~14.2 Should monitoring identify an issue with the application of the SPD, this may necessitate a partial review. Likewise, changes to legislation, national policy or guidance, or London Plan policy or guidance may also trigger a further review of the SPD.

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Report for: Cabinet – 6th March 2018

Title: Haringey's Transport Strategy 2018

Report Authorised by: Helen Fisher– Interim Strategic Director of Planning, Regeneration and Development

Lead Officer: Emma Williamson – Assistant Director – Planning

Ward(s) affected: All

Report for Key/ Non Key Decision: Key

1 Describe the issue under consideration

1.1 The Council's growth and regeneration plans, and its targets for improving health, inequality and environmental quality, are predicated on enhancing the public transport network, reducing reliance on private vehicles, and increasing walking and cycling. The Council therefore needs to produce a new transport strategy that clearly sets out the transport objectives and priorities that will provide the context for preparing more detailed plans, policies, and bids for investment and works over the next 10 years.

1.2 Following approval by Cabinet in October 2017 to consult on the draft Haringey Transport Strategy, a six-week public consultation was carried out which closed on 22 December 2017. This report outlines the consultation carried out, the responses received and how the draft is proposed to be amended.

2. Recommendations

2.1 It is recommend that Cabinet adopts the new Haringey Transport Strategy

3 Reasons for decision

3.1 The Transport Strategy is needed to ensure clarity around the Council's strategy and priorities for managing the local transport network and to support the delivery of corporate priorities for growth and regeneration as well as improving health and environmental quality.

3.2 The absence of a Strategy runs the risk of decisions about investment in transport being made in an uncoordinated manner. A new strategy is particular important to target resources effectively following the Local

Implementation Plan funding cuts announcement by Transport for London in their 2018 business plan.

4 Alternative options considered

4.1 The Council could rely on the Mayor of London's Transport Strategy and the North London sub-regional Transport Plan to provide the Strategy and priorities locally. However, while Haringey shares many of the same transport challenges as the rest of London and the sub-region, these higher level strategies and plans fail to recognise variations in approach based upon local context, and therein, the weight to be afforded to the realisation of specific objectives and priorities.

5 Background information

5.1 The Transport Strategy sets out the future direction for transport in the borough and describes the context and challenges we face and how, through the objectives and priorities outlined in the Strategy, we intend to address them. At the heart of the strategy is supporting growth in the Borough, improving quality of life and health and wellbeing and working towards becoming a carbon zero borough by 2050[1]. This overarching Strategy will be supplemented with a series of 'Action Plans' which will set out further details of our key programmes and priorities and actions needed to meet the vision set out in this strategy. The list of action plans are:

- Walking and Cycling Action Plan,
- Parking Action Plan,
- Sustainable Transport and Travel Action Plan, and
- Local Implementation Plan (LIP).

5.2 The Greater London Authority Act 1999 ("the 1999 Act") requires London boroughs to produce a Local Implementation Plan (LIP), which demonstrates how each authority will deliver the Mayor's Transport Strategy (MTS).

5.3 Haringey's LIP 2014 - 2017 sets out the overarching borough transport objectives and associated delivery plans, these objectives are based on TfL LIP Guidance aimed at implementing the MTS locally, rather than being Haringey-led transport objectives and priorities.

5.4 On June 21 2017 the Mayor of London published a draft of the MTS for public consultation. The document sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years. Although the new MTS is yet to be published, we have been mindful to ensure the Haringey draft Transport Strategy has considered and taken into account both the consultation draft MTS and the existing adopted MTS.

5.5 The draft MTS puts people's health and quality of life at the very heart of planning the city's transport, a theme we replicate locally through our draft Transport Strategy.

[1] the Haringey Zero-Fifty Commission recommendations 2017

5.6 The three key themes of the new draft MTS are:

1. Healthy Streets and healthy people - Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.

2. A good public transport experience - Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.

3. New homes and jobs - More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone

6 The Haringey Transport Strategy objectives and priorities

6.1 The overarching aim of the Strategy is to support a shift to more sustainable travel modes to help address the following transport challenges:

- **Population growth** – Haringey's population is forecast to grow by 15% over the next 10 years, from 256,000 to 294,000, resulting in significant pressure on the existing transport network;
- **Capacity and connectivity** – despite excellent transport links, at peak times the tube, rail and buses serving the borough are very crowded, and the lack of orbital connections hinders access to employment areas outside of the Central Business District (CBD). Both also impact on the attractiveness of Haringey for business and leisure.
- **Congestion and competition** – there is competing demand for the available road space for different road users from vehicles, buses, parking, servicing, cycling and pedestrians. Congestion leads to longer travel times, perceptions of user safety, and environmental impacts with respect to noise and pollution;
- **Quality of the transport network** - poor quality pavements, potholes, a lack of signage or facilities, stations only accessible by stairs, and poorly laid out or confusing junctions, impact on people's quality of experience and perceptions about safety and accessibility;
- **Air quality and noise** – road transport contributes significantly to poor air quality and pollution levels that impact on health and on climate change. The main source of ambient noise experienced by residents is from road traffic;
- **Parking pressures** – the reliance on car use to access employment or services, and the growth of households with multiple cars, is having a significant impact on urban and residential amenity. There is also the perception that high levels of customer parking are needed if town centres are to attract shoppers.

6.2 Our vision for the strategy is to deliver 'a transport system that matches our growth and prosperity ambitions, whilst also improving our environment, providing accessible choices and making walking, cycling and the use of public transport a first choice for all.'

Our vision will be achieved through four outcomes:

a) A public transport network that is better connected, has greater capacity and is more accessible, supporting our growth ambitions
b) Active travel the default choice, with more people choosing to travel by walking or cycling
c) An improved air quality and a reduction in carbon emissions from transport
d) A well maintained road network that is less congested and safer

6.3 As well as the above challenges, there are also opportunities for enhancements that can help Haringey address transport issues. These include large scale investment programmes such as the four tracking of the West Anglia Main Line; signal and higher frequency services on the Piccadilly Line Underground; the new station at White Hart Lane; low emission bus zone for Wood Green; and signalling strong support for Crossrail 2.

6.4 The Transport Strategy sets out objectives to address the challenges and to maximise the benefits of the opportunities for Haringey. These objectives engage with the MTS and Haringey's own Corporate Plan objectives and priorities.

6.5 The Strategy intentionally does not set targets for meeting these outcomes, rather the proposed Action Plans will provide the responses to meeting the challenges and assist in delivering transport enhancements.

7 Statement of Consultation

7.1 In October 2017, Haringey's Cabinet considered the draft Transport Strategy and resolved to publish the document for consultation for a period of 6 weeks. The public consultation ran from 10 November 2017 until 22 December 2017.

7.2 Over 300 notifications were sent by email to the transport planning consultation database and the transport forum contacts list, including consultation bodies, local groups including Haringey Cycling Campaign, residents and businesses. The council also used its twitter account (see Appendix F) to notify its followers that the consultation was happening. The strategy was presented to the Haringey Transport Forum in September 2017 and targeted meetings were held with interested groups and officers at the council.

7.3 Three consultation exhibitions were held in the borough on 27, 28 and 29 November 2017. The events were held at the following three libraries to cover the east, west and central areas of Haringey: Marcus Garvey library (see Appendix F), Wood Green Library and Hornsey Library. Officers were on hand at these exhibitions to present the strategy to residents and to answer any questions. These events were well attended.

7.4 Hard copies of the draft strategy were made available at the council's offices at both the Civic Centre and River Park House, as well as at all public libraries across the Borough. The draft strategy was also made available to view and download from the council's website, attached to a dedicated web page explaining the consultation. A dedicated mailbox was set up for responders to email and send their representations and questions to.

7.5 50 representations were received to the draft Strategy. These came from neighbouring authorities, resident groups, amenity groups, parents and school pupils and local residents. The majority of these comments related to bus route issues around Highgate School. Appendix A provides the table of responses and the council's proposed response to these comments. The Haringey Cycling Campaign (HCC) provided a detailed response to the draft and their comments, and the council's responses, are provided in Appendix B.

7.6 In summary, the strategy was strongly welcomed. There was some concern about the lack of targets in the strategy but the targets and monitoring framework will be contained in the proposed action plans.

7.7 The policy shift towards more sustainable modes of transport as a means of cutting congestion, reducing the reliance on the private car, tackling air quality and addressing public health and well-being, was welcomed and many expressed an interest to see the detail emerge from the action plans. The motorcyclist community in Haringey provided a representation expressing their concern about not being mentioned. This has been rectified.

7.8 There were 26 responses sent from parents and pupils of Highgate School complaining about the 603 and 210 bus routes and the need to extend the operating hours of the 603 to start earlier and finish later and for the 210 frequency to be increased. We will work with Transport for London buses to identify opportunities to improve both services as a means of enabling pupils to take the bus to and from school and cut congestion from school traffic.

8 Proposed changes

8.1 The proposed changes are set out in Appendix C. The changes have been made in response to a number of constructive and factual points made by the respondents. The strategy is not proposed to change in detail but rather minor amendments are proposed to firm up our commitment to the vision and the outcomes.

9 Next Steps

9.1 Following adoption by Cabinet, the new Haringey Transport Strategy will be published and preparation on the proposed Action Plan will be commence. A timetable for delivering the Action Plans is set out the in the Transport Strategy.

10 Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Strategic Procurement (Peter Capp)

10.1 Procurement notes that the reports seeks approval of the Haringey Transport Strategy.

10.2 Consideration should be given to how the strategy will be implemented with external suppliers.

10.2 Procurement does not have any concerns over this strategy.

Finance (Kaycee Okegwu)

10.3 This report seeks Cabinet adoption of the Haringey Transport Strategy following public consultation.

10.4 The Transport strategy is Haringey-led and is aimed at delivering a system that matches the Council's growth and development ambitions.

10.5 Any costs linked to implementing the Strategy would be met from existing resources. These include the current and potentially future LIP allocations. Funding will also be secured via Section 106 and Section 278 agreements, which are negotiated through the development management process.

10.6 Projects or programmes in the forthcoming action plans will be reviewed to ascertain the financial implication and will be presented for consideration via SLT or Cabinet as appropriate.

10.7 Any additional funding requirement would need to be carefully considered in the light of budget availability.

Legal (Ben Burgerman)

10.8 As the report notes section 145 of the 1999 Act requires each London Borough to prepare a LIP for the implementation of the Mayor's transport strategy and it is noted that this draft strategy appended to the report will be in addition to the LIP. Section 144 of the 1999 Act also provides that in exercising any function, the Council is to have regard to the Mayor's transport strategy and related guidance regarding its implementation, which is noted in paragraph 5.4 above.

10.9 An equality impact assessment and a strategic environmental assessment should be undertaken and appropriate findings addressed.

Equalities (Otis Williams)

10.10 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

10.11 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

10.12 An Equality Impact Assessment has been undertaken to support the draft Transport Strategy and is attached as Appendix E.

10.13 The Assessment provides further details on how the strategy will support work to tackle inequalities, such as those relating to health in Haringey. In addition, it considers accessible transport for disabled and older people.

11 Contribution to strategic outcomes

11.1 The Draft Strategy's alignment with our Corporate Plan vision and objectives to actively manage and drive growth and development across the borough is set out in section 3(d) of the attached Draft Transport Strategy. In Summary:

- **Priority 1 and 2** by making it easier for people to walk and cycle thereby increasing physical activity and creating healthier environments.
- **Priority 3** by making our street more safe and well maintained
- **Priority 4** by making Haringey an attractive place for business investment as well as ensuring Haringey residents are able to take advantage of wider London employment
- **Priority 5** by providing a more accessible and better connected transport system to support housing growth and provide the infrastructure to support development viability.

12 Appendices

- Appendix A – Table of responses
- Appendix B – Haringey's response to Haringey Cycling Campaigns detailed representation
- Appendix C – A schedule of proposed changes to the Strategy
- Appendix D – Equalities Impact Assessment (EQIA)
- Appendix E – Consultation Exhibition photo and Haringey's Twitter notification
- Appendix F – Haringey's Transport Strategy 2018

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Response Number	Respondent		Summary of response	Council's response
1	Sandy Schofield	Resident	• Does not address vehicle speed limits • Speed limits are not enforced • Will the Council take action to enforce speed limits?	The Council will continue to enforce speed limits and work with the police and neighbouring authorities to ensure a coordinated response. Additional wording has been added to outcome 4 to confirm our commitment.
2	Mr J Murphy	Residents	• Welcomes the move towards healthier active travel and usage • Supports the priority towards making Haringey one of the most cycling and pedestrian friendly boroughs in London and managing parking demand and provision • However, there needs to be an increased priority to deliver more separated cycle infrastructure to provide a safer means of active travel • The timescales for the cycling and walking action plan is too long	The Council welcomes the support. The cycling and walking action plan will explore the need for more separated cycle infrastructure and suggest necessary interventions to achieve better infrastructure. The action plan preparation is underway and the suggested timetable reflects a realistic timeframe to achieve a comprehensive set of actions.
3	Mr T Newland	LB Hackney – Senior Transport planner	• Welcomes the publication of the transport strategy • Looks forward to working closely on joint areas of interest along the border, in particular at Finsbury Park • Interesting in promoting the use of newly electrified Barking to Gospel Oak line • Welcome discussions on the improvement to Seven Sisters Road and Green Lanes for pedestrians and cyclists. • Welcome proposals to see cycle facilities continue into Haringey	The Council welcomes the support and looks forward to working with our neighbours. The concern raised has been miss interpreted from the strategy. The council was referencing the perception that high levels of customer parking is needed if town centre are to attract customers as a challenge to the strategy.

			• Welcome the move to introduce more stringent parking controls in Haringey Developments • Concerned at the suggestion that more town centre parking is needed in Haringey	
4	Mr D Jaeggi	Resident	• Broadly very supportive of the strategy	The Council welcome the support.
			• Specific points: • Section 3 'vision' – this should focus on % of journeys that could be walked or cycles are actually walked or cycled. • Outcomes. There is no specific outcome to reduce motorised traffic and there should be and not buried in outcome 2 • Outcome 2 – 'promoting' should be replaced with 'enabling'. • Would like to see Boris biked in Haringey • Outcome 3 – should be aggressively taxing • Outcome 4 – would like to see reference to specific measures such as traffic filtering to eliminate rat runs. Through traffic should be forced to use main through routes. • Question - If councillors were forced to travel on foot or by bike for a period of time, would this focus their minds to the real impediments to active travel in Haringey?	The vision has been amended to reflect the need to address actual walked and cycled journeys alongside the original vision. Outcome 2 has been changed to say 'enable' rather than 'promoting'. We believe outcome 3 will provide the measures of improving air quality without the need to aggressively tax. We will continue to monitor the effectiveness of the strategy through the action plans including the suggestion to change 'minimise' rat runs to 'eliminate'.
5	Mr C Barker	Transport Officer – Muswell Hill and Fortis Green Association	• Welcomes the strategy which echoes the Mayor's healthy streets agenda	The Council welcome the support.
			• Outcome 1 – A key requirement is better orbital connections.	Agreed and this will be a key part of the action plans

			• Outcome 2 – Some figures would help here. We should work towards 50% of journeys wholly on foot or by bike by 2020	The figures and evidence supporting the strategy outcomes will be provided in the action plans
			• Outcome 3 – a crucial requirement is a drastic reduction in fossil fuelled vehicles. The strategy should be encouraging the use of public transport, walking and cycling in place of using private cars by - • Phasing out diesel, particularly the use of diesel fuelled vehicles by the council by 2020 • Reducing the need to travel by intelligent land use planning • Encouraging car clubs which use only electric vehicles • Establishing a network of the electric vehicle charging points throughout the borough, exploring the possibility of using lampposts for this purpose and the use of other locations in the public realm such as car parks.	Agreed. The strategy is aiming to achieve all the suggested interventions. The phasing out of diesel vehicles is a national objective and therefore it is not repeated in this strategy.
			• Outcome 4 - there need to be a focus on reducing road casualties	Agreed. This is a key priority of outcome 4.
6	RED ARMY RIDING CLUB (RARC)	RARC President - representing Haringey's motorcycling community and other organisations	• Very concerned and disappointed that powered two wheelers are not mentioned once in the draft. • The document fails to address the issue of transport poverty and the vast inequalities which are present in Haringey. • No evidence of equality impact assessments • The document as it stands reads like a blueprint for rendering town centres and	The strategy has been amended to take account of specifically of the need to reduce road casualties for motorcyclists and scooters. An EQIA will be presented to Cabinet alongside the strategy in March. There are no specific leads for individual

			other parts of the borough exclusion zones for these and other groups, and seems to only prioritise the travel preferences of wealthy younger able bodied people without dependents. • Motorcycles are a sustainable transport solution. They reduce congestion and pollution and are significantly more economic on long and medium distances • We strongly urge the inclusion of motorcycles and scooters and the recognition of their benefits. • The Transport Strategy should propose the immediate appointment of a motorcycling policy lead at Haringey Council • Haringey Council must prioritise enabling powered two wheelers to be able to access all bus lanes • Crime is a serious barrier to the uptake of motorcycling. • The strategy should recognise the safety of all road users is important. • Vehicle access to town centres is very important. The strategy should not create exclusion zones for so many of Haringey's people with mobility preferences and issues. • The Transport Strategy should place more emphasis on creating suitable infrastructure such as electric vehicle charging points in all parts of the borough but especially on high streets and in town	transport modes at the Council. To support the use of electric motorcycles, the strategy has been amended to recognise their contribution to tackling air quality.

			centre • Electric bicycles should be classed the same as electric motorcycles and adequate infrastructure should be put in place for this type of vehicle. • The Mayor of London's unfair proposals to introduce the ULEZ tax in all parts of London from the North to the South Circulars will plunge thousands of people living in Haringey into transport poverty.	
7	Living Wightman	Representing the residents of Harringay Ward	• The draft strategy borrows heavily from recent Mayoral/ Greater London strategies but needs to have a more Haringey-centred view • Much of our traffic is "through traffic". One implication of this is that many measures to promote active travel will have limited effect – they might encourage a few Haringey residents to walk or cycle rather than use the car, but will have no effect on non-Haringey residents. • Targets need to reduce number of car journeys by 20% or to increase modal share of cycling by 10% and they need to be time based and not too far in the future. • Suggest outcome 2 is listed first • Would welcome measure such as modal filtering of Wightman Road which would facilitate its use as a Quietway and part of the "Green Grid" as shown on the Figure 1 map in the strategy • Outcome 1 – the capacity of the road network should not be increase (unless	The Council welcomes the comments. The overall strategy aims to reduce the number of car journeys and increase modal share of cycling. The action plan will set out the goals, the interventions needed and the timeframes for this should not be too far in the future. The numbering of the outcomes does not express an order of preference for an outcome. The Council works closely with our neighbours to take account of regional issues not solely local issues. Haringey is an active member of the North London Transport Group. The Council's car parking policy for new developments is set out in the adopted Local Plan 2017.

			purely for the purpose of public transport, this will merely induce more traffic • Outcome 2 – increasing electric vehicle use and car sharing does not promote active travel. This belong in outcome 3. Since the majority of Haringey residents don't own a car, this may increase car use. Also they still contribute to pollution and climate change particularly where the electricity is generated and vehicles are heavier and many increase particulate pollution • Outcome 2 - We would like to see some specific measurable goals for the active travel outcome • Outcome 4 - the strategy should be to eliminate rather than minimise rat runs. • The strategy should clearly state the council's policy as regards the borough's willingness to bear the burden imposed by traffic that wishes to use its roads purely as routes for private vehicles to pass through. • The strategy should include concrete data about the dimensions of roads in the borough and their suitability/capacity for carrying traffic. • The strategy also needs to take account of the projected population growth not just in Haringey, but also the even higher projections for neighbouring boroughs such as Enfield and Barnet (plus the higher levels of car ownership in those boroughs), and the potential adverse impact of this on Haringey residents	

			• The strategy should be clear that any new housing in the borough will be provided with zero car parking spaces other than for disabled or designated car-sharing spaces; but should have sufficient high quality cycle parking provision.	
8	Asim Mullick	Highgate School parent	• The 603 bus schedule should be changed allow it to operate during the school run will significantly contribute to your goals. As you know, there is considerable school run congestion around Spaniards Inn and Highgate Roundabout just by the senior school. Further, it will promote social mobility by giving a broader range of students access to Highgate.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
9	Sarah Gahagan	Resident	• Whilst the draft transport strategy sets out some high level ambitions, it has to filter down through to changes on an area/street level. I would like my children to cycle to school and I myself would like to cycle more, but we live on a residential rat run, and to get to school, have to navigate streets with no separated cycling infrastructure. It currently does not feel safe enough to do so. • I am hopeful that the council will feel empowered to make such decisions with the best interests and health of locals and our elderly/children in mind, whilst being supported fully by council members and	The strategy is intentionally a strategic document which tackles issues affecting the whole borough. The action plans will provide the opportunity to explore neighbourhood and streets to determine how we get best meet the strategy vision.

			councillors	
10	Mr J Maizels	Resident	• I am very encouraged to see the draft Haringey Transport Strategy to 2026 and strongly support the direction it takes, particularly the emphasis on improved health and air quality. • Greater emphasis could be placed on creating “Healthy Streets” as defined by the draft Mayor’s Transport Strategy (MTS). • The level of ambition could be clarified: a reputation for being a walking and cycling borough could be more precise. • Outcome 1 - Support this outcome broadly, especially improving connectivity, accessibility and capacity of public transport to support growth. The reference to road network in the first priority should be removed • Outcome 2 - Strongly support the priority of making Haringey one of the most cycling and pedestrian friendly boroughs in London, though would like to see more clarity about how this is to be achieved. Strongly support managing parking demand and provision and reducing overall vehicle movements. • Outcome 2 - do not support the 4th priority bullet - what evidence is there that “increasing the use of electric vehicles and car sharing schemes” promotes walking and cycling? References to electric vehicles should be moved to outcome 3. References to shared car schemes should be removed	The Council welcomes the encouragement for the strategy and the strong support for its direction. The MTS has been given significant emphasis in the local strategy including the healthy streets approach. Do not agree with the suggested amendment to outcome 1. All networks are important to supporting the aims of the transport strategy The details and target for meeting outcome 2 will be set out in the walking and cycling action plan Electric vehicles and car sharing schemes are important to achieving the change desired by outcome 2. They are part of the range of sustainable travel options provided to Haringey residents. Evidence suggests these modes have an effect on car ownership which means less cars on the road. The effect of this is creating a safer environment for cycling and walking. They also contribute to lower emissions which improves air quality and creates a healthier environment for cycling and walking.

			or linked to enabling lower parking provision for private cars. • Outcome 3 – Strongly support • Outcome 4 – strongly support but more could be added on speed enforcement	
11	Catherine Levin	Highgate School Parent	• The aims in your plan are laudable and I fully support the use of public transport and in particular your strategic aim for healthy streets and healthy people. Unfortunately, one of the ways in which this strategic aim is not met is by the continued use by parents of cars to ferry their children to school. • The 603 bus schedule should be changed allow it to operate during the school run will significantly contribute to your goals. As you know, there is considerable school run congestion around Spaniards Inn and Highgate Roundabout just by the senior school. Further, it will promote social mobility by giving a broader range of students access to Highgate. • The consequence of this is that children walk up from Hampstead to Whitestone Pond to get the 210 bus from Golders Green to Finsbury Park, which passes through Highgate. The 210 is often full at this point and drives straight past. When it does stop, it is so full that the children are cramped and travel in a very unpleasant cattle truck environment. For the younger children this is particularly stressful.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
12	Mr T Edwards	Resident	• Support the priority enabling everybody to	

			choose walking and cycling for the majority of their journeys • Outcome 2 - sounds like an encouraging statement, but there are no details in the strategy about how you will achieve this. The strategy fall short on promising to build dedicated infrastructure to support the aims. It is not enough to simply 'promote' active travel. • Outcome 4 - fully support the aim to minimise the use of the back streets as rat runs but how will this be achieved?	
13	Ms C Osborn	LB Waltham Forest – Senior Transport Planner	• Generally supportive of Haringey's overarching vision particularly regarding the focus on more walking and cycling, and a high quality public transport network. • Outcome 1 - supported and we are keen to continue working together to secure an improved public transport network • Outcome 2 - welcomed particularly due to Waltham Forest's recent Mini-Hollands programme and we would welcome cross-boundary working to ensure a robust and comprehensive cycle network that links the two boroughs. Waltham Forest would like to be given an opportunity to comment on Haringey's Walking and Cycling Plan when it is available. • Outcome 3 - It is felt that outcome 3 could be supported by more concrete priorities such as through exploring bike hire opportunities in collaboration with nearby boroughs, and expanding the car club offer.	The Council welcome the support from our neighbours and look forward to working together to achieve our joint aims.

			• Outcome 4 is supported although there is little description yet of how Haringey would manage the conflicts associated, such as 'enhancing' the road network whilst also improving conditions for cyclists and discouraging driving. Waltham Forest would not support any solutions that involved increasing road capacity and potentially unlocking induced demand on the highway network, as this would be likely to have a knock-on effect and result in an increase in the number of vehicles in Waltham Forest	
14	Ms J Teh	Resident	• I would like Haringey Council to strongly consider the possibility of adding additional 603 bus during school peak times in the morning and afternoons. • The 210 buses are overcrowded almost all the time now and school children are often having to wait for one or two buses to go by before they can get on both to and from school. This is a serious safety issue as not only are the school children crowding onto buses that are over crowded and also getting in by the back door and pushing their way on to the bus in any way possible.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
15	Ms H Ridgwell	Highgate School Parent	• Writing to request improvements for the 210 bus service from Brent Cross to Finsbury Park Station via Highgate Village.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
16	Ms T Luthra	Highgate School Parent	• Since you are trying to reduce traffic and congestion along Hampstead Lane / Spaniards, it would really help to have improved bus service on the 603.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.

17	Mr P Rothwell	Resident and School Governor	• Supports the transport strategy • Strategy should address the challenges of pupils in Tottenham travelling from Waltham Cross – long travel times over a short distance • Strategy should address the obstacles to pedestrians to reach schools with all the development going on in Tottenham. Particularly around Northumberland park, high road and White Hart Lane. • Strategy should address the 603 bus operating times to allow school children to use the bus.	The Council welcomes the support. The walking and cycling action plan will look at how we can improve the environment for pedestrians across the borough, including in Tottenham. The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
18	R Heath	Highgate School Parent	• The frequency of the 603 bus should be increased to accommodate school times to encourage parents to not use their cars to drop off and pick up their kids.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
19	A Montoya	Highgate School parent	• The frequency of the 603 bus should be increased to accommodate school times to encourage parents to not use their cars to drop off and pick up their kids.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
20	E Graham	Highgate School Parent	• The frequency of the 603 bus should be increased to accommodate school times to encourage parents to not use their cars to drop off and pick up their kids.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
21	T Craig	Highgate School Parent	• The frequency of the 603 bus should be increased to accommodate school times to encourage parents to not use their cars to drop off and pick up their kids.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
22	K Colin	Highgate School Parent	• The frequency of the 603 bus should be increased to accommodate school times to encourage parents to not use their cars to	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.

			drop off and pick up their kids.	
23	S Roome	Resident	• Pleased with the majority of the strategy but could be more specific in terms of additional cycle routes, introduce a campaign to reduce short car journeys, encouraging electric vehicles with support networks of charging points and increased but services	The Council welcome the support
24	C Lor	Highgate School parent	• The 210 buses should be more frequent at school hours to avoid parents having to drive	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
25	M Salter	Highgate School parent	• The 210 buses should be more frequent at school hours to avoid parents having to drive and the frequency of the 603 bus should be increased to accommodate school times to encourage parents to not use their cars to drop off and pick up their kids.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
26	A Perotti	Highgate School Parent	• The frequency of the 603 bus should be increased to accommodate school times to encourage parents to not use their cars to drop off and pick up their kids.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
27	H Zucchi	Highgate School Parent	• The 210 buses should be more frequent at school hours to avoid parents having to drive and the frequency of the 603 bus should be increased to accommodate school times to 28encourage parents to not use their cars to drop off and pick up their kids.	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
28	C Longton	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the

			kids to and from school	210 bus.
29	F Mian	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
30	J Bouvier	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
31	C Greenway	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
32	Mr Quentin Given	Co-ordinator Tottenham and Wood Green Friends of the Earth	• Welcome the aims of the strategy, however concerned with the lack of targets and a concrete vision. • Outcome 1 – should not be a priority to increase road capacity for private vehicles • Outcome 2 – should include a target to reduce the number of car journeys, a list of key cycling routes, and an ambition to increase the proportion of journeys made by food by 2020 • Outcome 3 – should include comment on the phasing out of diesel vehicles by 2020 and contractor fleets by 2022 and a commitment to ensuring electric charging points in all new developments with parking spaces, electric car clubs in all new development of 20 or more hoes and electric charging in all council car parks and in 10% of streets by 2025 • Outcome 4 – should include a priority to	The Council welcome the support. The target will be contained in the action plans. It is not the intention of the strategy to prioritise increasing road capacity for private vehicles.

			walking and cycling in maintaining the road network	
33	V Barnecutt	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
34	J Moores	Highgate School Pupil	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
35	P Moores	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
36	L Moores	Highgate School Pupil	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
37	J Twentyman	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
38	C Lithgow-Bertelloni	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
39	R Moores	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
40	D Green	Highgate School	• The 210 and 603 buses should be more frequent and the hours of operation	The Council will work will TFL to identify any opportunities to extend the 603 bus

		Parent	extended to avoid parents having to drive kids to and from school	operating hours and the frequency of the 210 bus.
41	I Beal	Highgate School Parent	• The 210 and 603 buses should be more frequent and the hours of operation extended to avoid parents having to drive kids to and from school	The Council will work will TFL to identify any opportunities to extend the 603 bus operating hours and the frequency of the 210 bus.
42	Ms Meagen Smith	Resident	• Vision – Consider difficulty of the frequency of hills • Outcome 1 – should make mention of these specific points. Ensure all train and overground engineering works are completed on time and to specification, locate bus stops closer to train stations, mandate that bus services through the area do not terminate early within 4 or more stops from the end of the route • Outcome 2 – should include extension of Santander cycle scheme, secure bike huts on streets, dedicated motorcycle bays and reward residents for not having a car • Outcome 4 – should include a commitment to keep track of projects, ensure projects don't conflict and remove traffic obstructions.	The Council is exploring opportunities for a bike hire scheme in the borough. The Council will continue to work with TfL to ensure engineering works are on time and to specification and to minimise early bus terminations without appropriate cause and the availability of another service.
43	C Harrington	Resident	• The issues with cycling that the Haringey strategy should tackle include - amount of traffic and under-occupied cars, potholes, pedestrians crossing the road without looking, road rage from motorists, scary junctions and half hearted attempts at putting in provision for cyclists.	Noted. Will be explored in the walking and cycling action plan.
44	Peter Corley	Tree Trust for Haringey	• Strategy seems OK but seems a wish list with no actual targets	The Council welcomes the support. Targets will be set in the action plans.

45	Bob Pennyfather	Commercial Planning Manager - Arriva London	• Welcome the commitment to support improved transport facilities and better bus services. • Points which need to be resolved to deliver the improvements include – increased bus garage capacity, increased bus stand capacity, improved journey times, and the need to convert garages to electric bus operations	The Council welcomes the support/ The Council will work with Arriva to understand the future needs of the bus operation and to discuss how these might be met.
46	Martin McDonnell	Resident	• The need for a segregated cycle lane along Green Lanes. The main concern for cyclist is safety.	Noted and will be explored in the walking and cycling strategy
47	Francis Hanly	Resident	• Haringey should consider its own congestion charge • Haringey's cycling infrastructure should be improved like its neighbours – Whiteman Road/Turnpike Lane junction is a prime example • Need to close rat runs not just width restrictions which are ineffective – note Watsons/Ringslade Road	A local congestion charge is not considered for this strategy. The direction of the strategy aims to improve cycling infrastructure across the borough. The Council will monitor its priority for minimising rat runs.
48	Denis Till	Resident	• Include something on minimising the conflict between cyclists and bus users. There are at least two bus stops in Haringey with cycle lanes running straight through the bus stops. • Include a commitment to prevents slipping through cracks on the pavement	An additional priority has been added to outcome 1 to take account of the suggestion. Pavement cracks are considered as part of the wider priority – of making Haringey one of the most pedestrian friendly boroughs in London.
49	Tom McGovern	Co Founder – Urbo Solutions (Dock less	• Outcome 1 – supports the outcome but consideration should be given to the role of Dockless bikes in Haringey, ensuring new bus routes are designed with the safety of	The Council welcomes the support. Support for bike hire schemes in Haringey has been added to outcome 3 and is supported by the priorities in Outcome 2.

		Bike Provider)	all road users, and supporting accessibility for all to the whole transport system • Outcome 2 – fully support and hope cycle hire is considered as one of the many options. Cycle parking should be prioritised. • Outcome 3 – Support the move toward zero emissions travel and consideration should be given to the role of dock less hire in supporting this move. • Outcome 4 – support the outcome - Well-built roads will create a safe cycle friendly environment. • Overall the plans for walking and cycling look impressive and seem that they will support the changes in travel behaviour as outlined in the strategy.	
50	Michael Poteliakhoff	Haringey Cycling Campaign	• Welcome the change in direction planned for Haringey and look forward to working with the Council on this. • The overriding focus of the Cycling and Walking Action Plan needs to be delivery of a dense cycle network that is entirely separated from fast or heavy traffic flows, complemented with the creation of low, or no-traffic neighbourhoods. • The challenge over the coming years is to make complete routes that offer a consistent standard from end-to-end. • The strategy should 'enable' not 'encourage' more active travel choices. See Appendix B for the Council's response to detailed the comments.	The Council welcomes the support and we look forward to continuing our engagement with the HCC.

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Appendix B - Haringey's response to HCC's detailed comments				
Page	**Text**	**Comment**	**Suggested amendment**	**Council's Response**
3	more connected and accessible transport system that makes Haringey an attractive place to do business	Businesses overwhelmingly see the advantages of a workforce who can travel safely by bike, and have supported delivery of separated cycleways in London via the Cycling Works London campaign. Liveablility is a key concern of large employers, and that means attractive street environments that prioritise walking and cycling.		Agreed.
3	Improving the health and well being of our residents and enabling them to lead healthy, long and fulfilling lives, through encouraging more active travel choices	Enable, not encourage. Encouragement only works for the very low hanging fruit. Cycling is enabled by the provision of a safe, direct cycling network going places that people want to go, connecting low-traffic areas where people live.	… and allowing them to lead healthy,long and fulfilling lives, by enabling more active travel choices	Suggested change has been made to the Strategy
3	Taking advantage of growth, and reducing inequality, through a transport system that connects residents to jobs and opportunities across the borough and in the wider region	Without mode shift away from space-inefficient cars, growth will worsen congestion and reduce Haringey's competitiveness.		Agreed.
3	Managing the impact of growth, reducing carbon emissions across the borough, through promoting greener travel options	What does this mean? 'Promoting' cycling doesn't work. What is a 'greener travel option'? Electric cars aren't 'green'.	Managing the the impact of growth, reducing carbon emissions across the borough, through prioritising walking, cycling and public transport	The Strategy has been changed as follows: ….'Managing the the impact of growth, reducing carbon emissions across the borough, through prioritising sustainable travel options'
3	A public transport network that is better connected, has greater capacity and is more accessible, supporting our growth ambitions	Does this mean increasing the amount of public transport on offer, or making it work more efficiently e.g. by being less stuck in traffic jams with private cars? Capacity would increase by enabling more journeys by bike.		This reference is to the amount of public transport and efficient. The following change has been made to make this clearer: ….'has greater and more efficient capacity and..'
3	Active travel the easier choice, with more people choosing to travel by walking or cycling	Easier compared to what? To other transport options? Easier than it is now?		This is refering to overcoming the changes associated with people not cycle and walking. 'Easier' has been replace with 'default'
3	An improved air quality and a reduction in carbon emissions from transport	This won't be achieved by a like-for-like replacement of cars with electric cars, which emit 3/4 of the particulate pollution of internal combustion engine cars.		Noted. Electric cars are part of a package of solution to get the step change in travel behaviour towards sustainable modes
3	This Strategy provides the overarching high level statement of our ambitions for transport and highlights our key commitments over the next 10 years. The	The ambition is not clear. Needs measurable targets.	This Strategy provides the overarching high level statement of our ambitions for transport and highlights our key targets over the next 10 years	Targets will be a key part of the action plans. This is a vision statement and strategic document.
3	Sustainable Transport and Travel Action Plan; and	Why/how is sustainable transport different from walking and cycling?		The title and scope of the third action plan is yet to be agree and will evolve from the gaps left by the cycling and walking strategy and parking strategy
4	reducing traffic, encouraging walking and cycling in "Healthy Streets" and by introducing more Quietways and Cycle Superhighway	The Mayor's draft transport strategy doesn't contain a single reference to Quietways or Superhighways	Superhighways (typo)	Changed.
4	Using transport infrastructure as a catalyst for growth such as allowing higher density development near stations and in town centres.	Mayor's draft London Plan specifically calls for car-free development in areas of high public transport accessibility - like the whole of Haringey.	….such as allowing higher density car-free development near stations….	This is dealt with by the Local Plan adopted in August 2017.

4	Improvements to the reliability of the existing road capacity.	TfL's recent Understanding and Managing Congestion report, suggests road capacity is increased on roads where space is allocated away from cars to cycling.		Noted.
4	**Healthy Streets and healthy people** - Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.	The MTS specifically refers to ENABLING active travel by providing well-designed space for walking and cycling. It also specifies that the rate of mode shift away from cars is dependent on planning streets for cycling.	…networks that enable and encourage walking, cycling and public transport use…	Direct quote from the MTS
4	**A good public transport experience** - Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport	There is no journey in this borough that is too far to cycle.		Direct quote from the MTS
5	**d) Local Context** Haringey has good radial transport links into central London by road, underground and rail. Orbital (east-	Haringey has poor to non-existent radial cycling links.	…by road, underground and rail, but lacks high quality radial cycling links	
6	**The Haringey Challenge:**	Needs to recognise in this section that the complete lack of a coherent cycle network presents a huge challenge if the aim is truly for a mode shift to bikes.	Whole new paragraph.	new paragraph added under 'parking pressures', titled 'Cycle network'
6	**Capacity and connectivity** – despite excellent transport links, at peak times the tube, rail and	Not for cycling, meaning needs clarification, eg by adding "public" to transport links	…despite excellent public transport links,…	Changed
6	**Parking pressures** – the reliance on car use to access employment or services, and the growth of households with multiple cars, is having a significant impact on urban and residential amenity. There is also the perception that high levels of customer parking are needed if town centres are to attract shoppers.	There is plenty of data collected in Haringey to disprove this perception, and lots of evidence that more walking/cycling is good for shops	Add- … ,but recent evidence has shown that increased walking and cycling can benefit local shops	Agreed. This will be challenged and explored in the cycling and walking strategy.
7	Haringey has a reputation for being a walking and cycling borough both regionally and nationally	What does this mean? Reputation for cycling is currently very poor.	Haringey has a reputation for the greatest shift towards walking and cycling, both regionally and nationally, supported by walking and cycling being prioritised in all new transport infrastructure	Current wording supports the aims of the strategy
7	That more journeys will be taken by walking and cycling than by using a car	This is already the case in Haringey according to TfL's latest Travel in London report.	That more than 50% of journeys will be taken by walking and cycling	Agreed. Amended to read …'more journeys will be taken by walking and cycling' Target will be set in the Action Plans
7	To have a high quality accessible and wheelchair friendly public transport network meeting the needs of Haringey residents, visitors and businesses.	Also need an accessible cycle network (useable by people with mobility problems)	Amend or add paragraph.	This is to specifally address concerns of public transport. Your point is considered to be addressed by the amendment made above.
7	**Outcome 2** - Active travel the easier choice, with more people choosing to travel by walking or cycling	What does this mean and how many more?	Active travel the easier choice, with a reduction in car use and without fear from fast moving traffic	Amended as above.
7	Greater capacity is needed on the public transport network to help us to deliver our regeneration plans for the Borough.	Increase capacity by getting cars out of the way of more efficient transport like buses and cycles. Reduce demand for public transport to free up more capacity by enabling cycling for shorter journeys in particular.	Greater capacity is needed on the public transport and cycling networks, to help us deliver our regeneration plans for the Borough	This is consiered to specifically address the needs of the public transport network in Outcome 1

8	**Key facts** The public transport network is already under strain in peak periods. Both the Victoria and Piccadilly lines are very crowded from Finsbury Park towards central London. The Barking Gospel Oak line suffers from significant crowding. Similarly there is standing room only on national rail lines towards Tottenham Hale and Seven Sisters.	There is no safe cycle route. This would relieve congestion from the tube.	Add to Key facts- The existing cycling network is deficient both in extent and quality.	Agree. This will be explored in the Walking and Cycling action plan.
8	➔ To increase connectivity, capacity and accessibility on our road and public transport networks to support our regeneration and growth ambitions for businesses, housing and jobs	Space is finite, so capacity can be increased by prioritising space efficient transport over private cars.	To increase connectivity, capacity and accessibility on our road, cycling and public transport networks…..	changed
9	By promoting these more sustainable modes of travel it can contribute to reducing the need to use motor vehicles. Although many road based journeys are not feasible on foot or by cycle, there is enormous scope for more cycling and walking in the borough.	Promotion doesn't work without safe roads for cycling. Which journeys? the draft MTS says 2/3rds of current car trips could be cycled.	By enabling these more sustainable modes of travel it can contribute to reducing the need to use motor vehicles. The Mayor's Transport Strategegy notes that 66% of current car trips could be cycled. In Haringey we estimate this at just under 40%.	changed as follows…'By enabling these more sustainable modes of travel it can contribute to reducing the need to use motor vehicles. Although 'some'….
9	The availability of parking and providing an alternative means of using private cars can support more walking and cycling.	Not understood as presently drafted.	A greater use of car clubs can reduce the demand for on street parking and give more space for cycling and walking.	changed as follows…'Limiting the avaialbility of parking and the greater use of car sharing/clubs can support more walking and cycling'
9	➔ making Haringey one of the most cycling and pedestrian friendly boroughs in London	How? Need a clear commitment to reallocate road space to cycles on main roads and reduce traffic on smaller roads in order to make this happen	Making Haringey one of the most cycling and pedestrian friendly boroughs in London, by prioritising this in all new road infrastructure, reallocating space to cycles on main roads and reducing traffic on local roads	The walking and cylcing action plan will explore the reallocation of road space.
9	➔ promoting active travel ➔ increasing the use of electric vehicles and car sharing schemes ➔ reducing overall vehicle movements	Enabling, not promoting. Car use is never more healthy, but electric cars can of course give some reduction in pollution. "vehicle movement" should read "**motor** vehicle movement"	enabling active travel Add to 2nd bullet- …to reduce air pollution and car use reducing overall motor vehicle movements	Agree to enabling and added 'motor'. The second bullet point is an overall aim of the strategy and does not need a specific mention.
9	It is widely recognised that CO2 emissions contribute to global warming and climate change. Global warming is expected to lead to flash floods from heavy downpours.	It would be good to add some local context		Noted. Will be dealt with in the action plans.
9	Road transport is a major source of nitrogen dioxide [NO2] and PM 10 emissions. 50% of NO2 and 50% of PM10 emissions are from road transport. 10% of NO2 emissions alone are from TfL buses. Diesel cars are responsible for 12% of NO2 emissions.	Suggest add PM 2.5 and some local context taken from LBH recent report		Noted. Will be dealt with in the action plans.
9	To support the use of electric/hybrid vehicles	These vehicles emit 3/4 of the particulate pollution of petrol cars. They will have a marginal, at best, impact on air quality. Reduction in carbon emissions will depend on the method of electricity generation used to power them and the considerable amount of embedded carbon in the vehicle manufacturing process.	To support the use of dockless bike hire, e- bikes, car clubs and electric cars, as technologies which can, to varying degrees help reduce air pollution and carbon emissions	Noted. These are part of the wider package of measure which together will help achieve the vision of the strategy. Added … 'bike hire schemes, car clubs and car sharing'.

9	Traffic speeds are sometimes too fast in our residential and local shopping streets. This can stop more people walking and cycling and can increase the number and severity of accidents. Research shows that there will be fewer accidents, and they will be less severe, if traffic is moving at 20mph rather than 30mph or faster. Many residential areas in the Borough suffer from freight vehicles rat running along unsuitable roads, causing noise and pollution for residents.	Excessive speeds and volumes of traffic is the major deterrent to cycling. Separation is required through dedicated lanes of routes through low traffic neighbourhoods. 20mph limits are not enough. Why just freight? Suggest change to "freight and other vehicles..."	Traffic is sometimes too fast or congested in our residential and shopping streets..... or faster. In many instances traffic reduction measures and separated cycle lanes will be needed. .....freight and other vehicles...	noted. No change necessary
9	→ Although the overall volume of vehicle traffic on major roads decreased by 16% between 2000 and 2014 there are delays at key junctions particularly in the Tottenham and Wood Green areas	How much of that 16% spare capacity has been reallocated to walking and cycling?		This will be explored in the walking and cycling strategy.
9	**Priorities**	Suggest add bullet point- To enable walking and cycling as the 1st choice for local travel.	To enable walking and cycling as the 1st choice for local travel.	Dealt with under priority 2 in outcome 2
9	**Priorities**	Suggest add bullet point- To take account of the needs of mobility impaired users of all transport modes.	To take account of the needs of mobility impaired users of all transport modes.	added to priority 2 in outcome 2
9	→ To minimise the use of our back streets as 'rat runs'.	why not eliminate? Minimise is very wooly language, rat running is never acceptable.	To eliminate.....	This will be monitored in the walking and cycling strategy with a view of amending if the outcomes are not being met
	→ To reduce the speed of road traffic in residential areas and shopping streets	How? Traffic calming measures do not work. Police are unwilling to enforce. Traffic should be removed from residential areas, other streets can be camera enforced with average speed cameras, as Hackney have recently trialled.		noted. We will continue to work with the police to ensure appropriate enforcement.

Appendix C – Proposed Changes to the Haringey Transport Strategy

1. Page 3 second arrow point – replace ‘through enabling’ with ‘by enabling’
2. Page 3 fifth arrow point – replace ‘promoting greener travel options with ‘prioritising sustainable travel options’
3. Page 3 first vision outcome – add ‘and more efficient’ before capacity
4. Page 3 second vision outcome – replace ‘easier’ with ‘default’
5. Page 4 first arrow point – replace ‘quietways and cycle superhighways’ with ‘superhighways’
6. Page 6 ‘Capacity and Connectivity - add ‘public’ after excellent
7. Page 6 ‘Parking pressures’ – replace parking ‘are’ with parking ‘is’
8. Page 6 new challenge added – ‘Cycle Network – a coherent cycle network is needed in Haringey to enable a modal shift to cycling’
9. Page 7 second arrow point – remove ‘than by using the car’
10. Page 8 ‘Priorities’ first arrow point - add ‘, cycling’ after road
11. Page 8 ‘Priorities’ – add additional priority ‘Minimising the conflict between public transport users and other road users’
12. Page 9 Outcome 2 – change ‘easier’ to ‘default’ in the outcome title
13. Page 9 Rationale Para 2 – replace ‘promoting’ with ‘enabling’
14. Page 9 Rationale Para 2 – replace ‘many’ with ‘some’
15. Page 9 Rationale Para 3 – rewrite as follows: ‘limiting the availability of parking and the greater use of car sharing and car clubs, which provide an alternative to the private car, can support more walking and cycling
16. Page 9 Priority 1 – add additional point ‘improving wayfinding and signage across Haringey’
17. Page 9 Priority 2 – replace ‘promoting’ with ‘enabling’
18. Page 9 Priority 2 – add ‘motor’ after ‘overall’
19. Page 9 Priority 2 - add additional point ‘taking account of the needs of mobility impaired users of all transport modes’
20. Page 9 Outcome 3 Priorities – add ‘, bike hire schemes, car clubs, car sharing and electric motorcycles/scooters’ after hybrid vehicles.
21. Page 10 Outcome 4 Priorities – add ‘and enforce speed limits’ after ‘speed’
22. Page 10 Priorities – add ‘, motorcyclists/scooters, after cyclists

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EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Transport Strategy
Service area	Planning
Officer completing assessment	Neil Goldberg
Equalities/ HR Advisor	Daisy Daventry
Cabinet meeting date (if applicable)	6th March 2018
Director/Assistant Director	Emma Williamson

2. Summary of the proposal

Haringey's Transport Strategy is a high-level strategic document that sets out the future vision/direction for transport in the borough over the next 10 years. The Strategy outlines the transport objectives and priorities that provide the context for preparing more detailed plans, policies and bids for investment and works.

The Transport Strategy vision is to deliver 'a transport system that matches our growth and prosperity ambitions, whilst also improving our environment, providing accessible choices and making walking, cycling and the use of public transport a first choice for all.' This will be achieved through four outcomes:

- A public transport network will be better connected, have greater capacity and be more accessible;
- Active travel will be the easier choice, with more people choosing to travel by walking or cycling;
- Improved air quality and a reduction in carbon emissions from transport;
- A well-maintained road network that is less congested and safer.

If the Transport Strategy is agreed at Cabinet, the Council will prepare four action plans which will provide the detailed plans and actions to deliver the Transport Strategy vision: Walking and Cycling Action Plan; Parking Action Plan; Sustainable Transport and Travel Action Plan; and the Local Implementation Plan. These will be subject to separate EQIAs.

The main stakeholders who may be affected by the strategy are the general public, transport providers, community and amenity groups and statutory bodies.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Haringey JSNA, 2011 Census ONS data, JMP report Haringey	N/A
Gender Reassignment	Haringey JSNA, 2011 Census ONS data	N/A
Age	Haringey JSNA, 2011 Census ONS data	N/A
Disability	Haringey JSNA, 2011 Census ONS data, JMP report Haringey	N/A
Race & Ethnicity	Haringey JSNA, 2011 Census ONS data, JMP report Haringey~	N/A
Sexual Orientation	ONS integrated household survey	N/A
Religion or Belief (or No Belief)	Haringey JSNA, 2011 Census ONS data	N/A
Pregnancy & Maternity	Haringey JSNA, 2011 Census ONS data	N/A
Marriage and Civil Partnership	2011 Census	N/A

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Key Findings

Haringey is one of the most deprived areas of the UK (24th out of 236 local authorities in the UK) with Job Seekers Allowance claims the 2nd highest in London. This is particularly concentrated in the wards to the east of the borough. 'Transport poverty' is therefore a likely reality for many residents in Haringey on low incomes, meaning some households are likely to struggle with the cost of car ownership. By promoting practical alternatives to the car, including a better-connected and accessible public transport system, better walking environments and promoting safer cycling, the Strategy will benefit the most deprived residents in the borough – amongst whom people with protected characteristics are overrepresented.

Physical inactivity in Haringey is a major area of concern, especially in more deprived parts of the borough where physical inactivity levels are some of the lowest in the country. According to the Haringey JSNA, 26.4% of Haringey adults are physically inactive (2014). This is lower than both the England and London average but remains high in more deprived areas of the borough. Carbon emission contributes to 1 in 14 deaths in the borough. All residents, including protected groups, will benefit from an increase in active travel and improved air quality.

Some groups may not be able to benefit from engaging in active travel, including people with mobility-related disabilities, some older people, young children and their carers and pregnant women. These groups may be negatively impacted by the reduction in private car use. The Parking Action Plan will consider how best to mitigate impact on these groups. They will also concurrently benefit from the strategy's objective to improve public transport in the borough.

All residents will benefit from the strategy's focus on making the borough's streets safer. This will be of particular benefit to people who are more vulnerable to road traffic due to their protected characteristic - older people, people with disabilities and children.

Sex

The borough has a relatively equal gender split - just over half the population is female (50.5%) in line with England and London.

Research from 2013 has found that men in Haringey are more than three times as likely to cycle as women. The Council is committed to continuing its active travel programme of cycle promotion and training for its residents. The Cycling and Walking Action Plan will examine the barriers to protected groups and set out a list of actions needed to increase the proportion of these protected groups making trips by bicycle and on foot in the borough.

Women are also more likely to be primary carers to young children. They may be negatively impacted by the reduction in private car use, but should concurrently benefit from the strategy's objective to improve public transport in the borough.

Gender Reassignment

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK[1]. It is anticipated that people with this protected characteristic will not be disproportionately impacted by this policy and have no specific needs relating to this characteristic.

Age - Children

Haringey's population is relatively young with a quarter of the population under the age of 20, and 91% of the population aged under 65.

Children make up a quarter of the population and are concentrated in wards in the east of the borough where deprivation is highest. Over 1 in 3 children in Haringey live in poverty. Children will therefore benefit from a reduction in Transport Poverty as their families will rely less on car for transport.

Childhood obesity remains a problem in Haringey. 23.03% of reception children and 36.67% of year 6 children in Haringey schools are overweight or obese. There is a clear relationship between the prevalence of obesity and the level of deprivation for both reception and year 6 children. Research has found that in Haringey children aged 5-19 years are the age group to cycle most frequently. They should therefore receive health benefits from the Strategy's focus on increasing Active travel options.

[1] https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review

All residents will benefit from the strategy's focus on making the borough's streets safer. This will be of particular benefit to children.

Age – Older People

A 2013 study found that once residents reach the age of 60, their frequency of cycle use rapidly drops. In addition, a Scrutiny Review of Sustainable Transport in Haringey was carried out in 2009. A major concern identified was the reliability of door-to-door travel provision for the elderly and the disabled, including dial a ride, community transport and hospital transport. Older people were also concerned about footway condition and lighting.

The needs of older people that have been identified will be taken into account in the detail of the action plans.

Disability

Census data shows that 14% of residents have a long-term health problem that limits their day to day activity - lower than in England but in line with London. 5.7% of residents report being in bad health, slightly higher than England and London.

Research has found women, disabled people and people from black and minority ethnic backgrounds are less likely to participate in sport, and therefore may be less likely to engage in active travel options. The Council is committed to continuing its active travel programme of cycle promotion and training for its residents. The Cycling and Walking Action Plan will examine the barriers to protected groups and set out a list of actions needed to increase the proportion of these protected groups making trips by bicycle and on foot in the borough.

People with mobility-related disabilities, age-related disabilities, and hidden disabilities may not be able to benefit from engaging in active travel. These groups may be negatively impacted by the reduction in private car use, but will concurrently benefit from the Strategy's specific objective to provide a high quality, accessible and wheelchair-friendly public transport network meeting the needs of Haringey residents, visitors and businesses. The Parking Action Plan will also pay due regard to the needs of people with this particular characteristic.

Race and Ethnicity

Haringey is the 5th most ethnically diverse borough in the country. 66% of residents come from non-White British communities, compared to 20% in England, 55% for London and nearly 81% of our schoolchildren. 190 different languages are spoken in Haringey schools - almost half of all pupils in Haringey Schools speak English as an additional language. Non-White British communities are concentrated in deprived areas – rising to 83.4% of the population in Northumberland Park, the most deprived ward. They will therefore benefit from reduction in Transport poverty.

Research from 2013 revealed that similar numbers of people from white, black and mixed ethnic groups cycle regularly, whilst people from an Asian background cycle less. However, people of Black and Asian ethnicity are more likely to never cycle at all compared to all other ethnic groups. The Council is committed to continuing its active travel programme of cycle promotion and training for its residents. The Cycling and Walking Action Plan will examine the barriers to protected groups and set out a list of actions needed to increase the proportion of these protected groups making trips by bicycle and on foot in the borough.

Sexual Orientation

The ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15th largest LGB community in the country. There are no anticipated specific travel needs identified for LGB people in the borough and they should not be disproportionately impacted by the strategy.

Religion or Belief

Haringey is one of the most religiously diverse places in the UK. The most common religion is Christianity, accounting for 45% of residents, less than London (48.4) and less than England (59.4%). The next most common religions are Islam (14.3%) – higher than London (12.3%) - and Judaism (3%) – higher than England & Wales. Haringey has a lower percentage of residents who are Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated in the 2011 Census that they did not have a religion, higher than London (20.7%).

There are no anticipated specific travel needs identified for people of different faiths within the borough and they should not be disproportionately impacted by the strategy. It is however unknown whether cultural issues in some faith groups may prevent people taking up active travel. The Council is committed to continuing its active travel programme of cycle promotion and training for its residents and the Cycling and Walking Action Plan will examine the barriers to different protected groups and set out a list of actions needed to increase the proportion of these protected groups making trips by bicycle and on foot in the borough.

Pregnancy and Maternity

Women in Haringey who are pregnant or are caring for young babies will be negatively impacted by reduced focus in the strategy on private car use and they will be unable to take up cycling options. The Parking Action Plan will take account of the needs of women with this protected characteristic and women with this protected characteristic will also benefit from the Strategy's objective to improve public transport in the borough.

Marriage and Civil Partnership

In 2011, Haringey had a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London. People who are in a civil partnership will be treated no differently under the Strategy to people who are married.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Public consultation was held on the Transport Strategy from 10th November 2017 – 22nd December 2017. Consistent with the Council's adopted Statement of Community Involvement, the consultation involved public exhibitions, the use of social media including twitter, an electronic notification to the planning policy consultation database and engagement through the public Haringey Transport Forum and through workshops with Councillors.

The needs of protected groups were considered when deciding how to consult:

- The time and location of the exhibitions were chosen to not exclude any group

- Three accessible library locations were chosen in different parts of the borough
- The timing of exhibitions allowed for those who work or have childcare commitments the opportunity to attend
- Exhibition boards were designed to summarise the key points of the strategy to assist the visually impaired or those who have difficulty reading. Officers were on hand to explain the strategy and to take note of any comments received. The locations were also chosen because they are frequently used, particularly by school children, parents and older people.

The council sent over 300 emails to notify a range of stakeholders including schools, neighbouring boroughs, community groups including groups representing the elderly, resident association, and religious groups.

For those who do not have access to the internet, copies of the strategy were placed on deposit in all Haringey libraries and the Civic centre to review.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

50 responses were received to the Strategy from a range of stakeholders.

26 of the responses were received from parents and children from Highgate School. Their concern was regarding two bus routes which provide a vital link between the school and neighbouring areas. The frequency and times of service meant many parents were driving their kids to school rather than using public transport. Although this is outside the scope of the transport strategy and is an issue for Transport for London (TfL), Haringey will work with TfL to see what can be done to improve the services.

Other responses were from resident groups and individual residents who were supportive of the Strategy but wanted more detail on how the outcomes would be achieved. This will be picked up in the detailed action plans the Council commits to preparing in the strategy.

One response from the Haringey Motorcycling community raised the concerns of the failure of the Strategy to acknowledge the role of motorcycles for those in transport poverty and a more sustainable solution to the car. The strategy has been amended to reflect this.

The needs of mobility impaired users on all modes of transport was raised by one respondent. A priority was subsequently introduced which acknowledges these specific needs and the role this will play in getting more people to make sustainable transport choices.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

1. **Sex**

Women will benefit from reduction in transport poverty; improved public transport; improved health from active travel focus and improved air quality; safer streets.

Women are more likely to be primary carers to young children and they may be negatively impacted by the reduction in private car use. The strategy is not seeking to eliminate car use. Instead, it promotes a package of sustainable travel options including car clubs, car sharing and better public transport, which might be a better alternative to owning a private car.

Women are less likely to cycle than men. Promoting cycle training for the whole family could provide an alternative to the car and will be pursued through the enabling active travel priority in the strategy.

Positive	X	Negative	X	Neutral impact		Unknown Impact	

2. Gender reassignment

It is anticipated that the impact on people undergoing or who have undergone gender reassignment will be the same as for people who do not share this protected characteristic.

Positive		Negative		Neutral impact	X	Unknown Impact	

3. Age

Children and older people will benefit from reduction in transport poverty; improved public transport; improved health from being enabled to take up active travel options and improved air quality; safer streets.

Older people are more likely to be dependent on cars for travel, particularly as they are more likely to have a disability. They may be negatively impacted by the reduction in private car use. The strategy is not seeking to eliminate car use but to promote a package of sustainable travel options including car clubs, car sharing and better public transport, which might be a better alternative to owning a private car.

Positive	X	Negative	X	Neutral impact		Unknown Impact	

4. Disability

Disabled people will benefit from reduction in transport poverty; improved public transport; improved health from being enabled to take up active travel options and improved air quality; safer streets. As a result of the public consultation, the strategy also specifically recognises the needs of mobility impaired users of all transport modes.

Disabled people are more likely to be dependent on cars for travel, particularly as they are more likely to have a disability. They may be negatively impacted by the reduction in private car use. The strategy is not seeking to eliminate car use but to instead promote a package of sustainable travel options including car clubs, car sharing and better public transport.

Positive	X	Negative	X	Neutral impact		Unknown Impact	

5. Race and ethnicity

People from a Black and Minority Ethnic background will benefit from a reduction in transport poverty; improved public transport; improved health from being enabled to take up active travel options and from improved air quality; and safer streets.

Positive	X	Negative		Neutral impact		Unknown Impact	

6. Sexual orientation

It is anticipated that the impact on people who identify as LGB will be the same as for people who do not share this protected characteristic.

Positive	X	Negative		Neutral impact		Unknown Impact	

6. Religion or belief (or no belief)

It is anticipated that the impact on people from one faith group will be the same as for other faith groups or for people with no religion. All residents will benefit from a reduction in transport poverty; improved public transport; improved health from being enabled to take up active travel options and from improved air quality; and safer streets. The Strategy is not proposing to alter any existing parking arrangements in Haringey, including parking close to places of worship.

It may be the case that some religious groups cycle less than others and the overall effect of the strategy to increase cycling in Haringey will enable more people from these religious groups to cycle. This will be taken into account when developing Walking and Cycling Action Plan.

Positive	X	Negative		Neutral impact		Unknown Impact	

7. Pregnancy and maternity

Pregnant woman and mothers up to 6 months after birth are unlikely to choose to cycle, despite the promotion of cycling in the strategy; they will benefit from improved public transport, improved air quality, and safer streets. Improvements to the walking environment will help woman push buggies in the borough and feel safer to walk around with a baby. Overall the strategy will have a positive impact on this characteristic.

The strategy is not seeking to eliminate car use but to instead promote a package of sustainable travel options including car clubs, car sharing and better public transport. Due regard will be given to the needs of this protected group in the Action Plans to be developed.

Positive	X	Negative		Neutral impact		Unknown Impact	X

9. Marriage and Civil Partnership

It is anticipated that the impact on people who are in a civil partnership will be the same as for people who are married. All residents will benefit from a reduction in transport poverty; improved public transport; improved health from being enabled to take up active travel options and from improved air quality; and safer streets.

Positive	X	Negative		Neutral impact		Unknown Impact	

10. Groups that cross two or more equality strands e.g. young black women

Many people will identify with more than one protected characteristic. For example, more than 70% of the borough's young people are from ethnic minority backgrounds. There are no accumulative impacts identified in this plan on people who identify with more than one protected characteristic.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?**
  This includes:
  a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
  b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**
  c) **Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low**
- **Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?**

The strategy is not considered to result in any direct/indirect discrimination for any groups that shares the protected characteristics.

The strategy is considered to have a positive effect on all residents in Haringey. All residents will benefit from a reduction in transport poverty; improved public transport; improved health from being enabled to take up active travel options and from improved air quality; and safer streets.

There are groups protected under the equalities act that generally do not currently cycle in Haringey. The strategy aims to enable more cycle trips to be made by these groups by challenging the assumption made by these groups, providing cycle training and making bicycles more accessible. The needs of these groups will also be provided for within the Walking and Cycling Action Plan. The strategy will also prioritise within the Parking Action Plan and Sustainable Transport and Travel Action Plan the needs of protected groups who cannot be supported to take up active travel options.

The transport strategy will indirectly foster good relations between residents from protected groups and other residents in Haringey by creating a shared vision for transport in the borough over the next 10 years by improving health outcomes, creating a healthier and safer borough and reducing transport poverty.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?	
Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality.	N
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty			
Impact and which protected characteristics are impacted?	**Action**	**Lead officer**	**Timescale**
Reducing the reliance on the private car affects young children and their carers (more likely to be women); pregnant women; disabled people; and older people.	Provide a range of suitable alternatives to the car in the strategy and action plans for those who want to choose more sustainable modes of transport but at the same time recognising some users will need to use their car.	Emma Williamson & Neil Goldberg	On going
Removing barriers to cycling – older people, women, BAME and religion	Provide cycle training targeting protected groups, better cycle storage facilities for all, improved access to bicycles and ensure cycling routes are safe and well maintained. The needs of these groups will be addressed in further detail within Walking and Cycling Action Plan.	Emma Williamson, Denise Adolphe (Active Travel team) and Peter Boddy (Highways)	Ongoing
Supporting those with disabilities, including	Provide a range of suitable alternatives to the car in the	Neil Goldberg	Ongoing

people with hidden disabilities	strategy for those who want to choose more sustainable modes of transport. Ensure the needs of this protected groups are addressed in the parking action plan committed to in the Transport Strategy		

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

None.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

The proposed Action Plans will set out the monitoring framework and targets for achieving the outcomes of this strategy. Targets will be set which reflect the impacts on identified protected characteristics in this EQIA.

The Action Plans will be subject to separate EQIAs and they will be subject to public consultation.

7. Authorisation

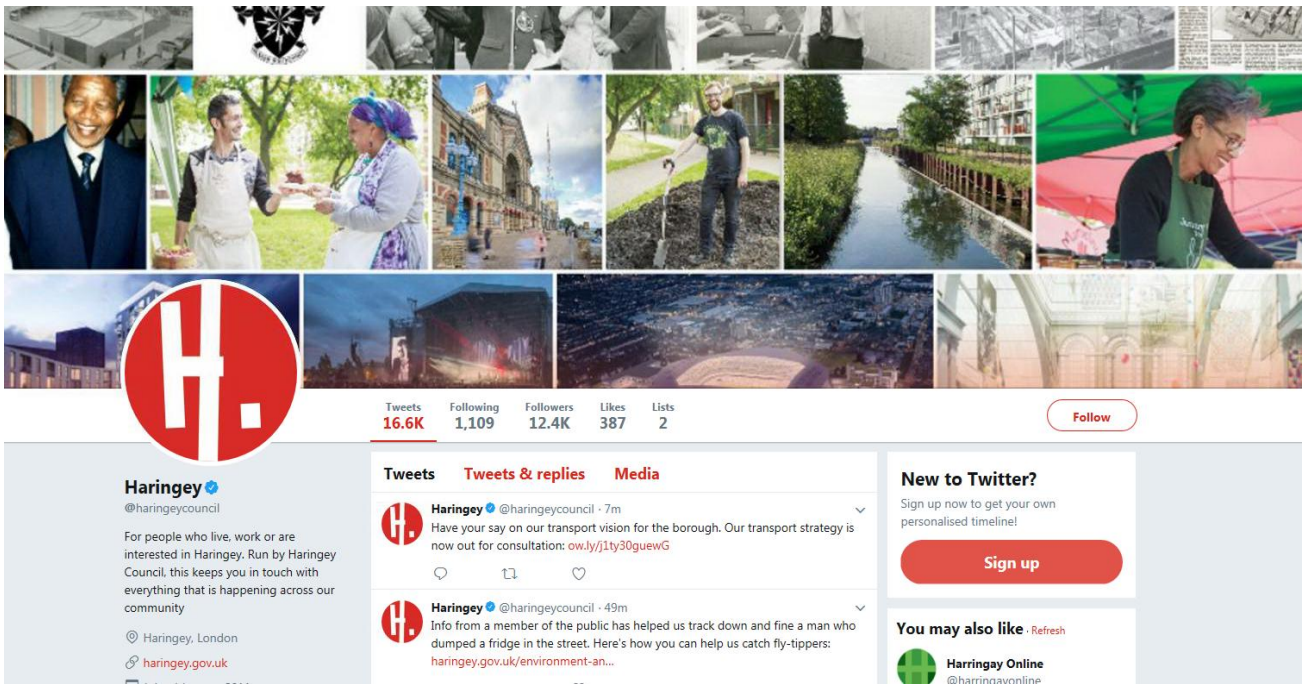
EqIA approved by (Assistant Director for Planning)	Date 21/2/2018

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Appendix F

The Consultation Exhibition at Marcus Garvey Library and the Council's Consultation Tweet (10.11.17)





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Transport Strategy 2018

Haringey LONDON

Foreword



Transport plays a pivotal role in our daily lives. Haringey is one of London's best connected boroughs and the transport network is used by our residents and businesses, and by people from across the City and beyond – either passing through or interchanging at a station or bus stop.

The Council's Corporate Plan sets out a vision for how we want to support a healthier and better quality of life for residents and local businesses. Delivery of this transport strategy is a key component in achieving many of the Plan's objectives. We want to greatly improve how our transport system works to support our aspirations for much needed new housing and jobs in the borough as well as promoting healthier forms of travel such as walking and cycling, thereby reducing carbon emissions and improving air quality.

Working more closely together with internal and external partners, especially the London Mayor, will form a critical element to successful delivery of this strategy.



Cllr Claire Kober
Leader of the Council



1 Introduction



Haringey is a place of great opportunity with enormous potential for growth – a growing economy, more and better housing and flourishing communities. The Council has set clear ambitions through its Corporate Plan 2015-2018 to make Haringey a better place to live, through encouraging investment and creating opportunities that all can share in.

We believe that transport has a key role to play in enabling us to achieve our wider goals for the borough:

- Enabling growth, focussed in our key growth areas, attracting investment to the borough through a more connected and accessible transport system that makes Haringey an attractive place to do business
- Improving the health and well being of our residents and enabling them to lead healthy, long and fulfilling lives, by encouraging more active travel choices
- Taking advantage of growth, and reducing inequality, through a transport system that connects residents to jobs and opportunities across the borough and in the wider region
- Connecting communities, work places, and high streets
- Managing the impact of growth, reducing carbon emissions across the borough, through prioritising sustainable travel options
- Creating a more liveable environment where people are proud to live and work, through clean, well maintained and safe streets
- Supporting a more fair and equal borough through development of a more accessible transport system

Our vision is to deliver 'a transport system that matches our growth and prosperity ambitions, whilst also improving our environment, providing accessible choices and making walking, cycling and the use of public transport a first choice for all.'

Our vision will be achieved through four outcomes:

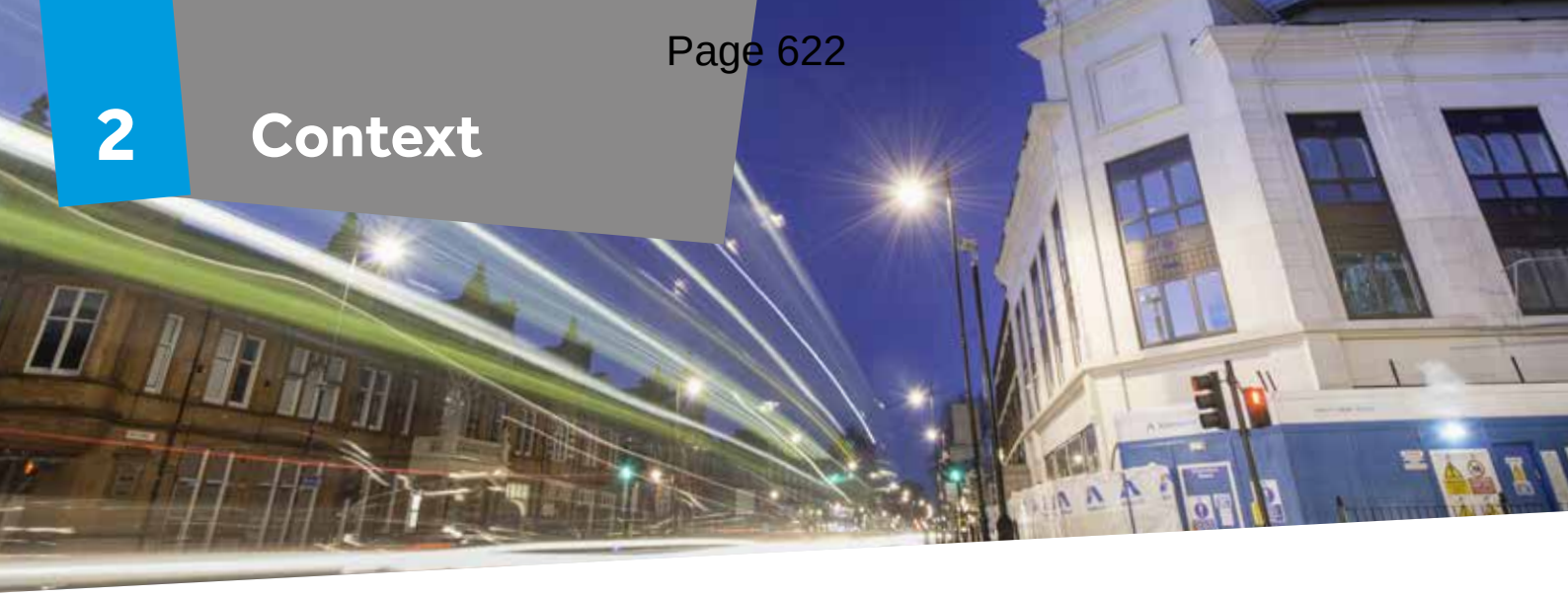
- A public transport network that is better connected, has greater and more efficient capacity and is more accessible, supporting our growth ambitions
- Active travel the default choice, with more people choosing to travel by walking or cycling
- An improved air quality and a reduction in carbon emissions from transport
- A well maintained road network that is less congested and safer

This Strategy provides the overarching high level statement of our ambitions for transport and highlights our key commitments over the next 10 years. The detailed actions of our key programmes and proposals are set out in a series of associated 'action plans' which will outline how the ambitions will be achieved. The proposed Action Plans which will follow the adoption of this strategy are:

- Walking and Cycling Action Plan,
- Parking Action Plan,
- Sustainable Transport and Travel Action Plan; and
- The Local Implementation Plan.

These Plans will outline actions and set targets to help deliver the Outcomes listed in Section 4 of this Strategy.

2 Context



a) Strategic context

Haringey's transport system does not operate in isolation but is part of a wider regional and sub-regional network connecting people to jobs and services across London and beyond. Many of the transport challenges we face cross borough boundaries. The Mayor's Transport Strategy (MTS) is a statutory document developed alongside the London Plan and Economic Development Strategy. It sets out the Mayor's transport vision and describes how TfL and its partners, including the London boroughs will deliver that vision.

The Mayor has published his strategy document "A City for all Londoners" which outlines the capital's top challenges and opportunities across priority policy areas, as well as the changes that City Hall wants to deliver over the next four years.

His transport priorities include:

- reducing traffic, encouraging walking and cycling in "Healthy Streets" and by introducing more superhighways.
- Using transport infrastructure as a catalyst for growth such as allowing higher density development near stations and in town centres.
- Better bus services to town centres are planned with more low emission buses running.
- Further devolution of rail services including the Great Northern services through Alexandra Palace.
- With greater pressure on road space from population and employment growth, innovative ways of managing this by time and purpose at different times of the day are proposed.
- Improvements to the reliability of the existing road capacity.
- Improving Air quality.
- The delivery of Crossrail 2.
- On road safety the Mayor will adopt a "Vision Zero" approach which puts reducing road danger at its centre.

On 21st June 2017 the Mayor of London published a draft of the MTS for public consultation, which closed in early October 2017. The document sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years. The draft MTS puts people's health and quality of life at the very heart of planning the city's transport, key a theme of the Haringey draft Transport Strategy vision.

The three key themes of the new draft MTS are:

1. **Healthy Streets and healthy people** - Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.
2. **A good public transport experience** - Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.
3. **New homes and jobs** - More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.

A three month consultation was carried out with the final MTS being published in the autumn 2017. This will enable the Local Implementation Plan – which details how Council will deliver the MTS at a local level - to be developed by late 2018/early 2019.



b) North London context

The North London sub-regional Transport Plan identified a number of challenges:

Challenges in every sub-region:

- Improve air quality to meet and exceed legal requirements and ensure health benefits for Londoners
- Transform the role of cycling and walking in the sub-region
- Meet CO_2 targets

c) North London specific challenges:

- Facilitate and respond to growth, especially in Brent Cross/Cricklewood and the Upper Lee Valley
- Enhance connectivity and the attractiveness of orbital public transport
- Relieve crowding on the public transport network
- Improve access to key locations and jobs and services
- Manage highway congestion and make more efficient use of the road network

d) Local Context

Haringey has good radial transport links into central London by road, underground and rail. Orbital (east-west) journeys are more difficult by road and rail with only the Barking – Gospel Oak line in the south of the Borough offering rail based public transport. Most of the bus routes operating in the Borough are radial. The nature of the road network and low rail bridges provides some constraint on enhancing orbital travel. Of the 43 bus routes currently serving Haringey all but 10 are high frequency routes.

The Borough has three Underground lines (Victoria, Northern and Piccadilly) and three national rail lines (West Anglia, Great Northern and London Overground). These lines serve four underground stations [Bounds Green, Wood Green, Turnpike Lane, Highgate], nine rail stations [White Hart Lane, Bruce Grove, Northumberland Park, Bowes Park, Alexandra Palace, Hornsey, Harringay, Harringay Green Lanes, South Tottenham] and three rail/underground interchanges [Finsbury Park, Seven Sisters, Tottenham Hale]. Nearly all rail and underground stations offer interchange with local bus services while Muswell Hill is an important bus to bus interchange. Finsbury Park, Tottenham Hale and Seven Sisters/South Tottenham are identified as key strategic interchanges in the MTS.

Haringey has 351km of roads made up of 30.3km of A roads (7.4km Transport for London Road Network and 22.9km of other Principal roads), 19km B roads, 21.4km





of other classified roads and 280.3km of unclassified roads. The TLRN roads are the A1

Archway Road and A10 Tottenham High Road, both running north-south in the Borough. In addition the A105 Wood Green High Road/Green Lanes, A1080 Westbury Avenue/The Roundway (west), A1010 Tottenham High Road and A1000 Great North Road are part of the Strategic Road Network.

Haringey's current population is estimated at about 256,000. By 2026 it is anticipated that the population will have increased to over 293,700, an increase of nearly 15%. 75% of the planned housing growth would be within the growth areas of Tottenham and Wood Green. Haringey has a young population with a high birth rate. The population is set to increase across all age groups with the exception of the 65-74 age group which is expected to decrease slightly as a proportion.

Linked to the increase in population is the increased need for more housing. The Mayor's London Plan sets out a requirement for Haringey to deliver more than 1500 homes a year from 2015 to 2025, almost double the previous target of 820 homes. This increase in population and housing will put considerable strain on transport and other infrastructure particularly in the growth areas of Tottenham and Wood Green.

The Haringey Challenge:

- **Population growth** – Haringey's population is forecast to grow by 15% over the next 10 years, from 256,000 to 294,000, resulting in significant pressure on the existing transport network;
- **Capacity and connectivity** – despite excellent public transport links, at peak times the tube, rail and buses serving the borough are very crowded, and the lack of orbital connections hinders access to employment areas outside of the Central Business District (CBD). Both also impact on the attractiveness of Haringey for business and leisure;
- **Congestion and competition** – there is competing demand for the available road space for different road users from vehicles, buses, parking, servicing, cycling and pedestrians. Congestion leads to longer travel times, perceptions of user safety, and environmental impacts with respect to noise and pollution;
- **Quality of the transport network** - poor quality pavements, potholes, a lack of signage or facilities, stations only accessible by stairs, and poorly laid out or confusing junctions, impact on people's quality of experience and perceptions about safety and accessibility;
- **Air quality and noise** – road transport contributes significantly to poor air quality and pollution levels that impact on health and on climate change. The main source of ambient noise experienced by residents is from road traffic; and
- **Parking pressures** – the reliance on car use to access employment or services, and the growth of households with multiple cars, is having a significant impact on urban and residential amenity. There is also the perception that high levels of customer parking is needed if town centres are to attract shoppers.
- **Cycle Network** – a coherent cycle network is needed in Haringey to enable a modal shift to cycling



3 Vision



We want 'a transport system that matches our growth and prosperity ambitions, whilst also improving our environment, providing accessible choices and making walking, cycling and the use of public transport a first choice for all.'

Where we want to be in 2026

- Haringey has a reputation for being a walking and cycling borough both regionally and nationally
- That more journeys will be taken by walking and cycling
- That active travel will have improved the well being of our residents, reducing obesity and improving air quality
- To have a high quality accessible and wheelchair friendly public transport network meeting the needs of Haringey residents, visitors and businesses.

To achieve these outcomes we will work with key partners such as the government, GLA, TfL, private sector developers, public transport operators, Network Rail and the voluntary sector.

Our vision will be achieved through four outcomes:

Outcome 1 - A public transport network that is better connected, has greater capacity and is more accessible, supporting our growth ambitions

Outcome 2 - Active travel the easier choice, with more people choosing to travel by walking or cycling

Outcome 3 - An improved air quality and a reduction in carbon emissions from transport

Outcome 4 - A well maintained road network that is less congested and safer

Outcome 1

A public transport network that is better connected, has greater capacity and is more accessible, supporting our growth ambitions for the borough

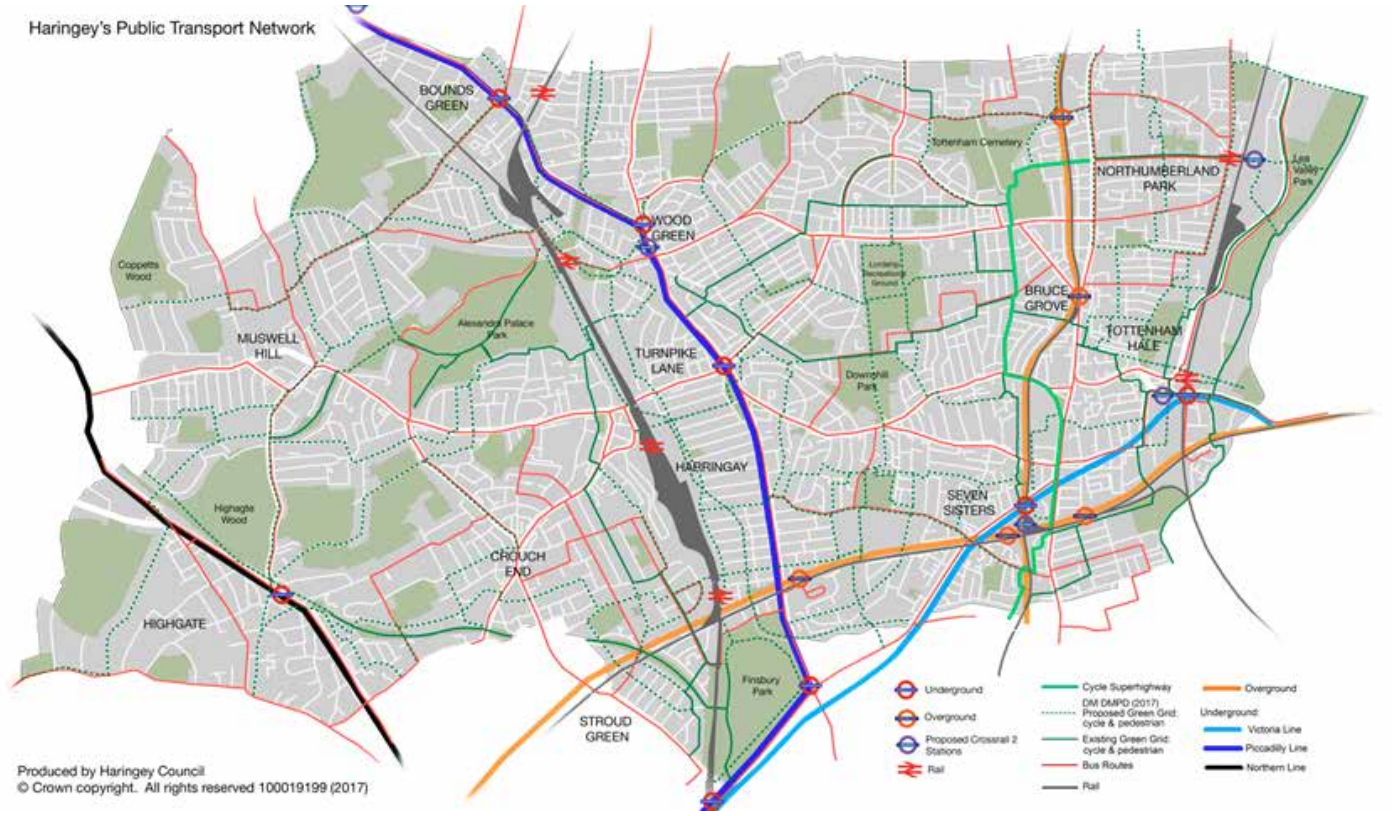
Rationale

Investment in strategic transport infrastructure is essential if Haringey and London as a whole is to meet the challenge of the predicted huge increases in population and jobs in the next decade.

We are required to deliver significant increases in jobs and particularly housing over the next 10 years. The Mayor expects Haringey to deliver at least 15,000 homes over the next 10 years. Our growth aspirations for Tottenham is planned to deliver 10,000 new homes. In Wood Green we seek to deliver a minimum of 4,600 new residential units and a minimum of 1,500 new jobs between 2016 and 2026. 5,000 extra jobs are expected to be created in the new retail development at Tottenham Hale. Overall jobs are expected to increase in Haringey by about 17,000 between 2011 and 2031.

Greater capacity is needed on the public transport network to help us to deliver our regeneration plans for the Borough.

Figure 1 below shows Haringey's public transport geography



Key facts

The public transport network is already under strain in peak periods. Both the Victoria and Piccadilly lines are very crowded from Finsbury Park towards central London. The Barking Gospel Oak line suffers from significant crowding. Similarly there is standing room only on national rail lines towards Tottenham Hale and Seven Sisters.

Priorities

1. To increase connectivity, capacity and accessibility on our road, cycling and public transport networks to support our regeneration and growth ambitions for businesses, housing and jobs
2. To work with partners to maximise investment in our road and public transport networks
3. Minimising the conflict between public transport users and other road users

Delivery Plans

- 'A Plan for jobs, growth and prosperity' The Haringey Economic Development and Growth Strategy
- The Haringey Adopted Local Plan July 2017
- The Haringey Local Implementation Plan
- Walking and Cycling Action Plan,
- Parking Action Plan,
- Sustainable Transport Action Plan.





Outcome 2

Active travel the default choice, with more people choosing to travel by walking or cycling

Rationale

Cycling and walking are an integral part of our ambitions to create a more attractive and accessible borough, contributing to improved local air quality, better access to local shops and services and a healthier local population.

By enabling these more sustainable modes of travel it can contribute to reducing the need to use motor vehicles. Although some road based journeys are not feasible on foot or by cycle, there is enormous scope for more cycling and walking in the borough.

Limiting the availability of parking and the greater use of car sharing and car clubs, which provide an alternative to the private car, can support more walking and cycling

Key facts

- 56% of adults, 37% of 10/11 year olds and 23% of 4/5 year olds are overweight or obese
- Over 26% of the population in Haringey are physically inactive
- 3% of journeys are by cycle and 37% by walking
- Just under 40% of vehicle movements in Haringey could be replaced by cycling

Priorities

1. To get more people to choose walking, cycling and public transport as means of travel by:
   - making Haringey one of the most cycling and pedestrian friendly boroughs in London
   - managing parking demand and provision on the borough's road network
   - improving wayfinding and signage across Haringey
2. To deliver our health ambitions by:
   - enabling active travel
   - increasing the use of electric vehicles and car sharing schemes
   - reducing overall motor vehicle movements
   - taking account of the needs of mobility impaired users of all transport modes

Delivery Plans

- Sustainable Transport Action Plan.
- Cycling and Walking Plan
- Parking Plan
- The Haringey Health and Wellbeing Strategy 2014-2018

Outcome 3

An improved air quality and a reduction in carbon emissions from transport

Rationale

Data from the GLA shows that around 9,400 deaths in London a year are attributable to air quality related illnesses. Air pollution also impacts on the lung functions of the young and can cause birth defects. Other GLA analysis shows the health effects of air pollution increased disproportionately in the most vulnerable and deprived communities such as Tottenham. Among the top 10% of London's most deprived areas half have NO_2 levels exceeding legal limits.

It is widely recognised that CO2 emissions contribute to global warming and climate change. Global warming is expected to lead to flash floods from heavy downpours, hotter summers with the risk of drought and water shortages, damaged ecosystems and on transport infrastructure buckled rails from heat, leading to travel delays.

Key Facts

Road transport is a major source of nitrogen dioxide [NO2] and PM 10 emissions. 50% of NO2 and 50% of PM10 emissions are from road transport. 10% of NO2 emissions alone are from TfL buses. Diesel cars are responsible for 12% of NO2 emissions.

In Haringey road based transport accounts for 18% of CO_2 emissions.

Priorities

1. To improve air quality by pursuing projects and programmes to reduce vehicle use, particularly diesel powered vehicles
2. To support alternative means of transport to motor vehicles such as through behavioural change programmes
3. To reduce the need to travel by linking transport and land use planning
4. To support the use of electric/hybrid vehicles, bike hire schemes, car clubs, car sharing and electric motorcycles/scooters

Delivery Plans

- Air Quality Action Plan
- Sustainable Transport Action Plan
- Walking and Cycling Action Plan
- Parking Action Plan
- The Haringey Local Plan adopted July 2017

Outcome 4

A well maintained road network that is less congested and safer

Rationale

Congestion is a key issue for our main road network, particularly at key hotspots such as town centres. Traffic congestion has a detrimental effect on the quality of life for many Haringey residents, contributing to health concerns arising from poor air quality and noise.

Traffic speeds are sometimes too fast in our residential and local shopping streets. This can stop more people walking and cycling and can increase the number and severity of accidents. Research shows that there will be fewer accidents, and they will be less severe, if traffic is moving at 20mph rather than 30mph or faster. Many residential areas in the Borough suffer from freight vehicles rat running along unsuitable roads, causing noise and pollution for residents.

Poor footway surfaces can deter more walking. Similarly pot holed roads are dangerous for cyclists and can cause damage to all vehicles.

Key facts

- Although the overall volume of vehicle traffic on major roads decreased by 16% between 2000 and 2014 there are delays at key junctions particularly in the Tottenham and Wood Green areas
- Road user casualties are above our targets for both killed and seriously injured and for all casualties
- About a quarter of Haringey's road casualties occur on the TfL road network
- On the main road network in the morning peak traffic speeds are typically only 10mph on average with buses caught up in the slow moving traffic.

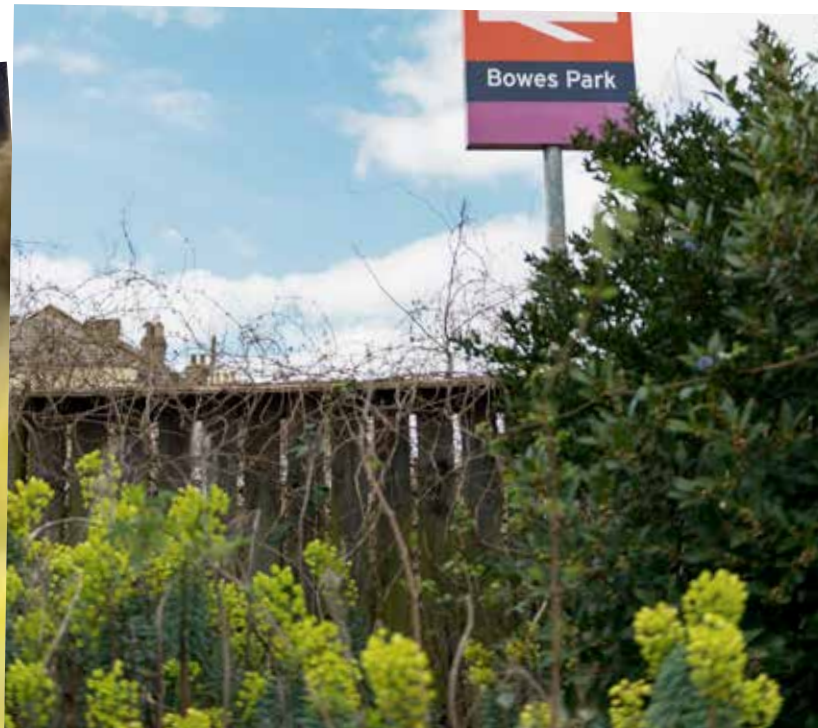
Priorities

1. To maintain and enhance our road network, making it best in class in London
2. To reduce road user casualties , especially among children, pedestrians, cyclists, motorcyclists/ scooters and other vulnerable road users
3. To minimise the use of our back streets as 'rat runs'.
4. To reduce the speed and enforce speed limits of road traffic in residential areas and shopping streets

Delivery Plans

- Highways Asset Management Plan
- Road Safety Plan
- Sustainable Transport Action Plan
- The Haringey Adopted Local Plan July 2017
- The Haringey Local Implementation Plan





4 Delivery



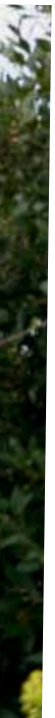
This Strategy will be delivered through the Action Plans and the Local Implementation Plan (LIP) listed in Section 1 above. This approach will allow for detailed and focused discussions and engagement on the key transport challenges facing Haringey and a mechanism for adopting tailored responses to meeting these challenges.

The Council will work collaboratively with neighbouring boroughs, TfL, the Government, infrastructure providers, stakeholders, residents and others to ensure the sustainable delivery of the Strategy outcomes.

A process of monitoring performance and reporting will be carried out to ensure delivery is on track.

Delivering the action plans

Development of: Cycling and Walking Action Plan Parking Action Plan Sustainable Transport and Travel Action Plan	Summer 2018
Publication of : Cycling and Walking Action Plan Parking Action Plan Sustainable Transport and Travel Action Plan	Winter 2018/19





Produced by Haringey Council Communications Unit • 1267.11

Report for: **6 March 2018**

Title: Response to the Joint Targeted Area Inspection and consequent required actions

Report Authorised by: Tracie Evans

Lead Officer: **Margaret Dennison**

Ward(s) affected: N/A

Report for Key/ Non-Key Decision:

1. Describe the issue under consideration

1.1 This report makes a number of recommendations based on the need to address and incorporate recent findings from the Joint Targeted Area Inspection (JTAI) of the multi-agency response to abuse and neglect in Haringey, which took place in December 2017 and the vision referred to in the letter published by the JTAI on 30 January 2018, with the "Future Operating Model for Children's Services" approved in March 2015, and with reference to legislative changes which will replace Local Safeguarding Children's Boards with new local partnership arrangements.

1.2 The report also seeks agreement to a review of those services in the Council (e.g. services provided to children and/or their parents by Public Health or Adult Services) ensuring that services provided to support better outcomes for children and families are effectively co-ordinated and aligned into a "Think Family" approach. In time this will produce a fully developed operating model increasingly reflecting a "whole authority" collaboration that maximises outcomes for vulnerable children and their families in Haringey.

1.3 The ambition to create a corporate family-centric approach to family based "Early Help" is in line with national policy guidance in "*Working Together 2015*" (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf) which has been revised to "*Working Together 2018*" (https://consult.education.gov.uk/child-protection-safeguarding-and-family-law/working-together-to-safeguard-children-revisions-t/supporting_documents/Consultationdocument.pdf) scheduled to come into effect from April 2018. This updated corporate approach to early help is further fuelled by JTAI findings of over reliance on Children's social care, and the changing legislative landscape as a result of the Children and Social Work Act 2017. The updated corporate approach being considered here should start to shape services to families in the context of the next "Borough Plan."

2. Cabinet Member Introduction

2.1 The proposals in this Cabinet report reinforce our commitment to providing the right support, at the right time to children, young people and families in Haringey.

The report builds upon the development and implementation of an Early Help service which has, since October 2015, supported over 1,500 families and provided additional support and guidance to a significant number of schools and early years settings across the borough. It recognises the changes that must be made, in light of the recent Joint Targeted Area Inspection, the changes introduced by the Children and Social Work Act 2017, and the new inspection regime for Children's Services. And it seeks to move at pace towards a new operating model which will enable multi-agency partners to play a full role in supporting and safeguarding children in Haringey.

2.2 Haringey has been hit hard by the budget cuts imposed by central Government. Our borough, home to some of the most vulnerable families in the country, and where one in three children still lives in poverty, has lost over 40% of its funding since 2010. But, even against this background, we continue to strive to achieve the best outcomes for our children and young people.

2.3 I am sure you will all join me in agreeing this report and looking forward to even better partnership working and increasing join up of our services to improve the lives of children and families in Haringey.

3. Recommendations

3.1 Cabinet is asked to:

a) Note the published letter from the Care Quality Commission (CQC), Her Majesty's Inspection of Constabulary (HMIC), Her Majesty's Inspection of Probation (HMIP) Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS), and Ofsted dated 30 January 2018 emerging from the Joint Targeted Area Inspection (JTAI) of the multi-agency response to abuse and neglect which took place in Haringey between 4-8 December 2017, a copy of which is attached as Appendix 2. Also, the next steps for the Director of Children's Services to prepare a written statement of proposed action responding to JTAI findings.

b) Note that the written statement should be a multi-agency response involving the national probation service (NPS), the community rehabilitation company (CRC), the clinical commissioning group for Haringey (CCG), the metropolitan police service (MPS) and the local authority including its health providers. The response should set out the actions for the above partners individually where appropriate and for the partnership as a whole.

c) Note that the written statement of action must be sent to Ofsted no later than 11 May 2018 and that the statement will inform the key lines of enquiry (KLOEs) at any future joint or single agency activity by the inspectorates.

d) Note the need for a comprehensive timely and detailed response to JTAI findings (representing all partners including the LA and its health providers) as the next inspection of Local Authority Children's Services (ILACS) is expected during the current calendar year.

e) Note the legislative changes identified in the "Children and Social Work Act 2017" with particular reference to the proposed abolition of Local Safeguarding

Children's Boards and their replacement by local arrangements made by the police, the CCG and the Local Authority.

f) Agree the principles of the evolving model of Early Help and as set out in paragraphs 6.4, and 7.2 to 7.10.

g) Agree that the vision to enable children to access help at an earlier stage and to use resources more effectively will be complimented by a corporately led review of the Council's commissioned services for children and Families such as those provided to parents by Public health and Adults services to take account of the principles of "Early Help" listed in this report at 7.2. This will involve all Council partners involved with providing services to children and/or their parents becoming aligned into a "Think Family" approach.

h) Agree that the "Early Help Strategy 2015-2018" should be revised in the light of all of the above.

4. Reasons for decision

4.1 As a consequence of the JTAI in December 2017, statutory partners including the local authority are required to respond with a written statement of action designed to address the areas of improvement stipulated in the published JTAI letter. The statement will inform the future lines of enquiry at any future joint or single agency activity by the inspectorates. Statutory JTAI partners are the National Probation Service (NPS), the Community Rehabilitation Company (CRC), the Haringey Clinical Commissioning Group (CCG), the Metropolitan Police Service (MPS), and the Local Authority, including its health providers. The Director of Children's Services in Haringey must send the written statement of action by 11 May 2018. As a further inspection of Children's Services is expected later in 2018, the response of all partners to the JTAI acquires additional significance, owing to the essential contribution of partners in inter-agency working to safeguard and promote the welfare of children.

4.2 Changes to legislation brought about by the Children and Social Work Act 2017, which amongst other things abolishes Local Safeguarding Children Boards with effect from April 2019, mean that new statutory partnership arrangements between the MPS, the CCG and the Local Authority must be capable of providing continuity of oversight and challenge in the effective delivery of Safeguarding services across the new arrangements in addition to the delivery of an effective response to the JTAI findings.

4.3 Budget Challenge

4.3.1 At the same time as demand for services has increased, resources have decreased across the Council as part of the national austerity measures imposed by central government. This has further compounded the challenge of addressing demand in Haringey and galvanised a renewed sense of urgency to transform. Demand and budget pressures together will mean that Children's services with the support of the whole council must continue to manage and deploy resources efficiently, in order to improve outcomes for children, young people and families in Haringey.

4.3.2 This situation is far from unique to Haringey, as recent national reports confirm rising demand for Children's services against reducing budgets. Local comparisons anecdotally confirm that neighbouring authorities are experiencing very similar recent pressures. In areas where patterns of demand have been successfully changed, e.g. in Hertfordshire County Council, and in other local authorities benefiting from innovation grants from government, reductions in demand for statutory services have been effected.

4.3.3 To continue to deliver improved outcomes for children and young people within a reduced budget, Children's services will be able to operate more efficiently and effectively by embedding with internal partners a single integrated multi-disciplinary approach across the borough, through the new Borough Plan and potentially right across strategic partnerships in Haringey as new safeguarding arrangements for children and young people begin to take effect.

4.3.4 As new local safeguarding partnership arrangements for children and young people take effect no later than April 2019, it is imperative that partners collectively make a collaborative and coherent response across all resource provisions to maximise outcomes and value.

4.4 Increased Demand on Children's Services

4.4.1 In addition to the budgetary pressures that the service must mitigate against, demand has increased significantly across a number of key statutory areas. There has been a 4% increase in the number of children and young people (0-25 years old) from a population of 87,306 in 2013 to 90,828 in 2016. Whilst the vast majority of people living in the borough are supported by universal services, demand for services for families with additional, acute or complex needs is rising consistently year upon year.

4.4.2 Where an organisation or member of the public has concerns about a child or a family, they are required to contact Children's social care services. When those concerns warrant further consideration, a referral is made. Annual referral activity is measured by a rate of 1 per every 10,000 children in Haringey aged 0-17. For the year ended March 2015, the rate of referral was 379, for the year ended March 2016 the rate increased to 539, for the year ended March 2017 the rate increased to 643 and the current rate for the year to date is 733.

4.4.3 These figures produce an overall increase in referral rate of 93% over the last three years since March 2015 when the original operating model was approved. Care applications to the Court are made where a child is deemed to be at such risk of significant harm that legal controls are required. The rate of applications to the Court increased in the same period by 77%. In the current national economic climate, there is no prospect of increasing resource in line with this level of increased demand. Analysis of all available data supports the need to progress with pace towards a new phase of the Local Authority's approach to children and families so that ever increasing demand challenges can be appropriately and collectively addressed.

4.5 Recent Inspection Outcomes

4.5.1 The recent Joint Targeted Area Inspection (JTAI) in December 2017 reviewed actions of all Local Safeguarding Children's Board (LSCB) partners operating in Haringey in the context of 'the multi-agency response to abuse and neglect'. Inspectors recognised a number of strengths across the partnership, but also found an over-reliance on children's social care by the partnership (LSCB), and a corresponding under development of multi agency early help, also across the LSCB partnership. The JTAI findings confirm the need for an updated and speedier approach to improvement from the LSCB as the current lead body which holds partners to account for their safeguarding activities. When adopted, the updated vision and the expanded early help approach could include all relevant council services operating as single integrated collective providing safeguarding services within a "family centric" approach. Once achieved this approach should deliver what the JTAI referred to as "coherent commissioning".

4.5.2 As part of the JTAI inspection summary, inspectors commented positively on the Interim Director's development of a 'clear vision to enable children to access help at an earlier stage and to use resources more effectively'. The recommendations in this report ask the Council to note the JTAI findings and how the updated expanded vision of Early Help begins to inform future safeguarding partnership arrangements that improve outcomes for children at an early stage avoiding over reliance on a social care model.

4.6 Legislation

4.6.1 Recent legislative changes will impact on both the opportunities and challenges within Children's Services, as set out in the Children and Families Act 2017. Cabinet has already agreed a report describing increased statutory responsibilities for the local authority for care leavers, which will further compound the demand pressure described above.

4.6.2 In addition, the Act will abolish the current children's safeguarding partnership arrangements (Haringey Local Safeguarding Children Board) with effect from April 2019, and instead require the local authority, police and the clinical commissioning group (CCG) as the new statutory safeguarding partners to make local arrangements for safeguarding and promoting the welfare of children on a basis of equal responsibility and ownership. The change in statutory partnership arrangements presents a timely opportunity to increase

the flexibility and autonomy for safeguarding partners to develop an operating model for delivering children's services as a single integrated multi agency system based on the updated expanded vision of early help noted by inspectors. The current LSCB accepted the updated vision in its meeting in September 2017. JTAI partners have also agreed to frame their responses to the JTAI findings against the updated vision. Although discussions are not yet concluded, so far, all partners have positively welcomed the updated vision and can see how it can be used to enhance current arrangements for delivering early help services to children, young people and their families, and reducing reliance on children's social care.

4.6.3 Whilst all local authorities are considering with statutory partners how best to continue to increase the impact of local safeguarding arrangements, national standards are also being updated. "*Working together to safeguard children*", is a statutory guide to inter-agency working to safeguard and promote the welfare of children. It is a national policy document which describes the statutory functions of local authorities and their partners in respect of safeguarding children and promoting their welfare, describing safeguarding and promoting the welfare of children as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

4.6.4 Local agencies including the police and health services have a duty to ensure they consider the need to safeguard and promote the welfare of children when carrying out their functions. Local authorities and their safeguarding partners are currently operating under "*Working Together 2015*", and government is currently consulting on an updated version of "*Working Together*" scheduled for implementation with effect from April 2018. Haringey's updated vision for Children's services, including an expanded corporate role for Early Help, is consistent both with the current guidance (*Working Together 2015*) and the updated version "*Working Together 2018*.

4.7 <u>Regulation</u>

4.7.1 In addition to the statutory changes described above, Ofsted, has recently implemented what they refer to as a new system of Inspections called ILACS (Inspections of Local Authority Children's Services) designed to "catch children's services before they fall" by being proactive and more continuously involved. The ILACS system or framework relies on a continuing conversation between Ofsted and local authorities to support its triennial inspection approach: Local authorities provide Ofsted with their self-evaluation of the current impact of Children's services on improving outcomes for children in their area. This is to confirm for Ofsted that Local Authorities have a sound grasp of their strengths and challenges and are planning accordingly. Inspectors' judgements in respect of the quality of leadership of Children's services will in part be informed by the relevance and application by the local authority of plans for continuous improvements in children's services. Even in poor circumstances a good plan will

be regarded as a strength in leadership capacity. As a result of informal dialogue with Inspectors during the JTAI, we were advised of the probability of an ILACS inspection in Haringey around October 2018. In this context it becomes absolutely essential that Haringey can evidence impact on JTAI's recent view of our areas of strength and areas for improvement. As the JTAI positively endorsed the "*clear vison to enable children to access help at an earlier stage and to use resources more effectively*" as explained in this report, it follows that the Authority needs to demonstrate progress in implementing the vision as part of the multi-agency response to the JTAI findings. JTAI also noted that the Local Authority has convened a Children's services Improvement Board, chaired by the Deputy Chief Executive, to improve early help and children's social care. JTAI were satisfied that "*plans have been developed to address the main deficits identified during this inspection*."

5. Alternative options considered

5.1 The proposed expanded vision of Early Help in the operating model builds upon the previously agreed Children's Services model approved by Cabinet in March 2015. Alternative options were considered at this time.

6. Background Information

6.1 The London Borough of Haringey has an increasing population. There has been a 4% increase in the number of children and young people (0-25 years old) from a population of 87,306 in 2013 to 90,828 in 2016. Whilst the vast majority of people living in the borough are supported by universal services, demand for services for families with additional, acute or complex needs is rising.

6.2 At the same time as demand for services has increased, resources have decreased across the Council as part of the national austerity measures imposed by central government. This has further compounded the challenge of addressing demand in Haringey and galvanised a renewed sense of urgency to transform. Demand and budget pressures together will mean that Children's services with the support of the whole council must continue to manage and deploy resources efficiently, in order to improve outcomes for children, young people and families in Haringey.

6.3 This situation is far from unique to Haringey, as recent national reports confirm rising demand for Children's services against reducing budgets. Local comparisons anecdotally confirm that neighbouring authorities are experiencing very similar recent pressures. In areas where patterns of demand have been successfully changed, e.g. in Hertfordshire County Council, and in other local authorities benefiting from innovation grants from government, reductions in demand for statutory services have been effected.

6.4 In March 2015, Cabinet approved the report "Future Operating Model for Children's Services". This set out the Early Help approach to working with families, establishing a service to work in partnership with others (including Housing, Health and Immigration) to prevent needs arising, tackle emerging problems and target support at those at risk of becoming vulnerable. It was agreed that "in the future, as this capacity is built within Early Help, it will enable

social workers to focus on child protection, looked after children and the most complex cases where support beyond that provided through early help is needed. The core social care function will work with children and families where there are acute or highly complex needs and/or a safeguarding risk."

6.5 This report also recognised "universal, targeted and specialist services provided by CYPS are part of a wider system of children's services, which also includes partners and families themselves." Effective partnerships are therefore essential to improving outcomes for children and young people.

7. Children's Services and the Future Operating Model

7.1 It is clear that there are a number of issues that must be addressed as part of the updated vision for children's services, including better outcomes, sustainable budgets, legislative changes, and addressing recent inspection findings. These challenges represent shared statutory and regulatory obligations and therefore tangible opportunities to draw partners further together to work more collaboratively as part of a single integrated system, in order to maximise the impact from the proposed changes.

7.2 Headline principles that underpin the Early Help approach are characterised by:

- Children are kept safe
- We provide services at the earliest opportunity
- We use a child centred approach
- Safeguarding is everyone's responsibility
- We work together and co-operate at all levels and stages
- We improve outcomes by SMART (Specific, Measurable, Achievable, Relevant, Timely) commissioning and SMART reporting
- We use Early help assessments to identify need proactively
- Targeted services are family friendly, enabling, accessible and promptly delivered
- Services to parents "Think Family".

7.3 Within Children's Services, there are a number of tiers of service. Tier 1 represents universal services which are accessible by all, and not limited by need. Tier 2 services provide support to families at risk of becoming vulnerable. In the updated vision the expanded provision of early help confirms that families can receive supportive services at Tier 3 with access to a social work assessment if the ranges of services being provided are not producing the expected impact i.e. improving outcomes for the child. This approach is designed to reduce the numbers of children currently receiving a social work assessment and progressing to a Child In Need (CIN) plan. The integration of social work assessment with Early Help and family support approaches together provide families with better opportunities to engage with multi agency services prior to a social work assessment or a CIN plan and will allow concentrated social work resource to focus more exclusively on child protection and looked after children. Children and young adults leaving care receive an approach that is described in "*Working Together*" as Early Help so all care leaving provisions should in future be able to demonstrate a range of integrated accessible and relevant approaches

from all relevant multi agency partners providing opportunities for improved engagement with service users as described in chapter 1 of "*Working Together".*

7.4 The Early Help service was launched in October 2015 and is now well established across the network learning communities in Haringey, having delivered support and interventions to over 1,500 families and additional support and capacity to a significant number of schools and early years settings across the borough. However, whilst providing support to Tier 2 families has delivered successful outcomes for a large number of families in the borough, it has not impacted upon the demand to social care sufficiently at Tier 3 and above as reported here. The updated vision considers the fusion of family friendly accessible services provided through an expanded early help approach with elements of statutory social work provision to provide a single model that stops constant exchanges of family based casework between early help and social care.

7.5 The previous Cabinet paper confirmed that once embedded, Early Help services would deliver interventions at Tier 3, so that social care staff are freed to work more effectively with families most in need of help and protection (child protection, acute and complex casework). As part of the next tranche of transformation activity, the service will continue with the mandated agenda, where Early Help and family support services will work with families who are in need of help and support at Tier 3 and where they could be better supported by a suite of multi-agency services which avoid over reliance on social care as a form of intervention and a sole driver of changes in family circumstances.

7.6 Social work oversight will be maintained as part of the model, in order to ensure that emerging risks are managed safely and effectively and family's needs are accurately assessed so that an appropriate range of multi-agency services can be provided at the right time, with the right level of support as indicated by JTAI findings.

7.7 The wider strategic partnership currently represented by the LSCB but also including Public Health, Commissioning, Adults services and Schools will together address improvements in response to the JTAI inspection findings to ensure that the system operates more effectively to address the wide-ranging issues impacting on families in the borough.

7.8 When fully implemented this should mean that families are better supported by more appropriate interventions, rather than costly and bureaucratic social care services or families and children "to-ing and fro-ing" across tiers of interventions resulting inadvertently in "over intervention" and thus failing by default to provide the right intervention, at the right time for our families and their children.

7.9 As a consequence of deploying an expanded version of Early Help to reduce over reliance on Children's social care the Council would expect to see a reduction in child in need cases, which should positively impact on child protection demand and on numbers of looked after children. Over time, this will enable Children's services to become more financially sustainable and support the Council to reach a financially sound position.

7.10 The consistent rise in concerns for the well-being of children in the Borough must be met by an agreed range of services provided in the community that address and mitigate concern. This applies to care leaving services as much as it does to younger children who are being referred. Most statutory services the Council has to provide for children, young people and their families, lend themselves to a multi-disciplinary and multi-agency approach which addresses need by providing services rather than referring need on to social workers who are less able to supply services than the referring agencies. This infers that the authority will need to re-consider how other services that parents and children need, can be arranged, in order to improve their outcomes. The JTAI refers to a "Think Family" approach which could be adopted by services accessed by adults where up until now little or no consideration has been given to the role of that adult as a parent and what impact the parents need for a service could have on their parenting capacity. Increasing the effectiveness of services to parents where children are vulnerable and ensuring that the family is supported will increase parenting capacity and reduce demand on higher levels of social care provision so need to be included in the updated and expanded model. This applies to substance misuse services, mental health services, services to adults with disability and services concerned with addressing domestic violence. Consequently a council wide review of service provision and commissioning in these sectors is required to identify enable and promote more family friendly service led arrangements within "*Working Together* " guidance as opposed to risk led reactive approaches.

8. Contribution to strategic outcomes

8.1 Our vision for children and young people in Haringey is set out within the Corporate Plan: "**Enable every child and young person to have the best start in life, with high quality education (2015-18)".**

8.2 This consists of six areas:

1. All children will have the best start in life.

2. Children and young people across Haringey excel at school, making the most of their potential.

3. All young people will have access to excellent employment or higher education opportunities.

4. Children and young people will be healthier, happier and more resilient and those who need extra help will get support at the right time.

5. Children and families who need more support will be helped earlier before issues escalate.

6. All children and young people will be safeguarded from abuse.

8.3 The updated model for Children's services will continue to deliver towards all the strategic outcomes by building upon and embedding the improvements across a number of the Priority 1 objectives, as well as enabling capacity and capability through an increasingly integrated service-based family centric

approach.

8.4 The new vision has been welcomed by partner agencies and accepted by the Local Safeguarding Children's Board (LSCB). Partners concerned in the co-production of the next Borough Plan have expressed a keen interest in the approach being promoted as a better way of addressing needs at strategic partnership level. In addition, relevant partners have agreed to use the updated model to frame their responses to the JTAI findings.

9. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

9.1 Finance and Procurement

This report clearly sets out the imperative for changes to aspects of the current operating model, driven by statutory requirements, response to the JTAI and the need to deliver services and work with both internal and external partners in a new model.

The decreasing funding envelope reinforces the need to implement the stated changes in the most cost effective way possible, whilst still meeting statutory requirements and designing a model of delivery that is ideal for meeting the needs of children and young people.

Partnership working across the organisation with regards to a family-centric Early Help model presents opportunity for streamlining and consolidation of resources across service boundaries. Synergies should be explored to maximise potential benefits, whilst still ensuring the desired outcomes are met.

In addition to this, the future safeguarding partnership arrangement between the Police, CCG and the Local Authority and the resultant shift from over reliance on children's social care could ensure that resources are used more effectively.

As the details of the new Early Help model are finalised, it is important to articulate the anticipated positive impact on children in need cases, and numbers of looked after children, so that a baseline against which results can be measured is established. Post implementation monitoring against this baseline will support future narrative on performance, provide a basis for iteration where this is required, and a measure for assessing financial impact. It would undoubtedly help in designing a final model that has the highest opportunity for success, and which produces the expected benefits by impacting on the identified service user group.

The current Medium Term Financial Strategy (MTFS) includes further savings of £1.748m to be delivered from children's social care budgets in 2018/19. The financial commentary assumes that the implementation of the Early Help model referred to in this report, and changes to safeguarding arrangements will be contained within the MTFS funding envelope by mitigating any resultant pressures. Where the service anticipates a deviation from this, it is expected that a decision paper will be presented in line with governance requirements and Financial Regulations.

9.2 Legal

The report seeks Cabinet approval to the updated vision and model for early help provision for children and families in the borough. The Council has the power to remodel its services to effectively discharge its statutory obligations to children and families under the Children Act 1989 and other related legislations.

The focus on the integrated provision of early help services is in line with expectations in the Working Together to Safeguard Children April 2018 Statutory Guidance which provides that - *"Providing early help is more effective in promoting the welfare of children than reacting later"* and that "Local authorities should work with relevant local agencies to develop a joined-up early help services based on a clear understanding of local needs" *(Page 14).*

The Guidance further provides that *"The provision of early help services should form part of a continuum of help and support to respond to the different levels of need of individual children and families…. It is important that there are clear criteria for taking action and providing help across this full continuum to ensure that services are commissioned effectively and that the right help is given to the child at the right time. These criteria for action should be understood by all practitioners and applied consistently, including for children returning home from care. The safeguarding partners, in making their arrangements, should determine how best to ensure that these criteria for action are transparent, accessible and well understood." (Pages 17 & 18).*

9.3 **Equality**

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Residents who have characteristics protected by the Equality Act (2010) are over-represented among those who are most likely to access Children's Services. Provision of support to families at the earliest opportunity will enable better outcomes for children and young people and thereby enable the Council to meet its Public Sector Equality Duty to advance equality of opportunity. We will evaluate the impact of the operating model on an ongoing basis in order to monitor and address any differential impact on those with protected characteristics.

10. Use of Appendices

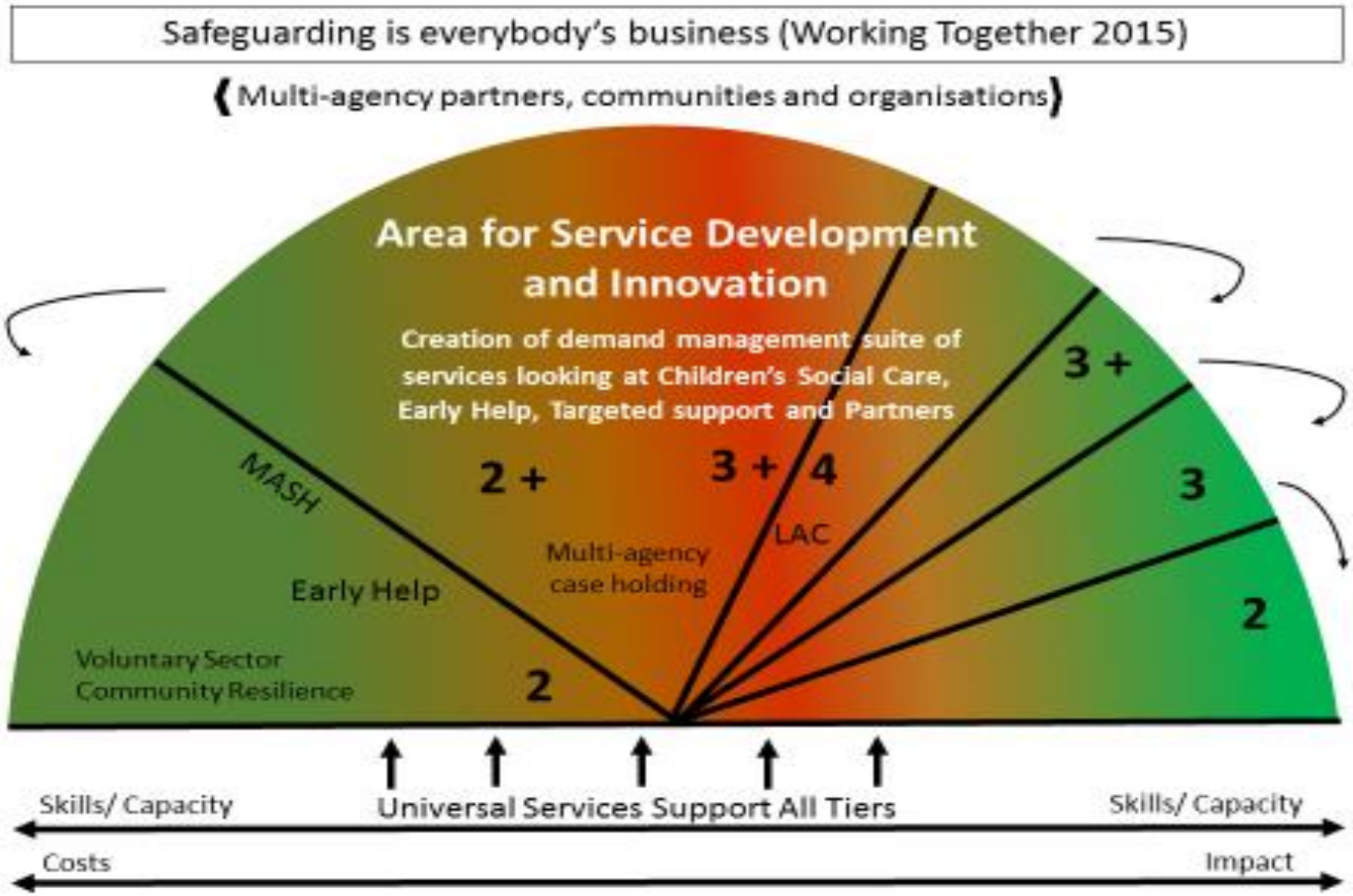
- Appendix 1 – Proposed Children's Service Model

- Appendix 2 - JTAI letter dated 30.01.2018

11. Local Government (Access to Information) Act 1985

- Cabinet Report of 16th December 2014 'Priority 1: Developing the Future Operating Model'
- Cabinet Report of 17th March 2015 'Future Operating Model for Children's services'
- Children and Social Work Act 2017
- Haringey Joint Targeted Area Inspection 2017 – letter from Ofsted
- Corporate Plan 2015-18
- Working Together 2015 (pages 5-29, and pages 102-105)
- Working Together 2018 (pages 6-37, and pages 121-124)

Appendix 1. Proposed Children's Services Model



30 January 2018

Margaret Dennison, Interim Director of Children's Services, Haringey Council
Jennie Williams, Haringey and Islington's Clinical Commissioning Group (CCG) Director of Nursing and Quality
Tony Hoolaghan, Chief Operating Officer Haringey and Islington CCG
Sophie Linden, Deputy Mayor for Policing and Crime
Cressida Dick CBE QPM, Commissioner of the Metropolitan Police
Des Fahy, Acting Borough Commander of the Metropolitan Police
Jennifer Sergeant Manager, Head of Service Youth Justice
Helga Swidenbank, Director of Probation, London Community Rehabilitation Company
Andrew Blight, Assistant Chief Officer Head of Haringey, Redbridge and Waltham Forest National Probation Service
Geraldine Gavin, Interim Chair of Haringey LSCB

Dear **local partnership**

Joint targeted area inspection of the multi-agency response to abuse and neglect in Haringey

Between 4 and 8 December 2017, Ofsted, the Care Quality Commission (CQC), HMI Constabulary and Fire & Rescue Services (HMICFRS) and HMI Probation (HMI Prob) undertook a joint inspection of the multi-agency response to abuse and neglect in Haringey.[1]

This letter to all the service leaders in the area outlines our findings about the effectiveness of partnership working and of the work of individual agencies in Haringey.

This joint targeted area inspection (JTAI) includes an evaluation of the multi-agency 'front door' for child protection, when children at risk become known to local services. In this inspection, the evaluation of the multi-agency front door focused on children of all ages who are being or who have been neglected. The JTAI also included a 'deep dive' focus on children between seven and 15 years old who have been neglected. This group of children will be referred to as 'older children' for the purpose of this letter.

The identification, assessment and service provision for children living with neglect in Haringey are too variable, and some practice is ineffective in improving the child's

[1] This joint inspection was conducted under section 20 of the Children Act 2004.

day-to-day lived experience. Although some good practice is evident, this is often due to the commitment and skills of individual professionals rather than sound practice underpinned by robust management oversight and quality assurance systems. There has not been a coherent commissioning of services for children living with neglect. Too many children are subject to social care assessments that do not lead to the provision of appropriate services, and cases are closed too early without sufficient progress being made. Some children are therefore referred and assessed again as they did not receive effective help before their case was closed. There are not enough parenting programmes or other interventions to support long-term change for children experiencing neglect. Children who would benefit from counselling support have to wait too long for this service. Early help is underdeveloped and there has been insufficient strategic leadership or prioritisation from the Local Safeguarding Children Board (LSCB) or the partnership to address this deficit. This means that children living with neglect do not consistently receive the right help at the right time.

The LSCB recognises that tackling neglect is a strategic priority, but it has been slow in taking action to achieve it. Auditing of cases undertaken by the LSCB and local authority is leading to increased self-awareness of the scope and scale of the issue. The partnership has a robust understanding of the deficits about both the front door service, and the response to children living with neglect, some actions have been taken to improve this. However, the pace of improvement is too slow. There has been a lack of effective business planning, which has not enabled effective monitoring and implementation of actions. Partners have not been fully held to account by the LSCB for their role in the safeguarding of children, and there is an over-reliance on children's social care.

It is good that the partnership has invested resources into the multi-agency safeguarding hub (MASH). However, the partnership has not enabled the full potential of the MASH to be realised. Partners are not involved in decision-making; most decisions are made by children's social care, or when there is a strategy discussion between the police and children's social care.

It is good that children's social care has implemented a clear model of practice and that training has been delivered across the partnership. Leaders recognise the challenges of embedding this model in practice. The relationship, engagement and support of schools are a strength in Haringey. This was reflected in the proactive approach to safeguarding issues that inspectors identified in cases.

The interim director of children's services has developed a clear vision to enable children to access help at an earlier stage and to use resources more effectively. There is significant energy being invested in creating momentum for this change with increasing urgency, and some early positive signs of improvement were observed. Neglect workshops have been arranged as well as workshops on thresholds in the

MASH. 'Bite size' learning modules have also been developed. There have also been improvements to the MASH. Plans have been developed to address the main deficits identified during this inspection. The local authority has set up an improvement board to improve early help and children's social care.

Key strengths

- There is multi-agency representation in the MASH to ensure that information is shared effectively. The appointment of a full-time health representative in the MASH, with support from safeguarding advisers at times of absence, is a positive development. This ensures that there is some continuity of health oversight for referrals, and, when the referral is notified to the health representative, information can be obtained and records updated accordingly. The role of the disclosure officer is well placed to quickly and effectively respond to information received from the community rehabilitation company (CRC) and probation. The disclosure officer is able to identify situations where further exploration and a referral are required.
- There have been some improvements at the front door. For example, performance data is now available daily and gives information on the previous seven days' activity. Thus ensures that managers have oversight and are able to maintain workflows. The managers meet with the team daily to ensure that work is progressed.
- The majority of parents spoken to by inspectors from families where older children are living with neglect are positive about their social workers and the way in which they are engaging and communicating with them.
- Auditing has led to the LSCB and local authority having a good understanding of the deficits at the front door and in relation to the response to children living with neglect.
- There is evidence in Merlin[2] reports of police officers speaking and listening to children who come to their notice. Investigations reviewed by inspectors show officers both listening to and acting on the views of children. There are examples of well-planned enquiries, with thoughtful updates of the risks to children and their brothers and sisters based on current circumstances, including the neglect they are experiencing and their previous histories.
- When a specialist police officer from the child abuse investigation team (CAIT) is dealing with an investigation, there is better partnership work; this was evident in strategy discussions and joint child protection investigations.

[2] Merlin is a database run by the Metropolitan Police that stores information on children who have become known to the police for any reason. A report is generated by the police at each incident.

- Neglect is recognised by the police as a crosscutting issue in child protection and is referenced in strategic documents, for example the child risk-assessment model guidance. In addition, guidance to officers on the Merlin child referral mechanism has a clear focus on the identification of neglect.
- There is an increasing and strong commitment to partnership working between children's social care and the police. For example, the arrangement to co-locate a social worker with the police between 3pm and midnight, seven days a week, has been agreed in order to support more timely assessment and response of the risks to children suffering neglect and other forms of abuse outside office hours. In addition, the police are embedding a greater number of police officers in the MASH, which is a positive development.
- Senior leaders in the Metropolitan Police Service (MPS) have recognised the importance of obtaining the voice of the child at incidents involving risk. For example, the most recent guidance documents on how officers should deal with incidents involving children at risk clearly highlights the importance of the voice of the child.
- Frontline resources, including detective constables, have been given safeguarding training on two occasions in the last nine months. The identification and response to neglect is a consistent theme in the training. This training has been delivered in partnership with national charities. Frontline police officers reported a clear understanding of their powers to protect children from significant harm, as a result of attending this training.
- In child and adolescent mental health services (CAMHS), evidence was seen of age-appropriate approaches used by staff to engage young children experiencing neglect, through drawings. Such approaches support child-centred practice and gather the views of children. In adult substance misuse (ASM) services (ASM), CAMHS and the 0—19 service, evidence of supervision and case discussion was seen in records to support practitioners' decision-making. However, actions were not always measurable to evidence progress.
- There is effective safeguarding practice, including the identification of neglect, in the community dental service.
- The relationship, engagement and support of schools are a strength in Haringey. This is reflected in the practice seen by inspectors in the children's cases reviewed. There is a proactive approach to safeguarding linked to the LSCB priorities. Designated staff for safeguarding have worked with schools to develop a neglect toolkit, which has been piloted and found to be effective. The toolkit will be rolled out to all schools in 2018 and monitored through the advisory service. Neglect is a significant part of the training for school staff, who receive regular updates on best practice regarding safeguarding. Schools report that this is an effective resource for their work. School staff know their children well, are committed to keeping children in school and provide pastoral support for children and their families.

- Schools effectively monitor the well-being of children who are living with neglect. Inspectors observed some good examples of school staff listening to and engaging with children. Overall, the engagement by schools with parents is positive. In the cases evaluated by inspectors, there are a number of examples of effective engagement with families, resulting from close contact with children and their families.
- Inspectors observed the positive use of interpreters for families that require this service. In some cases, there is good consideration of cultural practices and of how these affect children's identity in their families, with peers and in the wider community. Diversity is well recognised by police officers, and interpreters are provided where required for victims, witnesses and suspects. Schools are well aware of the cultural diversity found within their communities. They often use creative solutions, and staff support young people and their families with translation.
- There is evidence in assessments undertaken by the national probation service (NPS) and CRC of the impact of parents offending on older children living with neglect.
- In the youth justice service, there were two examples in which the 'Voice of the Child' self-assessment tool was used as part of the 'Asset Plus' assessment and the views of the child were incorporated into the assessment. The youth justice service has also developed its own 'My Plan' document, which enables the child to identify their own targets and to use it to address their offending behaviour effectively.
- The youth justice service undertook a review of the 20 most prolific offenders, focusing on their life histories. It found very high levels of neglect, and the effect of trauma the cumulative consequences of neglect have in the young people's lives. The service has disseminated the findings of the review widely and is currently seeking funding to develop a trauma-informed practice model. The youth justice service is represented at the LSCB and has taken important issues relating to young people to the Board, including the issue of young people in both police and prison custody.
- North Middlesex University Hospital emergency department (ED) makes good use of child protection alerts, and ED attendances are checked against the national child protection information system (CPIS) to ensure that risks, including those of the neglect of older children, are managed effectively. Information is shared appropriately with all health professionals involved.
- A gangs youth worker team is based at the North Middlesex University Hospital ED, to which young people at risk can be referred to help to meet their needs and encourage them to escape gang influences. This positive engagement with young people is also an opportunity to assess the risk of child sexual exploitation and neglect.

- General practitioners (GPs) receive good support from the named GP for safeguarding in Haringey. This includes regular safeguarding updates on both local and national issues, including neglect, as well as child protection training. This means that they are supported to identify risks and report it accordingly, and this was evidenced in cases reviewed by inspectors.
- In cases reviewed in which children are living with neglect, GPs demonstrate good professional curiosity and appropriate flagging of concerns to the relevant agencies. GPs evidence a good understanding of neglect of older children that enables effective identification and response to these children.
- The named doctor for Whittington Health has provided training in relation to health and neglect to social workers and CAIT officers. This includes key messages about neglect and the importance of making a referral for a medical assessment in which neglect is indicated. This demonstrates good multi-agency practice to recognise risk and refer accordingly for appropriate care and support for older children experiencing neglect. Further training is planned during 2018.

Case study: highly effective practice

Liam is a 12-year-old child who has experienced significant neglect throughout his childhood, which has had a detrimental impact on his emotional and psychological development and his relationship with his mother. Liam's presenting behaviours have impacted on his ability to engage with education. Through strong, committed and tenacious multi-agency working across the partnership, Liam has been supported to engage with CAMHS, the school nursing service and, with the provision of suitable education, has made a successful return to mainstream schooling. Psychological assessments and extensive psychotherapeutic intervention have addressed the underlying attachment issues impacting on Liam and his mother's relationship and parenting. Children's social care has led and managed a holistic package of support for Liam and his family, which has resulted in Liam having a better understanding of his behaviours and an increasing ability to regulate them. The outcome of the multi-agency interventions is that the local authority is now seeking to achieve permanence for Liam.

Areas for improvement

- Practice at the front door is not sufficiently robust. Pathways are not clear. In some cases, there are duplication and delay in MASH checks being undertaken when it is clear that an assessment is required. Agencies focus too much on sharing information rather than on evaluating the information to inform decision-making about the most appropriate help to meet the needs of children and their families. The quality of information and referrals from agencies is too variable. There are delays in some referrals being made and a lack of clarity regarding the outcome requested. Research is not carried out by the police prior to an initial referral being made, and when information is shared it is excessively detailed and some of the information is not always relevant. CRC and probation staff are not always clear about the difference between a check and a referral and, therefore, information is not always shared appropriately. In addition, parental consent is not consistently sought where appropriate. All these factors impact on the capacity of the front door. The front door focuses too much on process and gatekeeping, rather than ensuring that children have access to appropriate help and support. This leads to a high proportion of contacts and referrals for which it is decided that there should be no further action, and to some families not accessing the right help at the right time.
- The full potential of agencies working together in the MASH has yet to be realised. The role of agencies is limited to information sharing; thus, the skills and knowledge of all agencies in the MASH are not being harnessed to enable joint decision-making.
- Thresholds are not consistently understood and applied across all agencies.
- Historical information about children and families is not consistently taken into account to enable needs and risks to be considered and understood, which does not support effective decision-making. The voice of the child is not consistently evident in referrals and therefore does not influence decisions made about their lives. There is insufficient professional curiosity in some cases.
- Outcomes of referrals are not consistently shared with partner agencies, and minutes of meetings are not always evident in all agency records.
- Pathways to early help are not well understood among agencies, which leads to low numbers of contacts, referrals and assessments that progress to early help support. This means that families are not consistently receiving help at an early stage. Parents spoken to by inspectors stated that there is insufficient early help, and that too much onus is put on statutory social work services. Early help assessments lack focus on the child's needs, and the format used makes it difficult to follow progress to address needs and risks. There is limited analysis in

the documents to demonstrate the impact of interventions and the next steps required.

- Neglect is not being consistently identified by agencies. The focus is on the presenting issue rather than the underlying cause of the young person's behaviour. Neglect tools are not used routinely to assist in the identification of neglect.
- Overall, engagement with parents and children is weak. There is a lack of work with parents of older children living with neglect, which does not support the young person making positive progress. A consistent practice approach across the partnership has been to assess and make decisions about older children living with neglect based on the child's presenting needs and behaviours. Agencies are not consistently identifying and assessing the day-to-day experience of older children living with neglect and the impact of this on their behaviour. Interventions across the partnership with parents and children in cases seen have been reactive to the issues presented at a time of crisis.
- The combination of an insufficient focus on effective interventions with parents and lack of effective outcome-focused multi-agency planning and monitoring of progress has led to drift and delay for older children living with neglect. There is a lack of challenge by professionals where insufficient progress for the child is being made or there is disagreement about decisions being made. The LSCB escalation process is not consistently used by professionals.
- Consideration in meeting the diverse needs of the families is variable. Some partners have well-established processes to meet the diverse needs of families, whereas in some cases there has been little consideration to individual needs. In cases where the children's ethnicity is Gypsy Roma, professionals lack cultural competency and there is a lack of resources available in the borough to meet the needs of this group of children.
- Systems in individual agencies are not robust enough to ensure effective information sharing. Not all agencies are complying with their own policies to undertake safeguarding checks at key points of assessment and planning. Information sharing between different health services and between health and other agencies is poor.
- Professionals from all partnerships do have access to neglect training. However, training and learning have not led to sufficient knowledge across the workforce in relation to identifying, assessing and intervening cases in which older children are living with neglect.
- The LSCB has not challenged partners to ensure that there is timely action to address deficits identified in the response to children living with neglect. An effective action plan with clear timescales has now been developed, and this will be monitored by the LSCB.

- A backlog of approximately 200 cases is awaiting a full risk assessment by the police in the MASH due to issues of capacity. The case that has been longest in the queue is three weeks overdue. These cases have been initially graded as lower-risk cases and, although they have reduced from the backlog of 800 in September 2017, there may still be unmitigated risk in these cases. The MPS is increasing police capacity to address this shortfall.
- A significant intelligence gap exists in relation to the submission of Merlin reports handled by the police in the MASH due to an absence of police national database (PND) checks being conducted prior to a referral being made. The reason for this is that at the time of the inspection there were no staff trained in the MASH to access this information. Previous backlogs have been managed through a decision to file approximately 600 Merlin reports without sharing them further, on the basis that the child had not come to notice for six weeks following the original Merlin submission. Concerns are compounded as managers and senior leaders were unaware of this gap until it was highlighted by inspectors. The failure to identify this at an earlier stage means that risk is unknown and therefore unmanaged in a proportion of police notifications that were relevant to children for whom a PND check would have been required. The number of those referrals over and above the 600 mentioned for which PND checks have not taken place is also unknown. Thus, the scale and level of unmanaged risk cannot be determined. The MPS is immediately addressing this issue by ensuring that a trained staff member conducts PND checks in relation to referrals when necessary and also by training existing staff to perform this function.
- Police officers regularly submit Merlin reports about children who come to their notice. In most cases reviewed, there was some delay in police notifications being sent to children's social care, which adversely affects the timeliness of assessment and decision-making at the front door. There is no training available for new police MASH staff. Furthermore, in cases examined there had been a lack of understanding of police intelligence and information, resulting in the risk not being identified. The initial assessment and cumulative risk of neglect were being missed, which was resulting in children and families not being referred for help.
- Police officers generally fail to recognise the cumulative risk of other factors, such as domestic abuse, in families in which older children are known to be living with neglect. This additional information is not consistently used to inform decision-making. In the cases reviewed by inspectors, police officers did not take timely action, which included delays in investigations linked to children suffering from neglect.
- The good practice that inspectors have seen of police officers listening to children was not seen in all cases. Inspectors found that police officers generally focus on the presenting issue and behaviour, which means that they will tend to assess a violent child committing crime, rather than a neglected child. In these cases, parents may be more likely to be seen as victims of their child than the child being seen as having experienced neglect. In investigations, there was some

evidence of supervision. However, supervision did not consistently challenge the decisions already made, which resulted in drift and delay in some investigations and decisions being made in the absence of complete information in others.

- Although there is evidence of a shift in the emphasis of the MPS towards a more explicit focus on the reduction of risk and vulnerability, this has not yet been translated into consistent improvements in improving practice where the police come into contact with older children living with neglect in Haringey. Some areas of the work to improve this are yet to be implemented or are at a very early stage, and, as a consequence, these areas are not yet fully realising the intended benefits. For example, the introduction of the dedicated inspection team (DIT) is a positive step; however, the findings from audits show that the majority of investigations are below the expected standard. This qualitative process is not yet effectively informing practice and training to ensure that gaps in knowledge are addressed.
- There are an insufficient number of trained officers in the CAIT. Steps have been taken to mitigate this by the introduction to the team of seven police constable investigators. These officers should only be assisting with tasks such as statement taking and conducting some enquiries; however, they are carrying out investigations concerning children. Despite some mentoring being in place, they have not had any specialist training to carry out this level of complex investigation.
- Some police officers see children solely as perpetrators of offences rather than considering their needs arising from neglect. Inspectors saw children living with neglect spending significant overnight periods in custody and being released without a recorded risk assessment or support. Significant delays were seen in cases in which children were detained in custody for long periods before an appropriate adult attended. The reason for delays in an investigation while children are detained in custody is not evident from the custody record. In addition, there was no alternative accommodation offered to a child who was detained in custody.
- Health services under-utilise record-keeping systems that aid the identification of vulnerable children. Dedicated alerts, safeguarding templates and chronologies are not always completed or updated with the most recent risks. This prevents practitioners from having access to highly visible information that can help to identify children living with neglect.
- In health agencies, the quality of recording in some records is weak. Assessments are not comprehensive or are sometimes missing from records. In adult mental health and adult substance misuse services, risk assessments are not always updated or carried out fully. In school nursing, assessments are not underpinned by the use of tools to assess risks of neglect and do not demonstrate sufficient evidence of professional curiosity.

- In adult substance misuse and adult mental health services, the 'Think Family' approach is not fully embedded, which means that there is an insufficient focus by these services on children living with neglect. The adult substance misuse service does not have robust guidance in place to help safeguard children who may come into contact with adults receiving opioid substitution treatment. The service is not commissioned to carry out home visits. Checks on the safe storage of this medication rely on what the parent/carer reports rather than actual checks at the family's home. Therefore, the service cannot be assured that children are being adequately safeguarded.
- Information sharing between health services is not always effective to support the early identification of risks to children, including unborn children. Links between midwives and health visitors are not always robust to support the early identification of safeguarding risks. This hinders the provision of universal and targeted health visitor antenatal contacts. Links between adult mental health, adult substance misuse and the community dentist to the 0—19 team are not well developed to support information sharing. This limits opportunities to work jointly at the earliest opportunity to improve outcomes for children. Electronic records used by some health services and providers, such as the RIO (electronic healthcare record system) are not linked. This prevents access to a complete record of children's care.
- There is insufficient capacity in the school nursing service, which impacts negatively on the older children living with neglect. The resourcing of school nursing is on the trust risk register, but it is not clear whether this has taken into account the impact on children and their families. Managers reported that there is no established standard provision or offer to children and young people who are home educated or not accessing education. The current school nursing service offer to children, young people and families is, on the whole, reactive in nature. This limits opportunities to consider health needs or identify unmet needs of school-aged children and intervene early when children are experiencing neglect.
- School nurse records reviewed by inspectors demonstrated poor recording, lack of recognition and analysis of neglect and risk, delay in assessment and lack of specific, outcome-focused plans to meet the needs of these older children. Chronologies are not used consistently or effectively in the school nursing service, which would help practitioners to highlight patterns of neglectful behaviours, including missed appointments or unmet health needs. Thus, the school nursing service is not proactive in identifying neglect for older children. In three cases that were evaluated by inspectors, the course of action taken did not demonstrate sufficient evidence of knowledge and understanding of how to respond to neglect. These cases were not prioritised and there were delays seen of between six and nine months at the time of the inspection. The school nursing service was not invited and therefore did not contribute to multi-agency assessments and decision-making for these children.

- GPs have good relationships with health visitors in Haringey, and regular practice meetings take place. However, relationships with school nurses remain under-developed. Information sharing, specifically between school nurses and GPs, is weak.
- The paediatric dentistry referral form does not support the identification of children for whom there are known safeguarding concerns. This limits the opportunity to identify children living with neglect.
- Health leaders across Haringey provide senior leadership and there is a strong presence and engagement on the LSCB and subgroups. However, there is further room for all partners to be considered as equal partners. The complexities of the health landscape are not fully understood by the multi-agency partnership. Across primary care, acute, mental health and community health services, the important contribution that health practitioners make to the multi-agency safeguarding of children needs to be better understood by partner agencies and considered more appropriately. For example, health practitioners are not part of strategy discussions, referrals are not shared with the health professional in the MASH and health are not currently involved in decision-making at the front door.
- Most assessments undertaken by children's social care include key information and are mostly analytical. However, there is not always recognition of neglect for older children, and information gathered is not always used to inform plans. There is very limited use of tools to support assessments.
- Plans are not child- or outcome-focused and they are not always multi-agency. Actions are not consistently focused on the neglect experienced by the older child. This leads to a lack of timely and effective multi-agency intervention for older children living with neglect.
- Social workers receive regular supervision by managers, but this is not always effective in progressing cases and improving outcomes for older neglected children. Gaps in supervision have resulted in cases being 'stuck' and delay and drift occurring for older children living with neglect.
- The local authority faces significant challenges in relation to the retention and recruitment of experienced social workers. There is a high staff turnover and use of agency staff. This leads to challenges in enabling consistent social work practice. The local authority has recognised this. It has made the retention and recruitment of social workers a priority, and plans are being developed to support this.
- High demand has created significant capacity issues at the front door. This means that children are not consistently seen in a timely way. The performance indicator for seeing a child within 10 days of the start of an assessment does not support the importance and urgency in seeing children. Delays in seeing children and their families lead to challenges in engaging them and a delay in assessing risk.

- Probation staff undertake safeguarding checks at court, but due to practical issues, such as stand-down reports, the information is not always returned prior to sentence. There is a national policy that allows for cases to be sentenced without a safeguarding check, and it is down to professional judgement as to whether this would make a substantial difference. The consequence in Haringey is that an inappropriate sentence can be given to parents of children living with neglect because the safeguarding check has not been undertaken.
- The CRC has largely withdrawn from strategic engagement with local safeguarding partnerships as it rebuilds the organisation. It has developed proposals for future engagement and has discussed them with the local partnership. The CRC is in the process of implementing a new IT system that will include child safeguarding prompts. It intends to deliver two-day in-house safeguarding training for all of its staff in 2018. It does not intend to take up places on local partnership training in the near future, as that would require staff to exceed their allocation of training days. The combination of these factors means that the multi-agency involvement of CRC in safeguarding children living with neglect is significantly underdeveloped, which does not support effective practice.

Case study: area(s) for improvement

Partnership working has focused on the presenting issues of domestic abuse in a family in which children have suffered from years of neglect. The cumulative impact of that neglect has not been recognised. As a consequence, decision-making and planning have been driven by events, hampered by delays in information sharing that was not consistently robust across all agencies, and a failure to recognise the escalating risk.

John a child in this family was offered an appointment following a CAMHS referral. However, when he did not attend, professionals did not follow this up and were unclear about the status of the CAMHS referral. As a result, no further attempts were made to arrange an assessment to explore John's emotional well-being and the impact of suffering neglect. Thus, interventions and plans were not effective in improving John's situation. Although there was imminent high risk of domestic abuse following an incident, there was a three-week delay in a police officer attending to take a statement, and a strategy meeting took six weeks to be convened. This left the family unsupported and unprotected. The impact of this for John and his mum was that they were left without intervention following the incident, which potentially gave a message that they and their concerns were not important to professionals and resulted in both of them refusing to engage with the investigation.

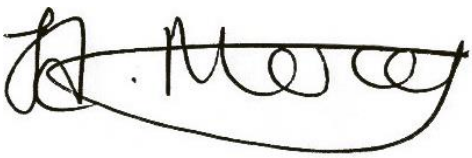
John has since been remanded to local authority care and placed in residential provision. There has been a lack of effective multi-agency work to safeguard the child. This was not recognised in management oversight until the partnership undertook an audit of the case as part of the inspection. An effective plan is now in place.

Next steps

The director of children's services should prepare a written statement of proposed action responding to the findings outlined in this letter. This should be a multi-agency response involving NPS, CRC, the clinical commissioning group and health providers in Haringey and the MPS. The response should set out the actions for the partnership and, where appropriate, individual agencies.[3]

The director of children's services should send the written statement of action to ProtectionOfChildren@ofsted.gov.uk by 11 May 2018. This statement will inform the lines of enquiry at any future joint- or single-agency activity by the inspectorates.

Yours sincerely

Ofsted	**Care Quality Commission**
 Eleanor Schooling National Director, Social Care	 Ursuala Gallagher Deputy Chief Inspector
HMI Constabulary	**HMI Probation**
 Wendy Williams Her Majesty's Inspector of Constabulary	 Helen Mercer Assistant Chief Inspector

[3] The Children Act 2004 (Joint Area Reviews) Regulations 2015 www.legislation.gov.uk/uksi/2015/1792/contents/made enable Ofsted's chief inspector to determine which agency should make the written statement and which other agencies should cooperate in its writing.

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Report for: 6th March Cabinet

Title: The Looked After Children Sufficiency Strategy 2018 - 2021

Report authorised by : Margaret Dennison, Interim Director Children's Services
Charlotte Pomery, Assistant Director Commissioning

Lead Officer: Sam Jacobson, Commissioning Manager

Ward(s) affected: All

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1 This report presents the draft Looked After Children Sufficiency Strategy for approval. The Council has a statutory duty to publish such a Strategy in order to identify how it will meet its duties to ensure that there is sufficient accommodation for looked after children that meets their needs and is within the local authority area.

2. Cabinet Member Introduction

2.1 I am pleased to present the draft Looked After Children Suficiency Strategy for approval. As corporate parents, we in the Council have a profound duty towards the looked after children in our care. The outcomes set out in the Strategy are intended to contribute towards looked after children developing and thriving and to strengthen our overall approach towards vulnerable children, young people and families in the borough.

3. Recommendations

3.1 Cabinet is asked to approve the Looked After Children Sufficiency Strategy attached as Appendix 1.

4. Reasons for decision

4.1 Councils are required to review and refresh their LAC Sufficiency Strategies regularly to take account of changing demographics, shifting patters of demand and developments in the market. This strategy will replace the previous Sufficiency Strategy which ran until the end of December 2017, offering an opportunity to present refreshed data and some innovative approaches to the challenges of LAC sufficiency.

5. Alternative options considered

5.1 It is a statutory requirement for the Council to produce a Looked After Children Sufficiency Strategy and for it to be made publically accessible. Alternative options were not therefore considered.

6. Background information

6.1 The Sufficiency Strategy has been developed to support the Council to deliver its vision of "giving all children and young people the best start in life, including world class education" and to ensure that the safety and welfare of children and young people are at the heart of all the Council does. The Strategy will also enable the Council to meet its statutory duties, by focusing on achieving improved outcomes for children and young people so that they are less likely to need long term use of the care system.

6.2 The core outcome of this Strategy has been identified to support the Council to meet its duties, recognising that this relies on responding to and managing demand as well as managing the market and that the key priority is ensuring that children and young people are supported to develop and thrive in the most enabling environment possible, where their safety and welfare can best be ensured. It is:

Children and young people in care live in stable, high quality settings, where their needs can be met and their outcomes improved, enabling them to return home where this is in their best interests

6.3 There is a strengthened focus on edge of care provision in this Strategy in recognition of the poorer outcomes for most children and young people coming into care and the benefits of supporting families to stay together in their communities and networks. These edge of care services can both divert children from care and also enable children and young people to return home quickly and safely after a period in care. Whilst some of these services require investment, they will lead to a more economic system overall with a greater proportion of funding to support proactive edge of care work thereby avoiding the need for and costs of social care interventions.

6.3 Elsewhere on this agenda, the new vision for children's services is being presented to Cabinet for consideration and this Strategy has been developed in recognition of its core principles and focus.

7. Contribution to strategic outcomes

7.1 The LAC Sufficiency Strategy supports the Council's priority, as set out in the Corporate Plan, Building A Stronger Haringey Together, to enable all children and young people to have the best start in life, including world class education.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

8.1 Finance (Chief Finance Officer)

8.1.1 Whilst this report does not explicity state a commitment to specific sums of expenditure, compliance to the statutory duties inherent within the strategy requires the council to ensure that there is appropriate funding provided to deliver those services.

8.1.2 The appropriate levels of funding are stated in the council's medium term financial strategy and is agreed by Full Council on an annual basis.

8.2 Procurement (Head of Procurement)

8.2.1 Strategic Procurement notes the contents of this report and will provide the necessary procurement support where required to implement the Policy.

8.2.2 Strategic Procurement already works with commissioners in developing commissioning strategies and markets to support outcome based requirements across other care categories. This support will be extended in to the LAC category as required.

8.3 Legal (Assistant Director of Corporate Governance)

8.3.1 Under Section 22G of the Children Act 1989 ("General duty of local authority to secure sufficient accommodation for looked after children") the Council must take steps that secure, so far as reasonably practicable, sufficient accommodation within the its area which meets the needs of its looked after children, and whose circumstances are such that it would be consistent with their welfare for them to be provided with accommodation that is in the Council's area ('the sufficiency duty'). The Council should be able to show that at a strategic level it is taking steps to meet the sufficiency duty, as far as is reasonably practicable.

8.4 **Equality**

8.4.1 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

8.4.2 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

8.4.3 The decision to adopt the Looked After Children's Sufficiency Strategy will enable the Council to meet its statutory duties to ensure that there is sufficient appropriate accommodation for looked after children. The strategy will have a positive impact on those within its remit; specifically looked after children,

among whom males and BAME children are overrepresented. In relation to the Public Sector Equality Duty, the strategy will advance equality of opportunity for looked after children with protected characteristics and foster good relations between looked after children with protected characteristics and those who do not.

9. Use of Appendices

9.1 Appendix 1 Draft LAC Sufficiency Strategy
Appendix 2 EQIA Draft LAC Sufficiency Strategy

10. Local Government (Access to Information) Act 1985

None

London Borough of Haringey

Looked After Children Sufficiency Strategy 2018-2021

A. Our vision and outcomes

Introduction

This document sets out how Haringey Council will meet its statutory duty to ensure that there is sufficient accommodation for looked after children that meets their needs, improves their outcomes and is within the local authority area. The Sufficiency Strategy 2018-2021 has been developed to ensure that the placement offer for looked after children and care leavers commissioned by the Council can respond to their assessed needs and help to improve their outcomes. This strategy sets out the actions that will be taken over the next three years to influence and improve the availability, quality and value for money of placements commissioned.

Vision and outcomes

The Council's Corporate Plan, Building a Stronger Haringey Together, sets out our vision for children and young people:

Giving all children and young people the best start in life, including world class education

The Sufficiency Strategy has been developed to support the Council to deliver its vision and meet its statutory duties, by focusing on ensuring that:

Children and young people in care live in stable, high quality settings, where their needs can be met and their outcomes improved, enabling them to return home where this is in their best interests

In addition to this outcome, we recognise that the ability of the Council to meet its duties relies on responding to and managing demand as well as managing the market and that the key priority is ensuring that children and young people are supported to develop and thrive in the most enabling environment possible. We believe that there are three principal ways, through this strategy, in which we will achieve this outcome:

- Sufficiency – Establishing whether we have enough of the right range of provision, and in the right proportion, to support these outcomes for children, young people and families
- Quality – Determining whether we have effective, local and high quality services to support these outcomes for children, young people and families
- Value for Money – Ascertaining whether we have the right balance of cost and impact in the provision we commission to support these outcomes for children, young people and families

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The sufficiency duty applies in respect of all children who are defined as 'looked after' under the Children Act 1989. However, as the statutory guidance on sufficiency states "an important mechanism – both in improving outcomes for children and in having sufficient accommodation to meet their needs – is to take earlier, preventive action to support children and families so that fewer children become looked after. This means that the commissioning standard outlined in this guidance also applies to children in need who are at risk of care or custody (sometimes referred to as children 'on the edge of care')". To ensure that the local authority only accommodates children and young people for whom being looked after is in their best interests, this Strategy also touches on provision at the 'edge of care'. In line with the guidance, and to ensure that the local authority delivers its corporate parenting responsibility for children in care as they transition to independence after 18, the strategy also covers provision of placements for 18+ care leavers. Finally, it includes analysis and actions for legal permanency, to ensure returns home and the long-term stability of children is always considered.

We recognise that access to effective universal and targeted, community based provision will help to develop a family's resilience and ability to cope under pressure. Whilst the services which may form part of an early help offer are not considered here in detail, there is a connectivity between these and the 'edge of care' and in care provision which is the focus of the LAC Sufficiency Strategy. By enabling access to stronger and earlier support in the community, the protective factors which ensure children and young people brought into care return home sooner, can be nurtured. In addition, from a LAC Sufficiency perspective, this approach will ensure that higher cost and more specialist resources are appropriately focused on meeting the needs of those children and young people who do come into care.

Based on the current placement mix and the value for money of provision, this Strategy identifies gaps and opportunities in the current market and establishes the commissioning and market development required locally to find better ways of meeting needs. It ends by defining the actions the Council and its partners are taking and will take to ensure sustainable placement sufficiency in the future.

Meeting the needs of looked after children is part of Priority 1 in Haringey Council's Corporate Plan. Within the overall aim of ensuring that all children get the best start in life, the council has an objective which details that "all children and young people will be safeguarded from abuse and offered the best possible care if they cannot remain with their own family".

The LAC Sufficiency Strategy forms an important part of Haringey's overarching strategy for looked after children and care leavers, but is only one element of the borough's whole system approach to meeting the needs of children, young people and families. Access to effective and timely support through established pathways to universal, targeted and specialist services is fundamental to ensuring that the needs of looked after children and young people are met holistically.

As such, the LAC Sufficiency Strategy 2018-2021 should be read in conjunction with a number of other local policies and strategies:

- **Early Help Strategy** – Haringey's Early Help strategy and service offer is intended to ensure that families are given the best possible chance of remaining together and reflects the council's belief that most children are likely to thrive and achieve good outcomes if they are cared for within their own families.
- **Corporate Parenting Pledge** – Adopted in July 2017 at a meeting of the Full Council, the Pledge has been co-produced with our children in care council, Aspire, to provide a consistent experience for all children in our care, regardless of age, reason for being looked after or placement type.
- **Permanency Policy** – Decisions regarding how to accommodate a child and their individual care planning must be formulated with the input of the child and/or their family. These decisions should be taken in line with Haringey's statutory responsibilities and guided by local policy for providing long-term stability and care for children.
- **Joint Commissioning Strategy for SEND –** Formulated to ensure integrated planning and commissioning for individuals with special educational needs and disabilities between Haringey Council and Haringey NHS Clinical Commissioning Group.
- **Housing Strategy 2017-2022 –** The strategy pledges to help young people, including care leavers, to secure and maintain independent housing and provides vulnerable children and young people with services to learn and develop independent living skills.

The Council is currently working with partners to develop a new vision and model to enable all children, young people and families in Haringey to thrive, reflecting a Think Family approach, supporting community resilience, prevention and emphasising the importance of access to a range of universal, targeted and specialist community based services to deliver better outcomes. Improving pathways for children in need, those at risk of coming into care or custody, as well as for those already looked after, is a key element of this approach which will strive to ensure that needs are met before a social care assessment is required. This 'whole system' approach will intertwine universal, targeted and specialist services to improve outcomes for all children and young people. This approach will also ensure that the full range of services work together to meet children's needs in an integrated way, including children who are already looked after, as well as those at risk of care or custody. The emerging model also highlights the role of earlier, targeted intervention to reduce demand for social work input and ensure that children brought into care can return home wherever possible.

B. Needs and market profile

National context

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Nationally, the number of looked after children continues to rise, increasing by 5.6% from 2014 to 2017. This has outpaced the increase in the 0-18 population, increasing the rate of looked after children nationally from 60 to 62 LAC per 10,000 children, and is driven in part by an increase in the number of unaccompanied asylum seeking children (UASC). The increasing number of LAC nationally should also be seen in the context of increasing demands in safeguarding and child protection services where both referrals and assessments have increased significantly even in the past year.

Since 2015 there has been a 19% decline in the number of children leaving care due to being adopted, from a peak of 5,360 to 4,350 per year following declines in the number of placement orders and placements for adoption in previous years. Following sustained increases since 2013, LAC ceasing due to a Special Guardianship Order (SGO) has also begun to fall slightly.

Policy, legislation and case law have had an impact on the demands placed on local authorities and their ability to respond through the commissioning of placements from the market. In the four years since Haringey published its last LAC Sufficiency Strategy, a number of national developments have affected local practice and provision:

- **Southwark Judgement** – A duty which obliges children's services to provide accommodation and support to homeless 16 and 17 year olds under Section 20.
- **Remand process** – When courts refuse bail to a child (10-17 years), they are remanded into local authority care or youth detention accommodation and treated as looked after.
- **Staying Put policy** – This enables a young person to remain in their current foster placement after turning 18. The young person may continue in their staying put arrangement until the age of 25.
- **Children and Social Work Act** – The new Act introduced in 2017 outlines the seven principles of corporate parenting which local authorities must abide by for looked after children and care leavers. Significantly, the Act enables local authorities to place children in secure facilities in Scotland and extends the personal advisor role to care leavers up to the age of 25 years, irrespective of their educational status.

Local context

The needs profile of Haringey's children in care

The primary reasons for children entering care in Haringey are abuse and neglect, followed by absent parenting. According to data from Haringey's Children in Need (CIN) census, domestic violence was the most prevalent factor identified which indicates that a large proportion of looked after children – who are likely to have been Children in Need at one time – may have emotional support needs, stemming from past traumas in the home environment. This is echoed by Haringey's 2017 LAC Strengths and Difficulties Questionnaire (SDQ) results, in which a third of looked after children had an SDQ score that was a 'cause for concern', highlighting the prevalence of emotional or behavioural disorders within this cohort.

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In addition to this, as alluded to by the SDQ scores, at least 10% of Haringey's LAC cohort of 422 children (August 2017) have significant behavioural or conduct difficulties and are at risk of involvement in criminal activities. In 2016/17 9% had at least one exclusion from school, 7% of LAC aged 10 and above had been convicted or subject to a final warning or reprimand during the year and 9% were detained on youth justice legal statuses.

A small proportion of Haringey's LAC cohort have extremely complex needs and are highly vulnerable. According to 2016/17 LAC reviews, 7.5% of our children in care are at risk of involvement in gangs and 2-3% percent are at risk of Child Sexual Exploitation (CSE). Furthermore, 2% of LAC who had been looked after for at least 12 months have been identified as having a substance misuse problem. Although the percentages are small, these statistics reflect incredibly complex young people in need of a range of tailored, highly specialist services to ensure that they overcome any difficulties and are no longer at risk.

The needs which arise from experiences of neglect and trauma are often manifest in poor emotional wellbeing and increased levels of mental illness in looked after children in Haringey. This is echoed by national statistics which estimate that approximately 45% of looked after children in the UK suffer from some form of mental ill health compared to 10% of children in the general population. Whilst we have commissioned targeted mental health services for looked after children, social, emotional and mental health and wellbeing issues remain significant.

In addition, we know that whilst national statistics show children aged 11 to 16 years from Black, Asian and Minority Ethnic (BAME) groups may have a higher prevalence of mental health problems than other groups, they are less likely to approach local Child and Adolescent Mental Health Services (CAMHS) for support and interventions. As 43% of LAC are from a BAME group this cohort constitutes a significant proportion of the LAC profile.

A distinct group within the BAME population is the cohort of Unaccompanied Asylum Seeking Children (UASC). This group comprise 19% of LAC entrants since the beginning of the financial year of which the majority are male and within the 16-17 years age range. Many of these young people may have experienced good parenting and a secure upbringing, but will need culturally appropriate support to successfully integrate into Haringey's communities.

The composition of Haringey's looked after cohort and the proportion of children with complex needs is reflected in the council's current placement mix and the increasing demand for specialist and therapeutic placements. These are key areas of focus for this strategy as we need to develop capacity to respond to the increasingly complex needs and behaviours being displayed by some children and young people. At the same time, we are developing a wider vision (as described earlier) for children and young people which should ensure that some of these needs are addressed earlier, in family settings and in the community rather than through services at the edge of or in care.

Haringey's Early Help offer seeks to deliver preventative support through a variety of mechanisms including the provision of parenting and strengthening family programmes and approaches to prevent crime, violence and anti-social behaviour. We are also working to

ensure appropriate access at an earlier stage to services for children's and parents' mental health and wellbeing, substance misuse and domestic violence to avoid family breakdown.

The desired outcomes and achievements for Haringey's children in care

A fundamental element of delivering this Strategy, is ensuring that all children in care are given sturdy foundations to ensure that they have the best start in life and achieve positive outcomes. A recent study conducted by Coram Voice and the University of Bristol highlighted the positive impact that care can have upon a child, with 83% of looked after children across 16 local authority areas stating that being in care has improved their lives. Haringey aims to ensure that all children experience an improvement to their wellbeing, attainment and quality of life whilst being looked after by the authority.

Through the improvement of placement stability and the provision of the highest-quality packages of care and support to all looked after children, Haringey aims to ensure that LAC educational achievement continues to improve, reaching the same levels as in the wider 0-17 population. Currently Haringey's educational attainment rates for looked after children are ranked among the best of our statistical neighbours, and we will seek to further improve on these levels. The average LAC attainment 8 score is 34.2 but in the future the improved confidence and emotional and mental wellbeing of looked after children will see attainment levels increase and move closer to the average for Haringey's 0-17 population (46.5).

The Council strives to guarantee that within each placement, the physical and emotional wellbeing of looked after children is improved, that they positively use their time and develop the skills necessary for the transition to independence. Ultimately, the high quality support and care that all children will receive whilst being looked after should translate into positive outcomes and destinations for young people when they become care leavers. Currently 47% of care leavers (aged 19-21) and 53% of UASC care leavers are in Education, Employment or Training (EET), which is above our statistical neighbour average. We will continue to encourage and support, from an appropriate age, more looked after children to be able to undertake education, employment and training upon transition to adulthood and therefore become more financially independent. Achieving these improved outcomes for our looked after children is directly connected to the council's strategy for commissioning a range of high-quality placements, which are able to meet the needs of each individual child.

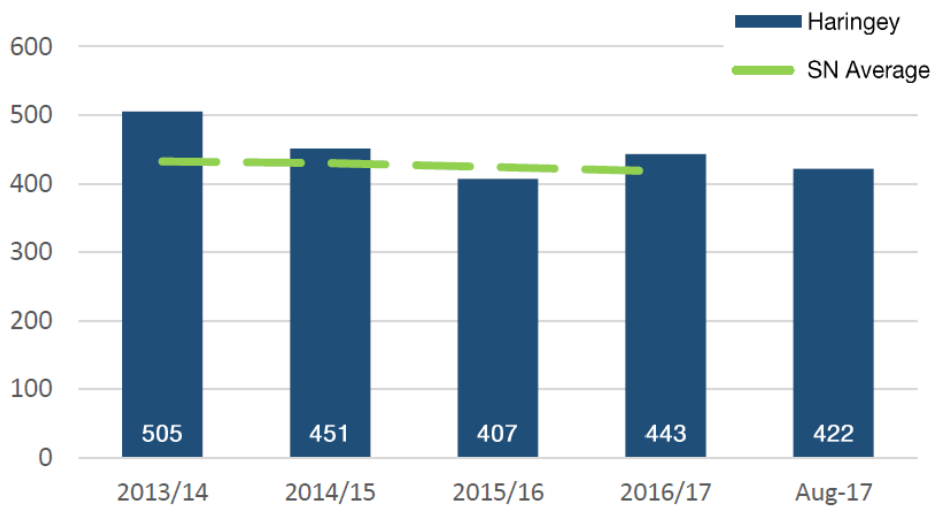
To contribute to achieving the desired outcomes for LAC, Haringey will ensure that placement providers are effectively linked into the wider network of services available for children and young people through establishing new communication forums for children and young people's provision. This will help to ensure that placement providers work collaboratively with education, health, wellbeing, welfare and leisure services to improve outcomes for children and young people in their care.

Demographics of Haringey's looked after children population

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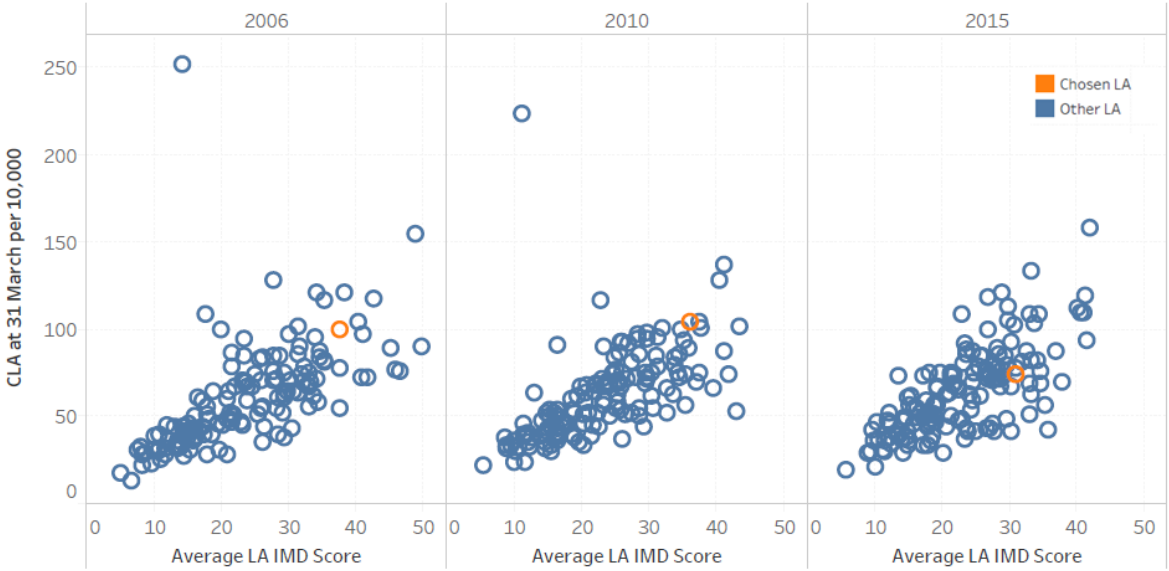
Over the period of the previous LAC Sufficiency Strategy 2014-17 Haringey significantly reduced its numbers of looked after children from 505 in 2013/14 to 422 in August 2017. Haringey's LAC population per 10,000 is now similar to our statistical neighbour average.

Number of looked after children by year – August 2017



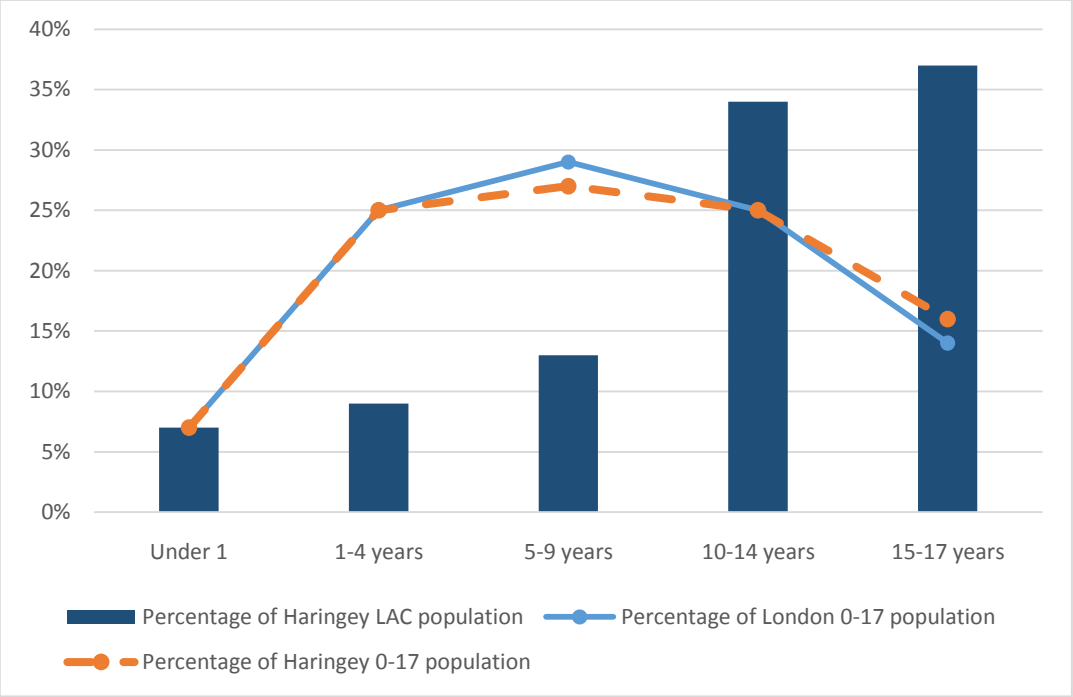
Research has highlighted that there is a correlation between a council's levels of deprivation and the size of their LAC populations. Based on comparator data gathered from other local authorities, it is indicated that the current size of Haringey's LAC cohort is within an appropriate range, considering the borough's average Index of Multiple Deprivation (IMD) scores.

Exploring the relationship between deprivation and need - 2015



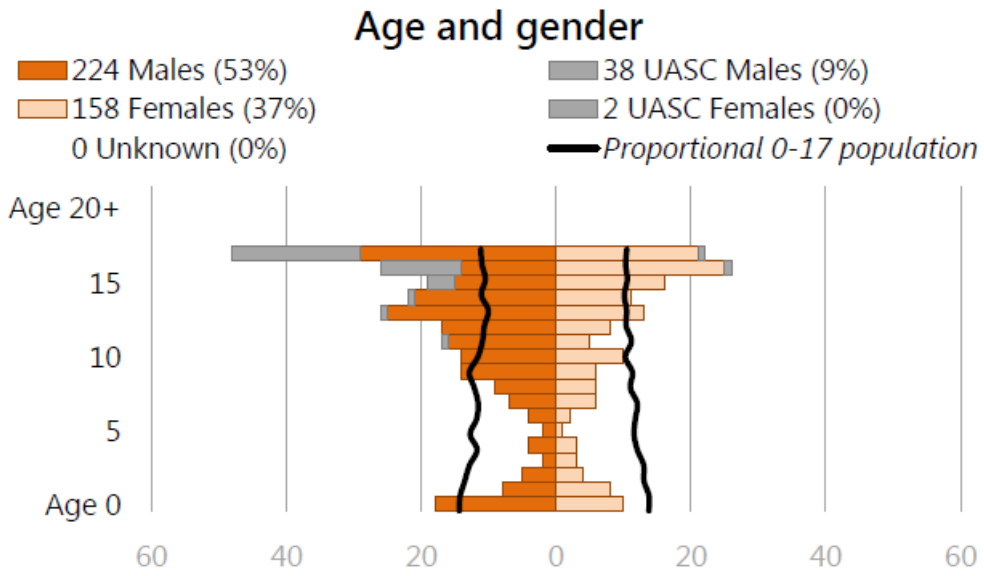
- The largest proportion of looked after children were aged between 15-17 years. A third of looked after children in the 15-17 years age range have been in care for less than 1 year, but nearly half have been in care for over than 5 years.

Number of looked after children by age – August 2017



- Our looked after children cohort includes a disproportionate number of males and this gap has increased from 57% of the cohort being male in 2013/14 to 62% male in 2017. The age breakdown differs by gender also, with the highest number of male LAC aged 10-14 and the greatest number of female looked after children aged 15-17 years.
- Haringey has a disproportionate number of children in care of Black ethnicity when compared to the wider population. 43% of the LAC cohort is Black, compared to 22% of the under-18 population of the borough. Children of White and Asian ethnicity are under-represented in our LAC cohort as they comprise 31% and 3% respectively of Haringey's looked after children population, but 50% and 8% of the local 0-17 population.
- As of August 2017 40 looked after children (9.5% of the LAC population) were Unaccompanied Asylum Seeking Children (UASC) and a large majority (95%) of this cohort were male and over the age of 10.
- In 2016/17 4.5% of LAC were children with disabilities and out of this cohort the primary reason for being looked after was because their parents were unable to meet the levels of care needed (73%).

Demographics of looked after children – August 2017



The disproportionality of boys in the looked after children cohort is reflected marginally in the data regarding Children in Need and children with a Child Protection Plan where there are higher numbers than would be expected from the general population. However, for ethnicity, there are markedly higher proportions of BAME in both the Children in Need and Child Protection Plan cohorts: 42% of CIN are from a BAME background compared to 22% of the Haringey under-18 population and 38.3% of those with an open CPP are of BAME origin.

Whilst there is an interrelationship with the numbers of Unaccompanied Asylum Seeking Children becoming looked after, who are predominantly male and of BAME origin, this is not the sole contributing factor to the over-representation of BAME groups in the LAC cohort. If all UASC were separated from the LAC cohort data, there would still be an overrepresentation of BAME children, males and adolescents in comparison to Haringey's under-18 population.

Ethnic background of looked after children – August 2017

	All LAC	Not UASC	UASC	CIN population	Haringey 0-17 population
White	31%	31%	30%	28%	50%
Mixed	14%	16%	0%	11%	14%
Asian or Asian British	3%	2%	8%	6%	8%
Black or Black British	43%	46%	20%	38%	22%
Other ethnic group	6%	3%	33%	5%	5%
Not stated/ not recorded	3%	2%	1%	13%	1%

The over-representation of BAME children in the LAC cohort is a trend evident throughout the country. The phenomenon has been questioned widely but is yet to be fully understood. Deprivation levels are likely to play a role, particularly given the correlation between deprivation and LAC rates (as demonstrated earlier), as well as the correlation between deprivation and ethnicity. Anecdotally, too, many factors are thought to contribute, from an overall lower number of BAME foster carers and the impact this has on the ethnic identity of BAME children in care[1], to single parent families being more common in Black and Mixed ethnicity households, which can lead to greater vulnerability and instability at home[2][3]

As highlighted in recent research into the disproportionate numbers of Black, Asian and Minority Ethnic (BAME) boys in the criminal justice system, BAME children in custody are less likely to be recorded to have substance misuse concerns, to be at risk of self-harm, to have learning difficulties, to have mental health concerns, to be disengaged from education or to have problematic family relationships. If it is the case that such needs have not been identified or met at an earlier stage, then this may lead to a care decision by both family and practitioners. The complex interplay of poverty, poor housing options (instability, overcrowding, poor quality accommodation) and issues such as mental health, domestic violence and substance misuse in the household, will also affect the decision making process for a child to become looked after, if only for a short time, and disproportionately affect some communities.

In line with this complexity, the data from the Haringey LAC cohort does not conclusively show why BAME children and young people are over-represented. For example, children of Black ethnicity are more likely to be LAC for 10 or more years than children of White ethnicity (10% vs 6%), but they are also more likely to be LAC for 3 years or less (72% vs 69%). Similarly, children of Black ethnicity are less likely to be adopted than White children (1% vs 4%), but they are also more likely to return to their parents from a LAC placement (29% vs 26%).

Haringey's placement mix

Since 2013/14 Haringey's placement mix has changed in a number of ways.

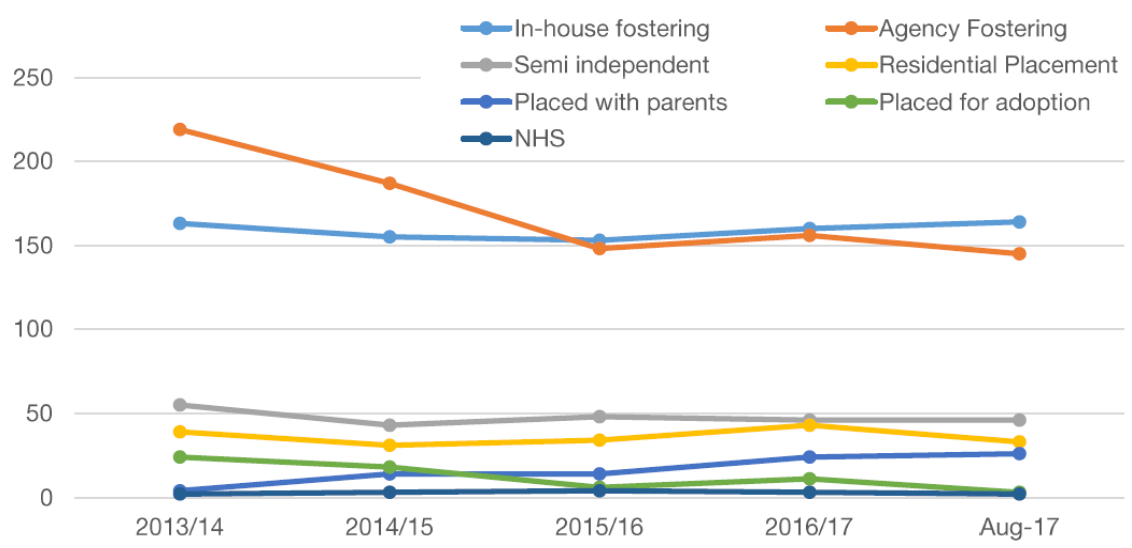
- The fostering mix has moved to a majority of in-house compared to Independent Fostering Agency (IFA) carers as the numbers of looked after children overall have decreased.

[1] Community Care, http://www.communitycare.co.uk/2011/08/23/successful-fostering-of-black-and-ethnic-minority-children/

[2] Census 2011, https://www.ethnicity-facts-figures.service.gov.uk/ethnicity-in-the-uk/ethnicity-and-type-of-family-or-household

[3] The Voice Online, http://www.voice-online.co.uk/article/how-care-system-letting-down-black-children

Looked after children by placement type 2013/14 – August 2017



- Increasing numbers of children are supported to remain at home as indicated by the significant rise in the number of placements where the child is legally looked after by the local authority but is placed with parents. Having access to high quality and effective universal and targeted services to meet their needs will be particularly important for this cohort.
- Semi-independent and residential placements remain consistent in use. This is in part due to the high numbers of looked after children becoming care leavers and because the needs profile of those requiring a residential placement remains stable.
- Since the publication of the last Strategy there remains a very limited use of placements in secure residential accommodation, as such accommodation is only utilised in extreme circumstances where the child may be at risk of repeat absconding, CSE or poses a danger to themselves or others.
- The location of placements remains similar to the previous period. Whilst it is positive that 82% of LAC are placed within 20 miles, there continues to be a lower number of placements within the borough (22%) than outside the borough (78%). However, this is a fairly typical spread of placements and mirrors trends seen in other London boroughs, whereon average 72% of placements are made outside of the local authority area.
- Placement stability will generally reflect that a child or young person is in a placement which can meet their needs and improve their outcomes, offering a safe place for them to develop. Stability is measured by tracking those looked after children who experience three or more placement moves – and a lower rate of moves is preferable for this statistic. 7.5% of looked after children in Haringey have

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three or more placement moves, better than our statistical neighbour average of 8%, and improved since September 2013 when stability was at 9%.

Gaps in capacity and supply

There are distinct areas of the market where supply is unable to meet the council's levels of demand and where we need to take action, as set out in this Strategy:

- There is a defined shortage of in-house foster carers, particularly those who are able to respond to higher levels of need or to the need for an emergency placement and those who can accommodate older children and or sibling groups.
- There is work to ensure that all placements reflect all the child's attachments and supports as well as their needs and outcomes, following consultation with family and community networks.
- For those children and young people legally looked after by the local authority but placed with parents, improved access to timely and effective universal and targeted provision needs to be effected.
- There is a national scarcity of secure beds making such provision very difficult to source
- There is a regional shortage of therapeutic residential placements which can mean that placements need to be made at a significant distance from Haringey. Some providers have found it challenging to manage the complex presentations of looked after children with greater levels of need; leading to instances of placement breakdown.
- A local shortage of in-borough high quality residential provision means that we can rarely place in residential care in Haringey
- Residential education placements are often located a significant distance from Haringey and there is a shortage of supply of high quality placements as a number of providers have recently left the market following an adverse Ofsted inspection.
- The local market does not currently offer the required mix of placements for care leavers. We have a need for additional local low to medium support shared and stand-alone accommodation within the semi-independent living market, for young people leaving care.
- We need to strengthen the voice of children and young people on the edge of care or in care to ensure that in all cases the child's own wishes and feelings are ascertained and that decisions about placements reflect those wishes

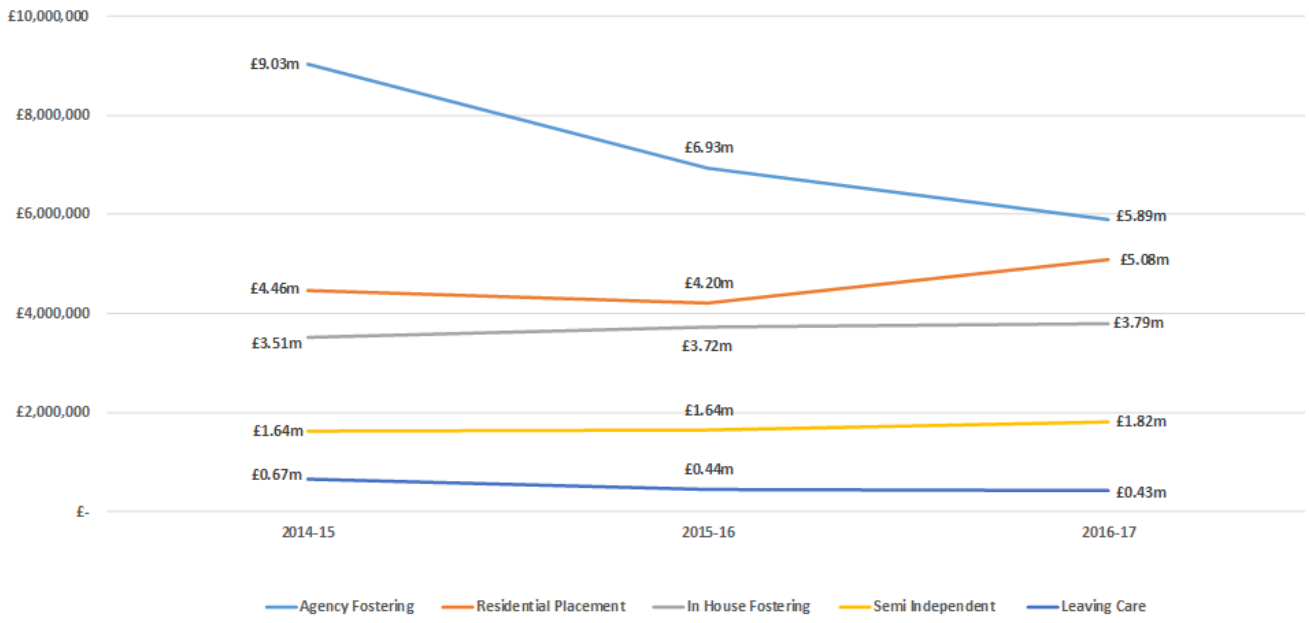
To manage these issues, the council will, where possible, work closely with providers to assist in building capacity and sharing expertise. This will help to address long-term supply issues and reduce constraints in the future.

Expenditure on placements

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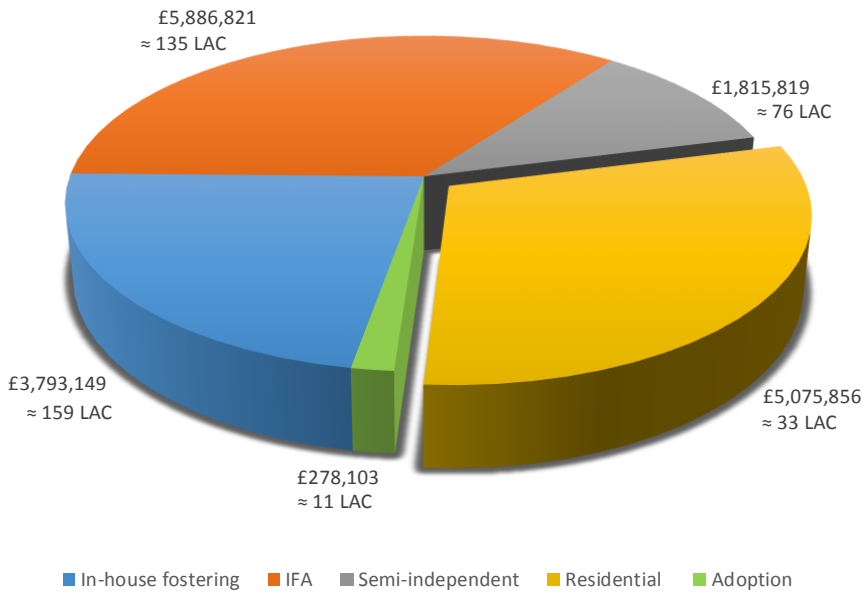
While the number of children in care has fallen overall, the spending on placements for this cohort has remained stable due to increasing market costs and higher levels of complexity and acuity of need.

Expenditure by service group – 2014/15 – 2016/17
(showing the five most expensive service groups)



**NB This chart includes the total annual costs for all children that had legal LAC status at any point during each financial year*

Snapshot of placements expenditure - August 2017



Placements in residential care and with Independent Fostering Agencies are designed to support children with more complex needs and are therefore more costly than local in-house foster care provision. Typically, the acuity and complexity of need of the children and young people placed in residential and or IFA placements is significantly higher than those placed in other provisions and the level of care and support provided, often highly specialist and requiring 2:1 or other forms of intensive support, reflects this greater level of need. Many children and young people in these types of placement may, for example, already have experienced a number of placement breakdowns and the trauma and difficulties this can cause.

Whilst such placements will always be needed, a key objective of this Strategy is to grow the number of in-house foster carers, in Haringey and in the immediate locality, so that, where appropriate, there will always be an in-house foster care offer. This is generally a cost-effective option and enables needs to be met locally, maintaining key community networks and support. The Strategy sets out our key actions to grow local foster care provision and to reduce inappropriate dependence on IFAs.

C. Principles and objectives of LAC Sufficiency 2018 – 2021

Principles

Broadly speaking, all partners contribute to improving outcomes for looked after children through the delivery of statutory safeguarding responsibilities, the completion of care plans and the development of pathway plans. In order to support delivery of the LAC Sufficiency Strategy's key outcomes, we believe there are some core principles which the whole network supporting a child, young person and family can adopt and embed in their day to day practice:

- the principal focus of any stay in care should be on meeting the child's needs and improving their outcomes;

- children should be supported to return home safely where this will best meet their needs and outcomes;

- plans must be made for alternative permanent care. Family members and friends should always be considered in the first instance with the permanence secured through the appropriate legal order to meet the child's needs;

- where it is not in the child's best interests to live within the family network, it will usually be in the interests of the child for alternative permanent care to be identified and the placement secured through adoption, long term foster care, Child Arrangement Orders or Special Guardianship Orders;

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- the right placement for a child will vary over time and care should be taken to match placements with outcomes and needs and to review this regularly. Any placement move should be driven by the needs of the child at that point in time in a child-centred approach;
- in all cases the child's own wishes and feelings must be ascertained, decisions about placements should reflect those wishes, as well as full consultation with family and community networks to establish the child's attachments and supports;
- wherever possible and when it is in the interests of all children, placements will be sought that allow sibling groups to be placed together;
- residential group living is provided only when substitute family care is not appropriate;
- for older children preparation for independent living must be planned for at an early stage to enable them to transition successfully;
- for care leavers a secure council tenancy will be provided to facilitate their transition to independence.

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Objectives

Based on analysis of the needs of looked after children, an understanding of the market locally and research into what has worked well elsewhere, we have selected five objectives designed to contribute to achieving the strategy's main outcome for children and young people:

Children and young people in care live in stable, high quality settings, where their needs can be met and their outcomes improved, enabling them to return home where this is in their best interests

The five objectives set out in detail below shape the activities we as an authority believe will best deliver this outcome. As we make progress with these objectives, we will achieve the quality, sufficiency and value for money we need in order to achieve the best for children and young people in the borough.

Objective 1) Strengthen our 'Edge of Care' Offer

The Council's aim to support children and young people to remain at home wherever possible is affected by the ability of the council to respond and provide effective support and specialist interventions when children are on the brink of coming into care.

The 'edge of care' is not straightforward to define, but should be understood inclusively, to cover the period:

1. **Directly prior to entering care, in which the child is at a high level of risk**
2. **Directly after entering care when a return to the home environment is possible**

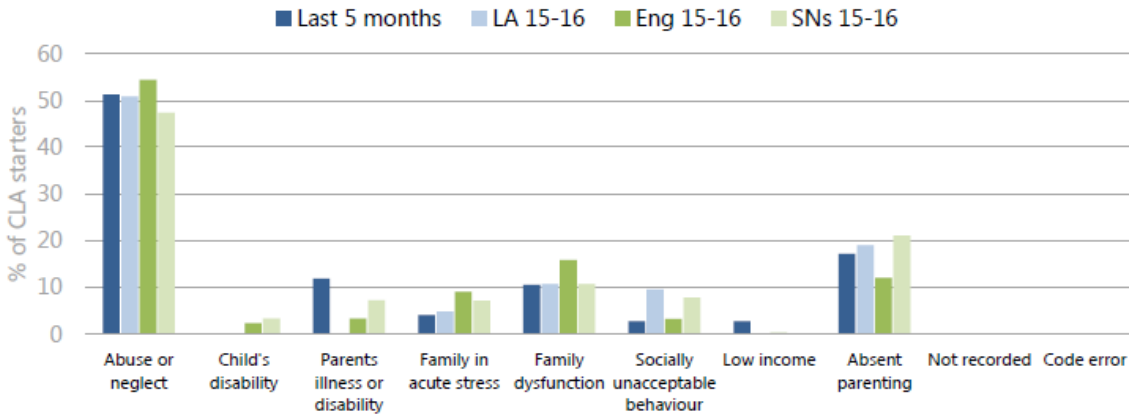
Issues & evidence:

The 'edge of care' cohort

Our response to the needs of children and families on the 'edge of care' is shaped by analysis of our children in need population and assessment of the LAC entrants cohort, which gives an indication of the profile of those at risk of entering care.

- The primary reason for children coming into care is abuse or neglect, accounting for 50% of children entering care in 2017. This trend is echoed in the children in need cohort, whereby the most common primary factors at the end of assessment in 2016/17 related to domestic violence in the home, the mental health of parents and substance misuse issues. Children with these experiences are likely to have emotional wellbeing and mental health needs arising from poor attachment and trauma in the child's home. In these instances, the child and family are likely to need intensive, specialist 'edge of care' interventions.

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Comparing the primary needs of LAC entrants – August 2017

- 12% of children coming into care in the past 6 months had previously had looked after status, suggesting that their needs may not have been met in earlier episodes in care and that they may have a history of neglect or abuse.

- The majority of children were brought into care under Section 20 (totalling 101 cases in 2016/17) with the consent of their parents or due to absent parenting.

- The number of children coming into care on care orders remained consistently low across the year, with 41 children entering on care orders and 53 emergency placements across the year.

Haringey currently provides a broad, targeted offer, as part of its early help provision, to support families to remain together and to prevent them reaching crisis point. Our edge of care offer is part of this broader targeted menu of interventions and is designed to help children to continue to have their needs met and to remain at home when families do reach crisis point and are at risk of coming into care. The edge of care offer includes:

- Intensive support delivered by dedicated key workers and specialist support delivered by domestic violence, Child and Adolescent Mental Health Services (CAMHS), adult mental health and substance misuse practitioners.

- Increased provision in tier 2 CAMHS and open access to CAMHS assessment and initial intervention through Choices.

- Family Group Conferencing at an earlier stage in the pathway helping families manage any issues which may lead to crises and the subsequent breakdown of the home.

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Over the three years of this Strategy, the council will continue to prioritise implementing a more robust 'edge of care' response and developing its own evidence base of what works in Haringey. To achieve this Haringey will explore a range of approaches successfully adopted by other councils to improve demand management, including for those children and young people with Special Educational Needs and or Disabilities. There will also be specific work to address any particular issues affecting children and young people of BAME backgrounds, many of them boys, who are overrepresented in the looked after children population. It is important that Haringey's edge of care offer is more targeted at those children and young people most likely to come into care. To ensure this, the council seeks to improve internal systems in order to enhance the recording of factors affecting children on the 'edge of care'. This will enable us to gain a better understanding of the needs of children in this cohort and will therefore inform commissioning practice. The council will also conduct financial modelling and in-depth analysis to understand the potential cost benefits and impact on LAC numbers that could be derived from any new interventions which might be adopted.

To strengthen our 'Edge of Care' Offer we will:

- Commission a young people's integrated supported housing pathway in spring 2018 to manage the routes into care, particularly where there is a primary need for housing and accommodation rather than care and support, as offered to looked after children.
- Refresh our Parenting Strategy, to commission a varied suite of tailored parenting courses to target key areas of need such as courses on caring for vulnerable adolescents and overcoming parental conflict.
- Commission a family mediation service.
- Seek to establish, with neighbouring boroughs, a shared sub-regional residential provision for children at the edge of care and their families, which would focus on building family capacity to continue to parent the child safely at home.
- Support families on the edge of breakdown to access positive activities in the community, including culturally responsive mentoring and peer support for young people.
- Ensure the voice of children and young people is reflected in decisions about their care.

Objective 2) Grow our in-house fostering provision

Children and young people in care often respond well to living in environments as close to a family setting as possible, as is offered by foster care. Often, the familiarity of a home environment enables children and young people to settle and develop, working through their own issues with the foster carers and learning to build family relationships. Where possible, social workers, supported by brokers, will identify foster care as the best option for children and young people. In-house foster care offers the opportunity for children to remain

living locally, in Haringey or in neighbouring boroughs, where their needs can often best be met.

In 2017 the Fostering Improvement Project was developed to support Haringey's in-house fostering service to improve. We are confident that this project will continue to transform the council's in-house fostering offer and whilst we recognise that we still have some gaps and capacity issues in relation to being able to match children and young people to in-house foster carers, we are aiming to address these through this Strategy.

Issues & evidence:

In-house fostering

- Over the period of the last Sufficiency Strategy Haringey successfully moved to having an increased number of children placed with in-house foster carers, rather than with IFAs and as of August 2017 37% of LAC were in in-house foster placements compared to 32% in November 2013.
- In-house foster placements typically meet the needs of most looked after children and are more cost effective than IFAs for all children except those with the most complex needs, for example in relation to mental health or behaviour. A factor contributing to in-house foster carers' ability to deliver better outcomes for LAC is that 41% of in-house carers reside within the borough and 93% of placements are within 20 miles of Haringey. This enables LAC to remain in close proximity to their social workers, support networks and allows them to continue to access their local schools and services if appropriate.
- Haringey pays an average of £500 per week for in-house fostering, above the London average of £424, but with no formal tiered arrangement for differentiating rates paid. Several neighbouring boroughs have tiered payment models which increase retention rates, incentivise carers to accept more challenging children and young people and offer a sense of professional progress.
- During the period of the previous Sufficiency Strategy 2014-17, the Council experienced significant challenges with the recruitment of in-house foster carers but through this Strategy aims to progress to a position whereby the number of new carers exceeds the number of de-registrations.
- Haringey participates in the North London Consortium (NLFAC) foster carer sharing scheme, all members of which are facing similar recruitment challenges, due to the declining numbers of families in London with spare rooms to accommodate additional children and the age profile of the foster care workforce.
- Within our cohort, the capacity of carers to take on children and young people does not align fully with our demand patterns. For example, no in-house carers are currently able to accept emergency placements or placements of young people on remand and few are able to accept sibling groups larger than 2. This leads to a reliance on IFA placements with limited leverage around cost.
- The higher than average number of children in care aged 14 and over which leads to demand for placements for this age group, is not reflected in our in-house foster

carer supply, with few foster carers able to accept or sustain fostering of adolescents, especially those with complex support needs.

- Haringey has two specialist mother and baby foster placements and 3 specialist foster respite placements along with a cohort of other in-house carers willing to provide respite care to support other foster households.
- In addition to this there are 6 in-house family link carers who can provide short-breaks placements specifically for children with disabilities. Haringey's in-house short-breaks provision is currently being reviewed to gain a greater understanding of demand and ensure that the commissioning methods utilised are appropriate.
- We currently use Independent Fostering Agencies (IFAs) to compensate for the shortage of in-house foster carers as well as commissioning them appropriately to meet the needs of children with more complex needs. The aim is for IFAs to be commissioned to support only those with more complex needs, large sibling groups (due to the nature of Haringey's housing supply and limited availability of large properties) and instances where LAC must, for their own welfare be placed out of borough.

To grow our in-house fostering provision we will:

- Introduce a revised foster carers support and remuneration package, including tiered payments, an increased training and support offer, council tax discounts and improved professional development to enable current carers to be able to manage more specialised placements.
- Formulate a marketing strategy to attract carers who reflect the demographics of our LAC cohort and launch a targeted recruitment campaign that will source in-house mother and baby carers, teenage/ 11+ carers and fostering households able to accept sibling groups and emergency placements.
- Deliver training for foster carers on attachment-aware and trauma-informed practice to support them in caring for more complex LAC and reduce instances of placement breakdown.
- Build in-house foster carers' capacity to accommodate additional children and or children with disabilities through exploring a range of accommodation options and ensuring that the necessary physical adaptations can be made.
- Conduct a strategic review of short-breaks provision for children with disabilities to establish demand and an appropriate commissioning model for the service.
- Ensure the voice of children and young people is reflected in decisions about their care.

Objective 3) Improve how we commission placements from the market, focusing on specialist and therapeutic placements

Due to their experiences, often in early childhood, looked after children may display behaviours which challenge or may have needs which require intensive, specialist or

therapeutic support for periods whilst they are in care. Nationally, there are a number of pressures on the sorts of provision which can meet such complex needs and Haringey, like many other boroughs, has limited leverage in the market. This is in part because, in Haringey as in most other authorities, most specialist and therapeutic options for looked after children, including those with SEND, are commissioned from external providers on a spot purchase basis, with limited influence for the placing authority. We are therefore seeking to commission such specialist provision on a proactive basis, working more collaboratively with other local authorities and engaging strategically with a range of providers.

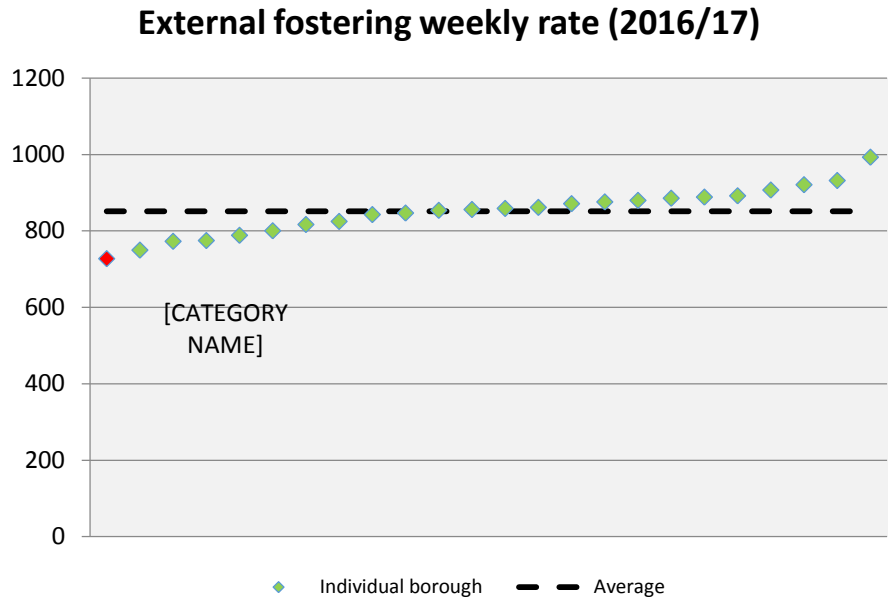
We have recently introduced a new performance monitoring and outcomes framework for providers, which we are using in the children's market in addition to existing contractual monitoring arrangements, which we are also in the process of refreshing. This is to monitor the efficacy of placements and to ensure that providers meet agreed outcomes for children and young people, operate in a child-centred way and deliver quality improvements.

Issues & evidence:

IFA placements

- 31% of Haringey's looked after children are placed with foster carers from IFAs, with an average placement cost of £728 per week – but costs vary significantly dependent on the child's needs.

London Council's ALDCS / SLT children's social care survey findings – September 2017

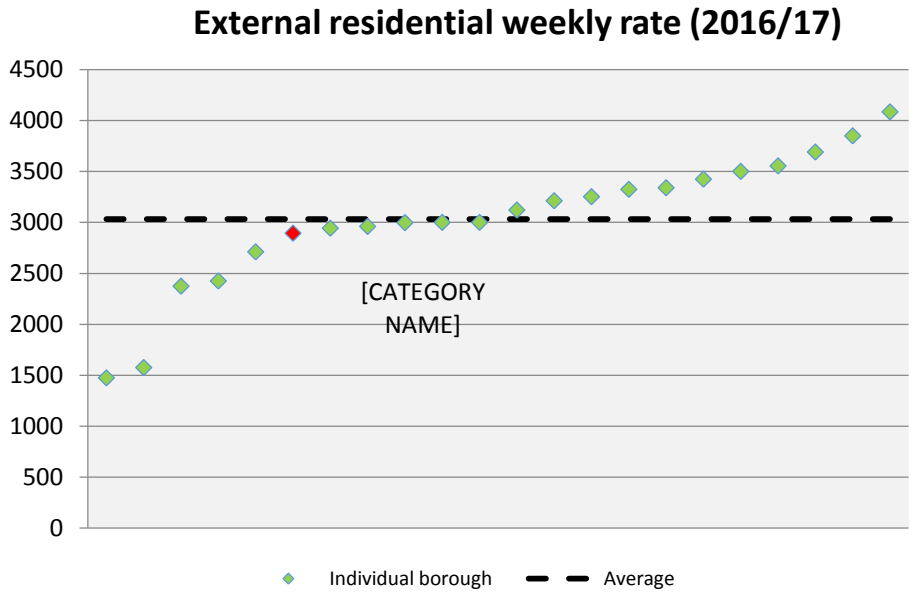


- Haringey's average IFA rates are below the London average of £851 and of the 24 boroughs participating in the London Council's Survey, Haringey had the lowest reported average cost per week.
- 97% of IFA placements in August 2017 were out of borough and there is significant overlap with the IFAs used across North London boroughs, which is indicative of the sub-regional nature of the market.

Residential care

- 8% of Haringey's looked after children (34 children) are in residential care, which is, as a proportion of our LAC cohort, below the national average.
- There are persistent gaps in supply and shortages in capacity in the residential care market – particularly in terms of specialist therapeutic placements accessible in the region and in-borough high-quality children's homes.
- There is also a shortage of small group homes (for 4-5 children), which are able to meet the social, emotional and mental health requirements of young people with complex needs.
- In addition, there is a demand for settings able to successfully transition children and young people out of residential care and into family-based or semi-independent placements.
- Placements in the three in-borough children's homes are limited, due to concerns around quality or limited availability of spaces.
- Residential care is the most expensive placement type and there can be significant variation in prices dependent on the child's needs. On average Haringey pays £2,896 per week for a residential placement, which is below the London average.

London Council's ALDCS / SLT children's social care survey findings – September



2017

- All residential placements are subject to regular review to ensure they remain the best fit for the child and to keep open longer-term options in a family setting, but despite this management action the number in residential care is consistently between 25-35 children.
- 50% of all residential placements are made within a 20 mile radius of Haringey. Where residential provision beyond the 20 mile boundary is used, it is to meet highly specialist requirements or because proximity to the borough would increase the risk of the young person being at harm.

Residential education placements

- Residential education placements are utilised when a child's care needs cannot be met by a family placement and their educational needs cannot be met in a mainstream school.
- Such placements are rarely utilised and in 2016/17 Haringey placed only 3 looked after children in a residential education facility.
- The average cost of a residential education placement commissioned by Haringey is £219,500 and prices range from £139,000 to £300,000 per year.
- Residential education placements are often located a significant distance from Haringey, there is a shortage of supply of high quality placements and a number of providers have recently left the market following an adverse Ofsted inspection.
- The high prices of residential special schools are reflective of the wrap-around service that these placements provide offering care, specialist education and therapeutic and behavioural support. However, it is felt that there is a need for providers in this market to offer detailed break-downs of their fees, in order to ensure transparency in pricing.

Secure accommodation

- Haringey rarely has looked after children placed in secure accommodation on section 25 orders and as at the 31st March 2017 2 looked after children were placed in secure units. This mirrors national trends in the usage of secure care facilities.
- Such placements are only beneficial to the child in circumstances where there is a high risk of repeat absconding or CSE and the child is a danger to themselves or others in the community.
- Nationally there is a severe shortage of secure accommodation, with a direct impact on cost and availability and risks to capacity. Across England and Wales there are only 242 secure beds in fourteen homes, run by 13 local authorities and one voluntary sector provider.
- The average cost of a secure placement purchased by Haringey is £4,053 per week. In order to manage these prices, as recommended by the National Children's Bureau, we believe that local authorities across the country should work in a more conjoined manner to block purchase beds and secure larger discounts.

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Placement stability

- Instability of placements is a major concern, for the disruption to the young person, the poor impact on their outcomes and the tendency to require more expensive placements to be sourced at short notice.
- Placement instability also potentially indicates that increased support needs to be offered to providers, to build their capacity to be able to look after children with complex behavioural and emotional needs.

To improve how we commission placements from the market, focusing on specialist and therapeutic placements we will:

- Focus on long-term planning for children in residential care, working closely with providers to maximise opportunities for children to step-down from residential care and to facilitate a move to a family-based placement or to supported semi-independent living for older children.
- Ensure greater sub-regional collaboration to stimulate and shape the IFA market. Haringey will work in partnership with other boroughs to establish a formal commissioning arrangement, equalise fees paid to IFAs across different councils and reduce inter-borough competition.
- Explore the potential of engaging in a sub-regional or regional commissioning arrangement to develop the market and broker capacity in residential and/or secure accommodation beds locally as well as sub-regionally.
- Implement a robust quality assurance and contract management approach for residential placements and IFAs to improve placement stability and ensure the implementation of quality improvement measures.
- Engage with the local market to stimulate local provision where possible and to improve quality and build understanding of how best to respond to Haringey's LAC needs.
- Establish new channels of communication with providers to ensure that placement providers are linked into the wider network of services for children and young people.
- Ensure the voice of children and young people is reflected in decisions about their care.

Objective 4) Build pathways to adulthood in semi-independent & supported living

As corporate parent to children and young people who come into our care, we need to do all we can to support them to develop into adulthood and ensure they are capable of taking on greater responsibility and determining their own futures. We know that we need to do more to commission the most effective support, in stable accommodation, for young people to help them build the skills to thrive and live independently upon reaching adulthood. Frequently, a structured programme of life skills is required which will support young people to learn to cope with everyday life on their own without the input of foster carers, residential care workers or their social worker. Enabling young people to "stay put" in their foster home

is an alternative pathway to adulthood, enabling care leavers to gradually transition to greater self-reliance, as would be offered in the home environment.

Many Unaccompanied Asylum Seeking Children are placed in semi-independent living and will access school, college, employment and training from these settings. In December 2017 a greater proportion of UASC care leavers were in either higher or other forms of education in comparison to the wider care leaver population (45% of UASC vs 34% of general care leavers). We are undertaking additional analysis to understand the needs of UASC and to ensure these needs are built into the new supported housing pathway we will be commissioning in summer 2018.

Issues & evidence:

- 11% of looked after children are in semi-independent placements, and a significant number of our care leavers remain in or move into semi-independent placements when they leave care at 18. As a result, there are 78 young people currently placed in semi-independent accommodation.
- Haringey pays on average £973 per semi-independent placement per week, which is above the London average of £839 (London Councils, Sept 2017).
- The local market does not currently offer the required mix of placements, and there is a shortage of stand-alone and shared accommodation with less intensive support.
- The semi-independent living market is unregulated by Ofsted, with considerable variability in quality and the need to quality assure all providers. Where providers do not meet expected standards, no further placements will be made and alternative arrangements sought.
- Haringey has implemented a dynamic purchasing system (DPS) for the semi-independent living market and currently the DPS registration reflects the current market and an oversupply of placements with higher levels of support, which are only infrequently required.
- There are a number of providers with existing shared accommodation placements who have not engaged in the DPS.
- Haringey is not yet involved in sub-regional commissioning activities in this area and therefore has limited leverage to manage the market effectively.

Staying Put

- National evidence suggests that remaining in foster care beyond the age of 18 is associated with improved outcomes, and helps to facilitate care leavers transition into adulthood.
- To date in Haringey, the number of young people able to take-up Staying Put arrangements has been low. As of May 2017, 16 care leavers over 18 were in a Staying Put arrangement. Although this is routinely discussed with the young person and the carer, the low uptake has been linked to the preferences of carers themselves to foster younger children and our overall lack of in-house foster carers. We are keen to do more work in this area to ensure that care leavers do have the

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opportunity to remain in foster care beyond the age of 18, where this will meet their needs and support their development towards adulthood.

To build pathways to adulthood through semi-independent & supported living we will:

- Implement robust quality assurance measures to ensure better outcomes and higher quality performance from semi-independent providers.
- Move away from reliance on spot-purchasing of semi-independent placements, through commissioning semi-independent units in the young people's supported housing pathway to meet projected demand and to ensure provision of a more flexible range of accommodation types, e.g. more independent units with floating support.
- Address the high cost of the provider market for Haringey, by working collaboratively with other North London boroughs.
- Facilitate more Staying Put arrangements where this will meet a care leaver's outcomes
- Ensure the voice of children and young people is reflected in decisions about their care.

Objective 5) Strengthen Legal Permanency Options

Wherever possible children's services undertake legal proceedings to ensure permanency, stability and the achievement of the best long-term outcomes for children. Legal permanency orders play a significant part in ensuring that children and young people do remain at, or return, home wherever possible, or are placed with other family members and close family friends. Permanency options for children include placement with parents, the granting of an adoption or Special Guardianship Order or the identification of a long-term fostering placement.

Issues & evidence:

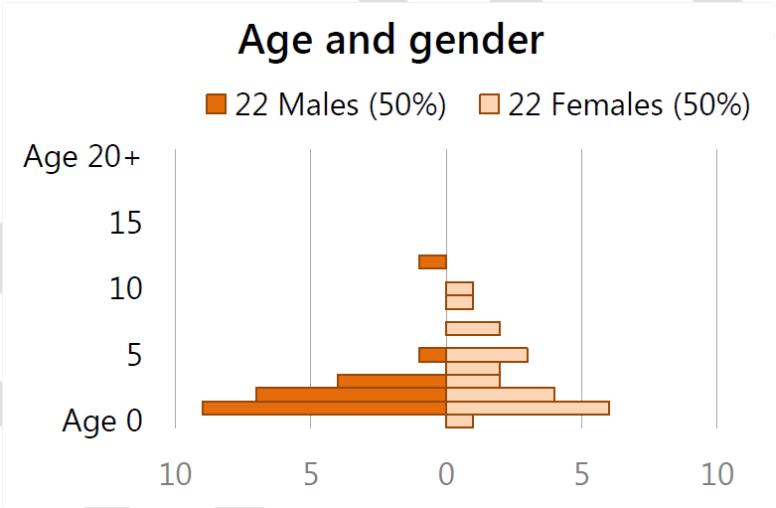
Adoption

- In Haringey, in line with national trends, the number of adoptions has declined from 38 in 2013/14 to 11 in the financial year up to December 2017, with 5 additional adoptions scheduled for approval before March 2018. This reduction is due to changes in judicial practice, which has reduced the granting of adoption orders in favour of granting Special Guardianship Orders and also reflects the decline in the number of adopters nationally.
- Across the boroughs within the North London Fostering and Adoption Consortium there has been a significant decrease in the number of enquiries from prospective adopters from 1,000 in 2015/16 to 612 in 2016/17.
- The increase in the complexity and specialist needs of Haringey's looked after children has meant that recruitment has had to become much more selective to

match the needs of the children waiting, resulting in reduced numbers of adopters approved.

- The tri-borough partnership (consisting of Barnet, Enfield and Haringey) through which Haringey recruits adoptive parents, has also identified a shortage of BAME adopters and adoptive parents for older children, children with disabilities and sibling groups. This limits the number of adoption placements, as a large proportion of our LAC cohort identify with one of the latter described characteristics.
- Therefore, Haringey has multiplied the number of information sessions held from 5 in 2015/16 to 12 in 2016/17 to increase recruitment. However, the conversion rates from the information sessions to the successful recruitment of adopters remains low. In Haringey 6 new adopters were approved in 2016/17.
- As of December 2017 out of the total number of children who have been adopted in the last 9 months (11 children) and those who are currently waiting to be adopted (33 children) 89% were aged 5 and below. This echoes national figures as in 2016 72% of children adopted were in the 1 to 4 year old age category.

Age and gender of adopted children March – December 2017



- As of December 2017, based on the 11 adoptions within the financial year, the average number of days between entering care and being placed for adoption was 419 days, which is an improvement on the previous year and below the Department for Education's target of 426 days.
- The length of time it takes to complete the adoption process ranges significantly, spanning from 175 to 852 days. It must be noted that Haringey had multiple instances in the past year whereby the child has been in care for a long period before being adopted, which significantly increases the recorded length of time to complete the adoption process. However, extremely positive outcomes are achieved for Haringey children through adoption.
- Adoption breakdown rates are very low for Haringey children, due to the care with which families are matched and the continued support offered by the adoption team. Since March 2015 there has only been one instance of breakdown,

- The government led regionalisation of the adoption process, due to be implemented in 2019, is expected to further increase the number of adopters approved and improve the timeliness of each stage of the adoption process, whilst also offering better economies of scale.

Special Guardianship Orders

- In the financial year to December 2017, 15 Special Guardianship Orders (SGOs) were granted.
- The numbers of SGOs have declined since their peak in 2014/15 and the majority of the boroughs within the North London area have experienced a similar reduction in SGOs. However, the emerging 2017/18 figures indicate that the number of SGOs granted may be increasing.
- 35% of all SGOs since 2013/14 have been made to the former foster carer, demonstrating a significant transfer of foster placements to permanency and 65% were granted a relative or family friend.

Long-term fostering

- Haringey currently has 67 in-house foster carers approved to provide long-term care, however an additional 43 carers have children placed with them on a long-term basis.
- In 2016/17 23 children (5% of the looked after population) were in friends and family long-term (permanent) foster placements.

Placement with Parents

- There has been a significant increase in the number of placements where the child is legally looked after by the local authority but is placed with parents. This highlights that increasing numbers of children are being supported to remain at home.
- For those children and young people legally looked after by the local authority but placed with parents, access to timely and effective universal and targeted provision needs to be in place so that their needs are met holistically in the community.

<u>To Strengthen Legal Permanency Options we will:</u>

- Seek to recruit in-house foster carers willing to provide long-term foster placements.
- Improve pathways to a range of community based services for children and young people legally looked after by the local authority and living with their parents.
- Explore launching an independent marketing and recruitment campaign to stimulate the market for adoptive parents, specifically targeting potential adopters who may wish to adopt older children, BAME children, children with disabilities and those with complex needs.

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- Review and evaluate the effectiveness of the tri-borough adoption recruitment process. Increase the utilisation of the Family Rehabilitation Service delivered by Tavistock and Portman in cases where the court has mandated the child to return to their birth family. This will ensure successful transitions home and helps to facilitate the process of coming back together as a family.
- Ensure the voice of children and young people is reflected in decisions about their care.

D. Conclusion

This Strategy has a distinct aim to ensure that children and young people in care live in stable, high quality settings, where their needs can be met and their outcomes improved, enabling them to return home where this is in their best interests.

As corporate parent, the whole Council has a role to play to improve outcomes for Haringey's looked after children. This Strategy and the delivery of its outcomes form just one part of our overall approach to supporting looked after children and those on the edge of care and should be read in conjunction with other local strategies for children and families in need of support and protection.

Further information on the delivery of the council's actions to improve the sufficiency of placements for looked after children is included in the implementation plan below. For details regarding individual projects the lead departments listed will be able to provide additional information.

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Implementation Plan		
Priorities	**Lead**	**When**
Objective 1) Strengthen our 'Edge of Care' Offer		
Commission a new young people's integrated supported housing pathway in spring 2018 to manage the routes into care, particularly where there is a primary need for housing and accommodation rather than care and support, as offered to looked after children.	Strategic Commissioning	Autumn 2018
Refresh our Parenting Strategy, to commission a varied suite of tailored parenting courses to target key areas of need such as courses on caring for vulnerable adolescents and overcoming parental conflict.	Early Help	Summer 2018
Commission a family mediation service.	Strategic Commissioning	Spring 2018
Seek to establish, with neighbouring boroughs, a shared sub-regional residential provision for children at the edge of care and their families, which would focus on building family capacity to continue to parent the child safely at home.	Strategic Commissioning and North London boroughs	Autumn 2018
Support families on the edge of breakdown to access positive activities in the community, including culturally responsive mentoring and peer support for young people.	All	Ongoing
Ensure the voice of children and young people is reflected in decisions about their placements and their care.	Strategic Commissioning	Summer 2018
Objective 2) Grow our in-house fostering provision		
Introduce a revised foster carers support and remuneration package, including tiered payments, an increased training and support offer, council tax discounts and improved professional development to enable current carers to be able to manage more specialised placements.	In-House Fostering Steering Group	March 2019
Formulate a marketing strategy to attract carers who reflect the demographics of our LAC cohort and launch a targeted recruitment campaign that will source in-house	In-House Fostering Steering Group	March 2019

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mother and baby carers, teenage/ 11+ carers and fostering households able to accept sibling groups and emergency placements.		
Deliver training for foster carers on attachment-aware and trauma-informed practice to support them in caring for more complex LAC and reduce instances of placement breakdown.	Fostering and Adoption	Summer 2018
Build in-house foster carers' capacity to accommodate additional children and or children with disabilities through exploring a range of accommodation options and ensuring that the necessary physical adaptations can be made.	Strategic Commissioning	Summer 2018
Conduct a strategic review of short-breaks provision for children with disabilities to establish demand and an appropriate commissioning model for the service.	Strategic Commissioning	From March 2018
Ensure the voice of children and young people is reflected in decisions about their placements and their care.	Strategic Commissioning	Summer 2018
Objective 3) Improve how we commission placements from the market, focusing on specialist and therapeutic placements		
Focus on long-term planning for children in residential care, working closely with providers to maximise opportunities for children to step-down from residential care and to facilitate a move to a family-based placement or to supported semi-independent living for older children.	Strategic Commissioning and Children's Services	Summer 2018
Ensure greater sub-regional collaboration to stimulate and shape the IFA market. Haringey will work in partnership with other boroughs to establish a formal commissioning arrangement, equalise fees paid to IFAs across different councils and reduce inter-borough competition.	Strategic Commissioning and North London boroughs	Spring 2018
Explore the potential of engaging in a sub-regional or regional commissioning arrangement to develop the market and broker capacity in residential and/or secure accommodation beds locally as well as sub-regionally.	Strategic Commissioning and North London boroughs	Autumn 2018
Implement a robust quality assurance and contract management approach for residential placements and IFAs to improve placement stability and ensure the implementation of quality improvement measures.	Strategic Commissioning	From March 2018

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Engage with the local market to stimulate local provision where possible, to improve quality and build understanding of how best to respond to Haringey's LAC needs.	Strategic Commissioning	Spring 2018
Establish new channels of communication with providers to ensure that placement providers are linked into the wider network of services for children and young people.	Strategic Commissioning	Summer 2018
Ensure the voice of children and young people is reflected in decisions about their placements and their care.	Strategic Commissioning	Summer 2018
Objective 4) Build pathways to adulthood in semi-independent & supported living		
Implement robust quality assurance measures to ensure better outcomes and higher quality performance from semi-independent providers.	Strategic Commissioning	Spring 2018
Move away from reliance on spot-purchasing of semi-independent placements, through commissioning semi-independent units in the young people's supported housing pathway to meet projected demand and to ensure provision of a more flexible range of accommodation types, e.g. more independent units with floating support.	Strategic Commissioning	Summer 2018
Address the high cost of the provider market for Haringey, by working collaboratively with other North London boroughs.	Strategic Commissioning and North London boroughs	Ongoing
Facilitate more Staying Put arrangements where this will meet a care leaver's outcomes	Strategic Commissioning and Fostering and Adoption	Summer 2018
Ensure the voice of children and young people is reflected in decisions about their placements and their care.	Strategic Commissioning	Summer 2018
Objective 5) Strengthen Legal Permanency Options		
Seek to recruit in-house foster carers willing to provide long-term foster placements.	In-House Fostering Steering Group	Summer 2018
Explore launching a marketing and recruitment campaign to stimulate the market for	Fostering and	Autumn 2018

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adoptive parents, specifically targeting potential adopters who may wish to adopt older children, BAME children, children with disabilities and those with complex needs.	Adoption	
Improve pathways to a range of community based services for children and young people legally looked after by the local authority and living with their parents.	Strategic Commissioning	Autumn 2018
Review and evaluate the effectiveness of the tri-borough adoption recruitment process.	Fostering and Adoption	Summer 2018
Increase the utilisation of the Family Rehabilitation Service delivered by Tavistock and Portman in cases where the court has mandated the child to return to their birth family. This will ensure successful transitions home and helps to facilitate the process of coming back together as a family.	Strategic Commissioning	Spring 2018
Ensure the voice of children and young people is reflected in decisions about their placements and their care.	Strategic Commissioning	Summer 2018

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EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty'** on all public bodies to have '**due regard'** to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	The LAC Sufficiency Strategy
Service area	Strategic Commissioning Unit
Officer completing assessment	Yasmin Drakes
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	6th March 2018
Director/Assistant Director	Charlotte Pomery

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

The proposal being assessed is the Looked After Children's Sufficiency Strategy which defines how Haringey Council will meet its statutory duty to ensure that there is sufficient accommodation for looked after children (LAC) that meets their needs and is within the local authority area. The strategy sets out the objectives designed to ensure that CYP can remain at home wherever feasible or they can be cared for in stable environments which meet their needs and enables them to return home where this is in their best interests. To achieve this, children's services and the strategic commissioning unit will work with other partners and councils to strengthen our edge of care offer, grow the in-house fostering provision, improve the commissioning of specialist placements and build better pathways to adulthood.

The key stakeholders affected by this strategy will be Haringey's looked after children cohort.

The LAC Sufficiency Strategy will first be circulated at DMT on the 5th February 2018. Following this it will be presented to SLT on the 13th February 2018 and Cabinet on the 6th March 2018.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Data from Mosaic including the fostering data set, findings from the Children's Analysis Tool (CHAT) and the Census 2011.	
Gender Reassignment	Data is not collected on this characteristic for LAC and there is no national data available.	
Age	Data from Mosaic including the	

	fostering data set, findings from the Children's Analysis Tool (CHAT), CLA benchmarking tool and the Census 2011.	
Disability	Data from Mosaic including the fostering data set, findings from the Children's Analysis Tool (CHAT), data from the SEND service and the Census 2011.	
Race & Ethnicity	Data from Mosaic including the fostering data set, findings from the Children's Analysis Tool (CHAT), CLA benchmarking tool and the Census 2011.	
Sexual Orientation	ONS Vital Statistics files.	
Religion or Belief (or No Belief)	Data from Mosaic and the Census 2011.	
Pregnancy & Maternity	Data from the Census 2011 and Haringey's Joint Strategic Needs Assessment.	
Marriage and Civil Partnership	N/A.	

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Key Data Findings:

Sex

- 62% of LAC are males, which is significantly higher than the number of under 18 males in Haringey (51%). This indicates that males are overrepresented among those impacted by the strategy.

Gender Reassignment

- We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is no national data collected for this characteristic. The Equality and Human Rights Commission estimate that there are between 300,000-500,000 transgender people in the UK. We will need to consider the inequalities and discrimination experienced for this protected group.

Age

- The strategy will primarily affect children. In comparison to the wider Haringey 0-17 population (in which 15% are 15-17 years old), the largest proportion of LAC are in the 15-

17 years age bracket (38%). This indicates that overall adolescents are overrepresented among those impacted by this strategy. However, in regards to adoption, 79% of LAC adopted in 2017 were aged 4 and below. This echoes national trends, whereby 72% of children adopted were in the 1 to 4 year old age category. This highlights that the actions within the Strategy focused on adoptions, will primarily effect the younger cohort of looked after children. However, the Strategy does include plans to increase the number of adoptive parents for older children.

Disability

- 4.5% of looked after children have a disability compared to 4.09% of the Haringey 0-18 population (2014). This indicates that the strategy will not disproportionally impact disabled children, however the strategy seeks to ensure the appropriate provision is available for children with disabilities who are looked after.

Race & Ethnicity

- Children of black (black African/Caribbean/black British) ethnicity represent the largest ethnic group of looked after children in Haringey (43%), which is more than the percentage of black under 18s in the borough (22%). This demonstrates that the actions to improve outcomes for LAC will primarily affect children of black ethnicity. Following this children of white ethnicity comprise 31% of the looked after cohort in comparison to 50% of the wider 0-17 Haringey population and LAC of mixed/multiple ethnicity are the third largest ethnic group, constituting 14% of looked after children and 14% of the borough's 0-17 population. This indicates that children of white ethnicity are underrepresented to an extent in the LAC cohort.
- Despite children of black ethnicity representing the largest ethnic group within the LAC cohort, they are underrepresented in the cohort of children adopted. In 2017 1% of LAC were adopted and of black ethnicity. In comparison, 4% of children adopted were of white ethnicity. The Strategy identifies this underrepresentation and sets out plans to increase the number of adoptive parents of black ethnicity.

Sexual Orientation

- We do not hold data on the sexual orientation of LAC. However, the ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15th largest LGB community in the country. We will need to ensure that the inequalities and discrimination experienced by LGB people are considered.

Religion or Belief (or no belief)

- 45.6% of LAC have a religion specified as unknown/not stated therefore it is difficult to accurately assess the impact of the strategy on this protected characteristic. Christianity is the most commonly listed religion, comprising 26.7% of the LAC population followed by Islam which accounts for 12.2% of the LAC cohort. This reflects the population of Haringey, where Christianity is the most common religion (43% of the population) followed by Islam (11%). From these findings, it is reasonable to conclude that Muslim children are overrepresented to some extent among the LAC cohort.

Pregnancy & Maternity

- We do not hold a data set on children who become parents while in care due to the low frequency of these occasions. ONS data indicates that nationally, children in care are more at risk of teenage pregnancy. In Haringey, teenage pregnancy amongst children in care has been low but increases with age, with care leavers being more at risk. 36.4% of Haringey's Family Nurse Partnership clients (first time teenage mothers referred before 26 weeks of pregnancy) are currently, or have been historically children in care or care leavers.

Marriage & Civil Partnership

- Looked after children cannot be married or in a civil partnership.

Due to the composition of Haringey's LAC cohort the strategy will disproportionately affect males, adolescents and children from a black ethnic background. However, the policy will have a positive impact on all of Haringey's children in care and proposes changes which will increase placement supply, improve outcomes and give the entire cohort the best start in life regardless of their protected characteristics. Therefore, no inequalities have been identified.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Looked after children are regularly consulted on individual placement decisions at their LAC review meetings and engage frequently with their Independent Reviewing Officers about their placement plans. Therefore, a separate consultation was not undertaken in the development of this strategy as this proposal focuses on the market development actions which will achieve the levels of placement quality and sufficiency required to meet the needs of our LAC.

Prior to the delivery of the actions and projects in the implementation plan, consultations with the relevant groups will take place. The groups that will be targeted include looked after children, care leavers, foster carers and providers of residential and semi-independent accommodation. They will be targeted through a range of methods including workshops, focus groups, informal interviews and surveys. For example, in preparation for the delivery of the new foster carers support and training package referenced in the strategy, foster carers were engaged in an informal group interview to establish the potential impact on foster carers and looked after children cohort.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

The engagement activity that will commence prior to the implementation of each project will shape the strategy by ensuring that all proposed actions do not have any adverse effects on groups with protected characteristics. The strategy's implementation plan will be modified and updated as each individual project is consulted on.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. Sex - This proposal will primarily affect male looked after children as they form the largest proportion of LAC. The proposal will ensure that children in care of both sexes will have better quality placements, suited to their needs and guarantees greater placement sufficiency.

Positive	X	Negative		Neutral impact		Unknown Impact	

2. Gender reassignment - We do not have local data regarding this protected characteristic. We do not think there will be specific impacts for this protected group and will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

Positive		Negative		Neutral impact		Unknown Impact	x

3. Age - This proposal will primarily affect 15-17 year old looked after children as they form the largest proportion of LAC. The strategy will ensure that LAC of all ages will have better quality placements suited to their needs and that their progression is in-line with their non-looked after peers.

Positive	X	Negative		Neutral impact		Unknown Impact	

4. Disability -This proposal will not disproportionately impact disabled looked after children, as children with disabilities constitute 4.5% of the LAC population. However, the proposal will ensure that children in care with and without disabilities will have better quality placements suited to their needs.

Positive	X	Negative		Neutral		Unknown	

				impact		Impact	

5. Race and ethnicity - This proposal will primarily affect black/ black African/ black Caribbean/ black British looked after children as they form the largest proportion of LAC. The proposal will ensure that children in care of all races and ethnicities will have better quality placements suited to their needs and will guarantee greater placement sufficiency.

Positive	X	Negative		Neutral impact		Unknown Impact	

6. Sexual orientation - We do not have local data regarding this protected characteristic. We do not think there will be specific impacts for this protected group and will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

Positive		Negative		Neutral impact		Unknown Impact	X

7. Religion or belief (or no belief) -The proposal will increase placement sufficiency and ensure that children in care of all religions and beliefs (including children with no beliefs or where their belief has not been stated) will have better quality placements suited to their needs.

Positive	X	Negative		Neutral impact		Unknown Impact	

8. Pregnancy and maternity - The proposal will seek to ensure that all children in care, including CYP who are pregnant or with children, will have better quality placements suited to their needs. This will be achieved through the provision of specialist young parents foster, residential and semi-independent placements where necessary. However as there is no data set for LAC who become parents the impact of the strategy on this group cannot be accurately assessed.

Positive		Negative		Neutral impact		Unknown Impact	X

9. Marriage and Civil Partnership – People who are in a civil partnership will be treated the same as people who are married for all parts of the strategy

Positive	N/A	Negative		Neutral impact	X	Unknown Impact	

10. Groups that cross two or more equality strands e.g. young black women - The proposal will ensure that children in care, including children that cross two or more equality strands will have access to better quality and increased sufficiency of placements. These groups include, but are not limited to, young black males, young children with disabilities, children with disabilities from an ethnic minority background and females from an ethnic

minority background.

Positive	X	Negative		Neutral impact		Unknown Impact	

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?**
  This includes:
  a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
  b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**
  c) **Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low**
- **Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?**

The proposal will not result in direct or indirect discrimination for any group that shares the protected characteristics and the assessment indicates that the strategy will have a positive impact on the majority of the protected groups.

The strategy will advance equality of opportunity between groups who share a protected characteristic and those who do not by ensuring that both cohorts receive the best start to life and are accommodated in care placements which progress their development. The actions contained in the strategy will take steps to meet the needs of persons protected under the equality act that may be different from the needs of alternate groups by ensuring that provision developed for LAC is tailored to their individual requirements. For example, to ensure equality of opportunity for a child with a religious belief, the strategy makes plans to increase the supply of placements that can match and support the child's religious needs. The strategy aims to provide appropriately matched placements for all LAC who share a protected characteristic.

The proposal will foster good relations between cohorts sharing a protected characteristic and those who do not by ensuring that both groups are given placements and opportunities of equal quality.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment? Further information on responding to identified impacts is contained within accompanying EqIA guidance	
Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty			
Impact and which protected characteristics are impacted?	**Action**	**Lead officer**	**Timescale**

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.
N/A

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:
To monitor the equalities impact of the proposal, the outcomes and of looked after children will continue to be regularly monitored by children's services and commissioning. The impact of the proposal will be demonstrated through performance data that is regularly collected from Mosaic including LAC reports, the fostering data set and the monthly ChAT data.

7. Authorisation	
EqIA approved by Charlotte Pomery (Assistant Director) 	Date 19/02/18

8. Publication *Please ensure the completed EqIA is published in accordance with the Council's policy.*

Please contact the Policy & Strategy Team for any feedback on the EqIA process.

Report for:	Cabinet 6th March 2018
Item number:	To be added by the Committee Section
Title:	Appropriation and disposal of land at Bernard Road, Tottenham
Report authorised by:	Helen Fisher, Interim Strategic Director of Regeneration, Planning and Development
Lead Officer:	Steve Carr, Interim Assistant Director Economic Regeneration and Growth
Ward(s) affected:	Tottenham Green

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1 This report seeks authority to declare the Council owned site at Bernard Road N17 (outlined in red on the plan in Appendix 1) as surplus to requirements. It also seeks authority to appropriate the site for planning purposes (subject to planning permission being granted) and to dispose of the freehold of the site to GCAP Investments Limited, a developer who owns the neighbouring land parcel. The disposal will facilitate a workspace-led scheme across the combined sites.

1.2 With plans to deliver 4,000 jobs by 2020, the Council has set out an ambitious vision for economic and employment growth in Tottenham. In order to achieve this vision, it is imperative that local employment land is fully maximised and complements the growing business sectors.

1.3 Tottenham has always been a place that entrepreneurs and small businesses have been proud to call home, and is becoming an increasingly attractive choice to a rapidly growing cluster of creative businesses and start-ups. A strengthened local employment and business portfolio contributes to higher wages, local perception of the area, inward investment, and a range of employment opportunities for local people.

1.4 However, with a substantial demand for workspace in Tottenham, and a limited vacancy, the cost of employment land is rapidly rising, and businesses are at risk of being priced out of the area.

1.5 Structural weaknesses in the market make new supply of workspace in Tottenham largely unviable. However, the Council are able to positively contribute to the supply and suitability of workspace through the use of Council-owned assets.

1.6 The proposed scheme from GCAP Investments Limited represents a fundamental shift of emphasis in a mixed-use development. It will bring forward high quality and affordable workspace on a currently under-used site, accommodating 40 local

businesses, and providing up to 225 jobs. It also provides an opportunity to combine the sites to provide a more comprehensive development scheme than if developed separately.

1.7 Once the development is completed, a locally based workspace operator will manage and let the units to local craftspeople, and start-up businesses for 25 per cent below market average. The workspace will be sub-leased to the operator for a minimum period of 50 years, providing increased assurance that the space will remain in use as high quality, managed workspace.

1.8 The residential development will comprise 89 units for private sale, with an additional 12 units providing 'tethered residential', where the units will be leased at 75 per cent of market rate to local businesses that are renting workspace on the site. The proportion of affordable housing provision is below the borough wide target of 40% due to the financial viability of delivering a workspace-led scheme reflected in the design and massing on the site. This is consistent with the site designation in the Tottenham AAP, which prioritises the provision of workspace and its affordability over the provision of affordable housing. The policy recognises the role of private residential provision in enabling other policy objectives, such as employment space.

2. Cabinet Member Introduction

2.1 Taking a pro-active approach to employment and business growth is essential to the successful future of the borough, and sits at the core of our plans for the regeneration of Tottenham.

2.2 Tottenham has an increasingly diverse businesses portfolio. Bespoke mirrors, high-end contract furniture and military tunics are examples of products contributing to a home grown 'Made in Tottenham' brand. As the number of small and creative businesses continue to rise, they will make Tottenham a more prosperous and resilient place.

2.3 However, it is becoming increasingly hard to find fit for purpose business premises at an affordable rate. Given the pressures for residential space, and obstacles in the market, the Council's policy base identifies areas to positively contribute to the supply and suitability of workspace.

3. Recommendations

3.1 Cabinet are asked to:

a) Confirm that the piece of land held for Housing purposes (vertical hatching in the plan attached as Appendix 1a) and the piece of land held in the General Fund (grey shading in the plan attached as Appendix 1a) are no longer required for the purposes for which they are held and declare them surplus to requirements.

b) Agree, subject to the approval of the submitted planning application (planning reference HGY/2017/3584), to the appropriation of both pieces of land (as shown edged black in the plan attached as Appendix 1a) for planning purposes under section 122 of the Local Government Act 1972, so that such land shall have the benefit of section 203 of the Housing and Planning Act 2016.

c) Agree the disposal of the Council's freehold interest in the land (as set out in the plan edged black in Appendix 1a) to GCAP Investments Limited for a sum set out in Part B of this report and set out in the Heads of Terms attached in Appendix 2 of this report.

d) Agree to place the sum set out in Part B of this report of the capital receipt into a reserve to cover the eventuality of the Council's guarantee being called upon.

e) Delegate to the Council's section 151 officer authority to review and amend the amount so reserved at the rent review period to ensure that it is in line with the potential liability under the guarantee.

4. Reasons for Decision

4.1 The limited supply of workspace in the borough gives significant strategic rationale for the Council to consider means of accelerating the delivery of affordable workspace.

4.2 The disposal of the site will enable an innovative workspace-led, mixed use scheme across two interconnected land ownerships. Both plots of land are too small to independently deliver viable schemes, which provide high quality workspace and positively contribute to the surrounding community.

4.3 Without Council intervention, the proposed scheme would not be delivered. Valuations and residual appraisals undertaken by both sides show the proposed development scheme as being marginal and less than the combined existing use value for both sites.

4.4 The Tottenham Area Action Plan (AAP) sets out a number of site designations which are designed to see the area thrive and intensify as a location for businesses and jobs. The AAP identifies this site as being appropriate for such development and encourages a joint approach.

4.5 The Tottenham AAP recognises that the site, in its current configuration, does not positively contribute to the local environment. The current workspace is in poor condition, causes noise pollution and fails to meet the demand of local businesses. The Council's site also incorporates a small green space, which is to be reprovided for. Furthermore, there are clashes between movements in the existing road network, where industrial traffic is directed through residential streets. These factors will be addressed through the proposed development scheme.

5. Alternative options considered

5.1 As the Council is part landowner within this site, a number of delivery scenarios were considered:

Option 1: Do nothing

5.2 A 'do nothing' option, whereby the Council does not facilitate the development of the site, would fail to meet the Council's policy and strategic objectives for workspace, predominantly set out in the Tottenham AAP. Without Council intervention, the site would continue to provide underused and inadequate workspace, and would not positively contribute to the local environment.

Option 2: Disposal of LBH Interest on the open market, or placing the site into the Haringey Development Vehicle

5.3 Alternative options of disposing of the Council's site on the open market or putting it into the Haringey Development Vehicle were considered. These were discounted on the basis that there was clear value to be achieved through working with the neighbouring land owner, and unlocking the potential of both sites.

Option 3: Entering into a Joint Venture with GCAP Investments Limited

5.4 Consideration was given as to whether the Council might enter into a Joint Venture, or similar partnership with GCAP Investments Limited. This would have given the Council greater control over the outcome of the development and a potential share of the profits involved. This route was discounted on the basis that the volume of legal and other professional costs of setting up a Joint Venture are significant and were viewed as disproportionate for a development of this scale where the Council's interests could be protected via other means.

Option 4: Acquisition of freehold and disposal of long leasehold

5.5 The Council explored acquiring the freehold interest in GCAP Investments Limited land holding, and the Council then granting a 250-year lease to GCAP Investments Limited for the combined site on the basis of it being redeveloped. This option was discounted, as it was agreed that the overarching lease would not provide the Council with sufficiently more robust control than a freehold disposal which was subject to S106 obligations. This option would also give rise to additional Stamp Duty Land Tax (SDLT), and a lower capital receipt than existing use value representing less than best consideration.

Option 5: Direct Disposal of LBH freehold to GCAP Investments Limited

5.6 The option outlined in this report sees the Council interest being disposed of directly to GCAP Investments Limited. This approach is the simplest disposal option, gives rise to a lower Stamp Duty Land Tax (SDLT) and a significant capital receipt. The Council are also able to sufficiently control the management and pricing of the workspace for a minimum period of 50 years through the planning system, and the initial conditions of the disposal.

6. Background Information

Strategic Context

6.1 The Tottenham Strategic Regeneration Framework 2014 (SRF) sets out a vision for Tottenham Hale to be London's next great neighbourhood – a bustling new centre with an international transport hub, residential quarter and thousands of new job opportunities.

6.2 With plans to deliver 5,000 homes and 4,000 jobs by 2020, the District Centre Framework 2015 (DCF) sets out a comprehensive delivery framework for Tottenham Hale. This document is based on extensive engagement with the community, stakeholders and landowners.

6.3 These two documents, alongside the Tottenham Area Action Plan (AAP) strive for large scale economic and employment growth in Tottenham Hale. In order to achieve this, it is imperative that local employment land is fully maximised.

6.4 The rising demand for workspace in Tottenham reflects the wider London landscape, where based on average take-up, there are just eight months of supply remaining. Protecting the affordability and availability of workspace is recognised as a priority in the London agenda. With Tottenham being one of the few remaining refuges in London of relatively affordable space, the lack of available workspace is viewed as a significant risk to London's economic and cultural vitality.

6.5 With significant private and public investment, Tottenham's land values are climbing alongside demand for both workspace and residential. As the area transforms, the Council is seeking that whilst growth is accommodated, there is capacity to retain and enhance a varied economic portfolio, inclusive of both existing businesses and communities.

6.6 There are limited levers at a borough level which are able to address structural weaknesses in the market, and thus the impact of rising land values. However, the Council are able to positively contribute to the supply and suitability of workspace through robust planning policies and direct provision, most notably through the use of Council-owned assets.

Bernard Road site

6.7 The site discussed in this report is shown edged black on the plan attached as appendix 1a. It is located between Herbert Road and Ashby Road, within the South Tottenham Employment Area ("STEA"). The STEA sits at the heart of Tottenham's

maker and small business community, and the Tottenham AAP sets out a clear ambition for the area provide high quality and rationalised workspace.

6.8 The site is designated under development site TH12, 'Herbert Road', where the key aim is to maximise employment generating uses. The site also permits residential use in order to cross-subsidise the development of new employment provision.

6.9 The Council commissioned GVA to undertake a review of delivery options on the cluster of Council land around Bernard Road and Herbert Road. The report supported an approach which would see the Council's land being brought together with the adjoining land owner, GCAP Investments Limited.

6.10 The Council owned site consist of a piece of open land held historically for housing purposes and land held in the General Fund, as outlined in appendix 1a, is made up of a low quality warehouse unit and associated parking fronting the north-south alignment of Herbert Road. The warehouse is currently sub-let to the Mill-Co Project under a tenancy at will on a meanwhile basis, at a peppercorn rent, and they in turn are leasing it out to a number of businesses.

6.11 The proposed development also incorporates a section of Herbert Road and Bernard Road, which are Adopted Highways maintained by the Council (see Appendix 1b). The designation in the AAP recognises the current clash between road uses and movement. It envisages the removal of the parallel roadways at Ashby Road/Bernard Road, and removing commercial traffic from Herbert Road (an existing residential street).

6.12 GCAP Investments' neighbouring site, as outlined in the plan attached as appendix 1c is 20,579 sqft in size, and consists of warehouse accommodation which is currently sub-let to a number of small businesses.

Community Engagement

6.13 GCAP Investments Limited submitted a planning application in December 2017. The proposed scheme is due to go to Planning Committee in March 2018. The Quality Review Panel have responded favourably to the most recent iteration of the design, and its response to the local environment.

6.14 In advance of submitting the planning application, significant engagement was carried out by the developer, including letter distribution, three-community drop in sessions, 1 to 1 meetings with residents, and ongoing communication with Ward Councillors. A Development Forum was also held by the Planning Authority.

6.15 Throughout the community engagement, the developer pro-actively altered elements of their scheme in order to respond to concerns. Iterations in response to community feedback include a reduction in the overall development height, and

an amended design of the road layout in order to preserve the cul-de-sac on Ashby Road.

Workspace Offer

6.16 The 25,000 sqft of new workspace is expected to be in high demand, however will be prioritised for local businesses and residents, and will be in line with the criteria below:

1) Are Tottenham residents (then Haringey residents)
2) Run Tottenham based businesses (then Haringey based businesses)
3) Run a business in the creative industries
4) Run a business that has a social impact (not-for-profit businesses will take priority over for profit ones)

6.17 Clauses will also be written into contracts meaning tenants will be legally obliged to give back to the local community through local apprenticeships, work placement schemes and additional community projects.

6.18 12 of the residential units, either studio flats (x8) or two bedroom flats (x4), will also be 'tethered live-work', where the units will be leased at 75 per cent below market rate to businesses which are renting workspace on the site. By supporting businesses to both work and live in the local area, they are able to positively contribute to the local community, and add to a more prosperous local economy.

6.19 For the smaller units, 12-month licenses will be offered. There will be longer three-year leases for larger workspace units tied to the two bed accommodation units, intended for people who have more established businesses and are supporting families. The leases and licenses will be monitored annually to ensure that people in the tethered housing are in need of their workspace.

6.20 The remaining residential units will be private sale. The proportion of affordable housing provision is below the borough wide target of 40% due to the site's designation in the AAP which prioritises the provision of workspace and its affordability over the provision of affordable housing. The policy recognises the role of private residential provision in enabling other key strategic objectives, such as workspace. The viability appraisal has been scrutinised by the Council's commercial property advisors and confirm that the development scheme has maximised its contributions and would not be viable if further affordable housing was provided in addition to the current quantum and pricing of workspace.

Protection of the Scheme

6.21 The management and pricing of the workspace will be primarily controlled through a robust S106 agreement. The draft S106 proposes capping the rent of the serviced workspace at £17.50 per sqft, assessed at 75% of current market value, for a period of 50 years. The rent reviews will be in line with RPI, no more than every three years. In the event that the workspace operator defaults within the 50 years,

GCAP Investments Limited will be required to provide a new workspace management plan for the Council's approval.

6.22 In order to protect the delivery and quality of the scheme, conditions of the sale of the site will include:

- A planning consent being obtained for the development
- Signed contract for construction of development in accordance with planning consent
- Grant of lease to a Workspace Operator on approved terms
- A buyback options if the scheme is not started and/or completed by specified dates
- Overage for the development including if the site is sold on rather than developed

6.23 The site disposal will also incorporate a Deed of Guarantee, whereby in the event that the workspace operator defaults within the first 10 years of operation, LBH will pay GCAP Investments Limited a sum equivalent to the difference between the rent payable under the lease and rents received from occupational subtenants for the following 12 months.

6.24 If the Deed of Guarantee comes into effect, GCAP Investments will be obligated to seek to secure an alternative Workspace Operator to take on the overarching lease of the premises. If a new operator is secured within the 12 months, the Council's liability for rent shall end.

6.25 In the event that the workspace lease is forfeited, the Council will also have an option to take a 5-year lease of the commercial premises. This ensures that the Council have ongoing control of the workspace, and are able to ensure the ongoing management of the workspace to a high standard.

6.26 The rental guarantee provides GCAP Investments Limited with more financial security, thus providing their funders with further confidence, given the relative infancy of the creative workspace market, and the lack of a mature market.

Appropriation

6.27 The act of appropriating land for planning purposes can engage Section 203 of the Housing and Planning Act 2016. In order to engage Section 203, the Council must exercise its powers under section 122 of the Local Government Act 1972 (Section 122 LGA 1972) to appropriate the land for planning purposes. The Council has the power under Section 122 LGA 1072 to transfer the allocation of land from one purpose to another.

6.28 Once the land is appropriated for planning purposes, the effect of triggering Section 203 HPA is that private rights of interests and restrictive covenants affecting the development are overridden and converted into a claim for damages. As a result of

this the developer has requested subject to planning permission for the scheme being granted that the Council exercises its statutory powers to override easements and other rights under section 203 HPA in carrying out the Development to overcome potential injunctable third party rights that may present an obstacle to delivery of the scheme.

6.29 Section 203 HPA can be used to override any easement, liberty, privilege, right or advantage annexed to land and adversely affecting other land. An easement is a right of light, or right of way or interest in land which entitles a neighbouring landowner to enjoy such rights over the adjoining site. Any development which interferes with that right may be the subject of an injunction preventing the development from going ahead. Section 203 converts that injunctable right to one of compensation only.

6.30 In order for the Council to appropriate the Bernard Road Site for planning purposes, the key procedural points under Section 122 of the Local Government Act 1972 are as follows:-

(a) The land must already belong to the council
(b) The land must be no longer required for the purpose for which it is currently appropriated; and
(c) The purpose for which the council is appropriating must be authorised by statute

6.31 The land is currently used for commercial letting and part is an open space and the appropriation seeks to change the designation for planning purposes.

6.32 GCAP Investments will provide an indemnity to the Council in respect of any residual liability that may fall to the Council as a result of GCAP Investments relying on Section 203 to override third party interests during development.

Best Consideration

6.33 The mixed nature of the scheme proposed has proven to be financially challenging in terms of providing a high quality scheme, which provides both affordable workspace and affordable tethered residential units. The viability is also influenced by the site and it's surroundings with the design and massing reflecting pre application discussions and consultation with the local community.

6.34 The report sets out a number of options that were considered in terms of the delivery of the development. This included the option of the Council acquiring the freehold of the adjacent site and then leasing the whole site to GCAP Investments Ltd. This option valued both Council and GCAP sites as being less than Existing Use Value. On this basis the Council would have received less than best consideration. In addition the Council would have a Stamp Duty Land Tax obligation as an additional cost.

6.35 The Council's advisers G L Hearn have undertaken a valuation report for the disposal of the freehold sale and have confirmed the price agreed (and set out in the Heads of Terms in part B to this report) represents best consideration to the Council and in terms of value is the best option considered. Further comment is set out in part B of this report.

7. Contribution to strategic outcomes

7.1 The disposal of the Council site will facilitate an innovative workspace-led development. This development aligns with the Council's Economic Development Strategy, the Tottenham Strategic Regeneration Plan, and the Tottenham Area Action Plan, all of which set out ambitious targets for employment and economic growth.

7.2 The intervention outlined in this report will most notably contribute towards priority 4 in the Corporate Plan:

- Priority 4 – Sustainable housing, growth and employment: Drive growth and employment from which everyone can benefit. (Transport, broadband, skills, carbon reduction, strategic development)

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

8.1 This report seeks to dispose of the Council's interest in the Bernard Works site to further the Council's strategic regeneration objectives in the area. A range of options to achieve the Council's objectives have been considered and are described in the report. A critical factor in the decision making process is the adjacency of the Empyrean site which is owned by GCAP Investments Limited as this site, when combined with the Council's land holding, provides a greater opportunity to further the Council's strategic objective for the area.

8.2 The recommendation to appropriate the land from housing purposes to planning purposes will have the effect of reducing the overall level of debt within the HRA and increase the overall level of debt within the GF. This in turn will reduce the interest burden on the HRA, increase the headroom within the HRA (thus allowing more investment) and increase the debt servicing costs within the GF. In addition, the GF will lose rental income of £15k. These financial effects are common to all the options except the do nothing one. As such they are not discussed any further.

8.3 Option 1: Do nothing. This option would have left the current tenant in-situ with a tenancy at will and a passing rent of £15k per annum. This option has been

discounted as not contributing to the Council's strategic objectives for the area, would be inconsistent with the AAP and fail to generate a capital receipt.

8.4 Option 2: Open market disposal or placing the site in the HDV. The advice from the Council's appointed valuation adviser was there was greater value to be achieved by engaging with the adjacent land owner, GCAP Investments, due to the marriage value arising from combining the two parcels of land. In this scenario it is anticipated that the Council would receive less from an outright disposal and a similar amount from the HDV process.

8.5 Option 3: Entering into a Joint Venture with GCAP Investments Limited. The transaction costs associated with the creation of a JV arrangement were considered prohibitive given the overall size of the transaction and the Council's likely need to invest funds given the difference in land values between the Council's land and GCAP Investment's land. No capital value was ascribed to this option.

8.6 Option 4: Acquisition of freehold and disposal of long leasehold. This structure would see the Council acquire the freehold of the GCAP Investments land and then grant a lease of 250 years to GCAP Investments.

8.7 Option 5: Direct Disposal of LBH freehold to GCAP Investments Limited. This is the recommended route for the disposal and the achievement of the Council's objectives for the area. The offer from GCAP Investments is for the Council to dispose of its land by way of a freehold disposal for a sum set out in part B to this report on the basis of the heads of terms (HoT's) appended to this report. This route has the advantage that it does not incur any SDLT liability for the Council. The recommended HoT's include provision for the Council to *inter alia* guarantee the rent for the work units when completed. This provision is explored below.

8.8 According to GCAP Investments, the requirement to provide and sustain the level of workspace units that the Council wishes to create via the S106 agreement on the site is placing a strain on their financing of the project. In particular, their position is that their funders are viewing the workspace element of the development as "speculative" and thus riskier than other elements of the development. In investment terms, risk is reflected in both the availability and price of funds: the higher the risk the higher the likelihood of no funds or the cost of funds rises.

8.9 An additional complicating factor is that the operation of the type of workspace envisaged in this scheme is not the core business of GCAP Investments so they are proposing to lease the work space to a specialist work place operator. This entity will find the tenants, collect the rent and service charge and remit the agreed rent to GCAP Investments. From an investment funding perspective this interjects further risk into the project.

8.10 To alleviate this issue, GCAP Investments have asked that the Council underwrite a maximum of 12 months of rent if their appointed work space operator should forfeit

their lease within the first ten years after commencement of operation of the work space. The relevant financials are set out in Part B of this report.

Legal

8.11 Under section 122 of the Local Government Act 1972 the Council may appropriate for any purpose any land which belongs to the Council and is no longer required for the purpose for which it is held immediately before the appropriation; but the appropriation of land by a Council by virtue of this subsection shall be subject to the rights of other persons in, over or in respect of the land concerned.

8.12 The land consist of land which is used a s a green space, the Council may not appropriate any land consisting or forming part of an open space unless before appropriating the land it causes a notice of its intention to do so, specifying the land in question, to be advertised in two consecutive weeks in a newspaper circulating in the area in which the land is situated, and consider any objections to the proposed appropriation which may be made to them.

8.13 Where the Council appropriates land for planning purposes and section 203 of the Housing and Planning Act 2016 is engaged, the Council would retain residual liability if the developer fails to pay any compensation under section 204 to any one whose their party right has been infringed as a result of the development. It is proposed that the developer provides the Council with an indemnity. The appropriation is subject to planning permission being granted, once appropriated the land will be held for planning purposes. The disposal is subject to the developer obtaining planning permission for the scheme. The Council can dispose of the land pursuant to section 233 of the Town and Country Planning Act 1990 to such person, in such manner and subject to such conditions as appear to them to be expedient in order—

(a)to secure the best use of that or other land and any buildings or works which have been, or are to be, erected, constructed or carried out on it (whether by themselves or by any other person), or

(b)to secure the erection, construction or carrying out on it of any buildings or works appearing to them to be needed for the proper planning of the area of the Council.

8.14 The disposal must also be for best consideration otherwise the consent of the Secretary of State is required.

8.15 Members should note that the Council would be providing a guarantee for the rent of the workspace as set out in paragraph 6.23 of this report.

Equality

8.16 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

8.17 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

8.18 The Council has set out an ambitious vision for economic and employment growth in Tottenham. This is in response to known economic inequalities between the population in Tottenham and the rest of Haringey and London as a whole. This is particularly with regards to median income, qualifications and skills levels, and career paths:

- Median hourly pay in the Tottenham wards is substantially lower than in the rest of Haringey and in London as a whole. The median hourly income of people living in Tottenham parliamentary constituency (£11.40) is far below that amongst people living in the rest of Haringey (£16.90) and London's top quartile (£16.60).
- The percentage of pupils with 5 A*-C grades at GCSE (including English and Maths) is significantly lower in North Tottenham (43.3%) and South Tottenham (46% than in the rest of Haringey (66.3%) and London's top quartile (70%).
- 26% of adults in North Tottenham and 23% of adults in South Tottenham have no qualifications, roughly double that of those outside of Tottenham (13%).
- The proportion of 16-18 year olds who are Not in Education, Employment or Training (NEET) is higher in Tottenham than the rest of Haringey (Tottenham Green- 3.8%).

8.19 This land transaction will enable the mixed- use development of residential units and workspace, primarily for small and medium sized businesses in the creative industries. This will create more job opportunities and workspace for local businesses in the creative industries. Compared to the rest of Haringey, Tottenham has a much lower proportion of more high skilled jobs. The Creative Industries offer a higher proportion of more highly skilled jobs.

8.20 However, it is known that particular groups with protected characteristics who are overrepresented in Tottenham are underrepresented in these sectors. It is notable that women, older people, and people with disabilities are underrepresented among employees in the creative industries; and that women, older people and BAME

people are significantly underrepresented in SMEs and start-ups. People with disabilities, BAME people, and women are overrepresented in the populations of the eight Tottenham wards. These groups will be targeted by Skills and Employment initiatives, in order to reduce existing barriers to employment.

8.21 Clauses will also be written into contracts meaning tenants will be legally obliged to give back to the local community through local apprenticeships, work placement schemes and additional community projects.

8.22 The businesses on site reflect the predominant demand in South Tottenham for light industrial space. This development will increase supply of light industrial space which aligns with the Council's adopted policies (the Tottenham AAP, the local plan, and the Economic Development Strategy). Local businesses and residents will be prioritised for the new work-units. The Council will monitor the equalities profile of new businesses occupying the new space to ensure residents in Tottenham are benefitting from the new opportunities being created.

9. Use of Appendices

Appendix 1a: Plan of Council land to be disposed of the GCAP Investments

Appendix 1b: Plan of Area showing Adopted Public Highway

Appendix 1c: Plan showing current land ownership of GCAP Investments

Appendix 2: Heads of Terms – See Part B to this report.

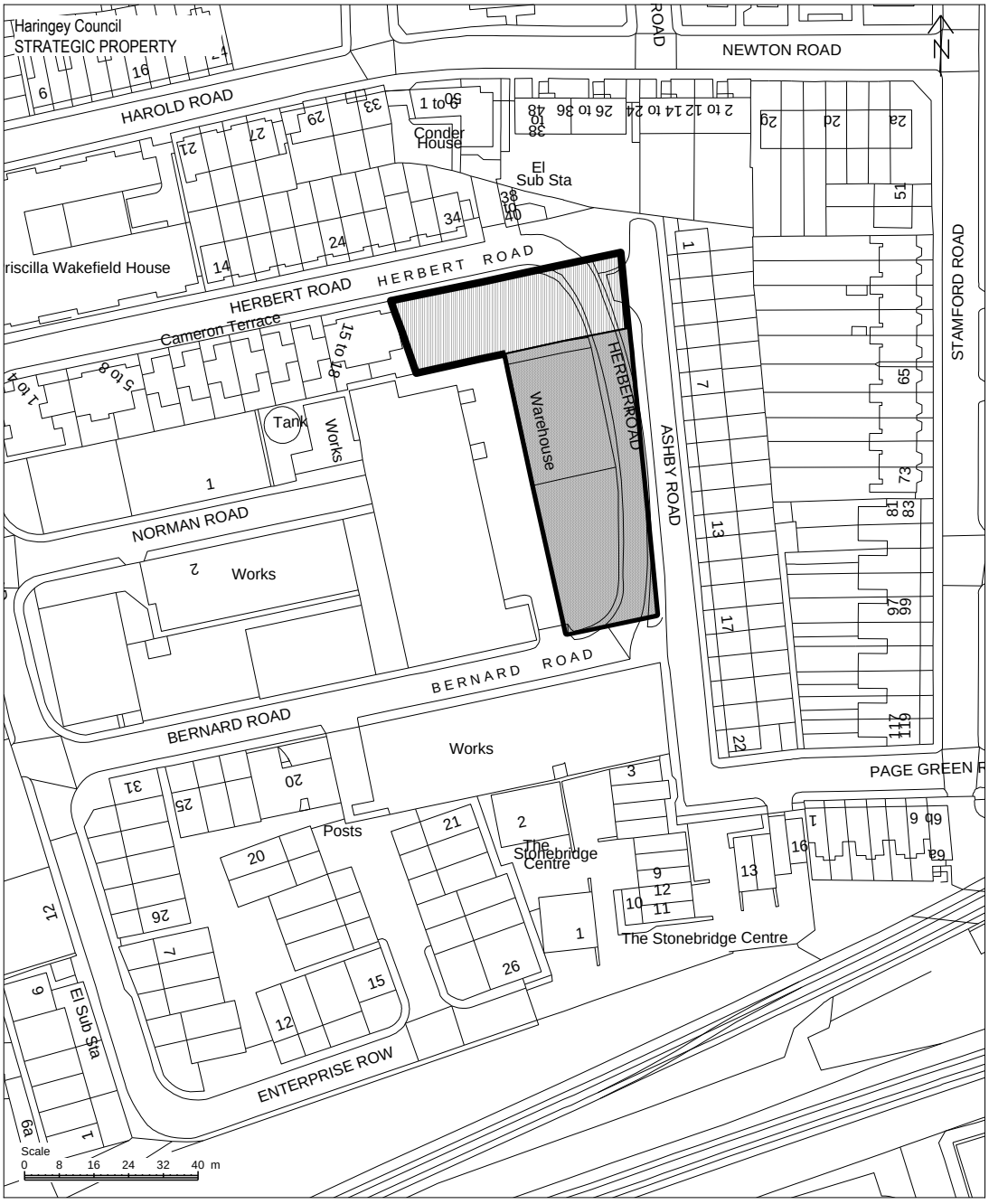
[NOT FOR PUBLICATION by virtue of paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972. This report is not for publication as it contains information classified as exempt under Schedule 12A of the Local Government Act 1972 in that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information).]

10. Local Government (Access to Information) Act 1985

8.23 **Tottenham Area Action Plan**
http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/tottenham-area-action-plan

8.24 **Tottenham Hale District Centre Framework**
https://tottenham.london/explore/tottenham-hale/new-centre-tottenham-hale

Appendix 1a: Plan of Council land to be disposed of the GCAP Investments



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Development site
Bernard Rd/Herbert Rd
Tottenham
LONDON
N15

Black verging - extent of Haringey Council ownership
Black vertical hatching - title no. NGL327591 HRA
Grey shading - title no. MX48732 GF

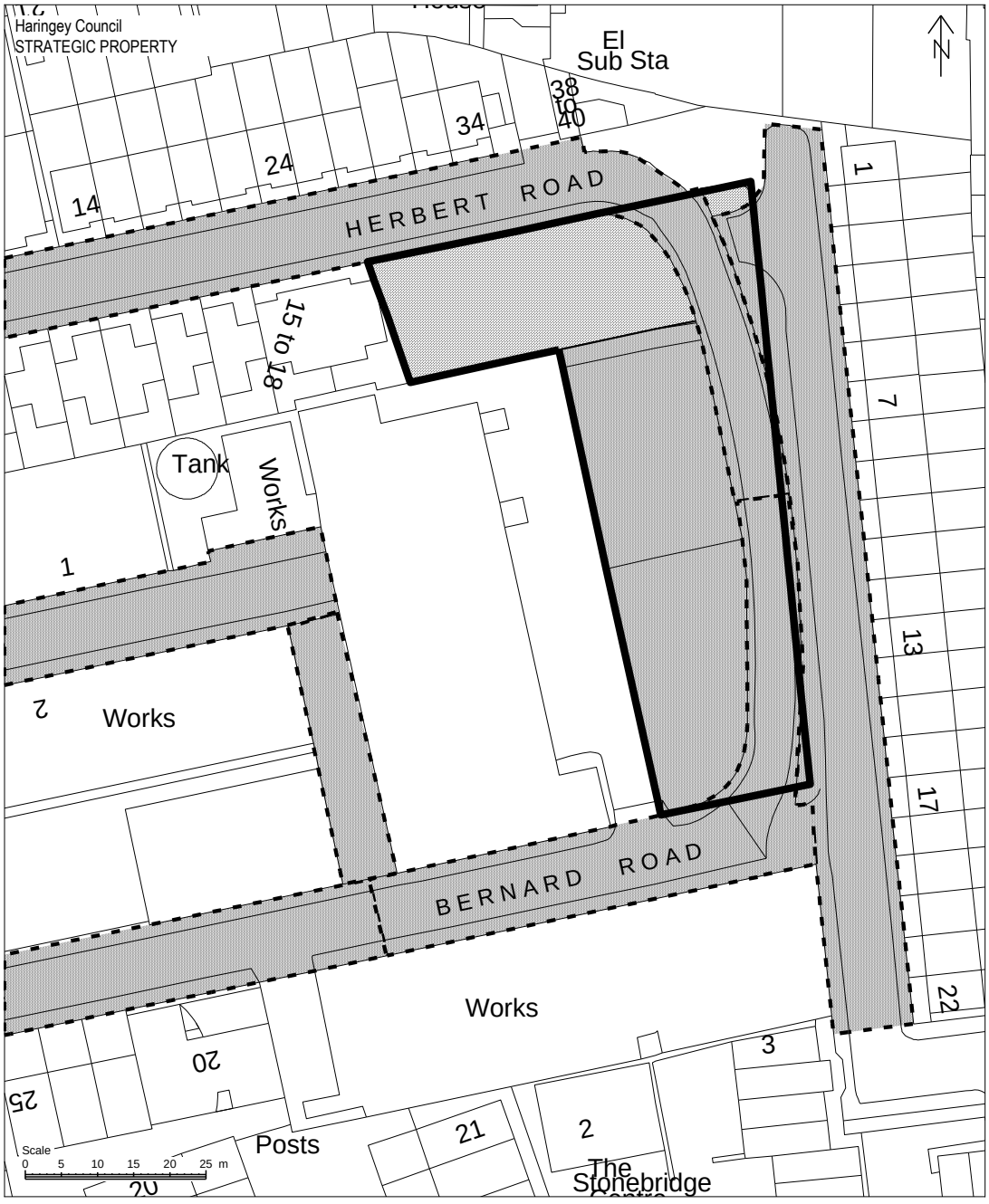
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Scale 1:1250
Drawing No. BVES A4 1790k V3

CPM No. Commercial file ref :

Overlay : CorpMisc. + TerAcq

Plan produced by Janice Dabinett on 20/02/2018

Appendix 1b: Plan of Area showing Adopted Public Highway



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Development site
Bernard Rd/Herbert Rd
Tottenham
LONDON
N17

Black verging - Site boundary

Grey shading - Haringey Council title MX48732 GF
Brick shading - Haringey Council title NGL327591 HRA
Pecked verging with vertical hatching - Adopted highway

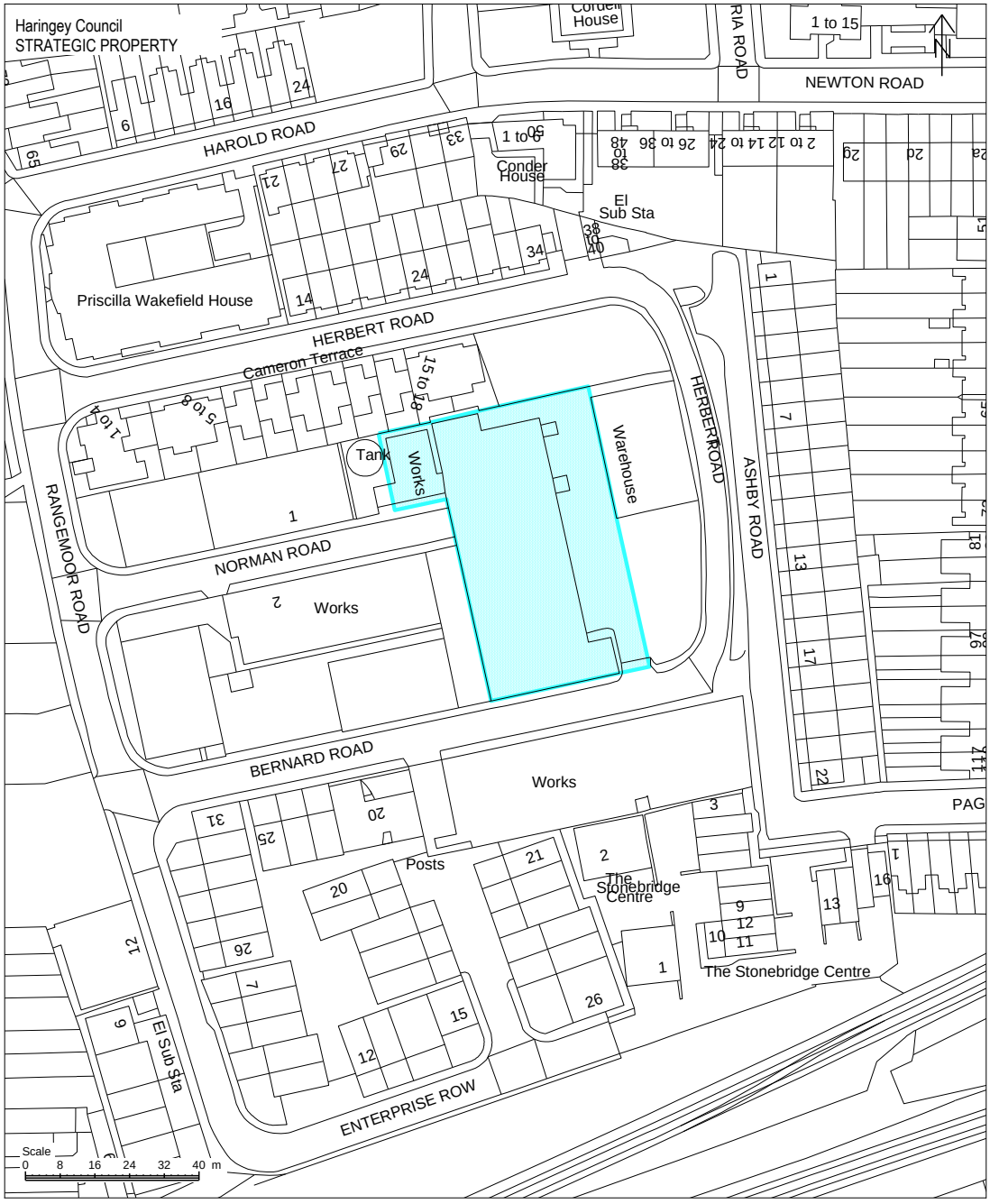
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Scale 1:750

Plan produced by Janice Dabinett on 19/02/2018

Drawing No. BVES A4 misc.

Appendix 1c – Plan showing current ownership of GCAP Investments land



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Development site - GCAP ownership
Bernard Rd/Herbert Rd
Tottenham
LONDON
N17

Blue shading - Private ownership title P37621

Overlay : TerAcq

Scale 1:1250

Plan produced by Janice Dabinett on 15/02/2018

Drawing No. BVES A4 1790m

Report for: Cabinet, 6th March 2018

Title: Haringey's commitment to being an LGBT+ inclusive borough.

Report authorised by: Jeanelle de Gruchy, Director of Public Health

Lead Officer: Nile Sobers-Bennett
Telephone: 020 8489 7039
Email: Nile.Sobers-Bennett@haringey.gov.uk

Ward(s) affected: All

Report for Key/ Non Key Decision: Non Key Decision

1. Describe the issue under consideration

1.1. Haringey Council is committed to creating a work environment and community which is inclusive of all groups. To action these commitments, the Council has developed an Equality and Inclusion agenda, a programme of work produced to improve inclusion for groups who fall under the nine protected characteristics under the Equality Act 2010 – age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

1.2. This report highlights the importance of Lesbian, Gay, Bisexual, Transgender and/or Queer or Questioning, Intersex, Asexual and Non-Binary (LGBT+) inclusion and Cabinet's commitment to equality for this group of staff and residents. It includes an action plan which outlines some of the specific actions the Council will be making for LGBT+ staff and residents. By following through on this action plan, Haringey will be taking some important steps towards improving the visibility, awareness and inclusion for Haringey's LGBT+ staff and community.

2. Cabinet Member Introduction

2.1. The Council recognises that LGBT+ issues are very important to delivering our outcomes of an inclusive borough. We have made important progress, particularly in two areas: supported housing (following clear recommendations from the cross-party working group) and workforce inclusion in the Council itself.

2.2. However, there is still much to do on this agenda. To really deliver for LGBT+ residents, we need to work with them and we need to work systemically across the full range of Council services, and the range of other services delivered by external organisations. We want to build on the important steps taken so far, to develop a more strategic, systemic approach and to do so in dialogue with LGBT+ residents. This report is the beginning of that important shift, setting out an initial LGBT+ Action Plan that summarises our current work and guides the future work of the Council and its partners.

3. Recommendations

3.1. To affirm the organisation's commitment to LGBT+ equality and note the action plan (see appendix 1).

4. Reasons for decision

4.1. Cabinet's full support highlights Haringey's commitment to being a more equal and inclusive borough for both our staff and residents.

5. Alternative options considered

5.1. As a public body, we have an equalities duty; by not doing anything, we are at risk of not fulfilling this duty.

6. Background information

6.1. Haringey has the eighth highest LGBT+ community in London (ONS, 2017). It is important that we carry out the necessary actions to ensure that LGBT+ residents in the community can thrive and are safe within our borough.

6.2. Haringey has a long history of activism for LGBT+ rights. This advocacy displays Haringey's commitment to bring about positive change in the community (see appendix 2). This report acknowledges the considerable diversity within the LGBT+ community – and in addition, that we all have a mix of identities from disability, ethnicity, age, gender, religion, for example. Residents may therefore face a multiplicity of issues arising from this; while focusing primarily on LGBT+ issues in this paper, we do this within an approach that promotes inclusivity on all levels.

6.3. Despite positive changes over recent years, LGBT+ residents continue to experience discrimination and abuse of their rights. For example:

- Opening Doors London (ODL) workshop findings that several LGBT+ people present felt unsafe in certain areas of Haringey and how 'services or community centres which might offer medical or social support were often in the very areas with a reputation for homophobic, bi-phobic and trans-phobic street abuse or harassment' (Opening Doors London report, November 2017).
- 'One in five LGBT+ people (21 per cent) have experienced a hate crime or incident due to their sexual orientation and/or gender identity in the last 12 months' (Stonewall, 2017).
- While anti-LGBT+ bullying and language has decreased across Britain's schools since 2012, 'LGBT+ pupils still face bullying at school' (Stonewall, 2017) and continue to face significant challenges.
- '24% of homeless youth population identify as LGBT+' (The Albert Kennedy Trust, 2015).

6.4. As an organisation, the council has signalled its commitment to LGBT+ inclusion through participation in the Stonewall organisational audit in 2016 and 2017. This ranks the council against all organisations in the UK. Our ranking in

2016 was 310 out of 439. Unfortunately, our ranking slipped in 2017 to 360 out of 434. This underlines the importance of continuing to progressively improve on our efforts.

6.5. Positive developments have been made in the community and workplace, for example:

- Woodside High School was awarded the Stonewall LGBT+ Gold award in December 2017 for the work they have done in the community. This is the first Gold award for a London school.
- The Housing Support Transformation (which stemmed from the Supported Housing Review) has already taken some positive steps forward. A one-year pilot project with Opening Doors London has been commissioned to bring LGBT+ social and wellbeing activities to our sheltered housing services for older people; we are in the process of adapting our LGBT+ supported housing service for young people to accommodate the more complex needs we are seeing in the borough.
- The Haringey Prevent Delivery Group adopted oversight of hate crime as a sub-group of the meeting in 2017. This has provided strategic input from a wide range of partners at senior level across the borough.
- The LGBT+ Staff Network has delivered two successful events for staff on the podium with about 80 staff attending each - an event marking Haringey's history of LGBT+ rights in June 2016 and an LGBT+ Hate Crime event in January 2018. These events demonstrated our collective commitment to improving equality for our LGBT+ staff and community.

6.6. This paper sets out our ongoing commitment to this agenda with key actions in four areas:

1. *Giving LGBT+ residents a stronger voice in shaping priorities and services to ensure that they meet the needs of LGBT+ residents.*

    a. To collect data that better identifies the diverse needs and backgrounds of the LGBT+ community in Haringey in order to inform the new Borough Plan, and to design and commission services that offer appropriate and sensitive support, assessment and intervention.
    b. To ensure LGBT+ residents have a role in shaping newly commissioned services, which may include selecting preferred organisations, peer review opportunities and sharing their views on 'what works' with commissioners.
    c. Extend the emerging good practice demonstrated by the Opening Doors London workshop through, for example a full consultation exercise to more meaningfully engage with LGBT+ residents.
    d. Implement actions flowing from the Supported Housing Review to improve the data, visibility and professional response to LGBT+ people accessing housing and housing support services. This includes actions to implement changes to supported housing contracts embedding a stronger focus on data collection and challenging prejudice, commissioning a pilot project for older LGBT+ people in partnership with Opening Doors London, reviewing our Stonewall Housing contract to better respond to the needs of LGBT+ young people in Haringey and exploring a toolkit for housing support

staff that equips them to ask sensitive and appropriate questions about the relationship between housing, homelessness and LGBT+ identities. We are in the planning stages of designing an LGBT+ staff event about housing and homelessness in May this year.

2. *Exercising system leadership across the networks of service providers supporting LGBT+ residents*.

    a. Working with the NHS, CCG, Police, voluntary sector and other partners to challenge ourselves to review our practice, including by developing a service improvement network or alliance to facilitate best practice sharing.
    b. Making a strong commitment to LGBT+ support this year with plans in place for the first LGBT+ Community Network meeting to take place in February 2018.

3. *Making Haringey a safe and welcoming place to live, work and visit for LGBT+ people.*

    a. Continue to work with the police and other partners to tackle hate crime. Work is co-ordinated through the local hate crime working group which looks at all forms of hate crime, with sexuality and gender identity motivated crimes featuring as strands of this work. The police have a dedicated LGBTQ Liaison Officer role, which will be a valuable resource for our joint engagement efforts.

4. *Making Haringey Council an LGBT+ inclusive workplace.*

    a. Prioritise improving data on the protected characteristics of staff, including LGBT+ staff through the equality data collection exercise (launched in October 2017). This will enable the council to build a solid evidence base to both monitor equalities in areas such as recruitment, promotion and redundancies and enable us to develop policies and initiatives to ensure we continue to progress as an equal and inclusive employer.
    b. Continue to strengthen the LGBT+ staff network.

7. The Action Plan in appendix 1 sets out in more detail how we plan to continue this work.

8. Contribution to strategic outcomes

8.1. The action plan contributes to Haringey's Corporate Plan through the following cross cutting theme:

- **A fair and equal borough:** Tackling underlying factors of poverty and discrimination with a scale and intensity proportionate to the level of disadvantage.

9. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

At this stage in the development of the council's LGBT+ inclusive borough policy for incorporation into the borough plan, it is anticipated that Haringey's main role whilst proposing a financial commitment as a prominent partner, will be that of lead co-ordinator bringing together all key stakeholders working towards an agreed set of objectives, within the appropriate financial contributions provided from each party.

Subject to consultation with all parties, it is at that stage where proposals can be fully costed and the resources identified in the context of the councils other financial commitments within the MTFS.

Procurement

N/A

Legal

A commitment by the authority to LGBT+ inclusion will assist the council to meet its objectives under the public sector Equality Duty (PSED). This duty requires the council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between those with protected characteristics when carrying out their activities.

Equality

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between people who share those protected characteristics and people who do not.
- Foster good relations between people who share those characteristics and people who do not.

The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Taking action to provide a more inclusive and equal borough for Haringey Council's LGBT+ staff and residents should help to eliminate discrimination and will advance equality of opportunity for this protected group. By celebrating LGBT+ history with staff and by pursuing preventative educational work with young people in schools, Haringey Council will also foster good relations between people who share these characteristics and people who do not.

10. Use of Appendices

10.1. **Appendix 1.**

Haringey's commitment to being an LGBT+ inclusive borough.

Action plan

Objective	Actions to date	Next steps	Milestones	Lead officer
1. Giving LGBT+ residents a stronger voice in shaping priorities and services to ensure that they meet the needs of LGBT+ residents				
1. To ensure full uptake of our offer on housing for homeless young LGBT+ residents.	▪ Referrals to Stonewall Housing have improved and contract management relationships have been strengthened.	▪ Engage with young people through Stonewall Housing to better understand their needs.		Gill Taylor
2. To improve our supported housing offer for older LGBT+ residents.	▪ This project is still in the initial stages of development and we are in the process of liaising with interested housing associations and developers.	▪ Explore the potential to develop LGBT+ inclusive housing in Haringey.		Alan Benson
3. Transform how we deliver and evaluate the commissioning of services to meet the needs of LGBT+ residents.	▪ Currently exploring the potential to improve our services and resources available to our LGBT+ residents. Excellent work with providers in sexual health and drug and alcohol services has been carried out.	▪ Embed best practice across all areas of commissioning in the Council.		TBA
2. Exercising system leadership across the networks of service providers supporting LGBT+ residents				

1. LGBT+ inclusion in schools.	▪ Member of Stonewall's Education Champions. ▪ Woodside High school announced as the Stonewall Education Champion for London as a result of their work on LGBT+ inclusion. ▪ Our response to the Department for Education consultation on changes to the teaching of Sex and Relationship Education and PSHE in schools included an ask for: "equality and mutual respect in all relationships" to be taught as part of the healthy relationship education of our young people.	▪ Meet with Diversity Role Models to discuss potential for further work on LGBT+ inclusion in schools. ▪ Look into the future role the Haringey Education Partnership (HEP) would have in delivering LGBT+ inclusive training by professional experts across schools in Haringey. ▪ Recognise and support the significant work in our primary and secondary schools to educate and equip our young people on LGBT+ inclusion.		TBA
2. Incorporate additional training for all frontline staff to ensure services meet the needs of LGBT+ service users.		▪ Training will be delivered with Adult Services to ensure social workers are able to recognise hate crime and know how to report it. Similar workshops will be planned for VCS organisations through the Bridge Renewal Trust in 2018. ▪ Explore further opportunities to train frontline staff.		Christina Andrew
3. Increase visibility and improve fostering services for LGBT+ people		▪ To attend the Council's LGBT+ History Month event – Haringey in Unity, Life Gets Better Together to promote and provide information	February 2018	Monyka Crafford

considering fostering.		on fostering within the LGBT+ community. ▪ Activities planned for LGBT+ Adoption and Fostering Week 5-11th March 2018. New Family Social's LGBT+ adoption and fostering campaign, which solely focuses on encouraging LGBT+ people to explore their adoption and fostering options as the need for a diverse range of adopters and foster carers, continues to grow. - Increase visibility by advertising on New Family Socials webpage. Promote LGBT+ fostering on Haringey's social media accounts. - Increase awareness about the processes of fostering through an information session in March. - Produce a case study with a Haringey LGBT+ foster carer. - Attend the LGBT+ information session scheduled to take place 3rd March for LGBT+ people considering fostering.	March 2018	
3. Making Haringey a safe and welcoming place to live, work and visit for LGBT+ people				
1. To ensure older LGBT+ residents feel	▪ In November 2017, Haringey Council, in partnership with	▪ ODL report to be distributed.	February 2018	Gill Taylor

safe and welcomed in the borough and services are responsive to their needs as appropriate.	Opening Doors London (ODL) organised an LGBT+ World Café event. This brought together professionals and residents from across the borough to discuss how we can respond in partnership to the needs of older LGBT+ people. ▪ Follow-up report received from ODL titled 'Are we meeting the needs of older LGBT+ people in Haringey?' has been received and awaiting comment from key stakeholders.	▪ Pilot funding for ODL as part of Hub&Cluster sheltered housing model. In the process of setting up a pilot for a befriending service and activities for our older LGBT+ residents. Pilot expected to be run for one year, starting 1st March 2018.	March 2018	
2. To celebrate Haringey's rich heritage of supporting LGBT+ equality.		▪ Plans in place for the first LGBT+ Community Network meeting to happen in March 2018. To capture Haringey's rich history of LGBT+ activism through a Heritage Lottery bid, with locally based organisations working together to deliver the bid based around 1989 Pride celebrations in Haringey.	March 2018	
3. Zero tolerance to hate crime - make the borough safe for LGBT+ residents. [Fully funded by the Home Office].	▪ The Haringey Prevent Delivery Group adopted oversight of hate crime as a sub-group of the meeting in 2017. This has provided strategic input from a wide range of partners at senior	▪ Awareness and reporting sessions are being arranged at specific venues following the National Hate Crime Awareness Week visits by local police officers. The first of these visits took place at		Christina Andrew

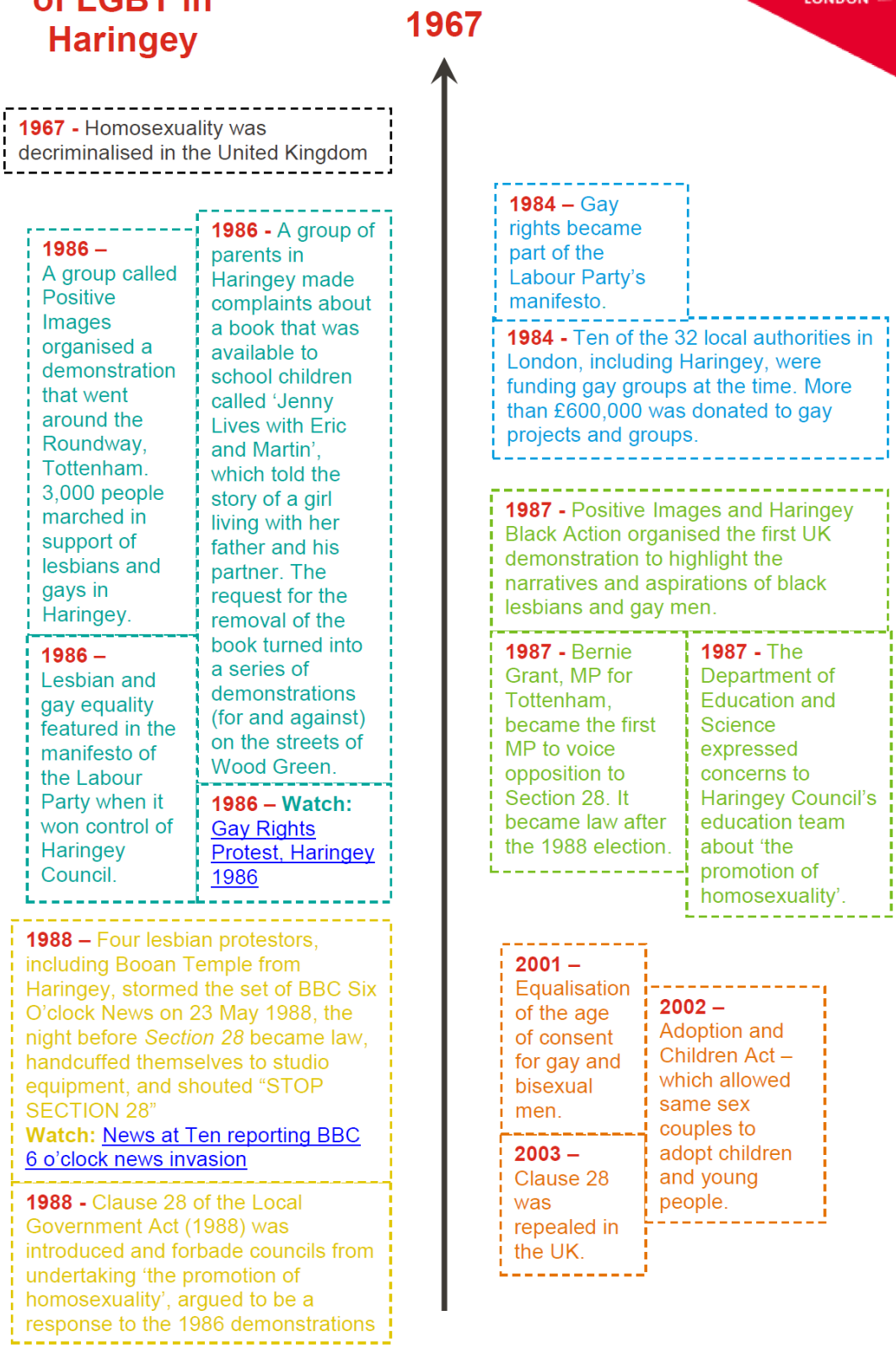
	level across the borough. ▪ A number of community visits were arranged with the local police during National Hate Crime Awareness Week in October 2017; this saw police visiting voluntary and community sector organisations and places of worship to provide resources. ▪ The LGBT+ Network held a hate crime event on the Podium on 11th January 2018 with speakers from Stonewall, local police, and a local victim of a homophobic attack. The event was very well attended with approximately 80 staff present.	one of our Mosques on 8th December 2017, with detectives from the local Community Safety Unit. ▪ Preventative work through awareness raising with young people is ongoing through a number of projects being delivered in Haringey schools and FE institutions. This includes the 'Heartstone Odyssey' which introduces ideas of diversity and tolerance to primary school children through a fantasy story. 'Stand Up! Education Against Discrimination' is aimed at 14-18 year olds and aims to create a safe environment where differences can be discussed. ▪ A workshop has been developed for delivery by Safer Schools Officers, which will focus on hate crime; sessions scheduled to be delivered in the spring / summer terms with a view to every secondary receiving input. ▪ We will continue to work closely with local police including the LGBT+ Liaison Officer and detectives from the Community		

		Safety Unit to provide support to organisations where to ensure we have a good understanding of hotspots and problem areas where LGBT+ hate crime is concerned.		
4. Making Haringey Council an LGBT+ inclusive workplace				
1. To improve LGBT+ inclusivity as an organisation.	▪ The Stonewall audit submitted in September 2017- The Council achieved a ranking of 360 out of 434.	▪ Further feedback and recommendations based on the audit will be received in March/April 2018 at the Stonewall benchmarking meeting. We will use this information to identify priority areas and gaps that need to be improved to ensure that we are more inclusive of LGBT+ staff. These recommendations will be developed into an action plan going forward.	March/April 2018	Jeanelle de Gruchy
2. To support LGBT+ staff engagement.	▪ The LGBT+ Network has delivered two successful events for staff on the podium with about 80 staff attending each - an event marking Haringey's history of LGBT+ rights in June 2016 and the LGBT+ Hate Crime event which took place on 11th January 2018. Both events were well attended which demonstrated our collective commitment to	▪ LGBT+ History Month event scheduled to take place in February 2018 to celebrate LGBT+ history and an LGBT+ housing event planned to take place in May to show Haringey's commitment to LGBT+ inclusion.		

	improving equality for our LGBT+ staff and community.			
3. To improve staff data in order to monitor and become a more inclusive organisation.	▪ The equality data collection exercise was launched in October 2017.	▪ Ensure staff data collection informs equality action plan.		
4. To commit to ensuring that the Council's policies are inclusive of all LGBT+ staff.	▪ Equality Handbook has been reviewed and updated.	▪ A new Council Transgender Guidance and Policy has been drafted and needs to be finalised.		TBA

10.2. **Appendix 2.**

50 year history of LGBT in Haringey



2009 – The T-shirt worn by Haringey campaigner Booan Temple when she stormed the BBC news room was one of the exhibits in the show *'From the Closet to the Collection: Haringey LGBT Exhibition'* at Bruce Castle Museum.





2010 – GIRES (Gender Identification Research & Education Society) was set up to improve the environment in which gender non-conforming people live.

2009-2012 - Lynne Featherstone, Liberal Democrat MP for Hornsey and Wood Green, was nominated for the Stonewall Politician of the Year Award in both 2009 and 2012 for her work to support equality for lesbian, gay and bisexual people. She was awarded Stonewall Politician of the Year (jointly), Attitude Magazine Politician of the Year and PinkNews Ally of the Year for her initiative on same-sex marriage and work on LGBT rights

2013 – WiseThoughts was set up to help address social justice issues and needs of LGBT and Black, Asian & Minority Ethnic (BAME) communities in Haringey.

2015 – Stonewall Housing launched a new monthly housing advice drop in service for LGBT people at Wood Green Library.

2016 – Haringey Council entered Stonewall's Workplace Equality Index for the first time to take stock of how inclusive the organisation is and identify areas of improvement.

2017 – Stonewall announced its Top 100 Employers List 2017 in January. Haringey Council came 310th out of 439.

2017 – Work begins to develop a plan to make Haringey Council a more LGBT-friendly workplace by using the feedback from Stonewall.

Today

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MINUTES OF THE MEETING OF THE CABINET MEMBER SIGNING HELD ON FRIDAY, 2ND FEBRUARY, 2018, 9.00 am

PRESENT: Councillor Joe Goldberg (Chair)

231. FILMING AT MEETINGS

The Cabinet Member referred those present to agenda item 1 as shown on the agenda in respect of filming at this meeting and asked that those present reviewed and noted the information contained therein.

232. URGENT BUSINESS

None.

233. DECLARATIONS OF INTEREST

None.

234. DISCRETIONARY BUSINESS RATES RELIEF: REVALUATION SUPPORT POLICY [AMENDMENT]

The Cabinet Member for Economic Development, Social Inclusion & Sustainability considered the report, which sought approval for the revised Discretionary Business Rates Relief – Revaluation Support Policy. The reason for this amendment is necessary to ensure full use of Haringey's allocation of the Government's funding for discretionary relief 2017/18 and for the remainder of the period, through to 2021.

It was noted that the original policy had been approved by Cabinet on 20th June 2017 and the changes proposed within this report were outlined as detailed in the recommendations.

RESOLVED

That the Cabinet Member for Economic Development, Social Inclusion & Sustainability approves the revised Discretionary Business Rates Relief – Revaluation Support Policy, as appended to this report at Appendix A, which makes the following amendments to the policy agreed by the Cabinet on 20 June 2017:

- **Year 1** (2017-18): Give effect to new policy clause 2.2.2 and proportionately apply the remaining funds amongst eligible businesses. This equates to a 10.5% increased discount (indicative), taking the total reduction to an estimated 52.5%. An approximate rather than specific percentage is given to allow for any further adjustments in the business base (including as described at section 6.3

of this report). A proportionate distribution of remaining funds is in keeping with the policy, most administratively efficient to operate and would provide further support to local businesses.

- **Years 2-4** (2018-19 to 2020-21): Give effect to amended policy clause 2.3, so that during each year that remains, funds available will be distributed proportionately amongst eligible businesses.
- **A caveat added**, which gives effect to amended policy clause 2.4; that this policy is subject to any relevant wider policy changes that may occur, including those outlined by Government. Should substantial changes arise then the policy is to be reviewed accordingly.

REASONS FOR DECISION

The proposed amendments seek to ensure delivery of the Discretionary Business Rates Relief – Revaluation Support Policy, as appended to this report at Appendix A, which: -

- Allocates discretionary business rates relief to rate payers where - The business rate increase is £500 or more (after all other applicable reliefs have been applied)
- Automatically applies a 42% discount on the monetary increase in business rates to affected businesses in 2017/18

With the following exclusions:
a) Premises occupied by multinational and national chain companies
b) Excepted hereditaments within the meaning of s 47 Local Government Finance Act 1988 and wider public sector premises
c) Businesses not located in the borough for the duration of 2016/17 and/or have left since April 2017
d) Premises with rateable values in excess of £200,000

The amendments proposed maintain the above outlined exclusions and are in keeping with the aims of the original policy. The policy sits in the context of the Council's wider economic growth priorities for the borough. We believe the policy best supports economic growth as it targets small, medium-sized and independent businesses over multinational, and national chain businesses. The policy aligns with the Council's existing policies to encourage business resilience and growth in Haringey and support local job creation. For this reason, the policy supports private businesses over public sector premises (a number of which are hereditaments already excluded in accordance with s 47 Local Government Finance Act 1988).

Haringey Council is expected to use discretionary business rates relief to distribute the Government's extra funding for „revaluation support" to those businesses that have seen increases in their bills incorporating the principles below:

- Target relief at businesses that are facing an increase in their business rate bills following the revaluation, encompassing different sizes, sectors and locations across the borough

- Distribute the extra relief in a way that is proportionate to how much a businesses' bill has increased, and in a fair and equal manner
- Apply to ratepayers occupying lower value properties
- Ensure that the extra relief is distributed to local businesses quickly and smoothly
- Be relatively simple for the Council to administer

ALTERNATIVE OPTIONS CONSIDERED

To include wider public sector. However, this is one of the exclusions in the policy, we are minded not to extend the fund to wider public sector organisations'. We believe this is in line with the aims of the fund, which are to support business and promote growth. Therefore, we believe it is best to support those small, medium-sized and independent businesses in Haringey facing difficulties.

To include multinational and national chain companies. This is another exclusion within the policy. The consultation feedback (which preceded the policy) supported the proposal that excluding multinational and national chain businesses is a fairer way of distributing the relief to businesses that are less able to cope with the business rate increase. A majority of the respondents to the Council's consultation stated that preference should be given to small, medium-sized and independent businesses; and Haringey's precepting Authority, the Greater London Authority, stated that firms operating nationally or internationally may be benefitting from reductions in business rates in other parts of the country.

To administer a hardship fund. This could create the need to consider a large volume of applications and subsequent lengthy delays in awarding relief. The Council does not have resources in place to manage this. Particularly within the time left for this financial year (2 months) to deliver the year one allocation.

235. NEW ITEMS OF URGENT BUSINESS

None.

CHAIR: Councillor Joe Goldberg

Signed by Chair ……..

Date ……

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MINUTES OF THE MEETING OF THE CABINET MEMBER SIGNING HELD ON TUESDAY, 6TH FEBRUARY, 2018, 12:00

PRESENT:

Councillor Alan Strickland, Cabinet Member for Housing, Regeneration and Planning.

236. FILMING AT MEETINGS

The Cabinet Member referred those present to agenda Item 1 as shown on the agenda in respect of filming at this meeting and asked that those present reviewed and noted the information contained therein.

237. URGENT BUSINESS

None.

238. DECLARATIONS OF INTEREST

There were no declarations of interest.

239. SALE OF SHARED OWNERSHIP UNIT AT 88 FENTON ROAD, LONDON, N17 7JQ

The Cabinet Member noted the report which sought approval for the disposal of a shared ownership unit at Fenton Road.

RESOLVED

I. That the Cabinet Member approved the disposal of the residential new build shared ownership 3 bed 5 person unit at (plot 1) 88 Fenton Road, London, N17 7JQ, for the price and on the terms set out in paragraph 1.3 of the report and detailed in Part B (exempt) of the report.

Reasons for decision

To achieve the objectives of the Housing Infill Sites Programme Phase 1a as approved by Cabinet in November 2013, as part of the Housing Investment and Estate Renewal Strategy. The programme was established to deliver the first new build Council homes in over 25 years as part of much needed housing supply across the borough.

The Fenton Road development provides low cost home ownership in the East of the Borough for local people in Haringey, as required by the Council's overarching Housing Strategy.

Alternative options considered

No alternative options were considered as the unit had been designed for shared ownership sale and funding was provided by GLA for this tenure.

240. NEW ITEMS OF URGENT BUSINESS

N/A

241. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the reminder of the meeting as the items contained exempt information, as defined under Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

242. SALE OF SHARED OWNERSHIP UNIT AT 88 FENTON ROAD, LONDON, N17 7JQ

The Cabinet Member noted the information contained in the exempt section of the report.

243. NEW ITEMS OF EXEMPT URGENT BUSINESS

N/A

CHAIR:

Signed by Chair ……..

Date ……

MINUTES OF THE MEETING OF THE CABINET MEMBER SIGNING HELD ON TUESDAY, 6TH FEBRUARY, 2018, 1.30 pm

PRESENT:

Councillors: Jason Arthur (Chair)

1. FILMING AT MEETINGS

The Cabinet Member referred those present to agenda item 1 as shown on the agenda in respect of filming at this meeting and asked that those present reviewed and noted the information contained therein.

2. URGENT BUSINESS

None.

3. DECLARATIONS OF INTEREST

None.

4. SECTION 75 AGREEMENT

The Cabinet Member for Finance & Health considered the report, which sought approval for a new Section 75 partnership arrangement between Haringey Council and Haringey Clinical Commissioning Group for the establishment and maintenance of lead commissioning arrangements for the commissioning of various children's services and aligning budgets for some children's commissioned services.

RESOLVED

That the Cabinet Member for Finance & Health approves:

- The proposal to enter into a new Section 75 partnership arrangement between Haringey Council and Haringey Clinical Commissioning Group for the establishment and maintenance of lead commissioning arrangements for the commissioning of various children's services and aligning budgets for some children's commissioned services
- That the partnership arrangement be consolidated into the existing Section 75 Partnership Agreement between Haringey Council and Haringey Clinical Commissioning Group dated 1st March 2017 by adding a new Schedule 6 which is attached as Appendix 1 and by making any other consequential amendments to the Agreement

- Delegate to the Deputy Chief Executive, in consultation with the Monitoring Officer the authority to finalise and agree the amended S.75 Partnership Agreement that includes the new Schedule 6.

Reasons for decision

Adding the proposed Schedule 6 (appendix 1), the commissioning of universal and targeted services for children and young people, to the existing Section 75 agreement will align budgets and allow the Council and the CCG to work together in a more coordinated way, to deliver children's services focused on promoting good health for all and tackle health inequalities.

Adding this schedule to the existing Section 75 partnership agreement provides opportunities to offer integrated services that improve the outcomes for children and families in Haringey and will support the development of the Haringey and Islington Wellbeing Partnership.

At this stage, there is no proposal to pool budgets but should the alignment of budgets deliver benefits, commissioners are open to exploring pooling budgets in relation to this set of children's services.

Alternative options considered

Consideration was given by officers to continuing the current arrangement of close liaison in relation to commissioning children's services. This new arrangement builds on this approach, enabling further integration of 0 – 19 year old services.

5. ANY OTHER BUSINESS

None.

CHAIR: Councillor Jason Arthur

Signed by Chair ……..

Date ……

MINUTES OF THE MEETING OF THE CABINET MEMBER SIGNING HELD ON WEDNESDAY, 7TH FEBRUARY, 2018, 10.30am

PRESENT:

Councillors: Joseph Ejiofor

1. FILMING AT MEETINGS

The Cabinet Member referred those present to agenda item 1 as shown on the agenda in respect of filming at this meeting and asked that those present reviewed and noted the information contained therein.

2. URGENT BUSINESS

There were no items of urgent business.

3. DECLARATIONS OF INTEREST

There were no declarations of interest.

4. AWARD OF CONTRACT FOR THE PROVISION OF OUT OF HOURS CALL-HANDLING - CONTRACT STANDING ORDER (CSO) 16.02 APPLICABLE

The Cabinet Member noted that the report sought approval for the Council to participate in an overarching agreement to provide a shared out of hours, customer call-handling service with the participating councils and organisations listed in paragraph 6.25 of the interleaved report, and adhere to a services agreement for out of hours' customer call handling services.

The Council had been part of a Pan London Framework out of Hours, customer call-handling service since 2009. The contract was managed by Ealing Council and service delivery provided by GDIT [General Dynamics Information Technology]. The current contract was due to expire on the 30th of September 2018 and an OJEU compliant procurement exercise had been undertaken including Haringey and which all the participating councils and organisations listed in paragraph 6.25 of the report had been party to. This lead to Ealing borough awarding the contract to Capita Services Business Limited [a subsidy of Capita] for a period of 5 years with a further option to extend for 1+1 years, meaning the maximum contract period could be 7 years.

The Cabinet Member was asked to approve the new contract to ensure a seamless transfer of the current out of hours' service to a new provider, continuing the good

value approach Haringey has taken since initially joining the framework in August 2009.

In response to a question from the Cabinet Member, it was clarified that there would be a midterm review of the contract which would consider performance and delivery and inform a view on whether the contract could be further extended for 1+1 years.

In response to a question on delivering the Out of Hours customer handling service in-house, the cost would be at least double the amount of the proposed new contract and there would be significant costs associated with keeping a Council building open for 24 hours to provide emergency contact with the Council.

The Assistant Director for Customer Services further advised that, in the event of a major borough emergency during out of hours in the Council, this contract arrangement would be able to call on a significantly larger pool of telephony resources and provide priority status for support. If the service was in-house, only circa seven members of staff could be called upon.

RESOLVED

1. In accordance with CSO 16.02, to approve an Out of Hours Customer Call Handling access agreement, with Capita Business Services Limited, under a new Framework Agreement that was tendered by London Borough of Ealing on behalf of the participating organisations. London Borough of Ealing will be the Lead Authority in the award of the new contract and will carry out the contract management for the contract.

2. To agree that the contract will run from 1st October 2018 to 30th September 2023, with an annual value for call handling in the region of £135k (approximately £675k over a five-year period). There is an annual lead client management fee payable to Ealing of £8,900 (approximately £45k over a five-year period). The total cost of the contract over five-years will be £720k.

   Summary

Period	Contract Cost (A)	Fee (B)	A + B
Per annum	£135,000	£8,900	£143,900
5 year period	£675,000	£44,500	£719,500

3. To approve the continuation of the policy of adopting the “Gold/silver” level service for Haringey Council; where Gold is having 80% of calls answered in 20 seconds and Silver is having 80% of calls answered in 60 seconds. The associated cost of these two service levels, based on the current service provision is explained in **Appendix A**.

Reasons for decision

The current service is delivered under a framework agreement, that commenced in October 2012. The contract is managed by Ealing Council and service delivery is provided by General Dynamics Information Technology Limited (GDIT). This contract for an Out of Hours call handling service is due to expire on the 30th September 2018.

A joint procurement exercise of which Haringey and all of the partners listed in 6.25 have been party to, in accordance with the Memorandum of Understanding between Ealing and all participating organisations was undertaken, and subsequently a new provider has been appointed.

The new contract will ensure a seamless transfer of the current Out of Hours service to the new provider, continuing the good value approach Haringey has taken since initially joining the framework in August 2009.

It is recommended that Haringey Council take forward this option.

Alternative options considered

Three options were considered:

- Option A - Do nothing
- Option B - To set up and operate our own in-house operation
- Option C - All participants/organisations to tender individually

Option A: This is not a viable option due to the current contract ending on the 30th September 2018. Haringey and the participating organisations have an obligation to residents to provide this critical emergency service.

Option B: This is not a viable option, due to the annual cost of running a stand-alone service. To provide an adequate service, a team of eight full-time employees, and management cover would need to be recruited, all of whom would operate on a rota basis covering un-sociable hours. It is unlikely that an acceptable level of service could be provided with this staffing number during unexpected peaks in demand e.g. borough emergencies. The staffing cost of maintaining the service in-house would equate to an estimated £336,000 per annum. Currently the cost for providing the out of hours' service is approximately £100,000 per annum. Further, a new location would need to be identified to house the service. The Customer Service Contact Centre, which provides Haringey's daytime service could host an independent Out of Hours team, however there would be additional costs incurred to ensure that Alexandra House is kept open 24/7. If demand for an in-house service were to fall after set up, there would be fixed overheads that Haringey would need to fund for a number of years. Therefore, taking into consideration the costs that would be incurred from Facilities Management, utilities and staffing, setting up a new in-house operation could cost in excess of £400k per year.

Suppliers in this field have advanced supply chains with specialist sub-contractors, that have a greater ability to innovate than would be possible with a traditional in-house service. Consequently, the in-house option, involving investment in the

necessary technology, staff and property carries business risk. Suppliers have advised us at soft market testing (carried out in June 2016) that they would typically require 5 years of contract length to repay this investment.

Option C: Although there would be sufficient time to conduct a separate procurement exercise prior to the current contract expiring (albeit under tight timescales), this would prove to be a costly option. Haringey would need to pay for the procurement exercise, and could not guarantee securing an equivalent level of service provision, with similar levels of flexibility and disaster recovery that is available under the Out of Hours Customer Call Handling services partnership, for a comparable or lower cost. The cost of the contract management would be solely the responsibility of Haringey Council. The partnership agreement allows for reduced costs due to the collective call volumes and economies of scale. Additional savings may be achieved should new participating organisations join. This would not be available to Haringey if we were to procure a replacement Out of Hours service separately to this framework.

Other public sector call handling frameworks do exist; however, most are specialist services aimed at Public Health or Police services. There is no other framework that Haringey could consider joining as an alternative.

5. NEW ITEMS OF URGENT BUSINESS

None

6. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as the following agenda item contained exempt information as defined under paragraph 3, Part 1 Schedule 12A of the Local Government Act 1972.

7. AWARD OF CONTRACT FOR THE PROVISION OF OUT OF HOURS CALL-HANDLING - CONTRACT STANDING ORDER (CSO) 16.02 APPLICABLE

As per item 4.

8. NEW ITEMS OF URGENT EXEMPT BUSINESS

None.

CHAIR:

Signed by Chair ……..

Date ……

Agenda Item 23

Report for: **Cabinet 06 March 2018**

Title: Delegated Decisions and Significant Actions

Report authorised by : Zina Etheridge, Chief Executive

Bernie Ryan AD Corporate Governance

Lead Officer: **Ayshe Simsek**

Ward(s) affected: **Non applicable**

Report for Key/ Non Key Decision: **Information**

1. Describe the issue under consideration

To inform the Cabinet of delegated decisions and significant actions taken by Directors.

The report details by number and type decisions taken by Directors under delegated powers. Significant actions (decisions involving expenditure of more than £100,000) taken during the same period are also detailed.

2. Cabinet Member Introduction

Not applicable

3. Recommendations

That the report be noted.

4. Reasons for decision

Part Three, Section E of the Constitution – Responsibility for Functions, Scheme of Delegations to Officers - contains an obligation on officers to keep Members properly informed of activity arising within the scope of these delegations, and to ensure a proper record of such activity is kept and available to Members and the public in accordance with legislation. Therefore, each Director must ensure that there is a system in place within his/her business unit which records any decisions made under delegated powers.

Paragraph 3.03 of the scheme requires that Regular reports (monthly or as near as possible) shall be presented to the Cabinet Meeting, in the case of executive functions, and to the responsible Member body, in the case of non executive functions, recording the number and type of all decisions taken under officers' delegated powers. Decisions of particular significance shall be reported individually.
Paragraph 3.04 of the scheme goes on to state that a decision of "particular significance", to be reported individually by officers, shall mean a matter not

within the scope of a decision previously agreed at Member level which falls within one or both of the following:

(a) It is a spending or saving of £100,000 or more, or
(b) It is significant or sensitive for any other reason and the Director and Cabinet Member have agreed to report it.

5. Alternative options considered

Not applicable

6. Background information

To inform the Cabinet of delegated decisions and significant actions taken by Directors.

The report details by number and type decisions taken by Directors under delegated powers. Significant actions) decisions involving expenditure of more than £100,000) taken during the same period are also detailed.

Officer Delegated decisions are published on the following web pagehttp://www.minutes.haringey.gov.uk/mgDelegatedDecisions.aspx?bcr=1

7. Contribution to strategic outcomes

Apart from being a constitutional requirement, the recording and publishing of executive and non executive officer delegated decisions is in line with the Council's transparency agenda.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Where appropriate these are contained in the individual delegations.

9. Use of Appendices

The appendices to the report set out by number and type decisions taken by Directors under delegated powers. Significant actions
(Decisions involving expenditure of more than £100,000) taken during the same period are also detailed.

10. Local Government (Access to Information) Act 1985

Background Papers

The following background papers were used in the preparation of this report;

Delegated Decisions and Significant Action Forms
Those marked with ♦ contain exempt information and are not available for public inspection.

The background papers are located at River Park House, 225 High Road, Wood Green, London N22 8HQ.

To inspect them or to discuss this report further, please contact Ayshe Simsek on 020 8489 2929.

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Interim Strategic DIRECTOR OF Planning, Regeneration and Development

Significant decisions - Delegated Action - For Reporting to Cabinet on March 6th 2018

♦ denotes background papers are Exempt.

Ms att	Date approved by Director	Title	Decision
1. ♦	**9th February 2018**	Purchase Property at Burns House, Northumberland Park N17 ORB as part of the Council's Right to Buy Acquisition	Purchase Property at Burns House, Northumberland Park N17 ORB as part of the Council's Right to Buy Acquisition
2.	**13 February 2018**	Approval of the AMP for FRA (Fire Risk Assessment) Works – Package 5 (Phase 9) 2016/17 project	1. Approval of the AMP submitted by Wates Living Space Ltd for FRA Package 5 (2016/17) in the sum of £665,153. 2. Approval of the total fees of £51,430. 3. Approval for a letter of intent to be issued up to the value of £66,515 The Cabinet Member Signing held on the 15th of December gave delegated authority to the Strategic Director to take this decision forward.
3. ♦	**15th February 2018**	Acquisition of property Orchard Place, N17, situated within the High Road West Regeneration area in order to assist with the delivery of the wider regeneration objectives for the area.	Purchase the property, N17 to assist with the acquisition programme of the High Road West Regeneration Scheme.
4.	**20th February 2018**	Approval of the Emergency Gas Safety Works for Broadwater Farm 2017/18	That the Interim Strategic Director of Regeneration, Planning and Development retrospectively approves the draft AMP submitted by Keepmoat for the estimated maximum sum of £1,519,104 for the gas safety works which includes the purchase and installation of the electric cookers That the Interim Strategic Director of Regeneration, Planning and Development agrees that leaseholders are not charged for the gas safety works and that they are offered the same level of compensation for the removal of gas cookers as the Council tenants. The Cabinet Member Signing held on the 15th of December gave delegated authority to the Strategic Director to take this decision forward.

Interim Strategic DIRECTOR OF Planning, Regeneration and Development

Significant decisions - Delegated Action - For Reporting to Cabinet on March 6th 2018

♦ denotes background papers are Exempt.

Ms att	Date approved by Director	Title	Decision
5.	**22nd February 2018**	North Tottenham Housing Zone Funding Agreement for the High Road West Regeneration Scheme	Agree to enter into two North Tottenham Housing Zone Borough Intervention Agreements (BIA's) with the GLA for: 1. Site Assembly at High Road West 2. Infrastructure in respect of High Road West
6. ♦	**22nd February 2018**	Award the Contract for the Manufacture and Supply of Granite Kerbs and Natural Stone Boulders to CED Ltd	Award the Contract for the Manufacture and Supply of Granite Kerbs and Natural Stone Boulders to CED Ltd
7. ♦	**22nd February 2018**	Award the contract for the Manufacture and Supply of Pre Cast Concrete Paving slabs to Charcon Hard Landscaping	Award the contract for the Manufacture and Supply of Pre Cast Concrete Paving slabs to Charcon Hard Landscaping
8.	**23 February 2018**	Approval of the AMP for FRA (Fire Risk Assessment) Works – Package 4 (Phase 9) 2016/17 project	1. Approval of the AMP submitted by Wates Living space Ltd for FRA Package 4 (2016/17) in the sum of £1,073,616. 2. Approval of the total fee's £83,012 3. Approval for a letter of Intent to be issued up to the value of £107,362 The Cabinet Member signing held on the 15th of December gave delegated authority to the Strategic Director to take this decision forward.
9.	**21st February 2018**	Tottenham Hale Housing Zone – Entering into funding agreements with the GLA	To give approval to enter into three funding agreements (Borough Intervention Agreements): Core District Centre. Affordable Housing cashflow funding and Ashley Road South improvements with the Greater London Authority, in order to draw down Housing Zone funding for these interventions

Delegated Action

Type	Number

Director/Assistant Director Signature Date

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By virtue of paragraph(s) 3, 5 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Document is exempt

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